

01 // INTRODUCTION

Wildlife crime ranks among the most lucrative of serious and organised international crimes along with human trafficking, drug running and illegal arms and in many ways can be just as dangerous and damaging.

Various organisations and reports estimate that the trade is worth at least AU\$22 billion per year worldwide¹ and the threat it poses to many of the world's most iconic species including elephants, rhinos and big cats is now widely recognised.

The illegal wildlife trade clearly impacts the welfare and conservation of endangered animals but it can also threaten national and global security through the increasing involvement of organised crime syndicates in the trade.² The safety of entire communities in targeted wildlife range States can be compromised by poachers and at least 1,000 rangers were killed in 35 different countries over the last decade.³

Illegally imported animals and plants can also carry diseases or become pests with significant negative impacts on human health and agriculture. The highly dangerous H5N1 avian flu virus appeared for the first time in Europe when it was discovered in a smuggled pair of eagles seized in Belgium in 2004.⁴

Australia is a global biodiversity hotspot with most native animals found nowhere else in the world and this makes them an attractive target for smugglers.⁵ Between 1996–2008 seizures of illegal endangered and vulnerable wildlife by Australian authorities represented around six per cent of global seizures (ranking alongside the USA and just below the UK)⁶ and more recent studies of illegal items indicate

a continuing trade, particularly in exports.⁷ Recent seizures of Australian native animals at the border and in Asia demonstrate that this problem continues to be an important threat to native wild animals.

The International Fund for Animal Welfare (IFAW) has carried out regular assessments into online trade in endangered species since 2004. IFAW's largest survey, *Killing with Keystrokes: An investigation of the Illegal Wildlife Trade on the World Wide Web* (2008), recorded 7,122 online auctions, advertisements and classifieds in 11 countries, only 77 of which were found on Australian websites.

Since that global survey, the illegal international trade in endangered species has continued to grow at a disturbing rate.⁸ In particular, the levels at which elephants are being killed is alarming – it is estimated that at least 25,000 elephants and as many as 50,000 are slaughtered each year for their ivory⁹ meaning that one elephant is killed for its ivory every 15 minutes. Rhino horn is now fetching record prices and rampant poaching has brought some rhinoceros subspecies to the verge of extinction.¹⁰

This report details the research IFAW carried out in 2013 to assess levels of trade in endangered wild animals and their products on web platforms hosted in Australia and accessible to the public.

In 200 hours of research, 282 endangered species listings were found on 14 websites, a large proportion of which were on eBay Australia.

02 //

AUSTRALIA'S TRADE IN ENDANGERED WILDLIFE

This report finds a remarkable and concerning number of CITES Appendix I species for sale on websites hosted in Australia.

2013 NOTABLE FINDINGS

Elephant ivory

- One hundred and sixty five ivory listings with items for sale making up 59 per cent of trade.
- Online auction site eBay Australia was responsible for the largest number of ivory items for sale. Two thirds of the 145 ivory listings on eBay Australia were posted by overseas sellers, predominantly in the USA.
- Smaller numbers of ivory advertisements were found on Gumtree Australia (a subsidiary of eBay) and Aotao, an Australian-based Chinese online shopping website.

Other species

- The second most common listing was for live birds. Out of 45 listings, pet website Petlink hosted the most advertisements with 21 birds offered for sale by Australian sellers.
- The third most common item found for sale was fabric from the endangered vicuna with 27 listings, followed by 26 listings on eBay Australia for reptile products such as crocodile teeth pendants, watch straps and wallets. Two eBay Australia sellers with 11 advertisements each for vicuna fabric and coats were based in Italy and the United Kingdom, but made no reference to export and import permits required for a sale to Australia.
- Two rhino horns were offered for sale, one by a New Zealand seller on Quicksales (an Australianowned free classifieds site) and an Australian trader on the online auction site eBid. Both offered to ship their items to international buyers. One seller claimed their item was an antique, the other only claimed to have 'collected' the item in the 1960s.

Other products for sale included nine antique turtle products (mainly shells), six big cat products (including a whole leopard skin, tiger teeth and claws and three traditional medicine products containing leopard bone) and two musk deer traditional medicinal products from Russia.

