

KILLING WITH KEYSTROKES

INTERNATIONAL FUND FOR ANIMAL WELFARE

An Investigation of the Illegal Wildlife Trade on the World Wide Web



Executive Summary

The rise of the Internet has revolutionized the way we exchange ideas, information and merchandise. This is largely due to the medium’s ability to facilitate communications and new commercial and social connections around the globe. However, as a result, the Internet is also facilitating the illegal trade in wildlife, which is having a devastating effect on animals, ecosystems and the communities that rely on them worldwide, making it one of the major wildlife conservation challenges of our generation.



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The International Fund for Animal Welfare (IFAW) has completed its fourth and most comprehensive investigation into the potentially illegal trade in endangered species on the Internet. The investigation spanned three months, involved six one-week snapshot investigations on 183 publicly accessible websites in 11 countries and looked at both the wildlife product and live animal trade in primates, birds, reptiles, big cats, bears, elephants, rhinoceros, sharks, Tibetan antelopes and sturgeon.

In a six-week period, IFAW investigators tracked 7,122 online auctions, advertisements and communiqués offering trade in the Convention on International Trade in Endangered Species (CITES) Appendix I listed wildlife, as well as a notable number of Appendix II listed species, for sale both domestically and internationally. This high volume clearly points to an even greater problem given that investigators focused on a limited number of species and only publicly available Web sites.

The results identified the United States as being responsible for more than two-thirds of the trade, an amount that was nearly 10 times more than the two countries with the next highest volume, the United Kingdom and China. The final tally of verifiable commerce (excluding the Latin America results) was approximately US\$3.8 million in advertisements and nearly US\$450,000 in final sales. While these figures are already high, they are made even more sobering considering that many sites do not offer an advertised sale price and only eBay provides the means for tracking final sales; a comprehensive tally would likely be much higher.

The results also indicate that this trade is contributing to the endangerment of species. It is alarming that IFAW found elephant ivory items dominating the results of this investigation. It is estimated that 20,000 elephants are slaughtered annually by poachers trading in tusks, and indeed, ivory appears at more than 73% of the activity monitored. The complexity of laws surrounding the sale of ivory, the fact that it is nearly impossible to distinguish between legal and illegal ivory on the Internet, the fluid nature of the Internet and weak or absent enforcement seem to allow unscrupulous sellers to profit from the slaughter of elephants.

In 2007, eBay announced a ban on cross-border trade in elephant ivory, meaning that sales across country lines would be prohibited. Yet a year after the announcement of the ban, eBay was found responsible for 83% of all ivory identified by investigators and a full 63% of all trade in this investigation, a significant amount of which shipped internationally. This demonstrates one of the key issues in global Internet trade: a strong policy without adequate enforcement is ineffective.

The investigation concludes that illegal wildlife transactions via the Internet may be fostered by low levels of awareness about guidelines regarding trade in protected wildlife; by a lack of stringent and enforceable legislation that clearly declares trade in endangered wildlife online as a serious criminal offence; by weak monitoring and enforcement and by readily available electronic loopholes through which wildlife traffickers can operate without detection. This latter point was most clearly evident with regard to the trade in live exotic birds, where buyers and sellers were observed to choose Internet sites that offered classified ads or message boards. The trade in live exotic birds accounted for nearly 20% of total activity identified in this investigation, and was second only to the trade in elephant ivory.

This report urges CITES, governments worldwide, Internet marketplaces, consumers, Internet Service Providers and anyone who values our planet’s rich biodiversity to take the steps necessary to stop the illegal wildlife trade over the Internet, including:

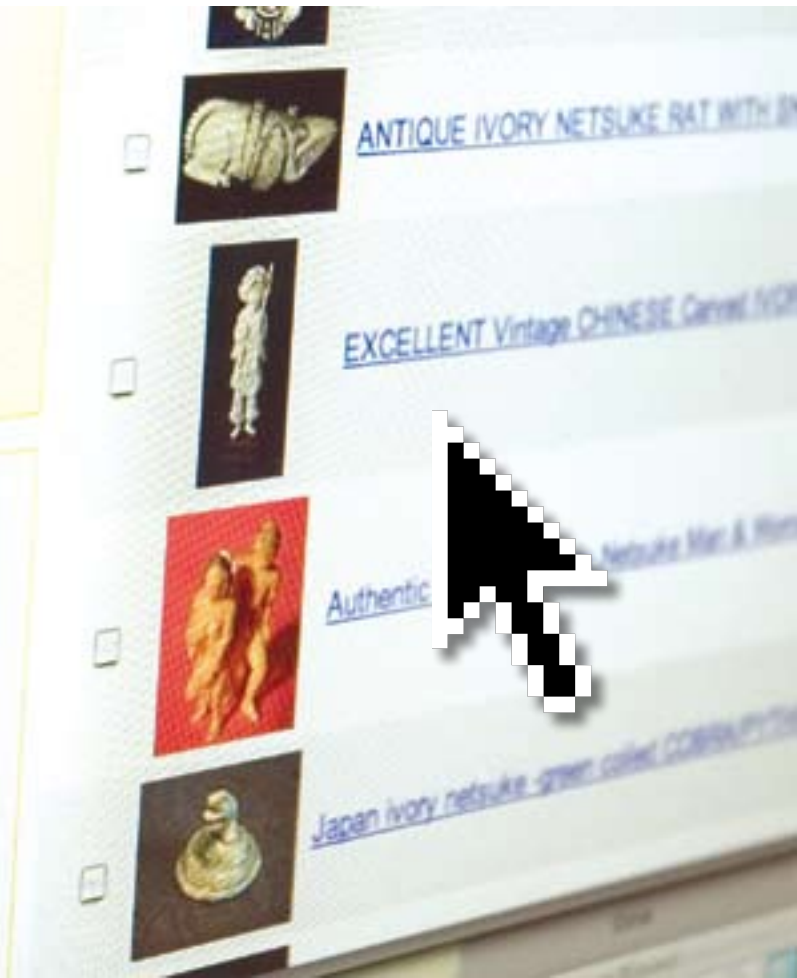
- Enacting robust domestic legislation on Internet wildlife trade
- Implementing and empowering effective enforcement
- Increasing public awareness of the problem
- Devising new ways to monitor and curtail the online trade in endangered wildlife

	Number of Websites Tracked	Number of Ads	Number of Ads found on eBay	Number of Ads that were Elephant Products	Number of Ads that were Exotic Birds	Number of Ads that Offered International Shipping	Percentage of Total Ads Tracked	Advertised Monetary Value of All Ads	Value of Final Sales Recorded
US	28	5026	3690	3921	1025	260	70.50%	\$1,896,827	370,365.00
UK	22	551	289	285	217	66	7.70%	\$383,149	\$28,719
CHINA	5	544	n/a	376	17	28	7.60%	\$654,283.00	1,266.00
FRANCE	11	380	249	325	10	69	5.40%	\$376,816.00	22,391.00
CANADA	11	244	167	178	34	165	3.40%	\$197,922.00	29,982.00
GERMANY	14	151	39	90	28	31	2.10%	\$90,019.00	3,514.00
RUSSIA	24	144	n/a	35	43	9	2.00%	\$247,831.50	n/a
AUSTRALIA	11	82	35	13	42	32	1.20%	\$24,352.00	1,103.00
TOTAL	126	7122	4470	5223	1416	660	99.90%	\$3,871,201.45	\$457,341.68

* Data from Argentina, Colombia and Mexico were not included in these global calculations.

Introduction

The rise of the Internet has revolutionized the way we exchange ideas, information and merchandise. This success is largely due to its ability to facilitate communications and new commercial and social connections around the globe. No wonder this pervasive and powerful technology has become the world’s largest “shop window.” Some of the characteristics of this virtual store – always open, unregulated and anonymous – have also made it a conduit for the illicit trade in wildlife, a trade that officials estimate may be worth in excess of US\$20 billion annually¹.



The rapid rise in global Internet usership, the diverse interests and activities of Internet users and the introduction of new technologies and applications are just three of the developments that challenge the ability of national and international law enforcement to keep up with the innovations of Internet-savvy criminals. Currently, national laws aimed at regulating wildlife trade to ecologically sustainable levels are poorly developed and insufficient to deal with the nature of Internet trade. Even where laws exist, enforcement is often inadequate or simply not focused on trafficking in wildlife. Meanwhile, the Internet provides an unprecedented platform for a burgeoning, undocumented trade in endangered animals, alive and dead. This new global marketplace distances the consumer from the trail of bloodshed that winds through the World Wide Web back to our most cherished wild places.



Investigations into the illegal wildlife trade on the Internet conducted by the International Fund for Animal Welfare (IFAW) since 2004 have revealed staggeringly high numbers of wildlife products traded daily. IFAW’s initial report, *Elephants on High Street* (2004), uncovered a brisk ivory trade in addition to a wide variety of elephant products for sale on the Internet in the United Kingdom. IFAW followed up with the 2005 report entitled *Caught in the Web*, a survey of Internet wildlife trade on English language Web sites accessible from the U.K., which exposed thousands of wildlife items for sale on the Internet in the span of just one week. IFAW’s report, *Bidding for Extinction* (2007), focused specifically on ivory trading on eBay, found 2,275 ivory items for sale on just eight national eBay sites in a single week². As a result of this report and ongoing consultations with IFAW, eBay announced, in June 2007, a global ban on cross-border trade in ivory products applicable to all of its national sites. eBay also clarified individual national policies regarding the sale of ivory. The investigation outlined in this current report was undertaken, in part, to better understand the effectiveness of recent reforms such as this one made by Internet market providers and governments.

These reforms are building from a mosaic of existing legislative and enforcement frameworks that deal with the illegal trade in wildlife including national, regional and international law. The international backbone of global wildlife trade law is the United Nations-backed Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES). CITES came into force in 1975 and currently has 173 parties, making it one of the most universally accepted instruments of international law.

Beyond CITES, some national and international authorities are responding to problems related to wildlife trade on the Internet: In March 2008 the United States House Committee on Natural Resources held a hearing on wildlife trade as it relates to national and global security issues, with the Internet being cited as one of the emerging venues for illegal trade needing serious further investigation; the international police organization Interpol has created a “working party” or group of experts to address the problem of Information Technology Crime (ITC); the CITES 14th Conference of the Parties in June 2007 agreed that a Working Group on Internet Trade be convened; and the Council of Europe Convention on Cybercrime is a comprehensive attempt to tackle the issue of Internet crime in general, although it lacks specific clauses regarding wildlife to assess the scope of the problem.

CITES Protection

The Convention on International Trade in Endangered Species (CITES) has three levels of protection for threatened species³.

The highest level of protection is afforded to the more than 800 Appendix I species designated as being in immediate danger of extinction⁴. With very few exceptions, commercial trade in Appendix I species is banned. These species include the highly vulnerable species like elephant, tiger, gorilla and marine turtle, along with a large number of additional wild cats, parrots, parakeets, cockatoos and macaws. Species listed on CITES Appendix II are recognized to require protection from trade, but not to the point of a ban. While trade may be allowed in Appendix II species, any international trade or transfer of such an animal or its derivative products requires an export permit issued by the authorities of the nation where the animal product is located and in some instances an import permit issued by the country where the animal product will be received. In theory, these restrictions on trade in Appendix II species are designed to regulate trade in order to ensure that these species are not exploited to the point where they require Appendix I protections. Appendix III species, while not facing specific global threats, are listed by individual countries wishing to enlist assistance in protecting species located within the borders of their countries⁵.

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|---|---|
| 1 | APPENDIX I – Those species designated as being in immediate danger of extinction. |
| 2 | APPENDIX II – Those species designated as requiring protection from trade, but not to the point of a ban. |
| 3 | APPENDIX III – Those species listed by individual countries wishing to enlist protection within their borders. |

Investigation Framework

In spite of the patchwork of laws and policies designed to address the problem of unregulated wildlife trade on the Internet, the vastness and adaptability of the World Wide Web, the anonymity afforded to traders, a lack of public awareness about regulations and inadequate enforcement of existing national laws all continue to threaten wildlife around the globe. This investigation is aimed at providing information to governments, enforcement officials and Internet platforms in order to give them greater understanding of the situation, suggest methods in which to counter illegal wildlife trade and aid further enforcement.

