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# RED FLAG INDICATORS FOR WILDLIFE TRAFFICKING IN CONTAINERISED SEA CARGO

*A summary compendium and guidance for the maritime shipping sector in Singapore*

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TRAFFIC



# TRAFFIC BRIEFING PAPER

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# ABOUT THIS COMPENDIUM

Wildlife trafficking is a multibillion-dollar criminal industry, fuelling the poaching of many species worldwide and compromising national and international economies, livelihoods, and security. Significant volumes of wildlife trafficking is enabled through containerised cargo, where large volumes traverse continents, often shielded by the sheer volume that prevents scrutiny of containers.

To foster closer engagement in the maritime sector, TRAFFIC and WWF first produced a global Red Flags Indicator Compendium for Wildlife Trafficking in Containerised Sea Cargo in March 2021, (Zavagli, 2021) curated from thousands of data points across the globe. It was intended to capture the most common red flag indicators in containerised wildlife trafficking, where these tell-tale signs can be used by companies and law enforcement agencies to profile, target, and detect suspicious shipments. While maritime supply chains are complex, the development and use of tools like these can improve due diligence by stakeholders and aid in the fight against wildlife crime.

This Singapore Compendium, developed in conjunction with local authorities and based off the global Compendium, has been tailor-made to suit the needs of Singapore, profiling specific cases relevant to the country to serve as a basis for closer public-private sector collaboration to tackle wildlife trafficking implicating Singapore. The Compendium is targeted at actors along the maritime containerised shipping chain including carriers, shippers and freight forwarders, and can also be used to develop targeted training materials and tools for relevant agencies.

It offers user-friendly information and recommendations specific to the Singaporean context, covering the following primary areas:

- The importance and relevance of wildlife trafficking to the maritime sector in Singapore
- CITES and Singapore's regulatory framework around transporting wildlife
- Trafficking tactics and vulnerabilities in the supply chain
- Red flags indicators that highlight how traffickers exploit the system including commonalities on routes, document falsification, and case examples
- Recommendations and best practices
- Tools and reference materials

Information in this Singapore summary Compendium was obtained from open-source data on enforcement actions recorded in TRAFFIC's Wildlife Trade Information System (WiTIS), guidance from the Singapore Government published online, published and internal technical reports, and information from the National Parks Board (the CITES Management Authority of Singapore).

It is important to also note that traffickers constantly modify their modus operandi to adapt according to factors that affect their business. Therefore, this Compendium should be considered as a guide based on current known information, that would benefit from periodic review and updates. Resources and contact information can become outdated over time, and these should also be cross-checked with openly available information.

## RED FLAG INDICATORS

 Shipment of commodities incongruous with origin and/or destination country	 Declared weight does not match cargo description	 Dubious or vague descriptions	 Value of cargo does not tally with description or size	 Questionable paperwork
 Consignment split across multiple shipments	 Shipping route is abnormal for the product and destination	 Change of shipping route once the ship has left port	 Switch Bill of Lading	 Request for use of Letter of Indemnity (LoI) without just cause
 Use of Free Trade Zones and Free Ports without Just Cause	 Failure to disclose true shipper or consignee information	 First-time shippers and shipper's reluctance to offer information about their business and the end-use of a product	 Last minute request for shipment clearance	 Cash-payments

Note: A combination of multiple red flags may be cause for suspicion, but are not evidence of illegality.

## TERMS AND ACRONYMS

B/L	Bill of Lading
CDSA	Corruption, Drug Trafficking and other Serious Crimes (Confiscation of Benefits) Act
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
ESA	Endangered Species (Import and Export) Act 2006
HS Code	Harmonized System Code – a global standard maintained by the World Customs Organization with standardized six-12 digit numbers used to classify traded goods.
IMO	International Maritime Organization
IWT	Illegal Wildlife Trade
NParks	National Parks Board – the CITES Management Authority of Singapore
SOP	Standard Operating Procedure
STR	Suspicious Transaction Report – private entities are legally obliged to file an STR if they suspect any connection to criminal activity
STRO	Suspicious Transaction Reporting Office – the Financial Intelligence Unit for Singapore, under the Singapore Police Force
WCO	World Customs Organisation
UN Comtrade	United Nations Comtrade database – aggregates detailed global trade statistics by product and trading partner



Pangolin scales



# 1. INTRODUCTION

## BACKGROUND ON WILDLIFE TRAFFICKING

Wildlife trade is a diverse global industry encompassing many different sectors and commodities: from timber and fisheries products to wild meat, live plants and animals, and products such as skins and herbal medicines. The trade follows complicated supply patterns (wild and farmed) from local to international trade and markets for food, furniture, medicine, pets, and decorations. Much of the trade is legal and supports local livelihoods and the global economy. However, the growing demand for wildlife fuels a parallel illegal market. Criminals exploit the legitimate wildlife trade systems to co-mingle licit and illicit proceeds, creating challenges for detecting and preventing illicit activity (FATF, 2020). As it is dynamic, complex and clandestine, the true scale and value of the illegal wildlife trade (IWT) remains unknown, with various estimates placing it within USD 4-23 billion per year and ranked among the top five illegal transnational trades (UNEP, 2016; t' Sas-Rolfes et al., 2019; UNODC, 2020). Presently, it is a low-risk and high-profit business often run by well-organised international crime syndicates; these are primarily behind the transport of wildlife and timber contraband through containerised shipping. IWT converges with other forms of serious crime, including money laundering, financial crime and corruption (FATF, 2020).

No country is untouched by this serious crime, which negatively impacts biodiversity, human health, national security and socio-economic development, and lines the pockets of organised criminal groups (UNODC, 2024). IWT also does not undergo hygiene, sanitary, and phytosanitary controls and therefore, can potentially contribute to the spread of zoonotic diseases. As an international and regional economic hub and major transshipment port, Singapore's maritime sector is vulnerable to exploitation by bad actors for wildlife trafficking (Ong et al., 2016). Singapore has intercepted significant volumes of illegal wildlife transshipments and has been implicated in other seizures elsewhere.

The legality of wildlife trade is defined by the protection status of wild animals and plants and the conditions under which trade is permitted. This differs according to a country's legislation. At the international level, the main treaty governing wildlife trade is the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Internationally, CITES controls imports and exports, with Article VII of the Convention stating that it "...shall **not** apply to the transit or transshipment of specimens through or in the territory of a Party while the specimens remain in Customs control", though voluntary recommendations are suggested under its resolutions. It is important to note, however, that Singapore, as one of the busiest transshipment hubs in the world, has a zero tolerance stance against illegal wildlife trade, and adopts a stricter regulatory control than that required by CITES.

## ROLE OF THE MARITIME TRANSPORT SECTOR

Wildlife traffickers rely on land, air, and sea transport networks to move illegal commodities across borders, oceans and continents. Legitimate transport service providers, including freight forwarders, airlines, and shipping companies, are exploited, exposing them to the risks of being linked with illegal wildlife trade chains. Travel distance and route, location, quantity of goods, and the type of wildlife, part or products influence the transport networks used.

Container shipping is mostly used to smuggle large quantities of non-live, non-perishable wildlife parts and products; refrigerated containers may be used for perishable commodities. It is considered cost effective to ship large volumes and heavy weight, and a low likelihood of detection given the massive volume at seaports and the facilities offered.

Moving large volumes of wildlife contraband indicates sophistication that typically involves organised chains of players exploiting trading links and networks, between source countries and end-use markets. This includes illicit procurement, consolidation and movement of wildlife contraband, great levels of financing, and collusion and corruption between government officials and transport sector operators that includes clearing agents and freight forwarders (CITES, 2019). The International Maritime Organization (IMO) has recognised this threat to the industry, developing the [Guidelines for the Prevention and Suppression of the Smuggling of Wildlife on Ships Engaged in International Maritime Traffic](#) in May 2022, which was revised in May 2024. This includes recommendations for public-private cooperation and action by companies to strengthen security, reduce risk, increased screening and reporting and conduct training and awareness raising.

Law enforcement agencies globally face immense challenges in detecting wildlife trafficked through containerised shipping. **This is why the vigilance of the shipping sector is crucial to complement Singapore's regulatory agencies' efforts.**

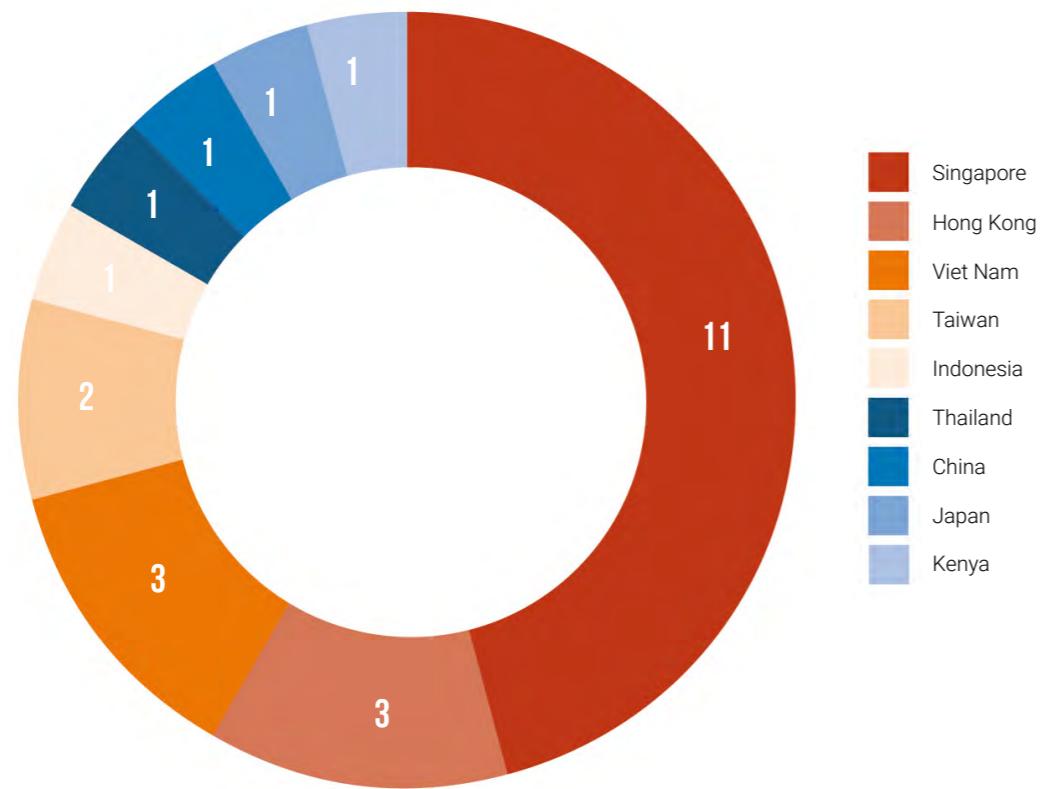
**90%**  
of global  
trade is  
seaborne



**70-90%**  
of wildlife,  
by weight, is  
trafficked by sea.

## SNAPSHOT ANALYSIS: WILDLIFE TRAFFICKING IMPLICATING SINGAPORE

As the world's second busiest container port (World Shipping Council, 2023a), wildlife parts and products have been moved to and through Singapore illegally. A synthesis of seizures<sup>1</sup> implicating Singapore — either as a source, transit or destination country — for wildlife and timber involving containerised shipping found at least 24 incidents between 2000 and 2023. Of these, 11 incidents were intercepted in Singapore<sup>2</sup> (Figure 1). Prohibited wildlife commodities include elephant ivory, pangolin scales, timber, and marine commodities. This is based on seizure data on enforcement actions recorded in TRAFFIC's Wildlife Trade Information System (WiTIS). These were obtained from comprehensive searches of open media sources, but these may contain incomplete information. Where possible, they were verified with relevant authorities.