Platforms and sellers

- Wildlife products represent the majority (84 per cent) of advertisements, while the remaining 16 per cent were for live animals.
- eBay Australia ranked first for endangered wildlife product listings with 203 advertisements representing 72 per cent of trade.
- Petlink ranked first for endangered live animals with 21 live bird listings, most of them non-native species.
- One hundred and seventy four advertisements identified in this survey were posted by sellers based outside Australia.
- Half of all advertisements made no mention of any documentary evidence that the items listed for sale were compliant with national and international laws or website policies.
- The total value of all advertisements recorded was \$637,387, of which \$175,658 was the value of listings from Australian sellers.

Acting on intelligence supplied by IFAW from this survey, in February 2014 investigators from the Department of the Environment executed two search warrants at properties of a Sydneybased online trading company, where they found and seized a large number of carved ivory ornaments and jewellery with an estimated value of up \$80,000.

2008-2013 TRENDS

Overall there has been a 266 per cent increase in the number of endangered animals and their products offered for sale on Australian websites **since 2008.** The total number of advertisements found has grown from 77 in 2008 to 282 in 2013, even though Australia's internet usage has only increased by 29 per cent in approximately the same period.¹¹

One of the main drivers of this rise has been the number of ivory sales, which have increased more than tenfold since the 2008 survey, from 13 to 165 items. Most of these are presented as antique but none of the listings offered any proof of item age. The 2013 findings reveal that ivory has now become

the number one traded item online, up from 15.85 per cent of trade to 59 per cent in 2013. Back in the 2008, live birds were identified as the most commonly traded Appendix I species in Australia (making up half of all listings).

As in 2008, eBay Australia remains the main site for endangered wildlife and the 203 products listed here represent both an increase in number and as a percentage of overall endangered wildlife trade identified in the earlier survey.

The total value of advertisements recorded at \$637,387 is over 23 times higher than the figure recorded in 2008.

THEN AND NOW: APPENDIX I ENDANGERED SPECIES FOR SALE ON AUSTRALIAN WEBSITES

Scan time	6 x 40 hours	450 L M L L L
		150 hours March—July
	May–June 2013	50 hours October
	Total time 240 hours	Total time 200 hours
Number websites scanned	10	14
Total animal items listings	77	282
Total live animals listings	41 (53.25%)	45 (15.96%)
Animal products for sale	36 (46.75%)	237 (84%)
Main site for product advertisements – eBay Australia	35	203
Main site for live animal advertisements – Petlink	23	21
Elephant product listings	13 (16.88%)	165 (58.51%)
Reptile product listings (crocodile/alligator etc.)	3 (3.9%)	26 (9.2%)
Live bird listings	38 (49.35%)	45 (15.96%)
Vicuna listings	1 (1.3%)	27 (9.57%)
Advertisements posted by overseas sellers	6 (7.79%)	174 (61.70%)
Advertisements posted by sellers based in Australia	71 (92.21%)	108 (38.3%)
Offering to ship overseas	22 (28.57%)	214 (75.9%)
Sellers in the region offering overseas shipping	17 (22.07%)	39 of 108 (36.11%)
Repeat sellers based in the region (i.e. with more than one listing)	5 of 61 (8.2%)	9 of 52 (17.31%)
Total monetary value	\$27,251.50	\$637,387
Sellers providing documentation showing legality	1	0
Appendix II items recorded	Only native species recorded	1,371



TRADE IN ENDANGERED LIVE BIRDS

Trade in Appendix I live animals represents 16 per cent of items recorded, all of which were live birds.

Forty five advertisements were identified for live birds, with lilac-crowned Amazons, double yellow-headed Amazons, red-fronted parrots and scarlet macaws as the most common species listed. All were from sellers based in Australia. Only one offered worldwide shipping for the sale of birds of prey.

Petlink, with 21 listings, was the site with the largest number of advertisements, the great majority of which made no reference to any documents or other evidence that the bird in their possession had been legally obtained as required by law.

Other sites with birds for sale included the classified advertisements site Adoos with eight listings and the online arm of a licensed bird trading retailer, Birdsville.au.net, with six. One seller posted 16 advertisements for parrots, macaws and conures over a number of websites.

The number of live bird advertisements recorded in 2013 is slightly higher than those identified in 2008 (38 listings), with a slightly smaller number of listings identified on Petlink.