IFAW's Investigation

IFAW's current investigation attempts to assess the nature and scale of illegal wildlife trade on the Internet by answering the following questions:

- Is the Internet a conduit for trade in illegal wildlife?
- What is the value and scope of this trade?
- Which species of protected animals are falling victim to e-commerce?
- Who is involved in the trading?
- On which sites is the majority of this trade occurring?

Methodology

This report is the product of a two-phase, three-month investigation carried out simultaneously in 11 countries. Phase I was a scoping exercise to determine the specific countries, search words and marketplaces to be used in Phase II. The second phase was conducted via a series of six one-week snapshots from May 12 to June 29, 2008 in Argentina, Australia, Canada, China, Colombia, France, Germany, Mexico, Russia, the United Kingdom and the United States of America, during which country investigators identified and tracked advertisements for live animals and wildlife products protected by CITES on 183 Web sites around the globe.

Countries were selected based on the prevalence of Internet use⁶ and cross-matched with capacity via IFAW's presence or local resources. Each of the countries chosen for this investigation is a party to the CITES convention.

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COUNTRIES INVESTIGATED



Key Internet marketplaces in the selected countries were identified by surveying more than 1,000 Internet sites for those offering significant live animals and wildlife products. The findings are a result of monitoring only Web sites readily accessible to the public. Although, Phase I investigators identified a number of password-protected, paid or otherwise private sites, these are not included in this report.

Some sites did not have significant enough levels of trade to include in the overall data. This accounts for the variance in the number of sites surveyed, from as low as five in China to a high of 28 in the U.S. This process alone revealed the varying scope and scale of the illegal wildlife trade on the Internet from country to country.

Keyword search terms were chosen based on species of concern for IFAW and the internationally accepted framework of CITES listed species, specifically those that are listed on Appendix I and, therefore, are afforded the most protection. Although the focus of the investigation was on Appendix I species, products from certain Appendix II species (such as the highly vulnerable sturgeon) were specifically searched and recorded; other Appendix II species that fell under the global keywords were recorded opportunistically.

Investigators recorded a number of data points for each individual advertisement (see Annex I) including list price, shipping range, Web site policy, and final sale status. An actual assessment of the legality of each product was beyond the scope of the research, so IFAW employed a three-tiered system categorizing listings based on the information presented as Likely Compliant, Potential Violation or Likely Violation.

GLOBAL KEYWORDS

Primate (Including Monkey), Bird (Including Birds of Prey, Parrot and Macaw), Reptile (Including Sea Turtle, Crocodile, Caiman, Snake, Lizard), Big Cat (Including Lion, Cheetah, Leopard, Tiger, Ocelot), Bear, Elephant, Rhinoceros, Shark, Shatoosh (I.E. Wool from the Tibetan Antelope), Caviar (Beluga, Black, or Diamond Caviar Only)

PRODUCT KEYWORDS

Trophy, Skin, Oil, Fur, Claw, Tooth, Teeth, Bile, Taxidermy, Ivory, Scrimshaw, Rug, Egg, Feather, Pelt, Tusk, Hide, Bone, Horn, Pet, Live, Tusk, Shell, Foot, Feather.



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Investigators used a conservative approach in assigning a violation category to a listing: in cases of uncertainty, listings were given the “benefit of the doubt.” If a cursory attempt was made by a seller to provide documentation (Likely Compliant), investigators accepted the permit or other documentation as valid. Further, while Possible Violations were found to be the most common, it is highly possible that many of these were actually more serious Likely Violations. By utilizing this conservative approach, IFAW investigators were able to minimize the risk of reporting false positives and produced consistently conservative data throughout the investigation.

CATEGORIES OF POTENTIAL VIOLATIONS

Likely Compliant: listings claiming legality (either under national or international law) and offering some form of supporting proof or documentation were classified as Likely Compliant so long as they were also in compliance with Web site policy. There was no further investigation into these claims, despite the ease with which documentation can be altered or counterfeited.

Possible Violation: this category refers to advertisements that made a claim of legality (either under national or international law), but failed to provide any supporting proof or documentation and therefore had a greater potential for being in violation of law and/or Web site policy.

Likely Violation: advertisements containing no reference at all to legality (either under national or international law) and/or clearly contravening Web site policy were classified as the most serious Likely Violations.

Investigators used a conservative approach in assigning a violation category to a listing: in cases of uncertainty, listings were given the “benefit of the doubt.”

Results

During the six-week snapshot investigation, IFAW investigators tracked 7,122 online auctions, advertisements and communiqués offering wildlife and wildlife products for sale domestically and internationally from 8 countries (data from Argentina, Colombia and Mexico were statistically insignificant and therefore not included in the global calculations – please see regional section for a review of the data). The results point to a problem more significant than originally suspected.

Volume of Trade

This investigation sought to determine the volume and value of the potential illegal trade in wildlife (or trade in CITES Appendix I species). Overall the results show a high volume with thousands of potentially illegal items offered for sale on the Web every week. The United States was responsible for 70% of the trade while the countries with the next highest volume, China and the United Kingdom, accounted for nearly 8% each.

INVOLVEMENT IN INTERNET TRADE

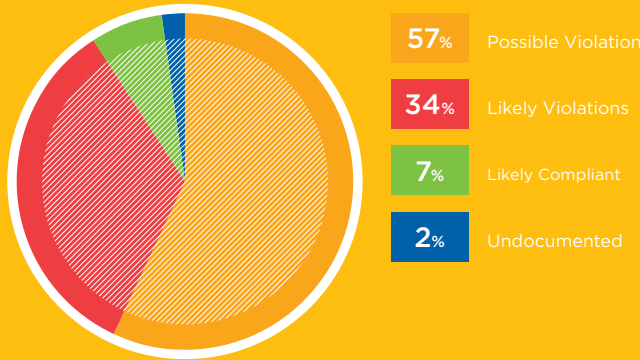
Country	Rank	# of Ads	% of Findings
U.S.	1	5026	70.5%
U.K.	2	551	7.7%
China	3	544	7.6%
France	4	380	5.3%
Canada	5	244	3.4%
Germany	6	151	2.1%
Russia	7	144	2.0%
Australia	8	82	1.2%

Globally, wildlife products represented 79.2% of the total 7,122 advertisements, while the remaining 20.8% (1,483) were for live animals. The results also indicate that the trade is dominated by elephant products and live exotic birds, which together make up more than 93.2% of items monitored. Investigators also found that the Internet was a conduit for a variety of other categories of protected wildlife including primates, big cats, reptiles, sharks, rhinoceros, sturgeon and others, but trade in these animals made up only 6.8% of the trade investigated.

Levels of Potential Violations

Most listings were categorized as Possible Violation (advertisements that made a claim of compliance but failed to provide any supporting documentation). These accounted for 57% of the results; 34% were Likely Violations (advertisements containing no reference to compliance or documentation); a mere 7% were considered Likely Compliant.

POTENTIAL VIOLATIONS



Assessing the Monetary Value

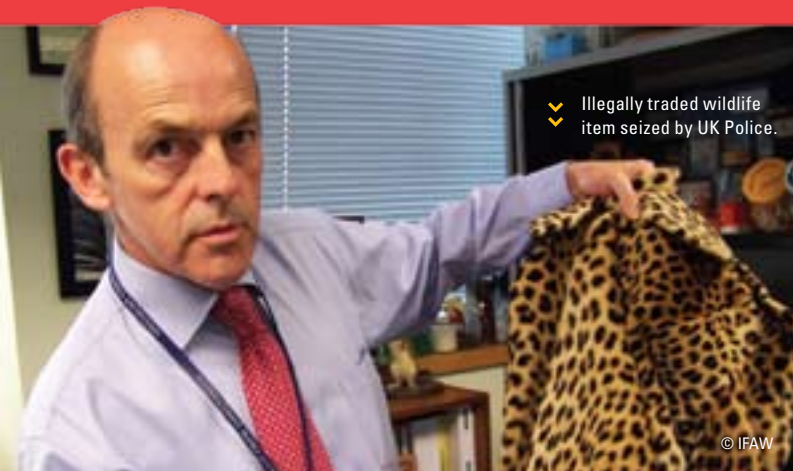
Calculating an accurate value of the trade in protected wildlife on the Internet is challenging because very few sites confirm sales and publish the final sale price of an item. In fact, from our research, the only site that produces reliable information about final sales is eBay (and its subsidiaries). IFAW's calculation of the total trade is therefore extremely conservative, totaling US\$3,871,201 in advertisements and US\$457,341 in sales on eBay sites for the six weeks tracked. Extrapolated to an annual figure, an alarming picture of e-trade in endangered species starts to emerge.

ADVERTISED MONETARY VALUE OF ALL LISTINGS (\$US)

U.S.	\$1,896,827.97
CHINA	\$654,282.95
U.K.	\$383,150.00
FRANCE	\$376,815.90
RUSSIA	\$247,831.50
CANADA	\$197,922.20
GERMANY	\$90,019.23
AUSTRALIA	\$24,351.70
TOTAL	\$3,871,201.45

MONETARY VALUE OF FINAL SALES RECORDED (\$US)

U.S.	\$370,365.89
CANADA	\$29,982.18
U.K.	\$28,719.45
FRANCE	\$22,391.10
GERMANY	\$3,514.00
CHINA	\$1,265.66
AUSTRALIA	\$1,103.40
TOTAL	\$457,341.68



In order to remain transparent, this report publishes two monetary measures of Internet trade: advertised price and final sales. The wide disparity between the figures above has two sources. Without proof that money changed hands, it is impossible to state that a sale actually occurred. Throughout this investigation, a final sale was only recorded if it could be verified, a feature only available on eBay. Therefore, a large amount of commerce is not represented in the final monetary tallies.

The following sections present an in-depth picture of the various issues and the major findings from the investigation.

CITES Appendix I Species In Immediate Danger of Extinction

Those species designated as being in immediate danger of extinction as a result of overexploitation from trade are listed under CITES Appendix I; parties to the convention are therefore obligated to afford these the highest level of protection. This investigation uncovered an alarming amount of trade concentrated in two categories of Appendix I species: elephants (specifically ivory) and exotic birds.

Elephant Ivory

Of the 7,122 auctions, advertisements and communiqués reviewed in this study, 5,223 (73.3%) offered elephant products. Elephant products, predominantly ivory, were the most commonly available products in six of the eight countries profiled, with the United States responsible for ten times more ivory listings than the next closest country (the United Kingdom). Of the elephant products recorded worldwide, 98.77% were ivory: the remaining products (fewer than 100) included elephant skin, hair, and taxidermy products.

ELEPHANT IVORY

	# Elephant Products	# Ivory Products	% Ivory
AUSTRALIA	13	11	84.6%
CANADA	178	178	100%
CHINA	376	368	97.9%
FRANCE	325	286	88%
GERMANY	90	90	100%
RUSSIA	35	33	94.3%
U.K.	285	279	98%
U.S.	3921	3914	99.8%
TOTAL	5223	5159	98.8%

With regard to violations, 74% of the ivory items were assessed as Possible Violations while 15.5% were Likely Violations – indicating that almost 90% of the ivory available on-line during this investigation was not properly documented and therefore possibly in violation of law or Web site policy.

eBay and Ivory

Despite IFAW's 2007 investigation identifying eBay as a conduit for trade in endangered and protected species and notwithstanding the eBay headquarters' (San Jose, CA, United States) response of issuing a global ban of cross-border trade in ivory on all of its sites, this investigation reveals an ongoing and alarming amount of potentially illegal ivory for sale on eBay platforms around the world⁷. Of all of the 5,159 elephant ivory listings tracked, 4,304 were on eBay sites (83.43%). Ivory products were most commonly available on eBay U.S.