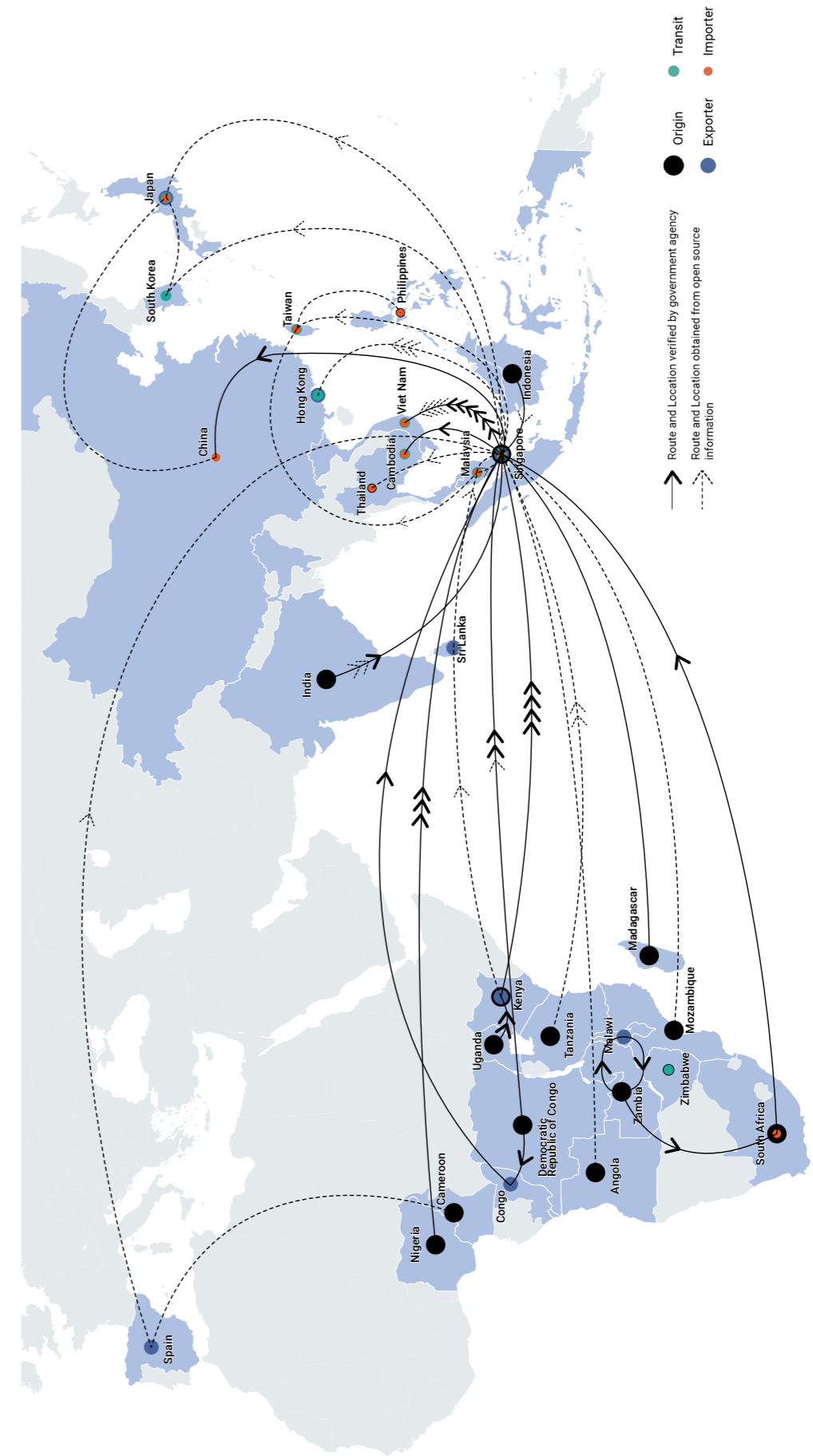


**FIGURE 1**  
Singapore has the highest seizure rates for all detected wildlife trafficking cases implicating Singapore between 2000 and 2023, a clear indication of its zero tolerance against illegal wildlife trade even for transshipment.

<sup>1</sup> Note that seizure data form an unknown proportion of illegal trade incidents and also reflect enforcement effort.

<sup>2</sup> Verified by Singapore authorities

A total of 29 countries were implicated (Figure 2). In two incidents, Singapore was listed as the first location (origin) and two times as the last location (destination); in all other incidents Singapore was a transit country. It should be noted that the seizure record does not always include complete route data.



**FIGURE 2**  
Routes of container shipping seizures implicating Singapore, based on data obtained from WiTIS.

## 2. LEGISLATION AND REGULATORY PROCESSES

### THE CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)



Established in  
**1973**



Legally binding treaty with  
voluntary inter-governmental  
cooperation mechanisms

Regulates international trade in wildlife so it does not threaten the survival of the species

Management Authorities issue permits and certificates to authorise different types of trade in CITES specimens, including:

- Import and export permits (see Red flags in CITES permits and documentation)
- Re-export certificate
- Certificate of captive-breeding or artificial propagation
- Pre-Convention certificate
- Certificates of origin
- Certificate of introduction from the sea



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**184**  
countries



Each country has  
CITES Management  
Authority and  
Scientific Authority

More than 40,000 animals and plants are listed under CITES within one of three Appendices:

#### Appendix I

- Species that are at risk of extinction from international trade
- **Export/Import of wild specimens for commercial purposes prohibited**
- Export permit may be issued only for non-commercial purposes, if specimen legally obtained, and import permit already issued

#### Appendix II

- Species that may become threatened with extinction if international trade is not controlled
- "Look-alike" species for effective enforcement
- Export permit may be issued only if specimen legally obtained
- Singapore has stricter rules that require import permits\*

#### Appendix III

- Species protected in at least one country which has asked other CITES member states for help in controlling the trade.
- Export permit from the State that listed the species is required
- Singapore has stricter rules that require import permits from listed country

\*Exception: CITES Import permit from NParks not required for CITES Appendix II and III artificially-propagated live plants.

HOW DO I FIND OUT IF A SPECIES IS LISTED UNDER CITES?

<https://speciesplus.net/> or <https://checklist.cites.org/#/en>

More information on CITES permits and certificates:

[https://cites.org/eng/prog/Permit\\_system](https://cites.org/eng/prog/Permit_system)

## REGULATORY FRAMEWORK FOR SINGAPORE

### ENDANGERED SPECIES (IMPORT AND EXPORT) ACT 2006 (2020 REV.)

In Singapore, the Endangered Species (Import and Export) Act 2006 (2020 rev.) (ESA) controls the import, export, re-export, and introduction from sea of CITES-listed species via certificates and permits.

The ESA mandates the evidence of a valid export/import/re-export/introduction from sea document, in the form of a CITES permit. Notably, this applies also for protected wildlife in transit, as Singapore adopts a stricter regulatory control than that required by CITES. Under the ESA, a scheduled species is in transit in Singapore only if –

- a. The scheduled species is supported by a prescribed document that –
  - ii. is issued on or before, or within 14 days after, the date on which the scheduled species is brought into Singapore; and
  - iii. specifies a port, an airport or any other place outside Singapore as the destination for the scheduled species; and
- b. one of the following conditions is satisfied:
  - i. the scheduled species remains at all times in or on the conveyance in or on which it is brought into Singapore, pending transport of the scheduled species to the port, airport or other place outside Singapore;
  - ii. the scheduled species is removed from the conveyance in or on which it is brought into Singapore and is either returned to the same conveyance or transferred directly to another conveyance, pending transport of the scheduled species to the port, airport or other place outside Singapore, and is kept under the control of the Director-General or an authorised officer while being so removed, returned or transferred;
  - iii. the scheduled species is removed from the conveyance in or on which it is brought into Singapore and kept under the control of the Director-General or an authorised officer for a period not exceeding 14 days, or such longer period as the Director-General may approve, pending transport of the scheduled species to the port, airport or other place outside Singapore.

Any **individual** found to possess, sell, offer for sale, or display to the public any scheduled species which has been unlawfully imported or introduced from the sea is subjected to a fine of up to **SGD100,000 per specimen** (not exceeding aggregate of SGD500,000 or the market value of all specimens at the material time, whichever is higher) **and/or imprisonment of up to six years.**

For **corporate offenders**<sup>4</sup>, the fine is up to **SGD200,000 per specimen** (not exceeding aggregate of SGD1,000,000 or the market value of all specimens at the material time, whichever is higher) and **imprisonment of up to eight years.**

The possession of wildlife that has been legally imported and sold is allowed when accompanied by approved CITES permits and documents.

**The trade of non-CITES wildlife still requires a declaration, as well as the necessary documents (e.g. certificate from country of origin) from the import/ exporter.**

Authorised officers are granted the powers to search, seize, arrest, and investigate.

### CORRUPTION, DRUG TRAFFICKING AND OTHER SERIOUS CRIMES (CONFISCATION OF BENEFITS) ACT

Wildlife trade offences are predicate offences under the Corruption, Drug Trafficking and other Serious Crimes (Confiscation of Benefits) Act (CDSA). The CDSA criminalises the laundering of criminal proceeds benefits (self and third-party laundering) and provides for investigation and confiscation of such benefits, including the laundering of proceeds from wildlife trade offences.

The CDSA empowers Singapore's Financial Intelligence Unit, the Suspicious Transaction Reporting Office (STRO) to receive, analyse and disseminate relevant financial intel relating to illegal wildlife trade.

<sup>3</sup> This includes both companies and individuals acting under the direction of companies.

It is important for the maritime transport sector to note that under Section 45 of the CDSA, all persons have the legal obligation to file a Suspicious Transaction Report (STR) to the STRO if they know or have reasonable grounds to suspect that any property may be connected to criminal activity, in the course of their trade, profession, business or employment. Failure to file a STR may constitute a criminal offence. A person who fails to file a STR could face up to 3 years imprisonment, a fine up to SGD250,000, or both. A company may be fined up to SGD500,000.