Captive breeding of native birds may provide a loophole for laundering wild caught birds and this makes it difficult for law enforcement and consumers to have certainty about the legality of sales of live endangered and vulnerable bird species.

As in 2008, researchers also found a large number of 'scam' advertisements in this survey, fake advertisements that most commonly offer birds and bird eggs, particularly on websites that offer free classified advertisements, encouraging buyers to pay for products that don't exist. This was most prominent on the websites of Adoos for exotic birds such as hyacinth macaws. Such advertisements provide an additional challenge to enforcement officers attempting to identify genuine examples of illegal wildlife trade.



WEB PLATFORMS

eBay Australia and Gumtree Australia - two of the three Australian websites hosting the highest number of listings in this survey - have strict policies on selling endangered wildlife. eBay Australia was the first eBay site to ban ivory sales ahead of a global site ban in 2008, which was thought to be the reason that Australia had the smallest volume of sales in Killing with Keystrokes (2008).

At that time, IFAW found only 10 ivory items for sale on eBay's Australian site. The surprising increase to 145 ivory listings identified on eBay Australia in 2013 demonstrates the important role of ongoing enforcement in the success of a site policy and ways to tackle traders' attempts to evade it, including the use of phrases such as 'faux' ivory, 'ox-bone' and 'using the natural material of Africa' (found on 12 advertisements from the same seller) to disguise ivory sales.

Gumtree Australia prohibits the sale of endangered and protected species and their parts, yet 19 Appendix I advertisements were found on its site and a significant number of Appendix II items.

The main sites for live animal sales - Petlink, Adoos and Birdsville - in contrast make no reference to CITES or national legislation, leaving the responsibility to the buyer for ensuring an item for sale is legal.

TRADERS

Traders offering multiple items for sale, often based overseas, make up a significant part of trade in this survey. A number of traders posted multiple ivory listings on eBay Australia including a US seller with 19 items for sale, and two others with 12 items for sale. Other eBay Australia sellers included a US seller with nine African crocodile teeth for sale and another with 11 crocodile skin watch straps. eBay Australia also hosted 11 ads each for vicuna products from sellers in the UK and Italy.

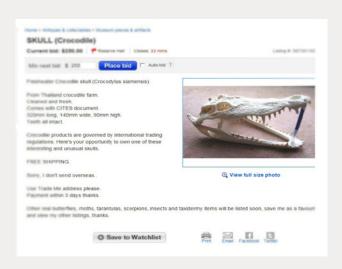
Advertisements posted by overseas traders represent 62 per cent of listings recorded, most of these advertising on eBay Australia and representing 83.24 per cent of trade on the site. They are also responsible for the high proportion (76 per cent) of listings offering international shipping of their items.

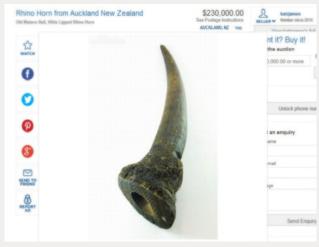
Repeat individual sellers based in Australia were also identified in this survey, including an eBay Australia seller who posted 24 advertisements offering worldwide shipping for high price sculptures. The listings omit the word ivory but the seller provides photographs showing unique cross hatching pattern that indicates the products were genuine ivory items.

The majority of Appendix I product sellers from Australia were found on eBay and Gumtree. For eBay, all listings from Australian sellers were for ivory, for Gumtree the majority of items for sale by Australian sellers were for ivory and turtle products.

Over a third of sellers based in Australia specified that they offered worldwide shipping with no reference made to the need for CITES import and export permits for Appendix I specimens to trade internationally. This included one seller trading on Aotao in ivory earrings, pendants, necklaces and bracelets with a minimum market value of AU\$12,180 as well as Appendix II handmade crocodile skin handbags.

The presence of a large number of advertisements from overseas sellers offering international shipping of items marks a significant increase from the 2008 survey where only six (7.79 per cent) of 77 listings originated outside the country and where the majority of sellers were 'oneoff' traders, with just under 30 per cent offering worldwide shipping.