Data captured from eBay during this investigation highlights one of the key issues in global Internet trade – wildlife trade policy that is not backed up by efficient enforcement leads to abuse of the marketplace. This very lack of policy enforcement may in fact make eBay the largest digital marketplace in the world for ivory that may violate national or international law or Web site policy.

For example, although eBay now specifically prohibits country-to-country sales of elephant ivory, 11% (457) of the total listings for ivory on eBay on the six sites monitored openly offered international shipping. In addition, despite eBay's policy of banning cross-border ivory trade, eBay sellers based one country are able to post ivory listings on other national sites. In fact, eBay itself specifically advertises to buyers other ivory items available from international sellers through a feature called "See all items including those available from international sellers" which appears at the end of a series of national listings. In one click eBay provides the buyer with all the possible items in contravention of its own policy. This feature, in combination with inadequate enforcement and the ability of eBay users to

EBAY NUMBERS (U.S.)

- **Total Ivory Items Tracked:** 3,667
- **Total Ivory Final Sales Recorded:** 1,847 (50.37%)
- **Dollar Value of Recorded Ivory Transactions:** \$369,885.39
- **Estimated Annual Ivory Commerce:** \$3.2 Million
- **Estimated Ivory Listing Fees:** \$3,278
- **Estimated Commission on Ivory Sales:** \$11,445.87
- **Estimated eBay Ivory profit per year:** \$127,606.87

communicate off-line is undermining the company's own policies on trade in wildlife products.

Ivory, CITES and the Internet

Not all elephant populations are listed on Appendix I; nevertheless, trade in those listed on Appendix II is regulated by a strict permitting system. The challenge in online trading therefore, is twofold: there must be a verification of whether the ivory offered originates from an Asian or African elephant as well as an identification of which particular African country it originates. A further challenge is to determine whether documentation, where provided, is valid. Additionally, different countries have different laws regarding the sale of ivory antiques. This environment of confusion disables authorities to combat wildlife crime and allows policies to be manipulated and ignored by buyers, sellers and traders.

Exotic Birds

One of the more surprising findings of our investigation was the scope of the exotic bird market. Overall, trade in this area was second only to elephant ivory, accounting for 1,416 listings (19.9%). The most commonly found Appendix I bird species include double yellow-headed and yellow-naped Amazon parrots, Goffin's cockatoos, military macaws, Moluccan cockatoos and scarlet macaws, with the occasional less commonly found palm cockatoo and hyacinth macaw. Live birds were the most commonly advertised Appendix I species in Australia and Russia; they were ranked second in Canada, Germany and the United States and ranked fourth in both China and France. In addition, live birds of prey and bird of prey trophies (predominantly gyrfalcons and peregrine falcons) were also found, largely for sale on Germany and U.K. sites.





While ivory and other animal products were predominantly offered on online auction platforms such as eBay, live exotic birds were primarily traded on Web sites that provide a forum for buyers and sellers to communicate, for example, on message boards or in classified ads. The countries with the most bird advertisements (the U.K. and the United States) have bird-specific message boards or lengthy classified sections such as birdtrader.co.uk, upatsix.com, and birdbreeders.com.

With regard to violations, investigators noted a pattern of very poor documentation when claims were made of its existence at all, with the majority of listings for birds falling into the category of Likely Violation.

BIRD LISTINGS

Violation Category	# BIRD Ads	% of BIRD Ads
Likely Compliant	19	1.3%
Possible Violation	86	6.0%
Likely Violation	1301	92.0%

It is worth noting the disparity between this violation breakdown and the global violation breakdown of all items (7.5% Likely Compliant, 57% Possible Violation, 34% Likely Violation). Clearly, bird listings are the worst offenders in the violation metric. Anecdotally, bird sellers tended to be far bolder than their counterparts selling other species; in a number of cases sellers admitted outright that their birds were illegal. This blatant illegality indicates major conservation and animal welfare concerns; this is clearly an emerging issue that necessitates immediate action.

Finally, because there are so many cross-postings and advertisements that do not list a price, a reliable value estimate for the bird trade online is not readily available. However, average prices can be ascertained for some of the most commonly traded bird species:

- Yellow-headed Amazon parrot/
Goffin’s cockatoo: US \$500-\$1,000
- Scarlet macaw/military macaw/
Moluccan cockatoo: US \$1,000-\$1,500

Other Species

Other Appendix I species documented in this investigation include primates (live chimpanzees, marmosets, cotton-top tamarins); big cat (primarily tiger, leopard, ocelot and jaguar products); reptiles (sea turtles products, live tortoises and big snakes such as constrictors); sharks (sawfish products); and rhinoceros products. The total volume of trade from these categories accounts for 6.8% (487 advertisements) of the total number of listings.

These products were spread fairly evenly between specialized forums/ message boards and well-established online platforms such as eBay, however, violations were most commonly Likely Violation (74%).

OTHER ANIMAL LISTINGS

Violation Category	# Other Ads	% of Other Ads
Likely Compliant	12	2.9%
Possible Violation	96	23.0%
Likely Violation	305	74.0%

CITES Appendix II Species Endangered With Strict Regulations

Species listed on CITES Appendix II such as the American black bear, the African grey parrot and all seahorses are designated by governments as requiring protection from trade, but not to the point of a ban. Any international trade in Appendix II species may be subject to a system of multiple permits including import, export and transit. Although this investigation did not focus on Appendix II species, investigators in the U.K., China, Canada, Russia, Germany and Australia did opportunistically record more than 958 advertised offers. While these were not researched thoroughly, they are instructive of what Appendix II species are being targeted and indicate that more research needs to be done in this area. It can be assumed that the trade in Appendix II species is much greater in volume then Appendix I if for no other reason than sheer numbers; there are more than 800 species on Appendix I and approximately 33,000 on Appendix II.

The Appendix II species most commonly found for sale included sharks (fins, bones, oil); bears (skins); lions (teeth and skins);, pangolins; reptiles, including crocodiles, snakes, lizards, turtles and tortoises (live animals, skins and shells); birds (live animals); and primates, including slow lorises, baboons, squirrel monkeys and capuchins (live animals).

Of those countries that recorded Appendix II species, Russia had the largest number and widest species variety, while Canada, ranked second, predominantly recorded reptile and bird species. China’s high volume was dominated by products derived from sharks. Although only three species of shark are listed in the CITES Appendices – offers of shark rarely identify the species. Therefore, for the purpose of this report, all were conservatively classified as CITES Appendix II. The U.K., France, Germany and Australia also recorded offers for sale of Appendix II specimens, but it must be re-stated that these were only opportunistic recordings that are in no way indicative of the volume and value of this trade, although this information in the Appendix II species trade may be useful for guiding future research.

The On-line Marketplace

This investigation sought not only to discover the volume and value of potentially illegal trade in a select number of species, but also to learn who was selling these items and on which sites. The disheartening result is that most Web sites do not require sellers to prove the legality of their items online nor do they monitor what is being posted or sold. Additionally, most do not enforce the rules by which they claim to operate. These factors, coupled with the anonymity of the Internet, make it a perfect marketplace to sell illegal wildlife items.

Web Site Vendors

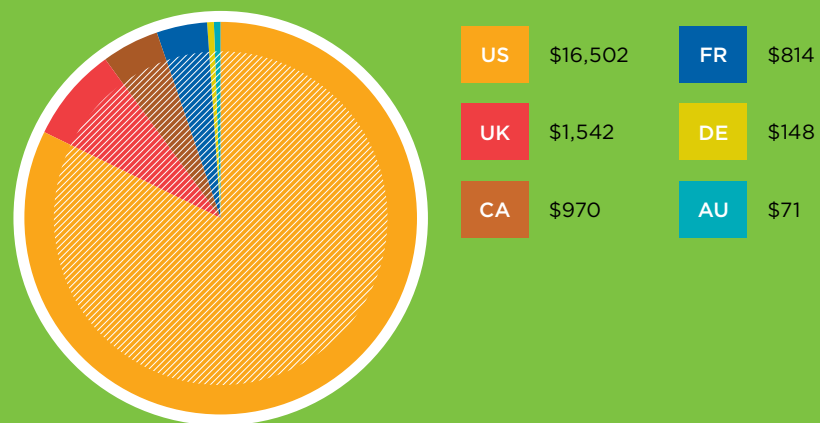
Having surveyed more than 1,000 Web sites and performed in-depth investigations into 183 selected sites, this investigation reveals that eBay is the dominant online marketplace for endangered and protected wildlife products. Founded in 1995 as a venue for individuals to auction off unwanted items, eBay has evolved from a virtual “garage sale” into a corporate powerhouse with a presence in 39 countries that boasts nearly 84 million active users⁸. Today, it is the preeminent forum for Internet commerce. eBay reported US\$348,251,000 in annual earnings in 2007⁹, largely attributable to the US\$60 billion in items sold on its sites¹⁰. In addition to the eBay auction site, the company owns Skype, a VOIP (Voice Over Internet Protocol) provider, as well as the online payment company PayPal, the preferred method of payment across its sites. eBay also owns shares in a number of affiliated Web sites such as Kijiji, Craigslist, Gumtree and Marketplaats.

When considering the six eBay-branded Web sites monitored (eBay U.S., Australia, Canada, France, Germany and the U.K.), eBay was responsible for 63% of the global advertisements in this study. When partially-owned affiliates such as Slando.ru, Craigslist.org, Eachnet.com, Kijiji.com and Kijiji.ca are included, that market share rises to 67%. This astonishing finding highlights how one corporation can influence two-thirds of the trade in protected species studied in this investigation, possibly making eBay one of the most responsible and powerful players in issues of conservation and animal welfare with regards to wildlife trade on the Internet.

Species listed on CITES Appendix II such as the American black bear are designated by governments as requiring protection from trade, but not to the point of a ban.

eBay's profits (comprised of listing fees and after-sale commissions) for the brief period of this investigation from the six eBay-branded sites are estimated at slightly more than US\$20,000. This does not include revenue streams from commissions paid for using PayPal, a service featured prominently with all listings. eBay's overall quarterly earnings for this same time period were recently announced as US\$2.20 billion¹¹. Although eBay's revenues from completed sales represent a relatively small figure compared to the company's entire annual revenue, eBay is undeniably profiting from trade in endangered and protected species.

EBAY REVENUES IN SNAPSHOT PERIOD



eBay Inc. has developed policies on restricted items including a blanket ban on live animals and, in some cases, a ban on endangered or protected species, or any part of an endangered or protected species. As a result of past IFAW work and negotiations with eBay platforms around the globe, specific national eBay sites (especially Germany, Australia, France and the UK) have strengthened their policies on wildlife trade. However, implementation and enforcement of eBay policies vary considerably across the country websites and may often depend on the honor system or on voluntary user reports of suspicious listings.

Individual Sellers and Buyers

The following data is based on the identities provided by sellers in their online advertisements. These user-selected identities range from seemingly genuine personal and business names to "handles." The reliability of these identifications is variable from site to site and many sellers are operating anonymously. Additionally, there are large numbers of postings worldwide with no seller ID provided (Russia and Germany). Even those IDs that are provided are often unverified and easily falsified. Such anonymity may very well provide a veil behind which sellers could be carrying out potential illegal activities more brazenly.

In total, 67% of unique seller IDs were linked to just a single advertisement during the period of investigation. From country to country that percentage ranges from 60-93%. A great deal of the observed trade appeared to be one-off sales by individuals of personal belongings. This figure may indicate multiple individual sellers who are unwitting criminals or that both buyers and sellers are unaware of the law. Nothing, however, stops single-item, individual sellers from registering multiple user IDs, thus opening up another loophole for the unscrupulous.

In a number of cases, a single seller was responsible for multiple and simultaneous sales ranging from three postings by one seller in Australia to 383 attributable to one seller in the United States.

Indeed, most "big sellers" used eBay U.S., while the most frequent sellers in four other of the countries studied used their country's eBay outlet. This may indicate that eBay is a preferred venue of big sellers.



