



# ***IN THE MAZE***

## ***An Outlook of Illegal Wildlife Trade before and during the Covid-19 Pandemic in Vietnam***

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# INTRODUCTION

Two rescued bears at Cat Tien National Park  
(Photo: PanNature)

As a transit and destination point for illegal transactions, Vietnam is considered one of the world's hubs for wildlife trade. This activity not only causes the decline of biodiversity in Vietnam but also affects wildlife populations in other countries through explicit international illegal trade networks. The endemic problem undermines the implementation of international commitment that Vietnam has signed up and damages the image of Vietnam in the international community.

For many years, the fight against wildlife trade has always been an issue that has received the attention and support of international and domestic conservation organizations, besides the resources of the State. However, statistics on wildlife violations do not show that the problem has improved. Together with the outbreak of the Covid pandemic and past epidemics such as HIV/AIDS, SARS, Ebola, MERS, etc., which are all believed to have originated from wildlife, the story of fighting wildlife trade once again has been raised as a difficult problem that needs an urgent solution. The immediate impacts on all aspects of life as Covid-19 have come as an alarm bell about the consequences of wildlife trade and use, and it should be thus taken seriously.

In order to bring a panoramic view of the illegal trade of wildlife during a special time, PanNature published the report *"In the Maze: An Outlook of Illegal Wildlife Trade before and during the Covid-19 pandemic in Vietnam"*, first appeared in Vietnamese. Data and information presented in this report mainly come from: i) Field surveys on illegal wildlife smuggling activities in Vietnam organized by PanNature during 2019 and 2020; ii) Statistics of wildlife trafficking violations in online newspapers in 2019; and (iii) Data on the illegal trade of selected species from reports of government agencies and conservation organizations. We focus primarily on domestic trade in this report.

This English translation of the report aims to share with the wider conservation community and interested parties about the magnitude and fluctuation of wildlife trade during the outbreak of Covid-19 – an unprecedented event in our modern history when our mobility and business-as-usual lifestyle have been challenged in most part of the world.



# BACKGROUND

Ivory is mixed with products of similar design and size made from plastic or animal bones to sell at Buon Don Tourist Area, Dak Lak (Photo: PanNature)

2004 - April 2019

 **600+**

seizures linked to the illegal wildlife trade

**105.72** tons of ivory



▶ **15,779** dead elephants

**1.69** tons of horn



▶ **610** rhinos



▶ **228** tigers



▶ **65,510** pangolins

(EIA, 2019)

In Vietnam, illegal trade in wild species on a commercial scale appeared in the late 1980s following the economic reform (Doi Moi) and opening-up policy. However, in recent years, Vietnam has become one of the world's largest wildlife markets and trading centers and an essential link in the wildlife smuggling ring in the region and continent (Bùi Đăng Phong, 2018). Figures from arrests in Vietnam show that many wildlife species are illegally traded not only domestically but also internationally, in which products from African rhinoceros, African ivory, pangolin scales, turtles, snakes, and tigers make up a significant number.

The sharp increase in demand for wildlife and wildlife smuggling rings locally, nationally, and internationally makes the overall picture of Vietnam's biodiversity increasingly bleak, in which many endangered populations are severely declined. Rhino was declared extinct in 2010. Additionally, there are no more than five tigers; 100 wild elephants. 16 out of 25 primate species are endangered. Hundreds of bears are being kept in captivity for bile, and many other endangered wildlife species are threatened by the illegal wildlife trade (Minh Nguyệt, 2019).

## 2013 -2017

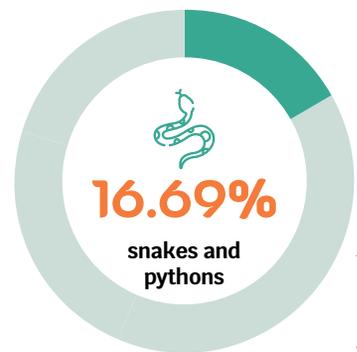
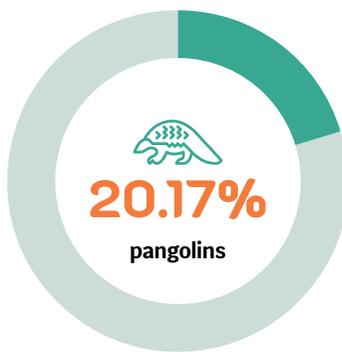
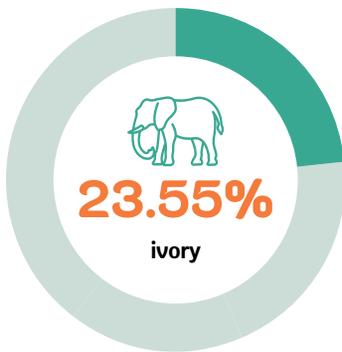