WEBSITES HOSTED OVERSEAS ALIBABA EXAMPLE

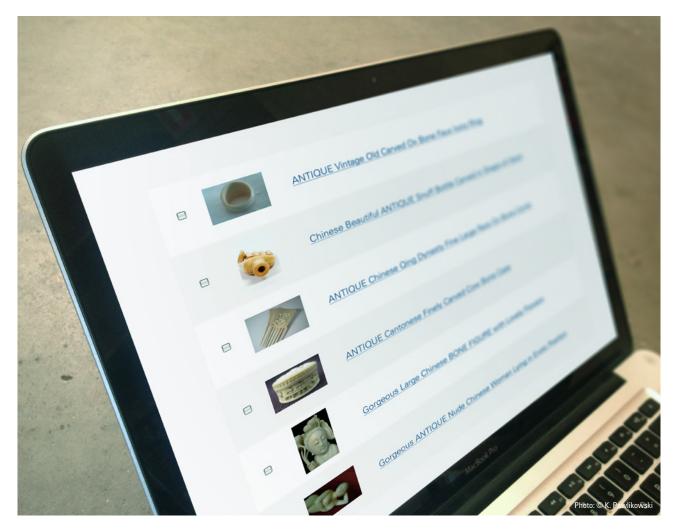
In 2013 IFAW also surveyed items available on Alibaba, a Chinese-hosted website that was part of the 2008 survey. This allowed researchers to assess the trends in the wildlife items available to Australian consumers from just one of the wider range of websites hosted overseas. The number of Appendix I listings had risen dramatically, from five in 2008 to 109 in 2013.

The majority of items were reptile skin products including crocodile and alligator handbags, belts, briefcases, wallets or simply lengths of skin to order in bulk. All listings were posted by overseas sellers, many individuals offering a large number of products for shipment to Australia or other international locations with no reference to the legality of the item or CITES permits required for sale, despite the fact that site policy prohibits sale of any product protected by CITES.

Sales of vicuna products on Alibaba have also increased significantly, up from just two listings in 2008 to 13 in 2013.

Appendix I items for sale on Alibaba

Type of species	Sales
Reptile (crocodile and	83
alligator) products	
Vicuna products	13
Elephant (ivory)	6
Big cat products	3
Bird products	1
Other ungulate products	2
Turtle products	1
Total	109





APPENDIX II TRADE IN WILDLIFE

In the first tranche of this survey IFAW included documented offerings for sale of Appendix II specimens. International trade in these species is permitted but must be regulated through CITES export permits and additional import approvals for almost all items coming into Australia.

In total 1,371 advertisements for Appendix II products were identified, of which 1,136 were posted by sellers based overseas. Only 224 listings made some reference to the legality of their item or permits required to trade in them.

A large proportion of advertisements were for reptile products, with 1,173 listings for crocodile, python and lizard skin items, the large majority on eBay Australia. Similar to Appendix I advertisements, large-scale traders offering multiple items for sale dominated the trade in reptile products, selling from bases in the USA, Hong Kong, Thailand, China and the UK.

The second most common items for sale were traditional medicinal products with 122 advertisements listing ingredients of musk deer, sea horse, saiga antelope, snake oil, pangolin scales and seal penis and kidneys. Almost all of these were made in China and the majority were offered by overseas sellers.

It was found that eBay Australia was responsible for the majority of Appendix II advertisements, hosting 1,234 listings over the first survey period.

However, for the 235 listings identified as being placed from Australia, Gumtree was the most popular website with 127 listings for a wide range of wildlife products and live animals.

Australian-based sellers also listed 98 items on eBay Australia and eight on Aotao. Reptile leather products were also the most common item for sale by Australian sellers with 171 products recorded including boots, clothing, accessories and guitar straps. The second most popular item was live reptiles with 46 listings (mainly pythons including spotted, diamond and Murray Darlings pythons) for pets. Sellers also offered a number of live birds (including three eclectus parrots and a blue-winged parrot native to Australia), erhu instruments and taxidermy items. Thirty-six of the Australian sellers offered worldwide shipping.



