

Global Wildlife Cybercrime Action Plan¹



A Call to Action for the London Conference on Illegal Wildlife Trade

October 11-12, 2018



¹ Wildlife cybercrime in this context refers to cyber-enabled wildlife trafficking.

Context

Historically the sale of illegal wildlife occurred in traditional markets but since the growth of the internet, there is compelling evidence that wildlife traffickers are going online to reach a vast virtual marketplace, making wildlife crime a form of cyber-enabled crime.

Key stakeholders in the public and private sectors are increasingly acknowledging the need to address the threat of wildlife cybercrime through capacity building and communication, cooperation and coordination across sectors.

Whilst a legal trade exists in many species of wildlife, online platforms can provide easy opportunities for criminal activities. The available evidence shows that the scale of wildlife cybercrime is significant while capacity to tackle the problem has been limited; meaning that online trade poses a serious threat to the survival of some of the world's most iconic species.

Key stakeholders in the public and private sectors are increasingly acknowledging the need to address the threat of wildlife cybercrime through capacity building and communication, cooperation and coordination across sectors. Coming out of the Cyber-enabled Wildlife Crime Workshop, co-hosted by INTERPOL and the International Fund for Animal Welfare (IFAW) in June 2018, was a commitment to improve coordination across the public and private sectors, ensuring the establishment of a network in order to defeat online wildlife traffickers.

This Action Plan calls for actors from government, inter-governmental organisations, enforcement agencies, private companies, non-governmental organisations and academics to map out our collective goals, outline the steps which must be taken to achieve these, and provide a reporting mechanism for adaptive management of the plan.

Strategic Goal

Enhance the detection, disruption and deterrence of wildlife cybercriminals and their networks at the national, regional and international levels by:

- Creating a multi-disciplinary network bringing together cross-sector expertise from the public and private sectors to identify and implement best practices in disrupting and dismantling cyber-enabled wildlife crime;
- Providing a strong deterrent in the form of strengthened law enforcement capacity and adequate legal penalties targeting organised traffickers;
- Preventing access to online markets through private sector engagement;
- Improving awareness of the impact of poaching on the survival of wildlife, the rule of law and the threat to local communities amongst customers/users; and
- Increasing understanding of the legislative restrictions on trade amongst low-level traffickers or uninformed traders.

Action Plan

This plan includes an overarching goal with specific, measurable steps that can be taken to help meet the objectives, and outlines the priority partners that can deliver the action steps. Some partners have already signed on to take on these action steps (detailed in the action plan) but other governments, companies, NGOs and academics are asked to join these partners in taking these actions forward together.

Target: Cross-sector

1

Objective

Create infrastructure that facilitates the sharing of information and provides targeted information across all relevant sectors.

Action steps	Priority partners
1.a) Raise awareness of the threat posed by wildlife trafficking and wildlife cybercrime and the negative impact this has on wildlife populations, local communities and ecosystems as well as contributing to the undermining of law, governance and security through 1) providing information in briefing documents targeting relevant sectors, and 2) posting information on relevant access portals such as the website of the <i>Global Coalition to End Wildlife Trafficking Online</i> (the Coalition) and ENVIRONET, as relevant.	International Fund for Animal Welfare (IFAW), WWF and TRAFFIC in conjunction with other NGOs, and academia
1.c) Identify an online portal that can be accessed by different stakeholders and has the facility to restrict distribution to targeted groups. The portal should contain information such as cases, prosecutions, contacts, research methodology, trends, modus operandi of traders, target species, code words, enforcement Standard Operating Procedures (SOPs) and guidelines, operational planning templates, etc.	IFAW
1.d) Work with parties to upload content onto the portal identified – as relevant, promote the portal across the relevant sectors, and monitor whether it is being utilised effectively to share information with enforcers, policy makers, the private sector, academia and NGOs.	IFAW

Target: Enforcement Inter-Governmental Organisations and national enforcement agencies

2

Objective

Ensure INTERPOL's member countries/enforcement agencies have the skills and knowledge to detect, investigate, compile prosecution case files, and lead operations targeting online wildlife traffickers.

Action steps	Priority partners
2.a) Produce INTERPOL guidelines on cyber-enabled wildlife crime that outline best practices for law enforcers, including understanding of the legal framework at the international, regional and national levels; guidance on digital forensics, particularly in relation to social media platforms; and reference to practical examples in the field.	INTERPOL
2.b) Provide capacity development to INTERPOL focus regions and their law enforcement agencies on how to detect and investigate online wildlife traffickers.	INTERPOL
2.c) Coordinate one global operation aimed at detecting and investigating online wildlife traffickers.	INTERPOL
2.d) Provide annual information and statistics' updates on cyber-enabled wildlife trends worldwide. Information can include methods to identify priority species; to better integrate cyber/digital forensics units into the investigative process; and information on tools aiming to improve efficiency.	INTERPOL