**1,504**  
violations



**1,461**  
objects related to endangered wildlife species

### 03 groups of largest volume confiscated:



(WCS, 2017)

According to the International Environmental Investigation Agency (EIA), between 2004 and April 2019, Vietnam had more than 600 seizures linked to the illegal wildlife trade. This includes a minimum of 105.72 tons of ivory, equivalent to more than 15,779 dead elephants; 1.69 tons of horn estimated to be sourced from up to 610 rhinos; skins, bones, and other products sourced from a minimum of 228 tigers; and the bodies and scales of 65,510 pangolins (EIA, 2019).

Based on data sources provided by law enforcement agencies, WCS also reported that for five years (2013 -2017) in Vietnam, there were 1,504 violations with 1,461 objects related to endangered wildlife species detected and handled; more than 180 species of wildlife illegally transported, traded, kept in captivity, poached, etc.; In terms of volume confiscated, ivory accounted for the largest number (23.55%),

followed by pangolins (20.17%), snakes, and pythons (16.69%) (WCS, 2017).

Recognizing the reality of wildlife trafficking and the importance of species and biodiversity conservation, since the 1990s, Vietnam has issued a number of important legal documents to prevent poaching and trafficking of wildlife species, such as 1991 Act on Forest Protection and Development; Decree No. 18/HDBT dated January 17, 1992, by Council of Ministers' promulgating the list of endangered forest plants and animals and the regime of management and protection thereof. Especially in 1994, Vietnam joined the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the Convention on Biological Diversity (CBD). These are the first international commitments on the protection of wildlife and biodiversity that Vietnam participates in.

From the early 1990s to the present, a series of important policies have continued to be supplemented and revised in the direction of perfecting the legal basis for nature conservation and prevention of illegal wildlife trade. Among these, there are two important laws that address the goal of protecting endangered, endangered wildlife and handling violations of illegal wildlife trade, namely the 2015 Penal Code, amended and supplemented in 2017, and the 2017 Law on Forestry. At the end of 2018, the Judicial Council of the Supreme People's Court continued to issue the Resolution No. 05/2018/NQ-HDTP dated November 05, 2018, of the Justice Council of People's Supreme Court on guiding the application of the Penal Code's Article 234 on the offense of violating regulations on the protection of wild animals and Article 244 on the offense of violating regulations on the protection of endangered, endangered animals and Article 106 on change or supplementation of decisions to institute criminal cases of the Criminal Procedure Code. While the 2017 Law on Criminal took effect from the beginning of 2018, Resolution No. 05/2018 and the Law on Forestry took effect at the end of 2018 and the beginning of 2019. The period 2018 - 2019 can therefore be considered as a milestone marking the important changes in the enforcement of illegal wildlife trade in Vietnam, especially in 2019 because this is the first year of parallel implementation of two important laws and Resolution No. 05/2018 in the direction of aggravating the penalty framework for wildlife violations. However, whether the change in policy helps better control the thorny wildlife trade that is one of the causes of disease outbreaks and the decline of Vietnam's flora and fauna resources as well as the whole region and world is questionable.



An otter (group IB) at a stall in Thanh Hoa market, Long An Province (Photo: PanNature)

**The period 2018 - 2019 can therefore be considered as a milestone marking the important changes in the enforcement of illegal wildlife trade in Vietnam, especially in 2019 because this is the first year of parallel implementation of two important laws and Resolution No. 05/2018 in the direction of aggravating the penalty framework for wildlife violations.**

# METHODOLOGY

A bear at Soc Son Wildlife Rescue Center (Photo: PanNature)



The methods used in the report include field surveys and investigation, information and data synthesis, and quantitative statistical methods.