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Circumventing Rules, Regulations and the Law

The rules, regulations and laws governing the trade in endangered species are often complex, diverse and differ from country to country, yet the trade has no boundaries via the Internet. This jumble of laws and policies—international, regional, national, state and local - which are not unified or simplified - as well as marketplace rules which are not cohesive or reflective of the laws, disrupts effective enforcement and allows users to manipulate loopholes. IFAW investigators were able to compile a list of many of the tools used by sellers and buyers on the Internet to circumvent rules, regulations and laws. These included:

- **Self-Authentication/Certification:** in many cases, the seller need only claim that the item for sale is legal to comply with Web site policy.
- **Documentation:** When provided, it is often impossible to verify documentation online. Documents can be easily counterfeited or obscured, improperly completed or replicated repeatedly for multiple sales.
- **Off-line Networking:** Advertisements on Internet marketplaces serve as forums for social networking, putting potential buyers and sellers in contact so that they may complete transactions offline and undetected by any enforcement systems.
- **Unrecorded International Shipping:** Some sellers noted in the U.K. offer only domestic shipping of ivory, but buyers' feedback indicates that items have been sent to buyers all over the world, including China.
- **International Access:** No system currently in place prevents a seller in one country from listing an item on a marketplace site in another. In some cases, the advertisement provides telephone contact details (rather than e-mail or online communications) thus avoiding an electronic "paper trail." For example, an ivory "calling card case" was sold on eBay U.S. for US\$273 although the seller was in Uruguay and the buyer in China.
- **Immediacy:** The speed with which online sales take place presents logistical hurdles for monitoring and enforcement, where they exist. In a system that relies on user reporting and a sluggish review process, these speedy sales can go largely undetected and thereby circumvent regulations. Demonstrating the problem of quick sales, a pair of "pre-ban" ivory

tusks weighing ten pounds was sold on eBay United States for US\$2,000 just two hours after posting, too quickly to be noticed by site monitors or enforcement agencies.

- **Anonymity:** The absence of user IDs probably accounts for what investigators found to be some of the more brazen activities encountered in our investigation. One seller on a Russian site responded to an inquiry from an IFAW investigator that [he had] "no papers since everything is smuggled."
- **Filters:** To circumvent marketplace filters, sellers use "creative" spellings such as *ivorie*, *ivoree*, *lv ory*, and *lv*ry*. U.K. sellers, similar to some Chinese sellers, used evasive descriptors, listing "material from an elephant" and "carved in one piece from the extremity of a large 4-four-legged African animal." Additionally, simply omitting the name of the material can evade a filter. Finally, it is possible that elephant ivory is being advertised as hippo or mammoth ivory.
- **Relisting:** Without adequate enforcement, sellers can easily re-list items that have been taken down by marketplaces, sometimes using new names for their items and also being openly defiant as in the case of one eBay U.K. seller who, upon having an item removed, re-listed with this statement, "*I am re-listing already because the item was removed by eBay for contravention of the wildlife protection act - must be some kind of record. So without mentioning the main material these napkin rings are made of they have silver initials, are in pristine condition and much older than the law which was introduced to protect elephants. I fully support the reason for the law of course but these go ways back before it was passed.*" The seller had no documentation.
- **Scams:** The proliferation of Web sites offering live animals for sale or providing opportunities for potential illegal wildlife sales is also facilitating other crimes commonly known as "scams." Scams are fake advertisements that most commonly offer birds, monkeys and bird eggs, particularly on Web sites that run free classifieds. Money is solicited from an unsuspecting buyer who receives no animal or product in return. Such advertisements waste the effort and limited resources of enforcement officers by distracting them from looking at genuine illegal wildlife trade.

Conclusions and Recommendations

The Internet clearly continues to facilitate significant trade in wildlife. This investigation spanned three months and 11 countries and uncovered advertisements offering US\$3,871,201 in selected CITES Appendix I protected species. A significant 91% of the trade was categorized as either Possible Violations or Likely Violations, with only a dismal 7.4% identified as Likely Compliant. During this time, investigators were able to track US\$457,342 in final sales and identify eBay as the leading venue for trade in CITES Appendix I species on the Internet.



The species most affected in the survey were elephants and exotic birds, but a diversity of other protected species were also available, including primates, big cats and reptiles. IFAW's investigation was able to initiate limited research in the sale of Appendix II species, an emerging issue which requires greater investigation by CITES officials.

The variety of government and platform policies in place among the countries studied highlight some interesting issues. China, with the strictest controls on Internet offerings, still struggles with illegal ivory trade, whereas site driven policies and enforcement have been effective in reducing the number of suspect items for sale on eBay Germany and the UK. These results indicate that only the combination of strict, clear policies set forth by providers and efficient enforcement mechanisms in place bring success, otherwise policies may be rendered useless. They also highlight that responsible Web site providers who are concerned about the environment and do not want to profit from loss of species and cruelty to animals do not follow inadequate government policy. For example, eBay Australia is the only provider in the study to have instituted an outright ban on ivory, and although there remain issues with enforcement, this site produced the lowest number of listings. Finally, at a minimum any seller of animals or wildlife products must be held accountable to the law, whether selling in a store or online. CITES regulations are still applicable to e-commerce and must be enforced by platform providers accordingly.

Overall, these results, while shocking on their own, represent a trend of potentially illegal wildlife trade that may continue to grow without immediate and coordinated action from all key actors. Consequently, IFAW offers the following recommendations.

IFAW urges CITES and all parties to the convention to pay due attention to the issue and devote sufficient resources to tackling illegal trade in wildlife on the Internet in CITES-listed species on a national, regional and international scale, to include the following:

- Support the CITES workshop on Internet trade in wildlife, tasked to assess the scale and nature of the trade in wildlife on the Internet, and with the development of recommendations to tackle the problem;
- Improve national, regional and international legislation to enable Internet users and enforcement agencies to better understand, adhere to and enforce the laws pertaining to the trade in CITES-listed species;
- Institute a total ban on all online trade of any Appendix I species of wildlife, as well as products from subspecies listed on Appendix II or "look-a-like" species. Where products can easily be confused, species should be covered by a simple blanket ban, for example, all elephant ivory;
- Improve national and international legislation to ensure that the online facilitation of and participation in illegal trade in wildlife products is a prosecutable crime;
- Monitor the Web to assess the scale and nature of trade in Appendix I and II species on publicly accessible and password-protected sites;
- Ensure proper enforcement capacity capable to guarantee widest compliance with legislation and policies;
- Increase public awareness of illegalities of and risks related to trade in wildlife. This should include the development and promotion of user-friendly information on Web pages and in online reporting mechanisms.

IFAW urges enforcement agencies to pay due attention to the issue and devote sufficient resources to tackling illegal trade in wildlife on the Internet, to include the following:

- Ensure that the trade in CITES-listed species on the Internet is given a high priority and thus sufficient enforcement expertise and capacity (trained and equipped staff) is made available to ensure widest compliance with legislation and policies at a national level;
- Develop and maintain processes to monitor and research wildlife trade on the Internet in order to secure reliable data and maintain a high level of awareness of the volume and trends of the trade in CITES-species on the Internet at any one time, and thus be able to adopt effective responses in a timely manner to combat illegal trade;
- Enhance systems for policing of potentially fraudulent CITES permits and other tactical enforcement techniques;
- Ensure thorough investigations of illegal internet trade in wildlife to garner sufficient evidence for the judiciary in order to obtain appropriate convictions and therefore deter future illegal sales.
- Ensure all investigations are thorough in order to supply the judiciary with complete evidence leading to appropriate convictions and therefore deter future sales;
- Participate in further international cooperative efforts on wildlife crime, for example, through cooperation with Interpol and the Ecomessage database.

The species most affected in the survey were elephants and exotic birds.



WHY A FULL IVORY BAN IS NECESSARY

The sad reality is that ivory trade anywhere is a threat to elephants everywhere. More than 20.000 elephants get poached every year to supply the illegal ivory markets. The killings will not stop until the trade does.

Partial bans, such as the one instituted by eBay Inc. are undermined by the patchwork of domestic legislation that bans international trade in CITES Appendix I-listed species but permits their domestic trade. For example, while it is legal to buy and sell elephant ivory domestically in South Africa, nothing currently stops a trader from listing his local purchase on eBay U.S. or on the numerous Craigslist sites around the globe. Likewise, it is not uncommon for the opportunistic to travel to South Africa, purchase and illegally transport CITES-protected species back home, and list them online.

Another legal loophole arising from the “split-listing” of protected populations, is that while all Asian and most African elephants are listed on Appendix I, elephant populations in Botswana, Namibia, South Africa and Zimbabwe are listed on Appendix II. A seller can therefore, simply claim an item to be a product of, for example, a Namibian elephant and offer fraudulent documentation. And even worse, the trade that has been witnessed in this investigation is predominantly undocumented – just another prime example of the need for a complete ban on all elephant ivory.

Because of the complications, bans must be thorough and reinforced by solid, cooperative, effective and proactive enforcement measures among authorities, site operators and law enforcement. In 1989, CITES banned the trade in ivory as it was widely recognized to be pushing elephants to extinction – during the 1980s African elephant numbers plummeted from an estimated 1.3 million to 450,000 because of ivory poaching. Today again more than 20,000 elephants are killed annually for their ivory. This ivory is in turn sold as trinkets, much of which clearly ends up on the World Wide Web. A complete ban of all ivory items on the Web is therefore the only way to prevent further detriment to this endangered species.

IFAW urges buyer-seller Web site owners to take responsibility for illegal trade in protected species occurring on their sites and take the following measures:

- Institute a total ban on all online trade in any CITES Appendix I species of wildlife, as well as products with subspecies on Appendix II or “look-a-like” species. Where products can easily be confused, species should be covered by a simple blanket ban, for example, all elephant ivory;
- Require sellers to supply proper evidence and documentation of the legality of the product;
- Institute a pre-examination of legality with a time delay on all ads of wildlife- related products in order to prevent immediate sales;
- Provide easy access for site users to information on the legal requirements for Internet wildlife trading and actively promote awareness of this issue;
- Actively monitor listings of all wildlife items and develop new filters to prevent seller evasion;
- Establish an effective reporting mechanism to allow users to report any suspicious items easily and receive prompt feedback on action taken;
- Provide technical assistance to and collaboration with law enforcement to assist with prosecution of suspected offenders;



IFAW urges buyer-seller Web site owners to take responsibility for illegal trade in protected species occurring on their sites.

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IFAW urges buyers and sellers to take responsibility for the items they are involved with and:

- Ensure that any traded item has thoroughly documented evidence that proves legality of the specific product;
- Lobby Internet sites to institute a total ban on all online trade in any Appendix I species of wildlife and ensure adequate enforcement to respond to the ban;
- Avoid contributing to the illegal killing of threatened species like elephants by not participating in the massive abuse of regulations concerning trade in elephant ivory: reject all trade in elephant ivory;
- Ensure that the acquisition of the product did not involve any harm to the welfare of the effected wildlife population or the welfare of the individual animal;
- Determine the market provider’s policy regarding wildlife and wildlife products and make sure that advertisements are in full compliance;
- Report suspicious advertisements to the market-place provider and to the enforcement authorities responsible for that site’s jurisdiction;
- Regardless, do not offer for sale or purchase Appendix I species.

Country-Specific Case Studies

Key Results UNITED STATES



With the highest volume of trade as well as the largest monetary value of items both advertised and actually sold, the United States ranks number one in this investigation, responsible for 70.5% of the global volume of Internet trade in protected species. It also ranks second in Internet users worldwide after China.

- Of the total volume tracked on U.S. Web sites, 73% occurred on eBay U.S.
- Despite eBay’s existing ban on cross-border trade in elephant ivory (put in place by eBay, Inc. itself in June, 2007), the trade tracked on this Web site was overwhelmingly dominated – 99% – by elephant ivory.
- A significant number of advertisements offered international shipping in violation of the ban.
- Of the large volume of listings identified, only 62 advertisements or 1.2% originated from outside the country, indicating that while the U.S. Internet marketplace is not heavily populated by international sellers, neither is it immune.