Target: Enforcement Inter-Governmental Organisations and national enforcement agencies

Action steps	Priority partners
<p>2.e) Facilitate the sharing of knowledge and expertise on effective clauses in national legislation that can be used to prosecute online wildlife traffickers via INTERPOL's annual Wildlife Crime Working Group meeting.</p>	INTERPOL
<p>2.f) Facilitate collaboration with online technology companies, NGOs and academics by 1) establishing Single Points of Contact (SPOCs) within national enforcement agencies on cyber-enabled wildlife crime; 2) providing enforcement agencies a contact list of SPOCs for private industry, NGOs and academia, and 3) utilising INTERPOL forums to gather worldwide enforcement agencies and civil society for structured, targeted workshops.</p>	INTERPOL
<p>2.g) Keep updated documentation on case studies to provide a practical analysis of best practices and lessons learned, and diffuse these through INTERPOL National Central Bureaus (NCBs) and identified cyber SPOCs.</p>	INTERPOL
<p>2.h) Explore existing and developing online training tools focused on investigating cyber-enabled wildlife crime targeted at enforcers, and develop new ones when required.</p>	INTERPOL

Target: Private Sector

3

Objective

Ensure online marketplaces, social media platforms and search engines join forces to reduce online wildlife trafficking by 80% by 2020.

Action steps	Priority partners
3.a) Ensure the expansion of the <i>Global Coalition to End Wildlife Trafficking Online</i> to prevent displacement of trade from sites/ platforms with robust policies to those that are not proactively addressing online wildlife trafficking.	Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i>
3.b) Roll out company action plans, including the adoption of enforceable wildlife friendly policies.	Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i>
3.c) Work with companies to simplify policies for both external (the public) and internal (admin/policy teams) audiences to help them understand the importance of tackling wildlife cybercrime and the resources available to them.	Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i>
3.d) Work with companies to ensure policies and reporting mechanisms for customers and users are easy to access and are user-friendly.	Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i>
3.e) Share best practices and learnings amongst online technology companies via digital updates and during virtual/physical meetings.	Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i>

Action steps	Priority partners
<p>3.g) Facilitate the reporting by online technology companies who are members of the <i>Global Coalition to End Wildlife Trafficking Online</i>, to the Coalition on their actions to highlight the scale of trafficking; demonstrate how sites/platforms can add value to the detection and disruption of trafficking; and assist with measuring the impact of the <i>Global Coalition to End Wildlife Trafficking Online</i>.</p>	<p>Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i></p>
<p>3.h) Provide in person training and/or online courses to company policy implementers ensuring they have the skills, knowledge and access to experts required to effectively detect and remove posts that breach their policies.</p>	<p>Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i></p>
<p>3.i) Continue to roll out the ‘Cyber Spotter’ reporting scheme run that enables trusted, trained volunteers to report suspicious ads/posts to companies.</p>	<p>Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i></p>
<p>3.j) Monitor the removal of advertisements/posts and seek feedback on actions which may (with the permission of the Coalition member) be included in public reports.</p>	<p>Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i></p>

4

Objective

Explore ways in which private industry can take a joined-up approach to tackle wildlife crime.

Action steps	Priority partners
<p>4.a) Broaden communication, cooperation and coordination across the private sector by identifying points of contact for other private sector wildlife trafficking initiatives, such as task forces or coalitions, to open channels of communication with the finance, transport, and tourism sectors.</p>	<p>Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i></p>

Target: Governments and policy makers*

5

Objective

Encourage CITES Parties to take action as directed in Resolution text relating to the illegal online trade in specimens of CITES-listed species.

Action steps	Priority partners
<p>5.a) Ensure paragraphs 11 and 12 of CITES Resolution Conference 11.3 on compliance and enforcement that relate to wildlife cybercrime are implemented, including (subject to revisions at CITES CoP18):</p> <ul style="list-style-type: none">● evaluating and developing domestic measures to address online wildlife trade;● establishing national units dedicated to investigating wildlife crime linked to the internet;● establishing national mechanisms to coordinate the monitoring of internet-related wildlife trade;● submitting information on methodologies used to facilitate trade;● ensuring that sufficient resources are directed to the investigations;● utilising data acquired during monitoring activities to establish strategies regarding enforcement, capacity building and public awareness; and● considering ways in which funding may be provided for the establishment of a full-time position within the General Secretariat of ICPO-INTERPOL.	<p>CITES Parties as directed in Resolution text</p>

* Note that this section of the plan will be delivered via CITES mechanisms. The work being undertaken via CITES has been captured here to ensure that vital policy work on this issue will be both visible in the plan and tracked as part of the adaptive management of the plan.