Regarding surveys and field investigations, the report recorded information from 13 media field investigation trips organized by PanNature in two years, 2019 and 2020, across 20 provinces and cities on the topic of illegal wildlife trade, in which six visits were to learn about the smuggling of elephant products, especially ivory across 15 provinces and cities; the remaining ones were to learn about the reality of smuggling products from tigers, freshwater turtles, wild birds, and wildlife farms.

Regarding the quantitative statistical method, the report on statistics of wildlife trafficking violations in 2019 was documented on online newspapers through the Google search engine with related keywords such as: “động vật hoang dã” (wild animals, wildlife), “buôn bán động vật hoang dã” (wildlife trade), “tiêu thụ động vật hoang dã” (wildlife consumption), “săn bắt động vật hoang dã” (wildlife hunting), “tê tê” (pangolin), “voi” (elephant), “tê giác” (rhino), “hổ” (tiger), “gấu” (bear), “khỉ” (monkey), “vượn” (gibbon), “rùa” (turtle), “buôn bán trái phép” (illegal trade), “săn bắt trái phép” (illegal hunting), “nhóm IB” (group IB), “nhóm IIB” (group IIB), “vảy tê tê” (pangolin scales), “ngà voi” (ivory), “sừng tê giác” (rhino horn), “cao hổ” (tiger bone glue), “mật gấu” (bear bile), and “trứng rùa” (turtle eggs). These words and phrases were searched monthly through Google’s automatic filtering system. In the case of multiple publications for the same article, the statistical results were recorded as one case

and sourced from the electronic newspaper that gives the most complete, accurate, and credible information.

Regarding the information and data synthesis, the report referred to and cited data from selected reliable sources, including information from authorities, nature conservation organizations, and major online newspapers. Currently, Vietnam has 18 governmental agencies responsible for implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (Đỗ Hương, 2019). This also means that wildlife data is processed, synthesized, and stored in many different agencies. However, this data source is not public and is not periodically updated on the portals of ministries and their lower branches. On the website of the Forest Protection Department of Vietnam, violations of wildlife management and protection are only listed in terms of quantity by localities and combined with violations of the law on forestry from 2007 to 2013. Therefore, information from authorities is reviewed and collected through data actually reflected in articles or research reports already. Besides, the report used data from publications and reports conducted by international and Vietnamese conservation organizations such as EIA, WCS, UNODC, ENV.



# RESULTS

An elephant at Yok Don National Park (Photo: PanNature)