LEGISLATION GOVERNING WILDLIFE TRADE ON THE INTERNET

Australia's legislation governing trade in endangered species is relatively strong in comparison to other countries such as New Zealand and its enforcement agencies seek to take a robust approach to ensuring compliance with the rules. However, the rise of online trading opportunities represents a significant challenge for effective law enforcement as it creates a large pool of online shoppers with access to wildlife products who may be unaware of the laws governing this trade. It also creates a pathway for those with criminal intent to utilise online trading platforms and the international postal systems to evade detection and prosecution.

The Australian wildlife trade legislation pre-dates the massive expansion of the online trading world and this, together with the international nature of the trade, can allow traders to evade or abuse legislation in various jurisdictions. There are no requirements for sellers to provide proof of an item's legality when offering it for sale, making it difficult for the customer to know whether a wildlife product or live animal is a legal or illegal specimen.

While the legislation currently makes it an offence to import, export or have possession of an illegally imported CITES listed specimen, it has no specific prohibitions for commercial activities that reflect the reality of the internet trade in which illegal items are offered for sale, bought and sold before the specimens are actually exported, imported or delivered. In this way the existing measures fall

short in capturing the sort of illegal wildlife trade activities taking place. This may impede successful prosecutions and fails to create a legal requirement for trading platforms to adopt more effective control measures for potentially illegal trade.

In 2010 the CITES Conference of the Parties passed a resolution in relation to e-commerce, (CITES Resolution Conf. 11.3 (Rev CoP15)) which recommends:

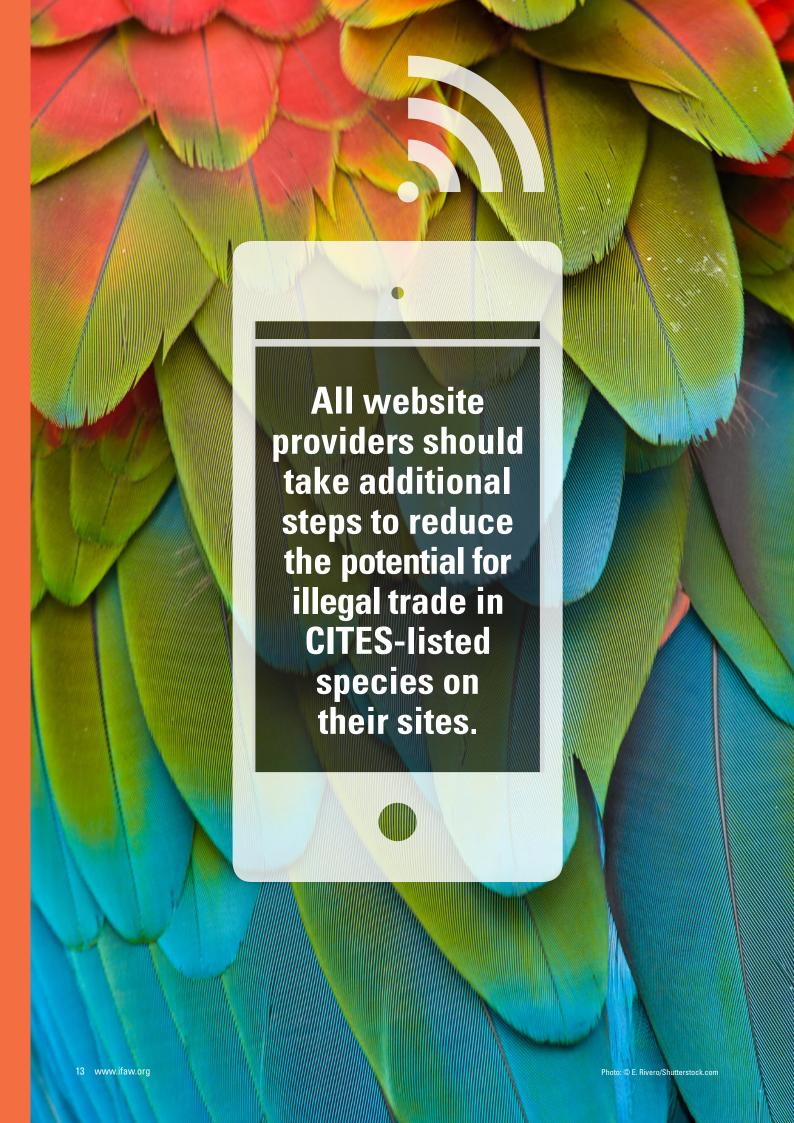
"CITES Parties evaluate or develop domestic measures to ensure that they are sufficient to address the challenges of controlling legal wildlife trade, investigating illegal wildlife trade and punishing the perpetrators, giving high priority to the offer for sale of specimens of species listed in Appendix I".