US Examples

- The largest single listing seller in the U.S. snapshot was an eBay user, registered as a jewelry auction house located in Miami, Florida. This user makes use of a relatively new eBay feature, the Live Auction. In an eBay Live Auction, large, established auction houses post entire lists of items to be auctioned off on their physical

- ivory through this avenue, none of it supported by documentation. Significantly, in several instances, investigators directly observed eBay users buying items from this user and then re-selling them at a profit using a standard eBay auction.
- An eBay U.S. user, who is a prominent online seller of worked ivory for

auction floor. For an eBay fee of US\$1,500, the seller can list up to 10,000 items on the Web site at a time. On the day of the auction, online bidders compete in real-time with bidders on the auction floor using a sophisticated live streaming interface. eBay reaps a 5% commission on sales made using the online service. This user sells a great deal of elephant

collectors and craftsmen, uses eBay not just as a market for his undocumented products, but a supply as well. One of the listings tracked by investigators was bought by this user on eBay U.S. - undocumented elephant tusks with a purchase price of more than US\$20,000.

- An ivory “calling card case” was sold for US \$273 on the U.S. marketplace although the seller was in Uruguay and the buyer in China.
- In probably the most ironic advertisement discovered by investigators, a small, carved ivory elephant was sold on eBay U.S. for US\$55, claiming that 10% of the proceeds were donated to the World Wildlife Fund. This seller claimed the piece was legal but lacked any documentation substantiating the claim.

Web sites	Sales	Percent
ebay.com	3690	73.42%
chats.upatsix.com/chats/	284	5.65%
hoobly.com	228	4.54%
birdbreeders.com/birds.aspx	134	2.67%
craigslist.org	122	2.43%
rubylane.com	106	2.11%
pet-classifieds.com	93	1.85%
kijiji.com	64	1.27%
etsy.com	41	0.82%
petclassifieds.us	35	0.70%
gotpetsonline.com	28	0.56%
centralpets.com	27	0.54%
forfarmers.com	22	0.44%
olx.com	21	0.42%
usa.adflakes.com	21	0.42%

Web sites	Sales	Percent
birdboard.com/classifieds/showcat.php?cat=2	20	0.40%
taxidermy.net/forum	17	0.34%
faunaclassifieds.com	16	0.32%
ioffer.com	15	0.30%
reptileauctions.com	4	0.08%
shorttailedopossum.tripod.com	3	0.06%
wildanimalworld.com	3	0.06%
onlineauction.com	2	0.04%
us.ebid.net	2	0.04%
agriseek.com	2	0.04%
buysellreptiles.com	1	0.02%
ucanbuyart.com/classifieds.html	1	0.02%
buytigers.com	1	0.02%
Total Advertisements	5026	100%

Global Keyword	Sales	Percent
Elephant	3921	78.01%
Bird	1025	20.39%
Big Cat	46	0.92%
Primate	18	0.36%
Reptile	9	0.18%
Rhinoceros	7	0.14%
Violations	Sales	Percent
Possible Violation	3476	69.16%
Likely Violation	1435	28.55%
Likely Compliant	115	2.29%
Value		
Total Final Sales Recorded (\$U.S.)	\$370,365.89	
Total Advertised Prices (\$U.S.)	\$1,896,827.97	

Outside the eBay marketplace, significant trade – classified as having more than 100 postings per Web site – was found on five other sites. The second most popular Web site among U.S. sellers was Chats.upatsix.com, a Web resource and forum for exotic bird owners, with 284 advertisements. This site cautions users not to post any “material that may violate any laws be it of your country, the country where ‘upatsix.com’ is hosted or International Law” but makes no reference to any specific laws, nor does it give guidance specifically pertaining to animals or wildlife products¹⁴. Hoobly.com logged in 228 offers of potentially illegal wildlife products yet contains no restrictions on advertisements except for “keep it clean.”¹⁵ Birdbreeders.com (134 advertisements) has no policy restrictions on wildlife sales, while Craigslist (122 advertisements) bans animal parts but allows advertisements of pets for sale. Rubylane.com (106 advertisements) issues a blanket statement stating that all advertisements must comply with the law and will be removed if they do not.

Consistent with the high volume of items observed, the U.S. marketplace was also identified as having the largest number of identifiable sellers (1,316). Although 344 advertisements, or 7%, of the U.S. sample were posted anonymously, the majority of sellers were identifiable. Nearly 40% of the sellers in the U.S. listed more than one item at a time. The average number of advertisements posted by sellers of more than one item was 7.4, although this number is heavily skewed by advertisements posted by the single most prolific seller who, alone, was responsible for 383 listings, all on eBay U.S. In relative terms, this seller single-handedly produced a volume of Internet listings equivalent to the entire volume identified in France, ranked fourth in our investigation.

Most U.S. sellers (69.2%) fell into the category of Possible Violation by making a general gesture to indicate legality, although the majority of these were ivory sellers advertising “pre-ban” ivory without the required supporting documentation attesting to the species or the age of the item. A significant percentage of the total (28.6 %), representing 1,435 listings, was categorized as Likely Violation, meaning no claim of legality was indicated, while only 2.3% of the listings qualified as Likely Compliant, having provided some proof of legal possession within the listings (115 advertisements).

Key Results

UNITED KINGDOM



The United Kingdom ranked second in volume in this investigation, with trade in protected species making up 7.7 % of the global volume tracked (551 listings), in a country where Internet usage ranks as the seventh highest globally¹⁶.

Just over half (279 listings or 50.6 %) of wildlife items tracked on U.K. sites in this investigation were elephant ivory, the majority for sale on eBay U.K. The investigation also revealed a large market for endangered exotic birds in the U.K. (217 or 39.4 %) – with listings for birds nearly double the global rate.

- eBay U.K. dominated the trade in CITES Appendix I species in the U.K. (289 advertisements),
- Second highest volume (81 listings) for trade found on the Web site birdtrader.co.uk.
- Of the remaining 20 Web sites, only one, preloved.co.uk, had more than 30 advertisements, with the majority having fewer.
- eBay U.K.’s policies have improved over the last few years, not least due to pressure from IFAW. Their policy on animal and wildlife products addresses the trade in CITES species with a strong focus on ivory trade requirements¹⁷. However, inadequate enforcement of these policies is perhaps the reason there continues to be potentially suspect ivory trade on eBay UK.
- Birdtrader makes no reference to wildlife in its terms of service but states that sellers must have the right to sell the goods and that the goods must comply with UK and European legislation where appropriate¹⁸.
- This may explain Birdtraders’s popularity compared to another bird Web site surveyed with far fewer advertisements, which specifically states that postings must have appropriate CITES documentation where required¹⁹.

Web sites	Sales	Percent
www.ebay.co.uk	289	52.45%
www.birdtrader.co.uk	81	14.70%
www.preloved.co.uk	33	5.99%
www.ukclassifieds.co.uk	23	4.17%
www.ukfalcons.com	22	3.99%
www.reptileforums.co.uk	15	2.72%
http://steveman.conforums.com/	13	2.36%
www.ad-trader.co.uk	12	2.18%
pets.uk.freeads.net	12	2.18%
www.birdtrade.co.uk	8	1.45%
www.local.thesun.co.uk	7	1.27%

Web sites	Sales	Percent
www.vivastreet.co.uk	7	1.27%
www.livefoods.co.uk	5	0.91%
www.featheredflyer.net	4	0.73%
www.pets-classifieds.co.uk	4	0.73%
www.ad-mart.co.uk	3	0.54%
http://tskaexotics.co.uk/	3	0.54%
www.taxidermy.co.uk	3	0.54%
www.adeex.co.uk	2	0.36%
www.appletonexotics.co.uk	2	0.36%
www.gumtree.com	2	0.36%
http://uk.ebid.net/	1	0.18%
Total Advertisements:	551	100%

Global Keyword	Sales	Percent
Elephant	285	51.72%
Bird	217	39.38%
Reptile	28	5.08%
Big Cat	14	2.54%
Primate	6	1.09%
Shark	1	0.18%
Violations	Sales	Percent
Likely Violation	201	36.48%
Likely Compliant	185	33.58%
Possible Violation	165	29.95%
Value		
Total Final Sales	\$28,719.45	
Total Advertised Prices	\$383,149.98	

UK Examples

- The single seller with the highest volume of ivory sales on eBay U.K. complied with site policy by offering postage to U.K. destinations only, but feedback on the seller reveals that ivory items documented during this investigation were sold to buyers in Spain, France and Finland. An ivory item from the same seller after the time period of the survey was sold to a buyer in China.
 - Another regular seller of ivory on eBay complied with eBay’s request for documentary proof that the ivory items
- were antique, but the documentation consisted only of a scan of a letter-head from an antique dealer with no visible details of the items for sale and which appeared to be used repeatedly for every item listed.
- A leopard skin rug was sold on eBay U.K. for US\$156. The seller stated that the rug dated back to the 1930’s but provided no evidence to support this assertion. Another eBay seller sold a tiger skin rug with head for US\$790. Both examples were lacking the documentation requested by eBay U.K. wildlife policy.

Sellers in the U.K. seemed to follow the global trend of one-time sellers, with “one-off” listings holding the largest market share (174 or 81 %). The 41 repeat sellers accounted for 19% of identifiable sellers, and averaged 5.8 advertisements each. The largest multiple seller in the U.K. skewed this number considerably, with 87 advertisements for ivory on eBay U.K. alone. Nevertheless, The U.K. also had a large number of sellers who did not provide a user ID, with 146 of the 551 (26%) advertisements posted anonymously.

Unlike other countries with a clear majority of cases representing a particular level of potential violation, in the U.K., violations were divided fairly equally among the categories. Likely violations (the worst, at 201 advertisements) comprised 36.5% of listings and ranked as the most frequent level of violation by a small margin. Likely Compliant advertisements ranked second (185), with 33.6% of the total, whereas Possible Violations comprised 30% of listings (165). Notably, unlike the largely undocumented listings of ivory in the United States, U.K. sellers were providing more documentation for ivory items, representing the much higher U.K. percentage of Likely Compliant. As eBay UK was the main platform for ivory sales in the UK, this is likely to be a result of their stricter wildlife policy requiring visual documentation to show that an ivory item is an antique, or a sales certificate issued by the U.K. government.

Finally, the U.K. had a notable number of ‘scams’ or fake advertisements, particularly on free classifieds sites. A likely scam found in this investigation offered for sale “friendly 10 week old male and female bears for sale” on pets.uk.freeads posted with a picture of two polar bears. Common examples were advertisements for exotic birds and monkeys. Further research into some of the sellers revealed complaints from customers that once funds were transferred, the animals were never delivered. It appears that unscrupulous individuals take advantage of weak or non existent Internet site polices on wildlife and ineffective enforcement, as well as exploit a demand for endangered species as pets in the U.K. Indicators of scam advertisements were poor English, claims by sellers to be based in the U.K. but providing a telephone number in West Africa, very cheap prices for the animals for sale, identical wording by different sellers (e.g. “we specialise in hand rearing cuddly, tame baby parrots”) and email addresses linked to known scammers. Such advertisements promote trade in protected wildlife and create an additional challenge for enforcement agencies that detract them from apprehending genuine wildlife criminals.

- A seller based in Australia but advertising on eBay U.K. offered an ocelot coat for sale with worldwide shipping, but with no reference of any documentation.
- An eBay seller offered sawfish bone (an Appendix I shark species) for US\$50 with worldwide shipping, but had no accompanying documentation or suggestion that this item falls under any derogation, e.g. an antique.





CHINA



Although Web sites in China are under some of the strictest scrutiny compared to other Internet marketplaces, China still ranks third in our investigation with respect to volume of trade. With its 253 million Internet users (just 19% of the country’s population), China recently ranked first in global Internet usage, surpassing that of the U.S., which has 220 million Internet users, or 72.5% of the population²⁰.