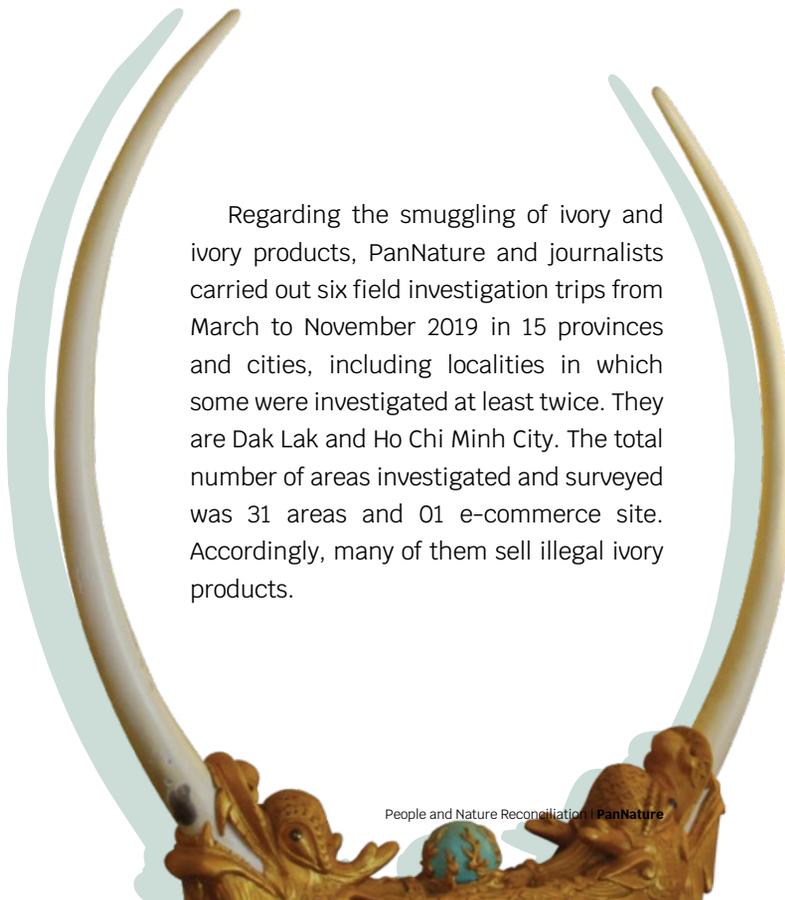


## 1 Survey on Wildlife Smuggling Activities in 2019 - 2020

In order to support law enforcement on wildlife protection and simultaneously get more evidence for contributions and policy recommendations, PanNature maintained regular field investigation trips on wildlife trade with the participation of journalists. In the two years 2019 - 2020, PanNature organized 13 field trips in 20 provinces and cities to penetrate the trading facilities of ivory, tigers, turtles, birds, and other wildlife. Below are the results we aggregated by species/groups.

### Ivory smuggling hid in the shadow of fine art products

Regarding the smuggling of ivory and ivory products, PanNature and journalists carried out six field investigation trips from March to November 2019 in 15 provinces and cities, including localities in which some were investigated at least twice. They are Dak Lak and Ho Chi Minh City. The total number of areas investigated and surveyed was 31 areas and 01 e-commerce site. Accordingly, many of them sell illegal ivory products.



## Ivory smuggling surveyed areas in 15 provinces and cities

1. Y Ngong Street, Buon Ma Thuot City, Dak Lak Province
2. Nguyen Van Cu Street, Buon Ma Thuot City, Dak Lak Province
3. Buon Don Tourist Area, Buon Don District, Dak Lak Province
4. An Binh Street, District 5, Ho Chi Minh City
5. An Dong Market, District 5, Ho Chi Minh City
6. An Dong Trade Center, District 5, Ho Chi Minh City
7. Ben Thanh Market, District 1, Ho Chi Minh City
8. Bao Dai Palace, Da Lat, Lam Dong Province
9. La Tulipe Shopping Mall, Nguyen Thi Minh Khai Street, Da Lat City, Lam Dong Province
10. Nhi Khe Craft Village, Thuong Tin District, Hanoi City
11. Thuy Ung Craft Village, Thuong Tin District, Hanoi City
12. Phu Khe Commune, Tu Son District, Bac Ninh Province
13. Cau Dat Ward, Ngo Quyen District, Hai Phong City
14. Ha Long City, Quang Ninh Province
15. Vincom Plaza Ha Long, Quang Ninh Province
16. Vuon Dao Street, Bai Chay Ward, Ha Long City, Quang Ninh Province
17. Cam Pha City, Quang Ninh Province
18. Hung Vuong Street, My Tho City, Tien Giang Province
19. Long Xuyen City, An Giang Province
20. Thu Dau Mot Market, Binh Duong Province
21. Bien Hoa City, Dong Nai Province
22. Cao Lanh City, Dong Thap Province
23. Tam Nong Farmers Market and Tram Chim National Park, Dong Thap Province
24. Thanh Hoa Farmers Market, Long An Province
25. Phan Chu Trinh Street, Vinh Thanh Van Ward, Rach Gia City, Kien Giang Province
26. Hoang Hoa Tham Street, Vinh Thanh Van Ward, Rach Gia City, Kien Giang Province
27. Ha Tien Border Gate, Kien Giang Province
28. Thach Dong Tourist Area, Kien Giang Province
29. Duong Dong Town, Phu Quoc Island District, Kien Giang Province
30. Tay Ninh City, Tay Ninh Province
31. Moc Bai Border Gate, Tay Ninh Province



Products advertised as ivory at a shop in Ha Tien, Kien Giang (Photo: PanNature)

The survey results of PanNature showed that only 4/31 areas had not recorded illegal trade in ivory products. They are Thuy Ung Craft Village (Hanoi) and Cao Lanh City (Dong Thap). Tam Nong Farmers Market and Tram Chim National Park (Dong Thap), and Thanh Hoa Farmers Market (Long An). The rest all have stores/areas that openly trade ivory products, and customers can easily find access to wholesale and retail stores of these illegal products.