The EU has stricter measures in place to make commercial activities such as offer for sale, offer to purchase and display and transport for sale an offence and this allows these provisions to be used as a basis for prosecution of illegal online activities.

Currently only one country, the Czech Republic, has put in place specific measures to control illegal wildlife trade on the internet. Among other things, the legislation requires the seller to include a notice 'CITES obligatory documents' as part of any online advertisements for Appendix I specimens, the website platform must make sure this information is made public and enforcement agencies are able to take down any non-compliant advertisements.¹³

The internet offers relative anonymity to sellers, making policing and enforcement more difficult than traditional methods of sale.





03 // RECOMMENDATIONS

Urgent action is needed to counter illegal wildlife trade which has profoundly negative impacts for endangered species protection, biodiversity conservation and for the welfare of wildlife trafficked for the live animal trade.

The internet, with an ever growing number of users, is the world's largest marketplace. Always open for business, it offers relative anonymity to sellers, making policing and enforcement more difficult than traditional methods of sale. Combined with a low level of awareness amongst buyers about the laws regarding trade in protected wildlife, the internet continues to offer a route for traders to conduct illegal wildlife transactions.

This research has demonstrated that high volumes of endangered wildlife products are being traded on the internet on Australian hosted websites, with no requirements in place to demonstrate an item's legality or provenance.

IFAW would like to see strict policies adopted on all websites selling wildlife specimens and welcomes the policies adopted by eBay and Gumtree Australia as well as Alibaba to protected endangered wildlife. It is disappointing to see traders flouting site bans and attempting to avoid detection: clearly more needs to be done to stop this practice. IFAW is committed to helping website companies ensure their policies are effectively enforced by sharing intelligence of suspicious traders and trading practices with both law enforcers and website companies.

In order to shut down opportunities for potential illegal trade in endangered wild animals on nationally hosted websites, IFAW urges the following action:

All website providers should:

- As a matter of urgency take additional steps to reduce the potential for illegal trade in CITESlisted species on their sites.
- Institute and implement a total ban on all sales of ivory and rhino horn on their sites and take necessary steps to enforce these policies to prevent illegal trade in these species from occurring.

- Actively monitor listings of all wild animals and their products and develop new filters and enforcement guidelines to recognise potential trade in endangered and protected species and prevent sellers from evading company policies and national legislation.
- Provide easy to find information on their site on wildlife crime, the rules around selling wildlife products and the threats facing endangered wildlife. Specifically a link to the Australian Department of Environment simplified list of CITES species http://www. environment.gov.au/topics/biodiversity/wildlifetrade/internationally-endangered-plants-andanimals-cites/cites-species.
- Work proactively with national law enforcement authorities to:

Implement compulsory 'pop up' notices (or similar warning/advisory methods) to traders at the point of sale warning them that they may be breaking the law by buying or selling wildlife products and requiring traders to confirm that they have read and understood their responsibility under the relevant legislation before proceeding to buy or sell CITES-listed species.

Review the format of sales advertisements to incorporate a requirement for inclusion of permitting information in all advertisements for CITES-listed species.

Identify suspicious trading behaviour that may relate to breaches of CITES-related laws and report this promptly to national enforcement authorities.

Where a breach of a CITES-related law is suspected, provide full identification details of sellers promptly to national enforcement authorities.

The Australian government should:

 Review current national legislation governing the trade in wildlife products and adopt strengthened provisions which implement CITES Resolution Conf. 11.3 (Rev CoP15) by:

Explicitly prohibiting the offering for sale of CITES Appendix I specimens without a valid permit.

Placing legal responsibility on potential sellers to provide access to relevant documentation for their products and to inform buyers of their obligations under wildlife trade legislation.

- Provide enhanced support to national wildlife enforcement authorities so that they have capacity to guarantee the widest compliance with legislation and policies in a rapidly evolving online marketplace.
- Continue to recognise the importance of international cooperation amongst wildlife enforcement agencies, including via INTERPOL's

Environmental Security Sub-Directorate and ensure adequate resourcing for national enforcement agencies to contribute to and benefit from such coordinated international action to combat illegal wildlife trafficking online.