- The most prevalent wildlife trade violation identified in China during our investigation concerned elephant ivory, followed by reptiles, specifically marine turtles.
- Combined, these violations accounted for nearly 90% of the total advertisements observed.
- The majority of violations were found on Taobao (294), Paipai (152), and Eachnet (57).
- Other Web sites contained fewer than 25 listings of wildlife products, accounting for less than 8% of the total trade in China.

Web site policies among the five sites are nearly identical, reiterating a notification announced in 2005 by China’s State Forestry Administration (SFA) warning Web sites to refrain from trading endangered species products online. The SFA is the agency tasked with implementing China’s wildlife controls. As a result of this system of oversight, Web site policies were found to be far stricter, more specific and more user-friendly than those found on sites in any other country²¹. Still, an alarming number – close to 70% of all listings – were offers of elephant ivory or other elephant products.



China Examples

- Investigators noted a large bowl made from rhinoceros horn that was among the most expensive listings discovered during the global investigation, offered at US\$23,317 on Taobao.
- Also on Taobao, a polar bear skin rug was sold for US\$25,825. The seller claimed that the skin was “imported from Canada, and it’s the last chance to have such a polar bear skin since the species is endangered due to the global warming.”
- Although the wild tiger teeters on the edge of extinction, tiger products can still be found on the Internet. For example, a 12cm (4.69in) length tiger tooth was sold on Taobao for US\$1,873.

China ranks third in our investigation with respect to volume of trade.



Web sites	Sales	Percent
www.taobao.com	294	54.04%
www.paipai.com	152	27.94%
www.eachnet.com	57	10.48%
www.alibaba.com.cn	23	4.23%
www.alibaba.com	18	3.31%
Total Advertisements	544	100%

Global Keyword	Sales	Percent
Elephant	376	69.12%
Reptile	104	19.12%
Big Cat	33	6.07%
Bird	17	3.13%
Rhinoceros	10	1.84%
Caviar	3	0.55%
Primate	1	0.18%

Violations	Sales	Percent
Likely Violation	404	74.26%
Possible Violation	107	19.67%
Likely Compliant	33	6.07%

Value	
Total Final Sales	\$1,265.66
Total Advertised Prices	\$654,282.95

Despite the relatively strong site policies, however, Chinese sellers fell into the global pattern of no-documentation listings. It is important to note the unprecedented amount of illegal ivory shipped from Africa to China over the years is a matter of great concern because many official legal certificates could be issued for ivory from dubious origins. Nevertheless, the overwhelming majority of sellers - 74% - were categorized as Likely Violations, with just 20% of listings categorized as Possible Violations and a low 6% listed as Likely Compliant. More positively, Chinese sellers demonstrated a high level of restraint with regard to international shipping, with just 28 of 544 advertisements providing this option.

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Key Results

FRANCE



France produced the fourth largest volume of advertisements during the eight-country survey. France is the eighth largest country in global Internet usage²². Investigators monitoring the French e-marketplace found that trade was overwhelmingly dominated by elephant products. The second largest category of potentially illegal wildlife trade in France were products from big cats with 22 listings, representing 5.8% of the total. Ten or fewer listings were recorded in all other categories. Nevertheless, the EU-wide bird ban in 2007 may have impacted the marketplace for exotic birds, identified in only nine listings.

- eBay France emerged as the driving force behind the French electronic marketplace, holding a 65.5 % market share and a wildlife trade volume nearly ten times larger than the second most prolific site, Vivastreet.fr; with 30 advertisements.
- About 77% of advertisements tracked on eBay France (192) were elephant ivory listings.

However, the number of elephant ivory listings tracked on eBay France during this investigation is approximately 73% lower than the number identified during IFAW’s 2007 investigation. This reduction could be a result of increased public awareness combined with improved national regulation and compliance with eBay France policies²³. Nevertheless, although eBay France’s site policy requiring proof of legality is similar to those of eBay Germany and eBay U.K., the actual policy is very difficult to find, so some users may be unaware that any restrictions or guidelines exist.

Of the listings in France for which investigators were able to record violation levels (358), the largest percentage of listings fell into the Likely Compliant category (146 or 38%) in which sellers provided proof of legality. Likely Violation advertisements were the next most frequent (116 or 30.52%), qualifying as clear violations, providing no proof or even indication of legal possession. Next was Possible Violation advertisements with 96 listings (25%). Investigators anecdotally noted, however, that much of the documentation appeared to be fraudulent.

France Examples

- Typical of the ivory products identified, a “sublime” ivory statue of a woman named “La Guerriere” sold for US\$500 with nothing more than a claim of legality.
- Among the specimens tracked in France was an ostrich skull purchased on eBay France for US\$29 and an “antique” tiger claw pendant that sold for US\$77.81 with no paperwork.
- Leopard skins were also offered for sale with no documentation on eBay.fr and Priceminister.com as well as a coat made with Cheetah fur offered for sale on marché.fr for US \$6280.



Web sites	Sales	Percent
ebay.fr	249	65.52%
vivastreet.fr	30	7.89%
leboncoin.fr	29	7.63%
priceminister.com	26	6.84%
marche.fr	20	5.26%
naturabuy.fr	12	3.15%
www.paruvenu.fr	6	1.58%
kijiji.fr	5	1.31%
le-monde-des-reptiles.com	1	0.26%
marocain.fr	1	0.26%
zevends.fr	1	0.26%
Total Advertisements	380	100%

Global Keyword	Sales	Percent
Elephant	325	85.52
Big Cat	22	5.78%
Bird	10	2.63%
Caviar	8	2.19%
Reptile	7	1.84%
Rhinoceros	2	0.52%
Oryx	2	0.52%
Shark	2	0.52%
Primate	1	0.26%
Addax	1	0.26%

Violations	Sales	Percent
Likely Compliant	146	38.42%
Likely Violation	116	30.52%
Possible Violation	96	25.26%
Not Documented	22	5.79%

Value	
Total Final Sales	\$22,391.10
Total Advertised Prices	\$376,815.86

Key Results

CANADA



Canada ranked fifth in volume during this investigation with 244 listings or 3.4% of the global trade. Investigators found the majority of advertisements on eBay Canada (167), followed by Kijiji (26) and Craigslist (18), while the other eight Web sites recorded fewer than ten advertisements each.

- Sellers in Canada were also among the worst global offenders with regard to offering international shipping: an alarming 67.6% of all listings offered this feature. A significant number of the advertisements identified in Canada originated outside the country (59.43%), mostly from the United States.
- The Canadian Internet marketplace in protected wildlife therefore provides one of the strongest examples of the impact of international markets – more specifically, the U.S. market - on domestic ones.
- Elephant ivory and other elephant products represented the dominant product category in Canada (73%), followed by the exotic bird trade at nearly 14%. Much of the trade in elephant products appeared once again to be driven by U.S.-based buyers and sellers.
- Of the 134 ivory items on eBay Canada, only 13% were posted by Canadian sellers while more than 50% (70) were offered by a U.S. seller in direct contravention of the eBay ban on cross border shipping of ivory.

With regard to violations, Canada had only one listing considered as Likely Compliant (a distinction shared with Russia and Australia) while the remaining 99.5% were either Possible Violations or Likely Violations. The 41% of sellers making no attempt to indicate legality puts Canada seven points above the global average for Likely Violations.

Several Canadian Web sites provided no policy guidance on wildlife, while others gave blanket advisories that all items must “follow the law.” Some sites gave examples of prohibited and restricted items, but even those lacked anything wildlife-specific. A number of sites failed to post any contact information. eBay Canada contained the most detailed policies among the sites surveyed, with information on prohibited items and links to provincial legislation²⁴. Yet the data indicates a wide gap between eBay Canada’s policies on wildlife products and the enforcement of these policies.

Canada Examples

- A seller on eBay CA maintains a busy jewelry store full of “vintage,” “retro” and “estate sale” ivory items on multiple sites. Responsible for 24 listings (or close to 10% of all Canadian listings), the seller offered the same listings on eBay Canada, eBay U.S., and eBay Italy despite being located in Israel and offering to ship worldwide (US\$4.99 registered airmail and US\$2.50 regular airmail).
- Kijiji carried numerous advertisements for exotic birds, including an advertisement offering a yellow-shouldered Amazon parrot for US\$1,400, a double yellow-head for US\$900 or trade, and a “not tame” lesser vasa parrot for US\$600.



- A pet store advertised Appendix I birds on Kijiji. While this seller did not give documentation, the store did disclose its business name, address and phone number, as well as a mapping link to help potential customers locate the store.
- A seller located in Thailand but selling on ebay.ca was responsible for 15 separate listings for “genuine crocodile” leather items. 5 larger items (purses and brief cases) had the same CITES permit attached to each listing but the permit was for only one hand bag.

Web sites	Sales	Percent
ebay.ca	167	68.44%
kijiji.ca	26	10.66%
craigslist.ca	18	7.38%
www.adpost.com	8	3.28%
livedeal.ca	7	2.87%
www.sellitbuyit.ca	5	2.05%
ca.ebid.net	3	1.23%
buyandsell.ca	3	1.23%
tradepoint.ca	3	1.23%
canada.oodle.com	3	1.23%
usedcalgary.com	1	0.41%
Total Advertisements:	244	100%
Global Keyword	Sales	Percent
Elephant	178	72.95%
Bird	34	13.93%
Big Cat	9	3.69%
Caviar	8	3.28%
Primate	6	2.46%
Reptile	5	2.05%
Shark	2	0.82%
Bear	1	0.41%
Rhinoceros	1	0.41%
Violations	Sales	Percent
Possible Violation	141	57.79%
Likely Violation	102	41.80%
Likely Compliant	1	0.41%
Value		
Total Final Sales	\$29,982.18	
Total Advertised Prices	\$197,922.2	

Key Results

GERMANY



The German virtual marketplace ranks fifth in the world in terms of Internet usership and sixth in our investigation²⁵. It is among the most highly regulated marketplaces of those included in this survey and responsible for 2.1% of the overall global trade.

The investigation in Germany revealed some interesting results:

- Despite detailed attention paid to elephant ivory and exotic birds at the corporate and governmental levels, these two categories of protected wildlife remain the most heavily traded of wildlife or derivative items in Germany, albeit at comparatively low levels to some other countries.
- Mirroring global results, nearly 60 % of advertised items were elephant ivory and products, with exotic bird in second place at 18.5%.
- Of the 14 Web sites surveyed, the top two (online auction house Henrys.de at 52 advertisements and eBay Germany at 39 advertisements) accounted for 60.3% of total volume.
- While Henrys.de lacks specific language regarding wildlife items in its user policies, eBay Germany currently bans listings of live animals and wildlife products without visual proof of e.g. item authentication in cases of antique listings, or CITES documentation.
- Of the 39 ivory advertisements on eBay Germany, 23 offered and provided documentation, with many sellers scanning CITES permits for potential buyers.



German sellers presented a different profile from the global seller profile. Most sellers (78) did not provide identification. Of the remaining 51 sellers identified, 44 were one-time sellers. Of the 11 sellers who offered multiple Vwith the most active seller responsible for listing seven advertisements on eBay Germany – for Congolese elephant ivory.