Among 15 provinces/cities, Dak Lak is commonly known as the “capital” of ivory smuggling, in which two areas focusing on ivory trade are Buon Ma Thuot City and Buon Don Tourist Area. Despite not being the largest hubs in quantity, their supply capacity of smuggled ivory products is huge. Information from shippers said that the smuggled ivories mainly originate from Africa and are crafted in Hanoi and Ho Chi Minh City before being moved to Dak Lak.

In the role of buyers, the Field Investigation Team was offered a multitude of ivory products by shippers such as necklaces, bracelets, rings, pens, Buddha faces, 12 zodiac animals, decorations, etc. Customers can even buy whole chunks of raw ivory. These items are sold both openly and secretly at gold shops, gem shops (in urban areas, commercial centers), and souvenir shops (in tourist centers, markets). Buyers are mainly tourists, so the products are compactly crafted in the form of jewelry and souvenirs. If customers are not satisfied with the available products, they can even order samples and switch to online transactions as well. Most shippers encourage exchanges via Zalo, Facebook to avoid risks of detection. Many shippers confirmed that buying and selling fine art products from ivory is very popular and rarely “touched” by the authorities, except for the whole block of raw ivory. One of the tricks that the stores often use is to trade ivory mixed with products of similar design and size made from plastic or animal bones so that even in case of being discovered, they would only be fined with administrative sanctions and charges.

In the areas of Phu Khe Commune (Tu Son, Bac Ninh); Cau Dat Ward (Hai Phong); Vuon Dao Street, Bai Chay Ward, Ha Long City (Quang Ninh); Thu Dau Mot Area (Binh Duong); Tay Ninh City (Tay Ninh), etc., after field investigations with accurate information, images and documents on ivory selling stores, the Field Investigation Team contacted the Environmental Police Office of Provincial Public Security to investigate, seize exhibits and handle the violations if any. However, at most of the reported points, the involvement of the authorities was quite slow and lack of drastic measures, while for some, the responses are even simply perfunctory. For example, in Tay Ninh, the team discovered at the private house of a subject in Tay Ninh City that they stored, used, and sold a lot of ivory products such as pens, bracelets, ivory teapots, pictures, and Buddha statues, and many wine bottles soaked in pangolins, cobras, geckos, even rhino horns, tiger tall, fangs and tiger claws. The team collected images, documents and worked with the Environmental Police Office of Tay Ninh Provincial Public Security. However, it was not until many weeks later; the office



Art products with trademarks of being made from ivory in Dak Lak (Photo: PanNature)

**One of the tricks that the stores often use is to trade ivory mixed with products of similar design and size made from plastic or animal bones so that even in case of being discovered, they would only be fined with administrative sanctions and charges.**



Products advertised as ivory at a shop in Phu Quoc (Photo: PanNature)

responded that “investigation is underway now.” Another case is Hai Phong, where the team collected a lot of documents about the fact that some gold, silver, and gem shops in Cau Dat Ward traded products from ivory, elephant tail hair, even tiger fangs, and bear claws, etc., the Hai Phong City Public Security did not even have any form of checking the reported facilities, even they dodged the interviews. In many localities, authorities often cited a number of inherent difficulties such as lack of human resources, difficulties in catching violators in the field, or difficulty in tracing the real goods’ owner to investigate and prosecute the case. In Quang Ninh, the market management agency said that there is no regulation on coordination with the police in reviewing, investigating, and handling the illegal trade of ivory products. In the worse case, a market management officer in Quang Ninh even wore a ring made with elephant tail feathers.

In addition to the direct investigation at the stores, the team also conducted a review of the e-commerce site Sen Đồ (sendo.vn) on the posting and trading of ivory products. The survey results in March 2019 showed that there were hundreds

**In many localities, authorities often cited a number of inherent difficulties such as lack of human resources, difficulties in catching violators in the field, or difficulty in tracing the real goods’ owner to investigate and prosecute the case.**

of images of advertised products made from ivory along with detailed information about stores that deliver these products in Ho Chi Minh City, Dak Lak, at a price ranging from a few hundred thousand to several million Vietnam dong. It is easy to contact with public phone number provided for appointment to see the goods in real. The group discussed with the City Environmental Police Office the issue. However, the office said that although the smuggled ivory market is real, it is only at a small level, and the office also does not have enough human resources to control it, not to mention that the officials have difficulty in distinguishing real - fake ivory to handle violations in practice as well.