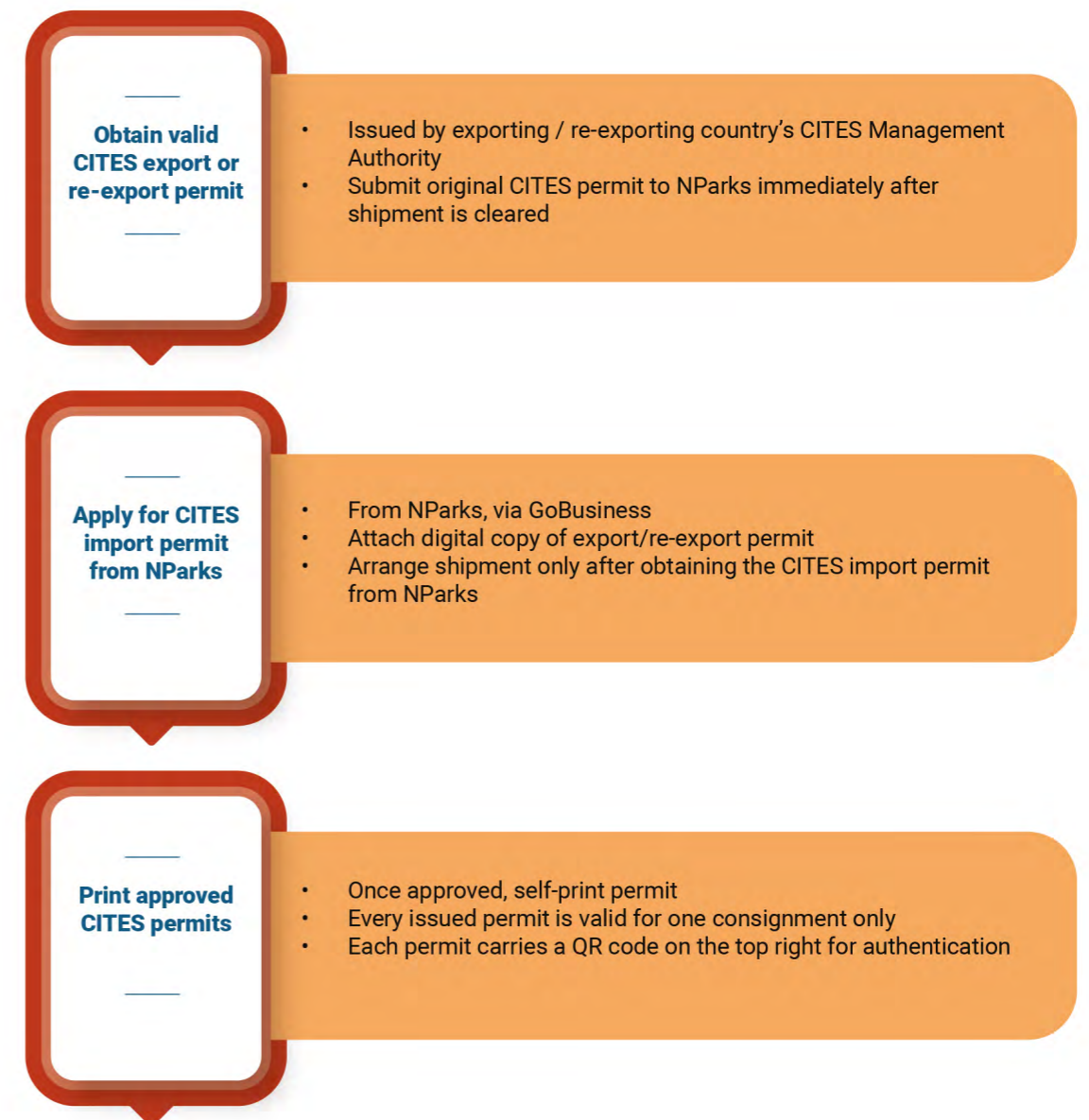
### ORGANISED CRIME ACT

Wildlife trade offences are included as serious offences in the Schedule of the Organised Crime Act (OCA) with effect from 30 August 2024. Under the OCA, depending on the facts and circumstances of the case, a person who commits a serious offence could face up to 20 years of imprisonment.

### CITES DOCUMENT SUBMISSION PROCESS FOR SINGAPORE

Application for CITES permits for the import, export or re-export of any CITES-listed species is through the [GoBusiness Licensing Portal](#). Please refer to the [NParks](#) website for more information for [CITES-listed animals](#) and [CITES-listed plants](#).

### IMPORTING CITES ANIMAL SPECIES



## EXPORTING OR RE-EXPORTING CITES SPECIES



## CITES SPECIES TRANSITING SINGAPORE

### If does not involve local consignee or importer

- Valid CITES export or re-export permit from exporting or re-exporting country

### If live animal or CITES Appendix I-listed species

- Valid CITES import permit from destination country
- CITES export/re-export permit from exporting/re-exporting country
- Present both to NParks before specimen arrives in Singapore
- CITES permits and other shipping documents available for inspection

### If involves local consignee or importer

- Considered an import for re-export
- Also applies to CITES specimens that remains or is temporarily stored at free trade zone
- Valid CITES export or re-export permit from exporting or re-exporting country
- CITES import permit from NParks
- Present both to NParks before shipment arrives in Singapore
- CITES permits and other shipping documents available for inspection
- Obtain the CITES re-export permit from NParks before specimen departs.

After obtaining CITES permits, a mandatory **Cargo Clearance Permit** must be obtained through approval of *TradeNet* declarations, using the appropriate HS codes and product codes.

All imports of live plants, seeds and certain plant products into Singapore require a **phytosanitary certificate**.

<sup>4</sup> Phytosanitary certificate can be used in lieu of CITES Export/Re-export permit for CITES Appendix II and III artificially-propagated live plants.

## RISKS TO THE TRANSPORT SECTOR FROM WILDLIFE TRAFFICKING

Shipping lines, freight forwarders, and port operators are exposed to a range of risks:



### Reputational

- Exposed to criticism for inaction, lack of detection or performing due diligence to prevent suspicious cargo.



### Legal

- Companies in the transport sector have been prosecuted for negligence in ensuring that shipments do not contain contraband.
- Singapore's laws allow for the seizure of vehicles (including ships) used to transport illegal cargo.
- Under the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act, private entities (e.g. Zero-GST warehouse licensees) are legally obliged to file a Suspicious Transaction Report (STR)\* if they suspect connection to criminal activity.



### Economic

- Cargo customers may avoid companies whose services may be delayed from increased checks and enforcement attention.
- Seized containers can be held by authorities as evidence for a long time while cases are investigated and /or prosecuted, incurring losses through inactivity.
- Insurance policies and fees may be reassessed or coverage denied for companies found to transport illegal goods.
- Companies may be barred by other countries from operating in key market ports, which may also include temporary license suspension, revocation or blacklist.



### Security

- IWT along with other forms of illegal trade provide a source of revenue for organized crime.
- Criminals may exploit weaknesses in the supply chain to their advantage.

\* The "Zero-GST Warehouse Scheme" allows approved companies to store imported non-dutiable goods for an indefinite period of time in a designated area licensed by Singapore Customs, with the Goods and Services Tax (GST) suspended. Red flag indicators for Zero GST Rated Licensed Warehouses for filing suspicious transaction reports are available at <https://www.police.gov.sg/Advisories/Commercial-Crimes/Suspicious-Transaction-Reporting-Office/Suspicious-Transaction-Reporting>

### Case Study: Freight Forwarder Sentenced to 10 months' Imprisonment for Failure to Take Reasonable Precautions and Lack of Due Diligence to Prevent Wildlife Trafficking<sup>5</sup>

In February 2023, Dao Thi Boi, owner and director of a one-person firm providing freight forwarding services in Singapore, was convicted of one charge under the Endangered Species (Import and Export) Act for the importation of a container containing 1,787 pieces of elephant ivory tusks weighing 3,480kg without permit, and sentenced to 10 months' imprisonment. Her appeal was dismissed on 11 July 2024 by the High Court.

This is a landmark case penalising the failure to take reasonable precautions and lack of due diligence pertaining to illicit wildlife trafficking by freight forwarders in the global logistics supply chain.

<sup>5</sup> <https://www.todayonline.com/singapore/trading-firm-director-elephant-tusks-1852361>



Part of the 8.8 tonnes of trafficked elephant ivory seized by Singapore in 2019



# 3. SIMPLIFIED TRAFFICKING TACTICS AND VULNERABILITIES IN THE SUPPLY CHAIN

Transport sector actors are almost never the manufacturers of the commodities transported and seldom the true owners of shipments. The sector is primarily reliant on information or documentation supplied by another party in the supply chain. However, as evidenced by recent landmark cases, including in Singapore, transport sector actors can be held legally accountable for failing to exercise due diligence and reasonable precautions to prevent the shipment of illegal wildlife products. Therefore, it is critical for transport sector actors to be vigilant about possible illegal actions.

Export

## TRAFFICKING TACTICS AND VULNERABILITIES IN A SIMPLIFIED OVERSEAS SUPPLY CHAIN\*

### Warehouse (Container Packing)

- Loading is carried out not always in presence of Customs authorities.
- Possible intrusions to warehouses and depots, and access to sealed containers, to insert wildlife and timber contraband into legitimate shipments



### Container Terminal Operator

- Possible intrusions and access to sealed containers, to insert wildlife and timber contraband into legitimate shipments



### Container Terminal Operator

- Possible intrusions and access to sealed containers, to remove contraband from legitimate shipments



### Transporter/ Freight Forwarder

- Weak due diligence and risk assessment on shipper, consignee and shipment
- Limited knowledge on IWT red flags



### Consignee/ Importer

- Use of fake addresses and 'shell' companies to hide true identity of consignor and/or consignee; last minute requests for change of destination address



A



B



C



D



E



F



G



H



I



J



K



### Manufacturer/ Shipper/Exporter

- Use of fraudulent paperwork such as forged certificates and permits; Misdeclaration of commodities to be shipped
- Use of fake addresses and 'shell' companies to hide true identity of consignor and/or consignee; last minute requests for change of destination address

### Transporter/ Freight Forwarder

- Weak due diligence and risk assessment on shipper, consignee and shipment
- Limited knowledge on IWT red flags

### Port Customs

- Container inspections for export are given lower priorities than incoming shipments due to revenue collection
- Risk profiling for IWT matters is still weak in many countries
- Depending on legislative requirements, manifests are received by customs too late for effective targeted container risk assessment
- In Singapore, risk indicators are keyed into the system and flagged out for checks when the container matches the set of risk indicators provided

### Ships At Sea

- Switched Bills of Lading; Alterations to certificate of origin; Undeclared or sudden changes to ports of call; Disabling of the Automatic Identification System (AIS); and insertion or retrieval of contraband in a container

### Port Customs

- Risk profiling for IWT matters is still weak in many countries
- Bill of lading are received by customs too late for effective targeted container risk assessment
- In Singapore, risk indicators are keyed into the system and flagged out for checks when the container matches the set of risk indicators provided

### Warehouse (Container Packing)

- Possible intrusions to warehouses and depots, to remove contraband from containers

\*Corrupted practices could happen at each step of the chain

Based on Zavagli, 2021.

## TACTICS USED BY TRAFFICKERS GLOBALLY



**Hide and mis-declare as other licit commodities**  
Illegal wildlife is often hidden amongst shipments of declared legal commodities to evade detection.  
Fish or other pungent commodities have been used to cover the signature smell of ivory or pangolin scales to disguise the scent from sniffer dogs.



**Forged or altered permits and other documents**  
to fraudulently legitimize the trade in species that require specific permits.



**Conceal information**  
Especially about the true shipper, consignee, ownership and business activities related to the shipment in the B/L, by providing incomplete or fraudulent shipment documentation.