All buyers should:

- Recognise the difficulty in ascertaining the provenance and legality of wild animals and products listed for sale online, especially from overseas sellers. Exercise caution and if in doubt, do not buy.
- If considering a purchase, at a minimum, ensure that each advertisement for the sale of a wild animal or wildlife product offers the appropriate evidence proving the legality of that specific product.
- Report advertisements which may contravene
 the website policy and/or the law to the site
 provider and to the national enforcement
 authorities responsible for that site's jurisdiction.



A TOTAL FINDINGS APPENDIX I ITEMS AUSTRALIA

Websites	Total Ads	National	Overseas	
еВау	203	32	171	
Petlink	21	21		
Gumtree	19	19		
Adoos	9	9		
Quicksales	6	5	1	
Birdsville	6	6		
Aotao	5	5		
Priam	3 3			
Petdirectory	3 3			
eBid	3	1	2	
Ecrater	1 1			
Petpages	1	1		
Tradingpost	1	1		
Locanto	1	1		
Total advertisements	282	108	174	

Websites	Reptile	Elephant	Live bird	Vicuna	Turtle	Big Cat	Rhino	Musk Deer
eBay	26	145		27		3		2
Petlink			21					
Gumtree		9			9	1		
Adoos		1	8					
Quicksales		3	1			1	1	
Birdsville			6					
Aotao		5						
Priam			3					
Petdirectory			3					
eBid		1				1	1	
Ecrater		1						
Petpages			1					
Tradingpost			1					
Locanto			1					
Total advertisements	26	165	45	27	9	6	2	2

B TOTAL FINDINGS FOR SELLERS BASED IN AUSTRALIA, APPENDIX I ITEMS

Websites	National	Elephant	Live bird	Turtle	Big cat	Rhino
еВау	32	32				
Petlink	21		21			
Gumtree	19	9		9	1	
Adoos	9	1	8			
Quicksales	5	3	1		1	
Birdsville	6		6			
Aotao	5	5				
Priam	3		3			
Petdirectory	3		3			
eBid	1					1
Ecrater	1	1				
Petpages	1		1			
Tradingpost	1		1			
Locanto	1		1			
Total advertisements	108	51	45	9	2	1

C WEBSITES IN ORDER OF HIGHEST NUMBER OF ADVERTISEMENTS FOR APPENDIX 1 ITEMS AUSTRALIA

Websites	Sales	Per cent	
eBay	203	71.99%	
Petlink	21	7.45%	
Gumtree	19	6.74%	
Adoos	9	3.19%	
Quicksales	6	2.13%	
Birdsville	6	2.13%	
Aotao	5	1.77%	
Priam	3	1.06%	
Petdirectory	3	1.06%	
eBid	3	1.06%	
Ecrater	1	0.35%	
Petpages	1	0.35%	
Tradingpost	1	0.35%	
Locanto	1	0.35%	
Total advertisements	282	100%	

D CATEGORY OF ADVERTISEMENTS FOR APPENDIX I ITEMS AUSTRALIA

Type of species	Sales	Per cent	
Elephant (ivory)	165	58.51%	
Live birds	45	15.96%	
Vicuna	27	9.57%	
Reptile (crocodile and alligator)	26	9.22%	
Turtle products	9	3.19%	
Big cat products	6	2.13%	
Rhino	2	0.71%	
Musk deer	2	0.71%	

METHODS

Researchers spent 200 hours monitoring 16 websites, 14 of which are hosted in Australia, using a variety of key words designed to find endangered or vulnerable species thought to be commonly in trade.

Research was carried out in two tranches. The first involved a search of websites hosted in Australia as well as one in New Zealand for Appendix I and II species, using five categories of wildlife products to identify wildlife advertisements as well as some additional Chinese language search terms.

The second stage of research later in the year took a snapshot of trade on relevant websites identified in Killing with Keystrokes (2008), using the same search terms and methodology and looking only for priority Appendix I species. For reasons of consistency the second stage of the research included one Chinesehosted website Alibaba that had been included in the 2008 survey.



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