Of the 15 surveyed localities, only a few received positive feedback on

the investigation and handling of ivory smuggling. For example, after a business trip to many locations in Rach Gia City, Ha Tien City, and Phu Quoc Island District (now City) at the end of 2019, the Field Investigation Team recorded many souvenirs gold shops, pawnshops, and jewelry stores there with signs of ivory smuggling. The team's investigation information was then transferred to the Kien Giang provincial authorities to expand the investigation. In May 2020, the Environmental Police Office (Kien Giang Provincial Public Security) coordinated with the Market Management Team No. 1 (Kien Giang Provincial Market Management Sub-Department) to inspect and seize nearly 180 handicraft products. There were signs of making from ivory from Thanh Trung Gold and Silver Trading Service Production One Member Company Limited (address at Phan Chu Trinh Street, Vinh Thanh Van Ward, Rach Gia City) and Lam Phat Gold Shop One Member Limited Company (Hoang Hoa Tham Street, Vinh Thanh Van Ward, Rach Gia City). On July 28, 2020, the Chairman of the People's Committee of Kien Giang province issued a decision to sanction administrative

violations of these two stores with a total fine of more than 1 billion VND, and at the same time confiscated exhibits being jewelry made from ivory with a total ivory amount of 2.24 kg.

In addition, after the investigation trip in May 2019 in Tu Son, Bac Ninh, the Field Investigation Team also transferred information to the Environmental Crime Prevention Police Department (C05, Ministry of Public Security) for investigation and handling a number of ivory trading stores. In June 2019, the Field Investigation Team, under the coordination of C05 with Tu Son Town Police Station, organized an inspection and search of Tam Anh Fine Art Business. At the scene, the Field Investigation Team discovered and caught this store selling five ivory rings and other jewelry and handicrafts suspected to be ivory products with no proven originality. They were then seized with a total weight of about 6 kg. However, according to the conclusion of the assessment from the authorities, out of 6 kg of suspected ivory products seized, only 0.76 kg was natural ivory.

In Ha Long, during the survey trip in July 2019, after being offered hundreds of products from ivory, the Field Investigation Team collected evidence and informed the authorities of Quang Ninh Province. The Environmental Police Office of Quang Ninh Province then checked and made a record of seizing more than 3 kg of products suspected to be ivory. However, after conducting the assessment, the Police Agency of Public Security Quang Ninh said that only 1.7 kg is natural ivory, the rest are animal bones and plastic, although before, the seller claimed 100% of the product was natural ivory. The case was then forwarded to the Quang Ninh Forest Protection Department for administrative sanctions.



*A whole piece of raw ivory is for sale at a jewelry shop in Buon Ma Thuot, Dak Lak (Photo: PanNature)*



*A tiger in captivity in Thai Nguyen (Photo: PanNature)*

## Tiger bone glue production and breeding tigers of unknown origin

In early 2020, PanNature staff and some journalists planned to survey Thai Nguyen, Cao Bang, Bac Giang to learn about the activities of tiger bone glue production and breeding tigers of unknown origin. From their own sources, the team moved to Cao Bang City and connected with a person named T. “Tiger” - who specializes in tiger bone glue production and trading. In the role of a customer specializing in high-end poaching, the team was openly told by T. “Tiger” how to produce high-quality products, transport goods, and deliver tiger bones to the production location without being detected by the authorities. From

the information exchanged, it can be seen that T. “Tiger” has been involved in the tiger trade rings for many years and can produce tiger bone glue at any location requested by the customer. They just need to pay in advance 1/3 of the live tiger’s money value for the first production of tiger bone glue to him. Even T. “Tiger” also went to Laos to select the tigers for production, and according to T., tigers from Laos are usually semi-wild tigers, aged between 8-10 years old, male. After being shot with anesthesia, they will be transported to areas near the border. Tigers there are electrocuted, butchered for bones, and transported to the production places. The delivery location will be designated by T. It is estimated that every year, dozens of tigers are killed for tiger bone glue production under the management of T. In early 2019, T. said that he had produced tiger bone glue from 6 tigers in Cao Bang and Ha Giang alone. According to T., even provincial and district leaders and business owners in the area use tiger bone glue provided by T. With all information obtained from this field trip, the team has transferred to the Environmental Crime Prevention and Control Department under the Ministry of Public Security for continuous monitoring and special project investigation.