**Consignment split across multiple shipments**  
To spread risk of loss in case of interception by law enforcement. Also breaks shipment into smaller volumes that can more easily be hidden within shipments of legitimate commodities. The illegal shipment is spread across multiple containers under one booking or across multiple bookings.



Confiscated pangolin scales packed in sacks

## 4. RED FLAG INDICATORS

Red flags are indicators that can be applied to shipping transactions to help identify possible attempts to circumvent controls. Further enquiries will then assist in identifying whether a transaction is legitimate and compliant with national laws and regulations, or if it should be refused and/or referred to an appropriate enforcement or regulatory authority for further scrutiny or investigation (SIPRI, 2016). A red flag indicator may indicate the occurrence of suspicious activity. However, one risk indicator alone, or without additional information about the client or transaction, is not likely to be sufficient to confirm illicit activity.



**Multiple red flags + Suspicious information about client or transaction  
= TAKE ACTION**

# RED FLAGS INDICATING POSSIBLE ILLICIT TRADE

## Red Flags for suspicious illegal wildlife trade

Many indicators of suspicious cargo are common to all forms of contraband, including trafficked wildlife. High levels of corruption in countries or in ports should be considered a major overarching red flag, since traffickers will look to exploit these weaknesses.

### Questions you should ask yourself to spot possible red flags<sup>1</sup>:



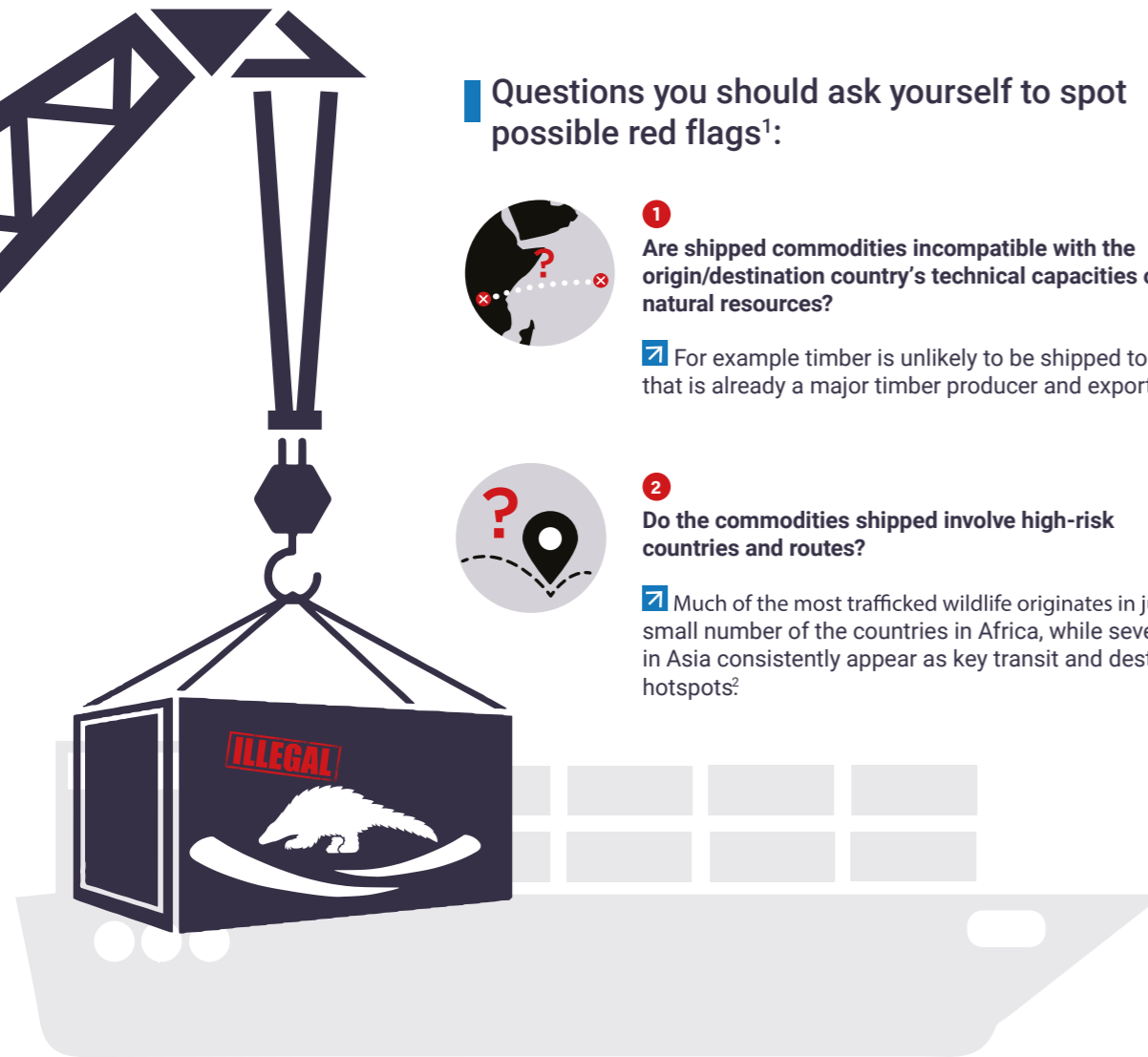
**1** Are shipped commodities incompatible with the origin/destination country's technical capacities or natural resources?

For example timber is unlikely to be shipped to a country that is already a major timber producer and exporter.



**2** Do the commodities shipped involve high-risk countries and routes?

Much of the most trafficked wildlife originates in just a small number of the countries in Africa, while several locations in Asia consistently appear as key transit and destination hotspots<sup>2</sup>.



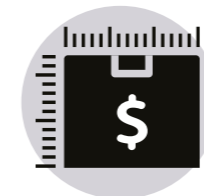
**3** Are weight and cargo appearance inconsistent?

For example, actual weights are different than those stated in the bill of lading or packing lists; declared weight is not reasonable or realistic for the declared commodity; and/or the appearance and characteristics of the shipment do not seem to match the description in the import declaration or other documentation.



**4** Are cargo descriptions dubious, vague or misleading?

Examples of vague or misleading descriptions for wildlife shipments include "fish", "shell", "horn" and "rosewood" (there are many species of rosewood, only some of which may be traded legally).



**5** Does the value of cargo tally with its description and size?

The value of cargo can help authorities determine whether the shipment is identical to what is declared.



**6** Is the paperwork questionable?

For example, are photocopies used instead of original documents? Are there spelling mistakes or inconsistencies? Is there a mismatch of permit number or date? Are documents expired? Is the official counter signature missing or do the documents seem altered (for example, look out for odd formatting, blurry text or cut and pasted logos).

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**7** Is the shipping route abnormal for the product and destination ?

For example, a) the shipment makes no commercial sense, e.g. is sent via a long slow route involving multiple stops when more direct routes exist; b) the shipping costs are abnormally high compared to the declared cargo value; or c) the shipment has no clear market value in the destination country. Criminal networks also have been known to use multiple shipments to hide the origin of shipments and make surveillance and traceability more difficult.



**8** Was the shipping route changed after the ship left the port?

Change of destination or diversion of cargo is a legitimate procedure for commercial reasons but can be an indicator of illegal activities and an attempt to evade controls.



**9** Was the Bill of Lading (B/L) switched?

This is when a shipper freight forwarder or shipping agent files a new Bill of Lading for a shipment that is already en route. This may occur for legitimate commercial reasons, but is also a common tactic used by traffickers to disguise information about the port of loading, port of discharge and routing of a shipment to reduce the likelihood that illegal shipments will be flagged for inspection or impede investigations if the contraband is seized.



**10** Was the use of a Letter of Indemnity (LoI) requested without just cause?

This can be legitimate where, for instance, the voyage is too short to issue B/ Ls. However, the LoI can designate different receivers, consigners and B/L contents. It can therefore be used to evade enforcement agency by using different receivers at short notice and to change the port of discharge.



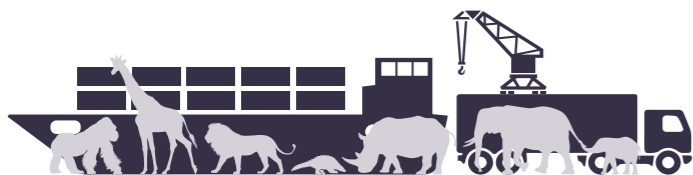
**11** Is the consignment split across multiple shipments?

The splitting of consignments may occur for legitimate reasons and purposes. However, it can also be a tactic used by traffickers to spread the risk of loss in case of interception by law enforcement. It is also used to more easily hide smaller illegal shipments within shipments of legitimate commodities. The illegal shipment may be spread across multiple containers under one booking or across multiple bookings.



**12** Are Free Trade Zones or Free Ports used for the shipment in a manner that seems unusual?

The simplified import, export, transit and transshipment procedures and lax controls of free trade zones and free ports can make them prime sites for diversion of illegal shipments.



**13** Is the shipper and consignee information false?

For example, look out for addresses that appear incomplete or overly simplistic (e.g., "1234 Main Street"); consignee names that are similar to large well-known companies; consignee addresses that are different to the businesses associated with the declared commodity.



**14** Is a first-time shipper reluctant to offer information about their business and product end-use?

New customers should be subjected to thorough screening to rule out that they are shell companies created to obfuscate the actual ownership of the cargo.



**15** Was shipment clearance requested last-minute by the shipper?

This might be an attempt to avoid Customs' controls due to time constraints.



**16** Are payments made in cash?

Cash payments can be a legitimate payment method, but they can also be a sign of an illegal transaction since they are not traceable.

**One risk indicator alone, or without additional information about the customer or transaction, is not likely to be sufficient to confirm there is an illegal activity. If you suspect something suspicious, ask the customer to provide you with more information and follow your company's Standard Operating Procedures. Companies are encouraged to consider using a system of green/orange/red lights for the indicators described that could help assess the overall risks and take action where required.**

- For sealed packed containers, the shipping line may not be able to determine several of the below red flags. Other parties in the supply chain may be able to do so as may Customs authorities when comparing the import declaration with the cargo manifest.
- For more information, see UNDP's flyer 'Overview of known trafficking routes, concealment methods and misdeclarations of wildlife products commonly trafficked in containerised sea cargo in recent years.'

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Disclaimer: The trafficking of protected wildlife is an illegal act under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). It is to be understood that the organisations endorsing this document oppose such trade and do not speak for, or condone, those who undertake or facilitate it.

# RED FLAGS IN CITES PERMITS AND DOCUMENTATION

False documentation facilitates the movement of protected or prohibited species. Signs of non-compliance in CITES permits can flag illegal wildlife trade.

## DOCUMENTATION RED FLAGS (see example on next page)

- Permit not original and or not in English, French, or Spanish (three languages of the CITES Convention)
- Non-valid Permits - e.g. an expired permit; description of the specimens that does not match what is in the shipment
- Fake or altered Permits that are not issued by a CITES Management Authority or a legitimate permit that has been altered after it was issued
  - Font size and type inconsistently applied across the permit
  - Paper or printing is abnormal in appearance (e.g. thickness, texture and/or colour; the permit provided is a photocopy and not an original)
  - Presence of ink spots - often indicating that a thinner has been used
  - Stamp, seal or security stamp showing signs of having been copied
  - Permit/certificate number altered
- Missing or incongruous information
  - For transshipments - final destination on both the permit and the shipping documents are not the same
  - For re-exports, country of origin, number of export permit and date of issue for the export permit not shown clearly in Box 12
  - For successive re-exports, country of last re-export, number of re-export permit or certificate and date of issue not completed in Box 12a
- Suspicious contents
- Unusually large quantities within one permit for the species and commodity type
- Permit issued for export of wild-sourced species not found native to these countries

When in doubt, contact NParks (the Singapore CITES Management Authority) or Management Authorities of exporting countries<sup>6</sup>.