Action steps	Priority partners
<p>5.b) Implement CITES Decisions 17.92 to 17.96 and 15.57 on Combating wildlife cybercrime including:</p> <ul style="list-style-type: none"> ● submitting information on best practises; ● publishing scientific research; ● assessing trends and trade routes; ● sharing updates on changes to domestic legislation; ● seeking engagement from online marketplaces and social media platforms, including raising awareness of the plight of CITES-Listed species via these platforms; ● providing enforcement expertise and supporting investigations; ● sharing information on e-portals; ● inviting INTERPOL to consider building capacity to support Parties including developing guidelines on how to combat wildlife crime linked to the internet; ● establishing a working group which reports back at each Standing Committee prior to CoP18; and ● if necessary make recommendations for consideration by Parties at CoP18. 	<p>CITES Secretariat and Parties as directed in Decisions text</p>

Target: Non-Governmental Organisations

6

Objective

Support the ability of companies, enforcers and policy makers to understand and address the problem of wildlife cybercrime by carrying out research and sharing data on trends.

Action steps	Priority partners
6.a) Provide relevant information to online technology companies and law enforcement agencies to highlight emerging trends.	Partners of the <i>Global Coalition to End Wildlife Trafficking Online</i> , in conjunction with other NGOs and academia
6.b) Identify a leading agency to research data protection legislation in target countries or regions in order to clarify restrictions for processing and sharing personal data.	IFAW
6.c) Analyse prosecution case studies to better profile online wildlife traffickers.	IFAW

Target: Academia

7

Objective

Deliver research on wildlife cybercrime to enhance understanding and awareness of the scale, impact and significance of wildlife cybercrime in the broader wildlife crime context.

Action steps	Priority partners
7.a) Provide knowledge of the ethics and governance as it relates to conducting research into internet-mediated wildlife cybercrime, including but not limited to privacy, GDPR, and copyright.	DICE, Oxford Martin Programme on the Illegal Wildlife Trade
7.b) Undertake research that provides an understanding of the scale, impact of and trends in wildlife trafficking to help inform policy and support senior staff in companies advocating for wildlife friendly policies.	DICE, Oxford Martin Programme on the Illegal Wildlife Trade, TRAFFIC, IFAW
7.c) Conduct research on effective messaging and methods to reduce consumer demand for illegal wildlife offered for sale online.	DICE, Oxford Martin Programme on the Illegal Wildlife Trade

8

Objective

Create methods for data sharing between sectors.

Action steps	Priority partners
8.a) Provide solutions and guidance on how to share data between stakeholders in compliance with data protection and related laws.	DICE, Oxford Martin Programme on the Illegal Wildlife Trade

9

Objective

Create tools to improve the detection and investigation of wildlife cybercrime.

Action steps	Priority partners
<p>9.a) Develop technologies to improve the detection and investigation of wildlife cybercrime.</p>	<p>DICE, Oxford Martin Programme on the Illegal Wildlife Trade</p>

Signatories to the Action Plan are:

The International Fund for Animal Welfare (IFAW), INTERPOL, WWF, TRAFFIC, the Oxford Martin Programme on the Illegal Wildlife Trade, and the Durrell Institute of Conservation and Ecology (DICE) at the University of Kent.

Signatories to the Action Plan commit to:

1. Delivering the work outlined above, noting that often delivery of activities is subject to securing funding;
2. Providing start and end dates for each activity in order to assist with the adaptive management of the plan and reporting;
3. Supporting the adaptive management and monitoring and evaluation of the action plan by providing data on both process and impact against activities for a mid-year review and end of year progress report, noting that activities will be adaptively managed and therefore may be updated based on the best available evidence.

Cooperation, communication and coordination between signatories:

- Note that each signatory remains its own independent entity. This Action Plan does not constitute a formal partnership between the signatories but does establish a willingness between signatories to deliver the activities identified in the plan in order to achieve a shared goal, and is resource dependent.
- IFAW will be responsible for seeking data on both process and impact against activities from signatories, drafting the mid-year review and end of year progress report based on this data provided and in conjunction with signatories, and monitoring and reporting on developments in CITES forums.

For more information on organisations mentioned visit:

International Consortium on Combatting Wildlife Crime (ICCWC)

<https://cites.org/eng/prog/iccwc.php>

INTERPOL <https://www.interpol.int/>

Convention on International Trade in Endangered Species of Wildlife Fauna and Flora (CITES) Secretariat

<https://www.cites.org/eng/disc/sec/index.php>

Global Coalition to End Wildlife Trafficking Online

<http://endwildlifetraffickingonline.org>

International Fund for Animal Welfare (IFAW)

<https://www.ifaw.org/united-kingdom>

WWF <https://www.wwf.org.uk/>

TRAFFIC <http://www.traffic.org/>

Durrell Institute of Conservation and Ecology (DICE) at the University of Kent

<https://www.kent.ac.uk/dice/>

Oxford Martin Programme on the Illegal Wildlife Trade

www.illegalwildlifetrade.net