In Thai Nguyen, the team found a tiger breeding household in Think Dan Ward,



Tiger bones (Photo provided by wildlife traffickers)



Tiger bone glues (Photo provided by wildlife traffickers)

Thai Nguyen City. Mr. Nguyen Khac Th., a retired military officer, in 2006 asked the local government for permission to breed 01 male tiger and 03 female tigers donated by relatives. 01 of them then died, leaving 03 in total later. Although he could not provide the original records of all three tigers, Mr. Th. was still allowed by the Thai Nguyen Provincial Forest Protection Department and Provincial People’s Committee for breeding. Even in 2007, the Thai Nguyen

Provincial People’s Committee actively requested the Ministry of Agriculture and Rural Development to grant Mr. Th. “trial” breeding of 03 tigers at a private farm. Thai Nguyen Forest Protection Sub-Department even then sent a written request to the Forest Protection Department of Vietnam on the issuance of a certificate of wildlife (tiger) breeding to Mr. Th. In May 2008, the tigers gave birth to two more baby tigers. In the same year, Thai Nguyen Provincial People’s Committee thus issued a decision to sanction Mr. Th. 30 million VND for illegally breeding 05 tigers according to Clause 4, Article 20 of Decree of Government No. 159/2007/ND-CP of October 30, 2007, on sanctioning administrative violations in the domain of forest management, forest protection, and forest product management. The sanctioning document was implemented according to the response dispatch of the Ministry of Agriculture and Rural Development. However, noticeably, in Article 2 of the sanctioning decision, it is still allowed that Mr. Th. can continue managing and taking care of all the 05 tigers?! As of March 2018, Thai Nguyen Forest Protection Sub-Department has granted the 7th certificate of eligibility to breed endangered, precious, and rare forest animals of IB category (tiger) to Mr. Th. with 06 tigers (03 females and 03 males) and clearly indicated that he could



**According to Article 6 of the Law on Investment, tigers are prohibited species for investment and business if they are originally from nature. The granting of a certificate of tiger breeding for this facility for commercial purposes is definitely not in accordance with any provisions of the law. ENV has not recorded any cases in the country where tiger breeding is licensed for “commercial” purposes like this one.”**

*Ms. Bui Thi Ha  
Deputy Director of the Education for Nature Vietnam (ENV)*

breed them for commercial purposes. It is worth mentioning that so far, Mr. Th. at that time was still unable to provide a record of the originality of the tigers on the grounds that the owner who sold the tiger could not be traced. Responding to the press on this issue, Ms. Bui Thi Ha, Deputy Director of the Education for Nature Vietnam (ENV), commented: *“According to Article 6 of the Law on Investment, tigers are prohibited species for investment and business if they are originally from nature. The granting of a certificate of tiger breeding for this facility for commercial purposes is definitely not in accordance with any provisions of the law. ENV has not recorded any cases in the country where tiger breeding is licensed for “commercial” purposes like this one.”* According to Ms. Ha, the condition for the license to breed tigers at the time of issuance

is to have a certification. The document of CITES on the ability to breed in a controlled environment but this authority has never confirmed it for tigers, then *“how can it be licensed?”* (Lam Anh – Hoàng Chiên, 2020)

After Thai Nguyen, the team continued to move to Bac Giang to meet Mr. L (Mr. Th’s brother) and his wife – two people who used to take care of tigers at Mr. Th’s house. In 10 years. Mr. L. still keeps many photos and clips of taking care of tigers, even bathing and riding tigers. According to Mr. L, Mr. Th’s tiger was once freed and ran into people’s homes before being recaptured then. In particular, Mr. L. confirmed that during the rearing process, the tiger herd reproduced, and the owner killed the tiger for meat and shared the meat with neighbors.