## Example of what a valid CITES document should include

Only one selection possible. If "re-export" has been selected, box #12 on the permit must be also completed fully.

Each original permit is numbered by the country's CITES Management Authority (M.A.).

Export and Re-export permits must be used within 6 months Import permits or Certificates of Origin should be valid for 12 months. (some countries follow stricter rules)

Specimens must enter the country of import before the expiry date. The validity of a permit is shown by the period of time between the expiry date (box #2) and date of issue (box #13).

This logo and the full name of the Convention must be present

If "other:" has been selected, the document type must be indicated in this same box

Permit number at the top and bottom should be the same

NB: Not all countries require that the permit is signed. If there is a place for the signature, this must be present

Must indicate number of specimens or weight in KG (terms like boxes or bags are not acceptable)

Scientific name must appear exactly as that used by CITES, followed by its common name.

E.g. live, logs, skins, shoes, bones, shells etc.

Check single letter source code on the back of the permit

If applicable, two figures will appear: 1. the total number of specimens traded since the beginning of the year, including the ones in this shipment and 2. the total quota for the species trade. i.e. 150/1100\*

To be completed only for re-export of specimens that were previously re-exported

National seal of the country's CITES Management Authority.

If the country uses a security stamp it appears here. The number of the security stamp should appear in box #5.

The security stamp must be cancelled by a seal and the signature of the issuing officer to ensure that the stamp is not re-used fraudulently.

Place & date of issue, written clearly. Name of officer, written in full.

14. Export endorsement:

Block	Quantity
A	
B	
C	
D	

15. Bill of Lading/Air waybill number: if applicable (i.e. not for land checkpoints).

Port of export Date Signature Official stamp and title

CITES PERMIT/CERTIFICATE No.

Not all Parties require box #14 to be completed. Contact your Management Authority if unsure. Inspection is required for all USA-bound shipments.

The inspecting officer must indicate the actual quantities of specimens being exported or re-exported.

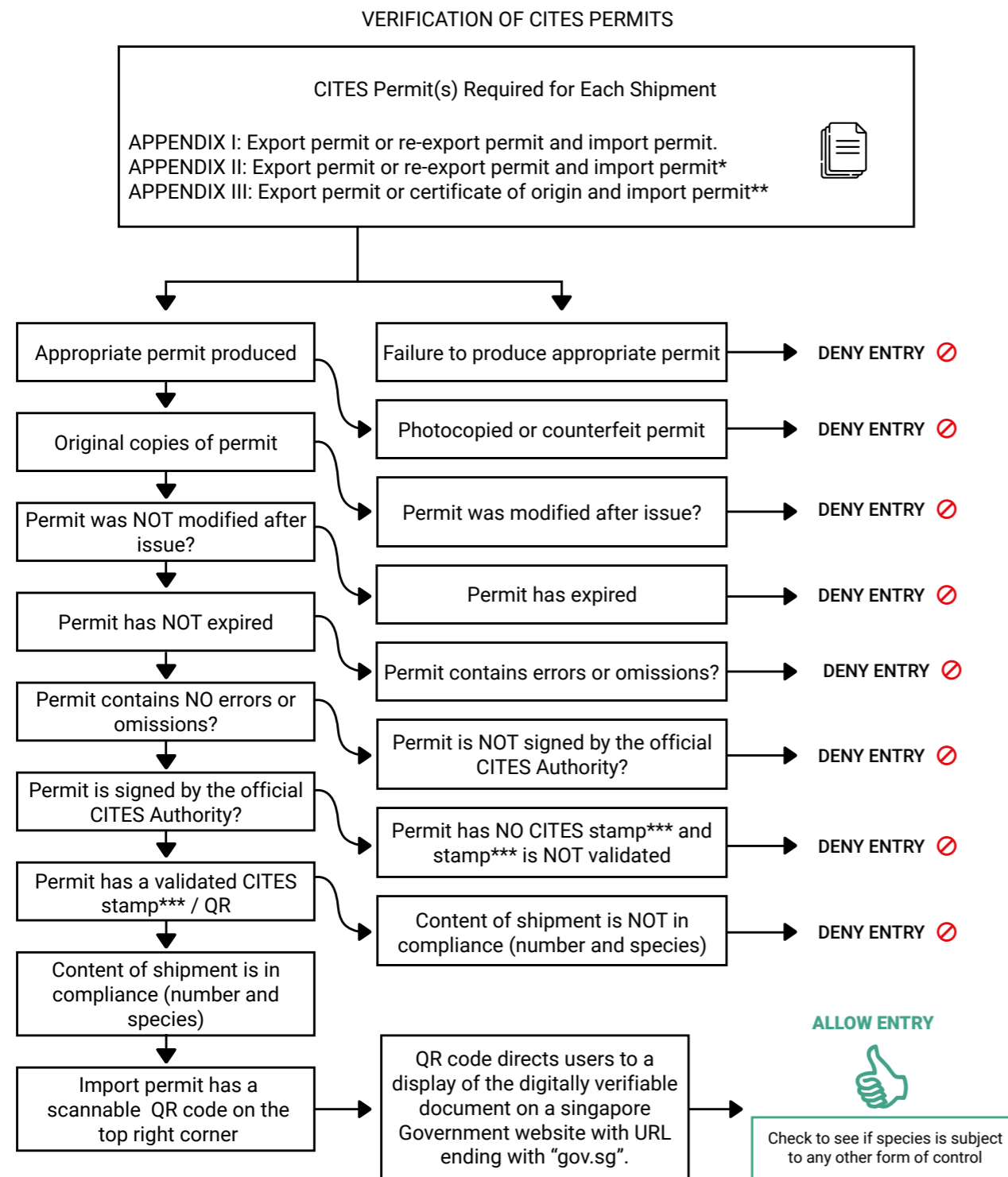
Quantity boxes not used must be crossed out.

Any shipment which contains more specimens than the number written in box #11 must be denied entry.

<sup>6</sup> List of CITES Management Authorities: <https://cites.org/eng/parties/country-profiles/national-authorities>

\*To check if quota applies: [https://cites.org/eng/resources/quotas/export\\_quotas](https://cites.org/eng/resources/quotas/export_quotas)

## PROCESS OF VERIFICATION OF CITES PERMITS IN SINGAPORE



Adapted from © Environment and Climate Change Canada, 2003  
 \* Import permit will be required unless exempted  
 \*\* Export permit and import permit required for imports from listing countries. Only certificate of origin required when importing from non-listing country.  
 \*\*\* Where applicable. Not all countries use CITES stamps.

## SPECIES-SPECIFIC RED FLAGS IMPLICATING SINGAPORE

Trafficking in different types of wildlife has its own specific typologies, concealment patterns, and emerging trends that can be identified through analysing seizure data and intelligence reports. This section draws from reported cases of wildlife trafficking via container shipping implicating Singapore to illustrate example species-specific Red Flags (see Snapshot Analysis).

Red flags associated with IWT may vary according to the nature of the trafficked wildlife goods and their associated geographies of movement. These patterns are dynamic and evolve with time as traffickers adapt their modus operandi to avoid detection. Nonetheless, criminals will also keep using smuggling methods and routes which have proved to be successful. Repeated use of the same routes can indicate a well-established network facilitated by corruption along the trade chain.

### The Africa-Singapore trafficking route

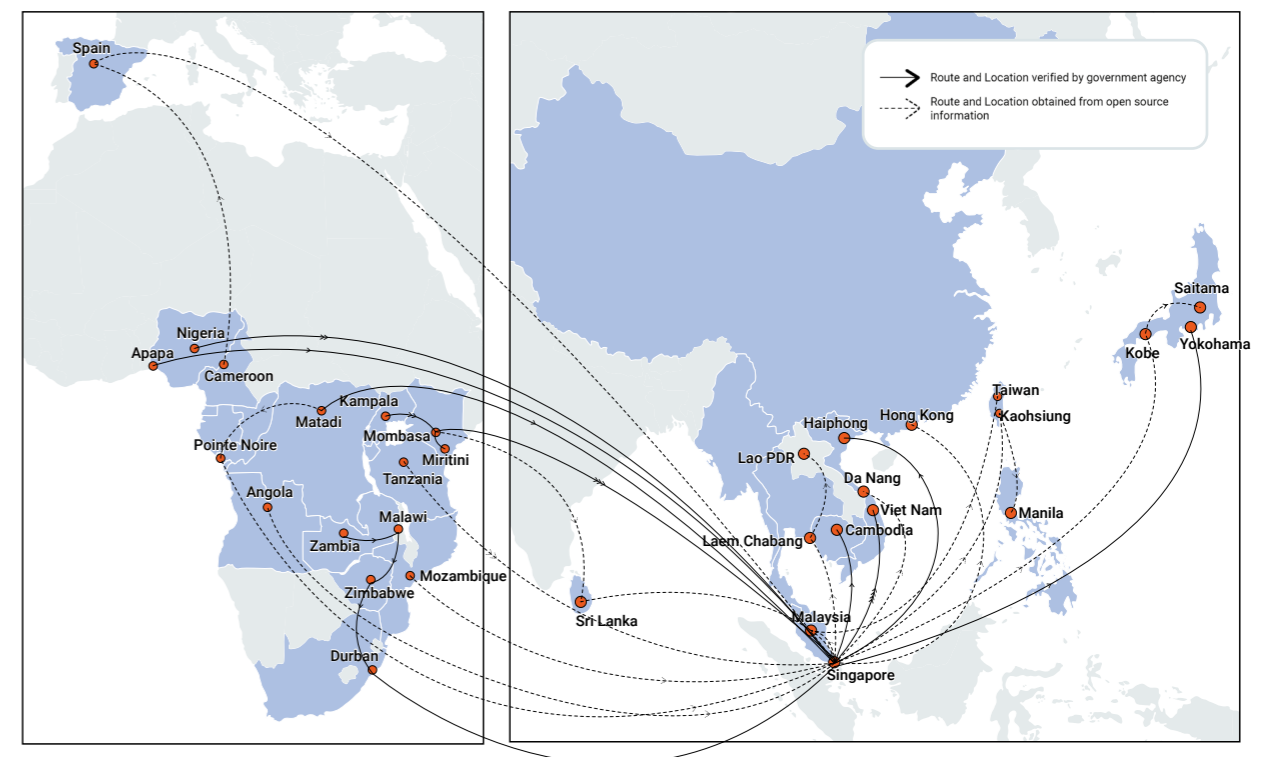
Africa's biodiversity is a major target for wildlife traffickers, and African countries often play a role in the export or transit for wildlife shipments destined to Asian countries. Singapore is one of the countries used as a transit port to smuggle these products, such as African pangolin scales, African elephant ivory and Malagasy rosewood. From the seizure records, origin countries from Africa include: Cameroon, Congo, Democratic Republic of Congo, Kenya, Madagascar, Mozambique, Nigeria, South Africa, Tanzania, Uganda, Zambia.