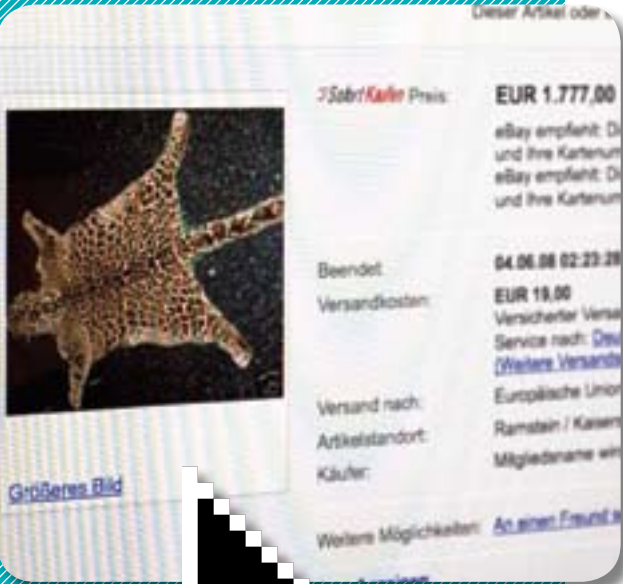
Violations were divided, with 68 (45%) classified as Possible Violations, 53 (35%) classified as Likely Violations and only 29 (19.2%) classified as Likely Compliant. Of note, 15 advertisements (9.9%) originated outside Germany, one of the higher rates observed. While 31 advertisements (21%) explicitly mentioned international shipping as an option, the majority of listings did not specify a shipping range. It is possible that many other sellers would ship internationally if asked, but investigators did not pursue this question.

Web sites	Sales	Percent
www.henrys.de	52	34.44%
www.ebay.de	39	25.83%
www.markt.de	18	11.92%
www.exotic-animal.de	12	7.95%
www.hood.de	9	5.96%
www.kalaydo.de	6	3.97%
www.tiere.de	4	2.65%
www.deine-tierwelt.de	3	1.99%
www.falkner-wolf-gang-weller.de	2	1.32%
www.vpnk.de	2	1.32%
www.auvito.de	1	0.66%
www.falkenboerse.de	1	0.66%
www.auxion.de	1	0.66%
www.haustieranzeigen.de	1	0.66%
Total Advertisements:	151	100%

Global Keyword	Sales	Percent
Elephant	90	59.60%
Bird	28	18.54%
Caviar	12	7.95%
Big Cat	8	5.30%
Primate	7	4.64%
Reptile	5	3.31%
Miscellaneous (Many Species)	1	0.66%

Violations	Sales	Percent
Possible Violation	68	45.03%
Likely Violation	53	35.10%
Likely Compliant	29	19.21%

Value		
Total Final Sales	\$3,514.00	
Total Advertised Prices	\$90,019.23	



German Examples

- IFAW’s Germany investigators flagged a “Luxurious Couture Ocelot sz 40/42” on eBay Germany. The seller claimed to have CITES documentation for the coat that for US\$1,647 was “to die for.”
- Found on Markt.de was a tiger fur “in mint condition,” offered at US\$7,492 (5200 euros), advertised as an “exclusive hearthrug – people will envy you.” CITES documentation was mentioned, but not provided in the listing.
- One seller on hood.de advertised ten small elephant figurines for US\$140 (99 euros) each claiming that they were “made in the 1940’s.” No supporting documentation was mentioned.

Germany is among the most highly regulated marketplaces and is responsible for 2.1% of the overall global trade.





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Key Results

RUSSIA



The investigation in Russia, seventh in terms of overall volume of trade identified, revealed a low volume of trade in CITES Appendix I listed species, but the numbers alone are misleading. With no single site dominating the trade, the sale of protected wildlife appears to be spread out among hundreds of internet sites throughout the Russian marketplace. Investigators surveyed only 24 of the largest. Such a disaggregated market may indicate that the problem in Russia could be greater than this investigation reveals and may create even more difficulties for law enforcement to detect illegal activity.

Unlike many other countries included in this investigation, a single product did not dominate the trade in the Russian marketplace. The category of exotic birds was the most frequently listed category of CITES Appendix I wildlife (43), followed closely by elephants (35), big cats (30) and reptiles (17). Polar bears are protected by the most stringent prohibitions on trade in Russia (although listed on CITES Appendix II), nevertheless investigators uncovered 19 offers of polar bear skins. Anecdotally, investigators noted a pattern of trade between Russia and Ukraine.

Of the wildlife listings identified in the investigation, 24 were on Slando.ru and 34 were on Molotok.ru. The remaining 86 listings were spread among the other 22 sites, with each site containing fewer than 13 advertisements each. Only three of the sites monitored provided any policies on trade in wildlife and/or animal products. The 21 other sites either contained general wording for users to comply with the law or made no reference to laws or site policy at all. While investigators identified only nine advertisements offering international shipping, this number is not representative as only Molotok.ru provides the option of listing international shipping in the advertisement.

As a rule, sellers made little or no attempt to comply with CITES regulations. Similar to Canada and Australia, there was only one listing categorized as Likely Compliant. Nearly 75% of the remaining listings were categorized as Likely Violations and 16% were Possible Violations. Meanwhile, the level of anonymity reflected in the absence of user IDs probably accounts for what investigators found was some of the more brazen activity encountered in the entire investigation. One seller responded to an inquiry by an IFAW investigator by stating that [he had] “no papers since everything is smuggled.”

Web sites	Sales	Percent
www.molotok.ru	34	23.61%
www.slando.ru	24	16.67%
www.animalsimport.ru	12	8.33%
pets.strana-ru.ru	10	6.94%
okcorp.ru	7	4.86%
www.avito.ru	7	4.86%
www.irr.ru	5	3.47%
www.zavedi-druga.ru	4	2.78%
mybirds.ru	4	2.78%
www.olks.ru	4	2.78%
www.acoola.ru	4	2.78%
allparrots.ru	4	2.78%
www.sellbe.ru	3	2.08%
www.medwed.ru	3	2.08%
www.groga.ru	3	2.08%
www.medwed.ru	3	2.08%
www.stpetersburg lions.ru	3	2.08%
www.zootorg.com	2	1.39%
www.azbuka-style.ru	1	0.69%
www.lesruk.ru	1	0.69%
www.net-slov.ru	1	0.69%
torg-info.ru	1	0.69%
www.freetorg.ru	1	0.69%
www.sibirsafari.ru	1	0.69%
Total Advertisements	144	100%

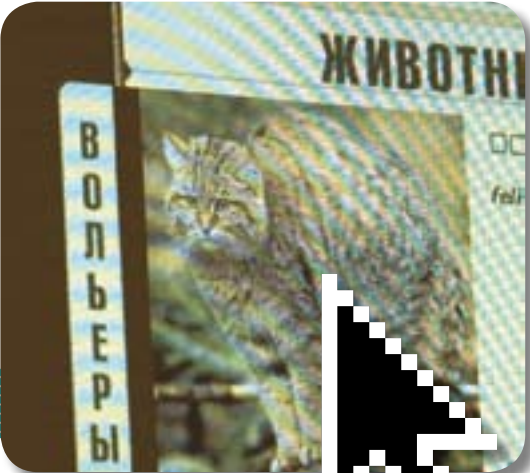
Global Keyword	Sales	Percent
Bird	43	29.86%
Elephant	35	24.31%
Big Cat	30	20.83%
Reptile	17	11.81%
Caviar	9	6.25%
Primate	7	4.86%
Rhinoceros	1	0.69%
Miscellaneous	1	0.69%
Bear	1	0.69%
Shark	0	0.00%
Violations	Sales	Percent
Likely Violation	107	74.31%
Possible Violation	23	15.97%
Likely Compliant	1	0.69%
Not Documented	13	9.03%
Value		
Total Final Sales	N/A	
Total Advertised Prices	\$247,831.54	

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Russia Examples

- Investigators learned of Animalsimport.ru after seeing numerous advertisements redirecting interested parties to this Web site. Once at the site, buyers could purchase Siberian tigers, fishing cats, leopards, pumas, lions, carcals, lynxes, ocelots, jaguars, cheetahs, brown bears, hyenas, baboons, lemurs, monkeys, falcons, vultures and even polar bears. For convenient service Animalsimport.ru is ready to ship animals to your doorstep.
- An ivory figurine was advertised on Avito.ru for 20,000 rubles. No documentation was mentioned.



Key Results

AUSTRALIA



Despite being ranked eighteenth in Internet users worldwide, Australia provides the smallest number of advertisements in this investigation – 82 or 1.2%. This is believed to be primarily due to the complete ban on elephant products, including ivory, on eBay Australia – the only country site in the world to have issued a total ban.

- Possibly as a result of the blanket ivory ban on eBay Australia, exotic birds emerged as the most prevalently traded item (51.22%), followed by elephant products (15.85%).
- All other categories combined make up one-third of listings, with investigators finding a few products in nearly all categories.
- The majority of potential violations identified in this country study originated from eBay Australia (42.68%).
- Petlink, a popular Web site in which users post classified advertisements for pets and equipment, ranked second (28%).
- The remaining 24 listings were spread among other nine sites, with each containing five or fewer advertisements.
- Investigators noted a dichotomy among Australian listings: those with live animals chose Petlink, whereas wildlife products and derivatives were primarily found on eBay. This may be due to eBay Australia’s enumerated policies regarding wildlife and wildlife products. Policies on the other sites ranged from no stated policy to abdication by site owners of responsibility for the content of advertisements on their sites.
- Yet eBay Australia remains the overall volume leader in the country, demonstrating again the important role of enforcement in the success of a site policy.

Australia Examples

- Several flagrant violations were found online in Australia: An elephant hide briefcase offered for US\$120 (AU\$150) on eBay by an individual who claimed to have bought it the previous year in Africa.
- There were numerous yellow-crowned Amazon and hooded parrots (the most traded species of exotic bird in the Australia investigation).
- On offer was a “real elephant skin hide pillow cover” offered for US\$104 (AU\$130) by an eBay store originating in South Africa and advertising worldwide shipping. In addition, the “other items by this seller” displayed in the listing were all ivory products such as corkscrews.



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Australia provides the smallest number of advertisements in this investigation – 82 or 1.2%.

Australian sellers generally made no attempt to acknowledge or comply with their legal obligations by providing or referencing required documentation. Nearly 72% were classified as Likely Violations while another 27% were Possible Violations. Australian sellers by percentage were also among the worst global offenders regarding international shipping: Nearly one-third (32) of the listings overtly offered this feature. Furthermore, ten of the 82 listings (12%) originated outside the country.

Web sites	Sales	Percent
ebay.com.au	35	42.68%
petlink.com.au	23	28.05%
petpages.com.au	5	6.10%
alibaba.com	5	6.10%
adoos.com.au	4	4.88%
tradingpost.com.au	3	3.66%
247petads.com.au	2	2.44%
petdirectory.com.au	2	2.44%
freead.com.au	1	1.22%
oztion.com.au	1	1.22%
priam.com.au	1	1.22%
Total Advertisements	82	100%

Global Keyword	Sales	Percent
Bird	42	51.22%
Elephant	13	15.85%
Ungulate	8	9.76%
Reptile	7	8.54%
Shark	4	4.88%
Marsupial	3	3.66%
Big Cat	2	2.44%
Tapir	1	1.22%
Caviar	1	1.22%
Otter	1	1.22%

Violations	Sales	Percent
Likely Violation	59	71.95%
Possible Violation	22	26.83%
Likely Compliant	1	1.22%

Value	
Total Final Sales	\$1,103.40
Total Advertised Prices	\$24,351.70

Regional Results Analysis

Looking at each country individually is vital for identifying specific and localized trends. Equally as important, however, is a regional-level analysis. Internet trade is international by its very nature, and useful lessons can be drawn from looking at the movement of goods within regions. The regions represented in this study vary in geography and political cohesion but exhibit three distinct patterns that shine a spotlight on the larger picture of global Internet wildlife trade.

Europe

Although only three European countries (France Germany, UK) were scrutinized in this investigation, this regional assessment may be representative of a number of overall challenges facing individual European countries as well as the EU as a whole in combating wildlife crime. When combined, the CITES Appendix I trade in the European countries in this investigation account for 15.2% of the total. The total value of wildlife listings tracked was US\$849,985, or 22% of the monetary value tracked globally. The value of items sold and actually changing hands totaled US\$54,625 (12%).

Data mirrored the overall global findings, with elephant/ivory products dominating the listings (65%) and exotic birds in second place (23%). The differing scope of this problem in each of these countries surveyed appears to be the failure by marketplaces to adequately inform users of site policies combined with the absence or ineffectiveness of enforcement by the site.