## TRAFFICKING IN ELEPHANT IVORY

### Conservation and legal concerns

- All elephant species are CITES Appendix I except for specified populations on Appendix II
- Elephant ivory may be smuggled in raw form (whole tusks or cut into pieces) or processed (polished or carved)
- Maritime routes are the preferred method for smuggling large quantities of ivory, accounting for more than 64% of all ivory seizures weighing over 500kg recorded during the 2017-2019 period (WJC, 2019)
- Between 2013 and 2022, 92,321kg of ivory was seized globally while being transported by sea, representing 52% of ivory seized by volume compared to other transport modes (C4ADS Dashboard, 2023)
- Combined shipments of elephant ivory and pangolin scales increasingly common

**Singapore-implicated elephant ivory cases (2000-2023). Singapore government-verified cases are in solid lines, and the number of arrows denote the number of incidents implicating that route.**



From known cases	
Concealment method	Misdeclared as other legal commodities, false declaration of destination, inside wooden crates, in gunny sacks, under cover loads including rocks or other low-value, bulk dry cargo exports, hidden in hollowed out wooden planks or timber, describing the name of the goods in an uncommon language, using incorrect consignee information.
Known to have been misdeclared as	Typically low-value, bulk dry cargo exports used as large volumes of cover materials. Nuts, dried fish maws, timber, frozen mackerel, coffee berries, tea leaves, waste paper, ceramics
Other highlights (e.g. HS codes, keywords)	Mostly raw ivory tusks or cut into smaller pieces and packed into multiple boxes, bags or sacks; In recent years often smuggled in combination with pangolin scales; Plastic resins (HS code prefix 39); Peanuts or groundnuts (HS code prefix 1202)

#### EXAMPLE CASES IMPLICATING SINGAPORE

Date	Species	Volume	Origin	Transit	End destination (actual or reported)	False declaration	Detection based on	Outcome
3 March 2018	Elephant ivory	3.5 tonnes	Apapa, Nigeria	<b>Singapore</b>	Viet Nam	Groundnuts	Risk assessment/ profiling.	Freight forwarder in Singapore jailed for 10 months in February 2023, for failing to take reasonable precautions and exercise due diligence to avoid the commission of the offence.
21 July 2019	Elephant ivory and pangolin scales	8.8 tonnes	Democratic Republic of the Congo	<b>Singapore</b>	Viet Nam	Timber	Information from China's General Administration of Customs	Singapore's collaboration with China led to the arrests of 14 suspected criminals by Chinese authorities <sup>7</sup> .

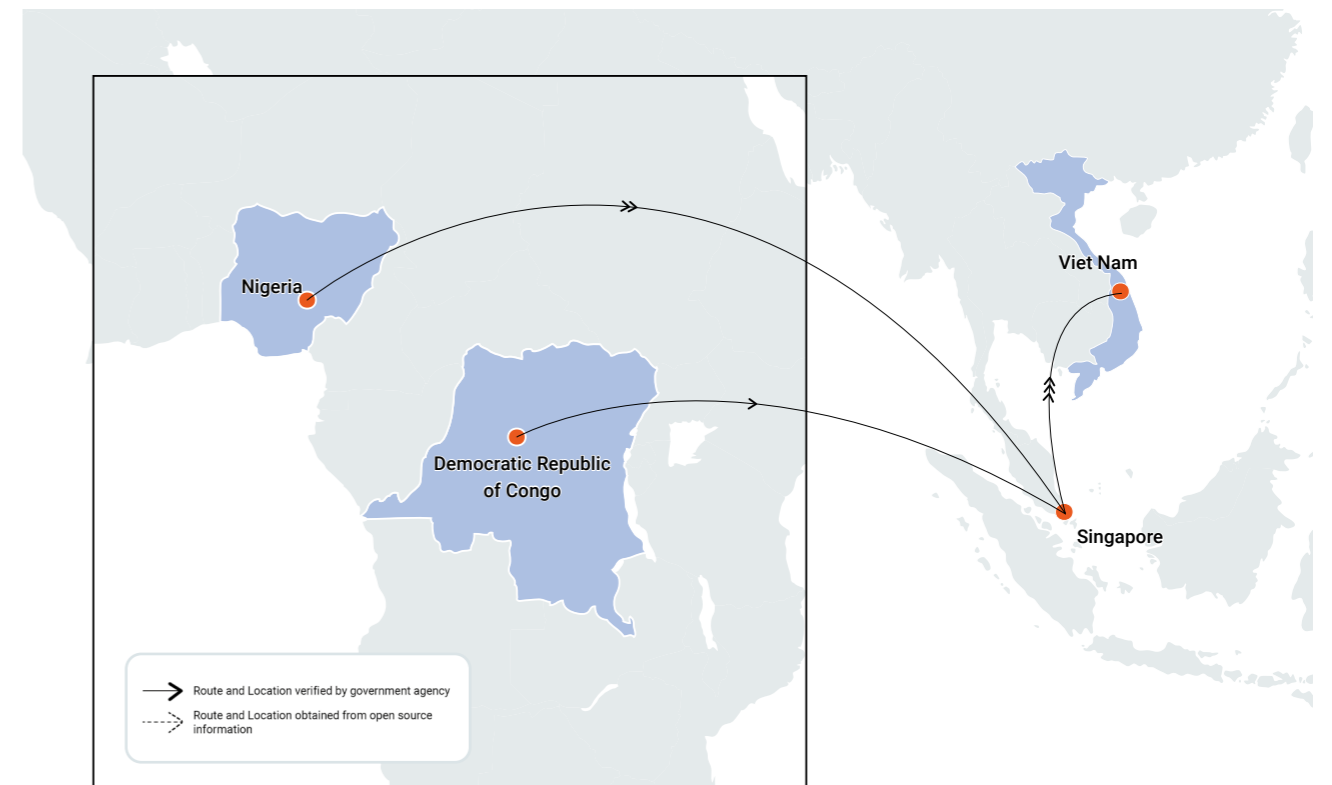


## TRAFFICKING IN PANGOLIN SCALES

### Conservation and legal concerns

- All pangolin species are CITES Appendix I
- Poached for scales and meat
- More than 330 tonnes of pangolins and their parts were seized in Asia from 2015 to 2021, in 1,141 seizure incidents involving both African and Asian pangolin species in Asia (TRAFFIC, 2022)
- Between 2013 and 2022, 164,329kg of pangolin parts and products were seized while being transported by sea, representing 61% of pangolin parts and products seized by volume across transport modes (C4ADS Dashboard, 2023)

**Singapore-implicated pangolin scale cases (2000-2023).** Singapore government-verified cases are in solid lines, and the number of arrows denote the number of incidents implicating that route.



<sup>7</sup> <https://www.straitstimes.com/singapore/record-haul-of-ivory-seized-in-singapore-together-with-pangolin-scales-worth-over-100-million>  
[http://www.xinhuanet.com/english/2019-07/23/c\\_138251392.htm](http://www.xinhuanet.com/english/2019-07/23/c_138251392.htm)

From known cases	
Concealment method	Misdeclared as other legal commodities, in gunny sacks, under cover loads including timber
Known to have been misdeclared as	Frozen beef, timber, cassia seeds
Other highlights (e.g. HS codes, keywords)	Sometimes smuggled in combination with ivory; Often declared as variations of plastics under Customs HS code prefix 39; Use of charcoal (HS code prefix 4402); Indirect shipments are often booked as two separate shipments or through switched B/Ls; Traffickers are known to be able to switch the port of origin to Tema, Ghana on shipments from Nigeria.

### EXAMPLE CASES IMPLICATING SINGAPORE

Date	Species	Volume	Origin	Transit	Destination (actual or reported)	False declaration	Detection based on	Outcome
3 April 2019	Pangolin scales and Elephant ivory	12.9 tonnes scales and 177kg carved elephant ivory	Apapa, Nigeria	<b>Singapore</b>	Viet Nam	Frozen beef	Risk assessment/profiling.	The seizure led to the arrests of several individuals in China. The entire consignment was disposed of by incineration.
8 April 2019	Pangolin scales	12.7 tonnes	Nigeria	<b>Singapore</b>	Viet Nam	Cassia seeds	Singapore collaborated with China to successfully investigate and intercept this shipment.	The seizure led to the arrests of several individuals in China. The entire consignment was disposed of by incineration.

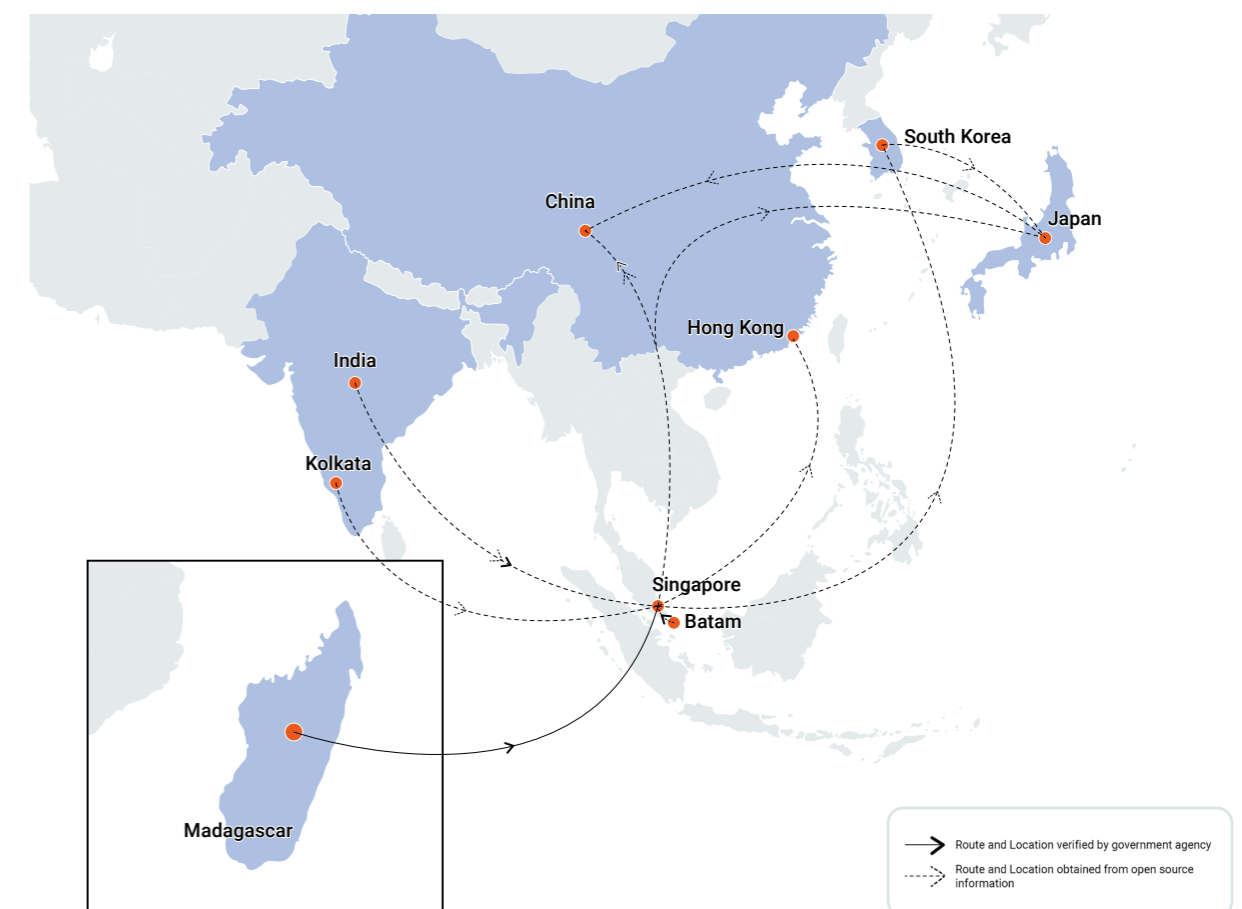


## TRAFFICKING IN PROTECTED TIMBER

### Conservation and legal concerns

- While many timber materials and products can be legally traded, **some are CITES-listed and/or nationally protected and permits are required<sup>8</sup>**.
- Highly trafficked<sup>9</sup> CITES-listed timber taxa include:
  - Rosewood *Dalbergia* spp. e.g. *D. latifolia* from India, *D. cochinchinensis* from Indochina (App II); *D. nigra* from Brazil (App I)
  - Red Sandalwood or Red Sanders *Pterocarpus santalinus* from India (App II)
  - Rosewood *Pterocarpus* spp. from Africa (App II)
  - African Pod Mahogany *Azelia* spp. from Africa
  - Rosewood or Bubinga *Guibourtia demeusei*, *G. pellegriniana* and *G. tessmannii* from central and west Africa (App II)
  - Ebony *Diospyros* spp. from Madagascar (App II)
  - Ramin *Gonystylus* spp. from Southeast Asia and the Pacific (App II)
- Protected timber is often mislabelled as and/or mixed in with non-protected, legal timber. Generic names are also used. Shippers are advised to examine all paperwork carefully and be aware of countries with timber export bans<sup>10</sup>.
- TimberStats can assist in identifying discrepancies in timber commodity trade reports, values and volumes reported by exporters and importers occur outside of typical ranges or related to specific 4- or 6-digits timber commodity codes, indicating potential illegality (see 5. *Tools and reference materials*)

**Singapore-implicated protected timber cases (2000-2023). Singapore-government-verified cases are in solid lines, and the number of arrows denote the number of incidents implicating that route.**



<sup>8</sup> For further details, see Groves & Rutherford (2023) CITES and Timber: A guide to CITES-listed tree species [https://cites.org/sites/default/files/timber\\_id\\_materials/files/CITES%20Timber%20-%20A%20guide%20to%20CITES-listed%20tree%20species%202023.pdf](https://cites.org/sites/default/files/timber_id_materials/files/CITES%20Timber%20-%20A%20guide%20to%20CITES-listed%20tree%20species%202023.pdf)

<sup>9</sup> Based on an unpublished 2010-2023 analysis of timber seizures and trade from TRAFFIC's database and the CITES Trade Database, and CITES and Timber: A guide to CITES-listed tree species

<sup>10</sup> Refer to <https://forestlegality.org/content/logging-andexport-bans> or <https://www.foresttrends.org/known-log-export-bans/>

From known cases	
Concealment method	Mixed with other legal timber, misdeclaration of origin country, misdeclaration of contents (e.g. as another non-CITES timber species, declared with a broader or generic name that does not distinguish the legality of the specific species, or misdeclared as an alternative timber HS code (44) to disguise its form), fraudulent documentation (invoices and permits)
Known to have been misdeclared as	Die cast components of aluminium, dyed red sandalwood, hot lime pickles, casting wheels
Other highlights (e.g. HS codes, keywords)	HS codes starting 9504 (games including billiards); timber commodities all have HS codes starting 44, and potentially high-risk HS codes for timber commodities are 440729 (tropical sawn wood), 441233 and 441299 (plywood) <sup>11</sup> .

### EXAMPLE CASES IMPLICATING SINGAPORE

Date	Species	Volume	Origin	Transit	Destination (actual or reported)	False declaration	Detection based on	Outcome
30 October, 13 and 14 November 2013	Red sandalwood <i>Pterocarpus santalinus</i>	1,329 logs / 45 tonnes	India	<b>Singapore</b>	Unknown	Hot lime pickles, casting wheels	Tip-off	Freight forwarder compounded for not exercising due diligence
5 November 2014	Malagasy rosewood <i>Dalbergia</i> sp.	29,434 logs / over 3,000 tonnes	Madagascar	<b>Singapore</b>	Hong Kong	None; permits missing	Tip-off	Court of Appeal ruled that the wood was in transit, owner of company acquitted <sup>12</sup> .



<sup>11</sup> As identified from commodity types imported into Singapore with large value differences from TimberStats  
<sup>12</sup> <https://news.mongabay.com/2017/04/singapore-convicts-rosewood-trader-in-historic-cites-seizure/>  
<https://news.mongabay.com/2019/04/singapore-acquits-trader-in-worlds-biggest-rosewood-bust-worth-50m/>

## TRAFFICKING IN MARINE COMMODITIES

### Conservation and legal concerns

While many marine commodities and high value seafood products can be legally traded, **a growing number are CITES-listed and/or nationally protected and permits are required.** These include some species of shark and ray, sea cucumber, seahorses, abalone, and corals, including their parts and products. While there are limited marine commodity seizure cases implicating Singapore, global examples are presented to illustrate typical origins, routes and trafficked commodity types. Illegal marine commodities are known to be shipped together with other protected marine commodities, and hidden and misdeclared as other legal commodities (e.g. dried seafood products, wood pulp, table salt, sheep skin, squid bones, fish maw).

### Seahorse

- Traded largely for medicinal use, often as whole dried bodies, and also live for the aquarium trade.
- All *Hippocampus* species are Appendix II.
- Many countries, such as India, the Philippines, Thailand and Indonesia, have also banned exports completely, but trade research indicates that many dried seahorses traded might be illegally imported from such countries (Foster, S. J, et al. 2019; Louw and Bürgener, 2020b).
- Historically, Singapore was an important import and re-export hub for dried seahorse trade (Perry et al., 2006 in Foster, S.J., 2023) and dried seahorses are used in traditional Chinese medicine in the country (Foster, S.J., 2023).
- For global **legal** CITES exporter-reported commercial trade in seahorses from 2018-2023, top exporters are Mexico, Hong Kong SAR and China, while USA is the top importer by number of specimens.

### Shark and ray

- Traded largely for consumption, and in some cases for exotic leather (rays), pets (freshwater rays) and medicine (manta ray gill rakers).
- Commonly traded forms by container shipping are dried and frozen fins.
- Sawfish (Pristidae spp.), Oceanic whitetip shark (*Carcharhinus longimanus*), Manta rays and devilfishes (Mobulidae spp.) and Whale shark (*Rhincodon typus*) are CITES Appendix I; commercial trade banned
- Appendix II listed:
  - Thresher sharks – *Alopias* spp.
  - Requiem sharks – *Carcharhinidae* spp.
  - Mackerel sharks – *Carcharodon carcharias*, *Isurus oxyrinchus*, *Isurus paucus*, *Lamna nasus*
  - Gulper sharks – *Centrophoridae* spp.
  - Basking shark – *Cetorhinus maximus*
  - Oil shark – *Galeorhinus galeus*
  - Guitarfish – *Glaucostegus* spp and *Rhinobatidae* spp.
  - Smooth-hound sharks – *Mustelus* spp.
  - Wedgefish – *Rhinidae* spp.
  - Hammerhead sharks – *Sphyrnidae* spp.
  - Some freshwater stingrays
- Vast majority of shark fin exports are destined for import by countries and territories in East and Southeast Asia such as Hong Kong SAR, Taiwan, China, Singapore, Malaysia, and Viet Nam (Dent and Clarke, 2015). According to the CITES Trade Database, from 2018-2023 South Africa was the largest exporter of CITES-listed sharks and rays to Singapore, with Shortfin Mako Shark (*Isurus oxyrinchus*) the top species.
- For global **legal** CITES exporter-reported commercial trade in shark fin for 2018-2023, Spain, Ecuador, Peru, Indonesia and Sri Lanka are top exporters, with Hong Kong SAR, China, Singapore, Peru and South Korea the top importers.

### Sea Cucumber

- Processed and dried sea cucumbers are exported in large quantities to Asia for consumption, with this demand driving many species to decline.
- *Holothuria fuscogilva*, *H. lessoni*, *H. nobilis*, *H. whitmaei* and *Thelenota* spp. are listed on CITES Appendix II.
- Many countries have banned (e.g. India and Tanzania) or restricted (through quotas and minimum size restrictions) sea cucumber trade and exports.
- A global review of sea cucumber seizures (Ong and Chin, 2022) and analysis of sea cucumber seizures in India (Fernandez et al., 2022) recorded illegally-sourced sea cucumbers entering destinations including Singapore.
- For global **legal** CITES exporter-reported commercial trade in sea cucumber for 2018-2023, Indonesia, Papua New Guinea and Yemen are the top exporters and Hong Kong SAR, Singapore and Malaysia are the top importers by weight.



# 5. RECOMMENDATIONS AND BEST PRACTICES

## PREVENTATIVE MEASURES

### Know Your Customer – client-facing measures

- **Adopt best practices** to ensure that your clients are engaged in legitimate trade, such as implementing a 'risk-based approach' and conducting thorough due diligence when onboarding new customers. First-time shippers or new customers should be subject to thorough screening to confirm that they are who and what they claim to be, not shell companies created to obfuscate the actual ownership of the cargo. Existing customers should also be monitored. Related escalation and mitigation protocols should be in place for customers who fail the due diligence processes. A model corporate policy that incorporates counter-IWT provisions is Swire Shipping's Responsible Cargo Carriage Policy<sup>13</sup>.

### Some questions when assessing potential new clients (or monitoring existing ones).

- Is the shipper a registered business entity? Does it have a tax ID? Is it a member of the national Chamber of Commerce or the relevant business association? Conduct searches on local corporate registries to verify that the company is active. (Remember: recently established companies may be a risk factor)
- Does the company exist on the web? Own a third-party website? Does its website corroborate the stated line of business? (For example a Nigerian timber company sending a one-off shipment of cashew nuts could be suspicious)
- Can you geo-locate the company? Is it a private residence or commercial property? Are multiple other businesses registered at the same address? (Remember: the inclusion of fake addresses on documentation is a possible indicator of a shell company)
- Are the IP address, phone, and email address consistent? Is it a business email address or - for example a gmail, yahoo account? Who answers the phone? (Conduct searches for adverse media coverage on shipper in local language sources. Links between Africa-based shippers and Vietnamese or Chinese individuals/companies might be a risk factor)

<sup>13</sup> <https://www.swireshipping.com/information/info-pages/about-us/policies/>

- **Develop and maintain a caution list** of fraudulent shippers/clients and other known bad actors (persons, companies, freight forwarding and clearing agents suspected of IWT or other illicit activities).
- **Collect shipper, agent and consignee information**, subject to applicable legislation, such as phone numbers, email, addresses, bank accounts and payment details to support critical evidence for law enforcement. This can be used in investigations and court cases when such companies are involved in trafficking attempts and assist potential anti-money laundering investigations.
- **Review your terms of carriage policy**, subject to applicable legislation, such as on the transportation of smuggled wildlife. Inform clients that your company reserves its right to waive confidentiality for the information provided by the shipper and to disclose it to law enforcement agencies in case of regulation infringement.