- eBay U.K., eBay France and eBay Germany were the most active marketplaces in the region, with its 578 listings accounting for 53% of all listings tracked.
- Policies on the eBay platforms in the three countries studied require supporting documentation to be displayed for wildlife items – particularly in the case of elephant ivory.

- However, improved policies alone do not necessarily lead to eradication of potentially illegal trade. For example, of 192 elephant ivory listings tracked on eBay France 25% were classified as either a Possible Violations or Likely Violations. In the U.K., 93 elephant ivory listings tracked on eBay U.K. were categorized as Possible Violations or Likely Violations.

The scrutinized European countries also had the highest rate of listings that offered international shipping (14.7%), with nearly 94% of the listings posted originating within the country of advertisement. While this investigation was not able to identify which of these listings were intra-European as opposed to outside of the European Union territory, this illustrates a potential EU-specific loophole. European Commission Regulations permit free trade of CITES wildlife trade specimens between EU member states. Annex A or Appendix I specimens usually require a commercial use certificate, but again due to the flaws of derogations, like the antiques derogation and the abuse that it therefore receives, certification is unlikely to be a priority for traders or enforcement authorities between EU states.



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Derogation

Derogations open loopholes for criminals to launder their contraband into a legal trade system, for example, EU legislation allows the rules surrounding antique items to be circumvented.

EC Wildlife Trade Regulations states that trade in certain “worked items” of Annex A (Appendix I) species which pre-date June 1947, are declared an “antique” and therefore may not need a sales certificate. To be classified as an “antique” the item must have been significantly altered from its natural state for jewelry, decoration, etc, before June 1, 1947. It must have been obtained in this condition and require no further crafting for the purpose for which it is intended.

However, this antiques derogation provides huge loopholes for the illegal trade in ivory:

- Under the regulations, it is suggested (rather than being a legal requirement) that “antiques” are dated and confirmed as “antique” by an “antiques expert”, although as there is no registration system for “antiques experts,” anyone could self-certify themselves as such.
- There is no standardised documentation which “antiques experts” can provide to prove a piece is pre-1947, opening up potential abuse for a trader to forge his or her own proof.
- Documentation proving the item’s age is not a legal requirement of sale – it only has to be supplied if requested by a police or enforcing officer.

Such uncertainty enables the unscrupulous or unwitting trader and buyer to trade in ivory of any origin or age with little risk of legal penalties. This weakens the legal requirements of CITES trade rendering the majority of trade legal to enforcement agencies, the “antiques trade” sees little of their attention or resources.

Latin America

As part of the initiative to identify emerging markets, our investigation of wildlife trade on the Internet was also conducted in three Latin American countries: Argentina, Colombia and Mexico.

While the data sets collected in these countries’ investigations were not statistically significant enough to be counted in the global assessment, it does illustrate a small, highly undocumented and diverse online marketplace for illegal wildlife products. It also demonstrates that wildlife trade on the Internet is occurring outside of the larger markets of the U.S., Europe and China. As well, the limited trade activity in these countries mirrors our findings from the more active countries:

- Elephant ivory and birds share the top spots for trade.
- Combined, the top three wildlife species most impacted by the trade were exotic birds (21%), primates (17%) and elephants (16%) with reptiles in fourth place (15%).
- As well, this region recorded species not necessarily found in other country investigations including the lesser rhea, vicuna, lemur, and long-tailed otter.
- In total the advertised value of Appendix I animals and products over the 6 week period was \$34,296 and 83% of the listings garnered a Likely Violation – no documentation or reference to legality. Taken as whole, this is twice as high as the global average.

Elephant ivory and birds share the top spots for trade.

It is important to consider these points, given rapidly increasing levels of Internet access in these countries. Mexico and Argentina are now among the top 20 countries in global Internet access, ranking 15 and 19 respectively²⁷. Colombia lags not far behind those markets: 26.9% of the Colombian population (12,100,000 users) now has access, fewer than 3,000,000 short of entering the top 20²⁸. While the Latin American market is not yet a major source of demand, it has the potential to grow. As Internet access expands in Latin America and elsewhere, so does the marketplace for wildlife.

Argentina

Investigators in Argentina surveyed 25 sites and found 33 CITES Appendix I items, the largest sample in the region. Complementing these were 43 Appendix II items and two Appendix III items. Reptiles and elephant items were the most commonly listed, comprising 48 of the 78 identified. Among CITES Appendix I items, sellers made almost no attempt to prove legality, with 90% of items classified as Likely Violations. Web site policies ranged from no wildlife policy at all to an explicit ban on illegal wildlife trade, with the majority of sites lacking any policies specific to wildlife.

Colombia

Investigators in Colombia surveyed 11 sites and discovered eight Appendix I items and 42 Appendix II items. These were divided mainly between primates (28) and birds (21). Of the eight Appendix I items, 3 were Likely Violations, 3 were Possible Violations, and 2 were Likely Compliant, a ratio of violations categories that carried over into the Appendix II species as well. Web site policies spanned the spectrum, but more than half provided specific direction to sellers forbidding the sale of wildlife.

Mexico

Investigators in Mexico surveyed 21 sites and discovered 17 Appendix I listings and 19 Appendix II items, for a total of 44. Birds (13) and elephants (12) were the majority categories. Sellers of Appendix I species overwhelmingly committed Likely Violations (15), while only two seemed to adhere to the full process of documentation. Unlike the other countries in this region, sites in Mexico often allowed for a publicly viewable dialogue between seller and potential buyers, allowing investigators to note that one of the most frequently asked questions regarded legality. While investigators found Web sites with a variety of wildlife policies, many were operated by a single owner with the sole power to approve content and post advertisements, a feature not seen elsewhere.

North America

In terms of this investigation, North America comprised the smallest geographic region with two countries (the United States and Canada: Mexico was included in the Latin America section) yet was responsible for the majority of global e-commerce in endangered wildlife. With both countries in the top 12 of global Internet usership, the combined Internet marketplace is a powerhouse in terms of scope and value³⁰. The United States and Canada accounted for 54% of global listings with a total advertised price of US\$2,094,750 and more importantly, actual final sales of \$400,348 (87.5% of the total value).

Our findings in North America also reveal one of the more interesting trends. Due to a number of factors such as the shared common border, liberal trade agreements and other economic ties, the United States and Canada are linked in a unique manner

- the vast majority of the data in this region can be attributed to the United States
- 32% of Canada’s listings originated across the border.
- Clearly, the United States is a driving force behind much of the potentially illegal e-commerce in the Canadian electronic marketplace.
- The largest conduit for this trade is eBay, on which cross-posting identical advertisements between the United States and Canada accounted for 12% of the listings on eBay.ca and continues to be as simple as the click of the mouse.
- In the case of ivory, any international trade is in violation of international law and existing eBay policy yet eBay USA still accounted for 52% of the ivory listings identified in Canada.



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Annex I: Data Description

Investigators collected the following data points on each wildlife advertisement throughout the survey:

- **Advertised Species:** The species of animal or product offered for sale.
- **Advertised/Buy it Now:** The asking price for the product offered for sale. On eBay pages, the “Buy it Now” price (if applicable)
- **Annotation/Advertisement Number:** If a unique advertisement number was provided (e.g. eBay auction number), it was recorded.
- **Country of Origin:** The country in which the wildlife product originated, if disclosed.
- **Current Bid:** On auction sites, the current level to which the product had been bid was recorded.
- **Date of Survey**
- **Final Sale Price:** When available, investigators recorded what the tracked item sold for. This was mainly restricted to eBay pages where completed auctions can be browsed. Only those items which actually reached final sale, having satisfied any reserve price requirements, were recorded.

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¹ <http://www.interpol.int/Public/EnvironmentalCrime/Wildlife/Default.asp>

² Australia, Canada, China, France, Germany, Netherlands, U.K., U.S.

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⁸ eBay, Inc. (2008). *eBay Media Center: About eBay*. Retrieved August 8, 2008 from <http://news.ebay.com/about.cfm>

⁹ Yahoo Finance. (2008). *Income Statement for EBAY Inc*. Retrieved August 8, 2008 from <http://finance.yahoo.com/q/isis?s=EBAY&annual>

¹⁰ Yahoo Finance. (2008). *Income Statement for EBAY Inc*. Retrieved August 8, 2008 from <http://finance.yahoo.com/q/isis?s=EBAY&annual>. This figure is actually lower than normal due to the disappointing performance of Skype, one of the other ventures in its portfolio.

¹¹ eBay, Inc. (2008). *eBay Inc Reports Second Quarter Earnings*. Retrieved August 8, 2008 from <http://files.shareholder.com/downloadadvertisements/ebay/381470849x0x213648ca-3cd2-4c58-98a5-c24a06092b30/213648.pdf>

¹² eBay, Inc. (2008). *eBay: Animals and Wildlife Products*. Retrieved August 8, 2008 from <http://pages.ebay.com/help/policies/wildlife.html>

¹³ eBay, Inc. (2008). *eBay Inc Global Citizenship: Environmental Activities*. Retrieved August 8, 2008 from <http://pages.ebay.com/aboutebay/environment.html>

¹⁴ Up At Six.com. (2008). *Up At Six- Terms of Service*. Retrieved August 8, 2008 from http://www.upatsix.com/chats/subscribe/tos_classifieds.html

¹⁵ Hoobly.com. (2008). *Hoobly.com: Help*. Retrieved August 8, 2008 from http://www.hoobly.com/help?topic_id=AD

¹⁶ Miniwatts Marketing Group. (2008). *Internet Users- Top 20 Countries- Internet Usage*. Retrieved August 8, 2008 from <http://www.Internetworldstats.com/top20.htm>

¹⁷ eBay U.K. (2008). *eBay U.K.: Animals and Wildlife Products*. Retrieved August 8, 2008 from <http://pages.ebay.co.uk/help/policies/wildlife.html>

¹⁸ BirdTrader.co.uk. (2006). *Birds for sale and wanted on BirdTrader.co.uk- Free Advertising of Private / Trade / Breeder birds on BirdTrader U.K*. Retrieved August 8, 2008 from http://www.birdtrader.co.uk/advert_terms.php

¹⁹ ibid

²⁰ BBC News. (2008, July 28). “China becomes biggest net nation,” Retrieved August 8, 2008 from <http://news.bbc.co.uk/1/hi/technology/7528396.stm>

²¹ The identical policies state: “only common poultry, cattle, pet and other table meat animal can be trade (sic) on Eachnet. According to related law, live animal, organ, body part, skin, specimen and any other product of wildlife, state-protection animal and endangered species is banned to sell on this platform.” All the sites except PaiPai additionally make specific reference to the ban in elephant ivory and marine turtle products.

²² Miniwatts Marketing Group. (2008). *Internet Users- Top 20 Countries- Internet Usage*. Retrieved August 8, 2008 from <http://www.Internetworldstats.com/top20.htm>

²³ French national regulations require the ivory to have been carved prior to June 1947 to be considered an antique; proof of antiquity in the form of a certificate issued by an expert must accompany any ivory item claiming to be antique. All non-antique worked ivory must be accompanied by an intra-community certificate issued by DIREN (Direction Régional de l’Environnement)

²⁴ eBay Canada. (2008). *eBay Canada: Animals and Wildlife Products*. Retrieved August 8, 2008 from <http://pages.ebay.ca/help/policies/wildlife.html>

²⁵ Miniwatts Marketing Group. (2008). *Internet Users- Top 20 Countries- Internet Usage*. Retrieved August 8, 2008 from <http://www.Internetworldstats.com/top20.htm>

²⁶ ibid

²⁷ ibid

²⁸ Miniwatts Marketing Group. (2008). *South America Internet Usage and Population Statistics*. Retrieved August 8, 2008 from <http://www.Internetworldstats.com/south.htm>

²⁹ Miniwatts Marketing Group. (2008). *Internet Users- Top 20 Countries- Internet Usage*. Retrieved August 8, 2008 from <http://www.Internetworldstats.com/top20.htm>

³⁰ ibid

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