### Keep your house in order – internal measures

- **Go digital** – use of digital documents and automated transport processes improve traceability and transparency of operations allowing for faster detection of irregularities, possible fraudulent attempts and corruption. The Baltic and International Maritime Council (BIMCO) has launched a "25 by 25" pledge to accelerate digitalization, and Digital Container Shipping Association (DCSA) member carriers have committed to transition to a fully standardized, electronic B/Ls by 2030 – this commitment has already been signed by nine large container lines.
- **Enhance data systems** including screening software and risk profiling to screen data and/or cargo, to identify potential shipments of suspected illegal wildlife and their products (See also 5. Tools and Reference Materials: e.g. Hazcheck Detect, TimberStats and FishTradeStats).
- **Conduct due diligence when hiring new employees** to verify their integrity and any potential past involvement in fraudulent activities.
- **Adopt a zero-tolerance corporate policy** for any act linked to illegal wildlife trade and related corrupt behaviour; convey this directly to all employees, subcontractors and clients.
- **Raise awareness and capacity of employees** about the business risks associated with wildlife trafficking and the latest trends on concealment methods and trafficking routes.
  - Roll out role-specific training e.g. for staff carrying out risk profiling, doing documentation checks.
  - Nominate IWT focal points within a company and who can be specifically trained to champion the topic of IWT, including red flags, permits, incidents reporting and sharing.
  - Institutionalise the issue of IWT, for example via Responsible Carriage policies, and ensure that there is a plan in place to transfer knowledge if the focal point leaves the company.
- **Encourage shippers to use World Customs Organisation (WCO) HS codes** and include them in B/Ls to strengthen Customs' ability in their container risk profiling. HS Codes are also a consistent requirement for proper Customs processing in Singapore.
- **Timely provision of shipping documents** to enable effective container/cargo risk profiling and investigations by Customs.
- **Implement supply chain security programmes** such as World Customs Organization's Authorized Economic Operator (AEO) programme and the Customs Trade Partnership Against Terrorism (CTPAT). Such programmes help your business reduce risk from exposure to illicit activities while benefitting from facilitated trade transactions.
- **Become a member of the National Association** relevant to your line of business, the Chamber of Commerce and or other national, regional and international initiatives to help you stay up to date on latest issues and best practices to counter illicit trade.

## DETECTING SUSPICIOUS SHIPMENTS

- **Invest in and integrate IWT-specific red flag indicators into your company's cargo risk assessment systems** that may already be in place to detect other forms of contraband. This can include utilising digital AI and software to conduct risk profiling, identify suspicious routes and commodities, and search through all available booking details to detect mis-declared and undeclared wildlife commodities in addition to other commodities.
- **Conduct due diligence on shipments** - identify anything that seems unusual and trust your instincts if something doesn't seem quite right. By recognising the red flags, inspecting documentation thoroughly, and asking the right questions, you should be able to identify when instances of trafficking might be occurring.
  - Look out for shipments of legal wildlife (plants and animals) with anomalous, incomplete, or otherwise suspicious certificates. If handling cargo with CITES-related species, run extra checks and if in doubt contact the relevant CITES authorities, and check against the list in the CITES website for the agencies who are authorised to sign the permits.
  - For other cargo declared to contain animal or timber derivatives, carefully check the certificates (e.g., phytosanitary, fishery, veterinary and quarantine certificates) to ensure that what is being transported is what is stated, and that the product is not protected in the country of origin.
  - Overall, if shipping information is incomplete or you are in doubt, ask the shipper for clarification and additional information.

## REPORT SUSPICIOUS SHIPMENTS

- To report suspected illegal wildlife trade, please report to the National Parks Board (NParks) via NParks' Animal Response Centre Hotline at 1800-476 1600, or email [cites@nparks.gov.sg](mailto:cites@nparks.gov.sg)
- To file suspicious transaction reports (STR), please report to the Suspicious Transaction Reporting Office. More information on filing STRs are found at <https://www.police.gov.sg/Advisories/Crime/Commercial-Crimes/Suspicious-Transaction-Reporting-Office>.

Tip-offs from private sector staff can be crucial in alerting local authorities of wildlife trafficking attempts. As a maritime transport operator, you can have a similar impact by reporting any suspicious activity. If you are already in possession of a shipment that raises red flags, it should be referred to the appropriate enforcement or regulatory authority.

- **Ensure clear standard operating procedures (SOPs)** are in place to guide employees on what steps to take in case of detecting suspicious illegal shipments, including processes for reporting, handling, and communicating with the client. Depending on your position, you might be expected to report to your direct supervisor, rather than directly to the local enforcement authority. Your company might also have strict procedures in place that you will need to follow to address suspected cases of trafficking.
- **Record details.** It is vital to present the right information when reporting. Record details from the shipping documents, including details of the shipping agents, the exporting company, the importing company and their addresses.
- **Anonymous reporting.** Whistleblowing on illicit activities can sometimes backfire when you find yourself in a corrupted environment, especially when you're unsure who you can trust. Check if your company or government has a whistleblowing system/anonymous line you could use to report or tip-off corrupt practices and IWT without exposing your identity.
- **Alert colleagues** about any illegal shipment found and concealment methods observed so they can be on the lookout as well (including colleagues in other countries).

- **Voluntary information sharing and reporting** in detecting suspicious containers to any law enforcement agencies in Singapore will improve knowledge and identification on new smuggling trends and patterns, the volume of undeclared containers with IWT, risks associated with specific ports, thereby improving future detection.
- **Communicate to other companies via national associations** (e.g. the Singapore Shipping Association) when a suspicious shipment has been detected and/or rejected, to ensure that a shipment rejected by one carrier will not be shipped by another carrier.

## SUPPORT AUTHORITIES' INVESTIGATIONS

- **REMINDER!** Once you have detected and reported a suspected case of wildlife trafficking, it is important to secure items that could be used in the investigation. Do not let unauthorised people handle the goods, or interfere with packaging, or the shipping documentation in any way that could compromise potential forensic evidence. The shipment should be treated as a crime scene. Photographs of the cargo or documents should be given to authorities to assist in their investigation.





# 6. TOOLS AND REFERENCE MATERIALS

## TOOLS TO DETECT IWT SHIPMENTS AND IDENTIFY HIGH-RISK ROUTES

### **Hazcheck Detect for wildlife**

The National Cargo Bureau's (NCB) software, [Hazcheck Detect](#), is already a proven and well-established cargo screening tool for the detection of misdeclared and undeclared dangerous goods. With financial support from Swire Shipping and WWF's Innovation Fund, NCB and WWF are developing a [Proof of Concept solution](#) to screen bookings and shipping documentation for mis-declared or undeclared wildlife products, initially focusing on elephant ivory and pangolin scales. This uses a powerful combination of WWF, TRAFFIC, the Environmental Investigation Agency (EIA) research and data inputs, which includes historical seizure incident data and suspect lists for these two types of heavily trafficked wildlife products to create a set of "rules" that identify wildlife trafficking patterns in bookings. Carriers screen their bookings against the set of rules in the library, which then flags carriers when a booking is likely to be illegal wildlife trade. Hazcheck Detect already has major carriers involved, representing over 30% of global container volumes, and onboarding discussions are underway with additional carriers to adopt the system.

WSC is planning to add an IWT screening tool to its Cargo Safety Program that screens for mis- and non-declared dangerous goods. It would provide for an industry-wide minimum screening best practice alongside any proprietary screening tools individual carriers may have.

### **[TimberStats](#) and [FishTradeStats](#)**

A web-based, interactive and data-driven platform that analyses and visualises UN Comtrade data, funded by Norway's International Climate and Forest Initiative (NICFI) and hosted by TRAFFIC. The tool assists stakeholders to identify trends and discrepancies within annual timber trade data that can aid in risk indicator monitoring and development. TimberStats visualises where discrepancies in commodity trade records, values and volumes reported by exporters and importers occur outside of typical ranges, indicating inconsistencies and potential illegality. This allows maritime shippers and enforcement agencies to discern suspicious and high-risk routes for illegally transported timber products and to improve detection rates among searched containers by identifying timber specific HS Codes that may contribute to the trade discrepancies along those routes. TimberStats can be accessed through TRAFFIC's [Wildlife Trade Portal](#), and TRAFFIC offers training to use the tool.

TRAFFIC, with support from Map Scientific Services (MAPSS), have also developed FishTradeStats: an online dashboard for the analysis of UN Comtrade trade data for high value marine products. It identifies discrepancies in this import and export data that may indicate illicit international trade, allowing maritime shippers and enforcement agencies to discern suspicious and high-risk routes for illegally transported marine products and to improve detection rates among searched containers. FishTradeStats currently displays the most recent ten years of export and import data for the trade in abalone, shark fins, and sea cucumbers for priority Southern African Development Community (SADC) coastal states and priority trade partners. This is a "beta" version and that minor changes still need to be made by the developers before the final version is shared, and TRAFFIC intends to expand the scope of the dashboards to more countries and commodities in future.

### **[IMO Guidelines for the Prevention and Suppression of the Smuggling of Wildlife on Ships Engaged in International Maritime Traffic](#)**

Formally adopted in May 2022 and revised in May 2024, it provides extensive recommendations for both government agencies and the private sector to increase due diligence over wildlife trafficking.

## AWARENESS RAISING MATERIALS

### **Introduction to counter wildlife trafficking in the maritime supply chains**

An [e-learning course](#) developed jointly by IMO, the World Maritime University (WMU) and WWF launched in May 2024, it equips Government Agencies and maritime supply chain operators with actionable insights to effectively combat wildlife trafficking at sea, empowering them to proactively prevent and suppress such illicit activities.

### **[Combating Illegal Wildlife Trade through Ports](#)**

An awareness-raising video and factsheets were launched in January 2022 under a UNDP-led project, in partnership with TRAFFIC, United for Wildlife, UNODC and WWF. Complementing fact sheets were published on 1) [preventative measures for shipping companies and freight forwarders to combat illegal wildlife trade](#); 2) [red flags for law enforcement that may indicate possible illegal cargo](#); and 3) [known trafficking routes, concealment methods and misdeclarations of wildlife products commonly trafficked in containerised sea cargo](#).

### **[Joint Industry Guidelines](#) and [Red Flag Indicators brochures](#)**

Developed by the World Shipping Council in collaboration with TRAFFIC and WWF, supported by UNDP, GEF and GWP and co-sponsored by IFAW, BIC, Global Shippers Forum, and the TT Club. The Red Flag Indicator brochures are also included within this compendium.

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WORKING TO ENSURE THAT TRADE  
IN WILD SPECIES IS LEGAL AND  
SUSTAINABLE, FOR THE BENEFIT OF  
THE PLANET AND PEOPLE

**TRAFFIC**

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