All results of the investigation into tiger trade and breeding activities in Thai Nguyen and Cao Bang were transferred by the team to the Environmental Crime Prevention and Control Department (Ministry of Public Security) for continuous monitoring and project investigation. The series *“Infiltrating tiger trafficking networks in Vietnam”* after this investigation was awarded the first prize by the CHANGE named Journalism Awards for “Paranomic view of the wildlife crisis” in 2020. In particular, after the series, the Ministry of Agriculture and Rural Development has assigned the CITES Management Authority of Vietnam to make a plan to inspect all tiger breeding facilities in Vietnam. In Directive No. 29/CT-TTg dated July 23, 2020, on a number of urgent solutions for wildlife management, the Prime Minister also requested the Ministry of Agriculture and Rural Development to organize an assessment of the pilot and implementation of tiger breeding, later approved by the Prime Minister in Document No. 1761/VPCP-NN dated 4/4/2007.

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Checking tiger bones before cooking glue (Photo provided by wildlife traders)



# Trade of valuable, rare turtles and wild birds

Many species of freshwater turtles are publicly sold at Thanh Hoa market, Long An (Photo: PanNature)

Investigations of PanNature in Bac Kan and some localities in the Mekong Delta found that turtles have been widely traded for food at restaurants, breeding as pets, released for religious purposes, and also produced as bone glue for a long time. Around Ba Be Lake (Bac Kan), many restaurants invite diners to use wild meats and turtle products, including turtle shells, bone glue, or finished products. Here, live turtles are sold for 1-2 million VND/kg; when produced for bone glue, it costs 1.5-3.5 million VND/100g. The types of turtles collected for bone glue production are mainly rare turtles, mountain turtles, salamanders..., in which many of them were reported to have been poached from Ba Be National Park and surrounding mountains. From a number of sources, the Field Investigation Team found four places specializing in collecting and producing turtles for bone glue in Cho Ra Town. After collecting specific information, the team informed the authorities of Bac Kan Province and Ba Be National Park. These authorities then set up inspection teams to review and require restaurant owners to

sign a commitment not to use rare wildlife products again.

In Ho Chi Minh City and the Mekong Delta, the smuggling of turtles, wild birds, storks, snakes, monkeys, and other animals is publicly opened, especially in Tam Nong (Dong Thap), Thanh Hoa (Long An), and Ong Bau Markets (Dong Thap). These three areas are considered the largest wildlife suppliers in the region, especially in the flood season. The wildlife here, according to information from traders, is partly transported from Cambodia and partly caught from Lang Sen Nature Reserve, Tram Chim National Park, and surrounding areas. It is worth mentioning that there are many rare species that are openly traded, such as otters, The Asian water monitor (*Varanus salvator*), The Mekong snail-eating turtle (*Malayemys subtrijuga*), The yellow-headed temple turtle (*Heosemys annandalii*), Malayan box turtle (*Cuora amboinensis kamaroma*), The elongated tortoise (*Indotestudo elongata*), Ornate Softshell Turtle (*Amyda ornata*), Asian Openbill (*Anastomus oscitans*), etc. The trades even kill wild animals right along national highways or roadside markets, causing unorganized and unsafe situations for the vehicles.

In all the surveyed localities, the team collected information and contacted the forest rangers many times. However, many

Here, live turtles are sold for

**1 – 2** million VND/kg  
when produced  
for bone glue, it cost

**1.5 – 3.5**  
million VND/100g.



units only responded with “nothing initially detected” or only checked perfunctorily. Particularly with the Thanh Hoa market, the Field Investigation Team contacted the leaders of the Forest Protection Department to request its inspection and handling. In March 2020, the leaders of the Department sent a special team to scout, and at the same time, coordinated with the Forest Protection Sub-Department of Region 3 and the authorities of Thanh Hoa district to organize a secret inspection at the Thanh Hoa Farmers Market (Long An). Through the inspection, one otter of 8 kg; two monocled cobra (*Naja kaouthia*) of 5 kg; one oriental rat snake (*Ptyas mucosa*) of 1.6 kg; one Javan mongoose (*Urva javanica*) of 0.5 kg and 30 kg of Radiated rat snake (*Coelognathus radiata*) and other snakes, were confiscated. All exhibits were recorded and handed over to Saigon Zoo and Botanical Garden One Member Limited Liability Company for care, release to nature, and/or preservation during custody for verification. After the inspection, the Ministry of Agriculture and Rural Development issued Document

No. 2066/BNN-TCLN on March 23, 2020, asked the Chairman of Long An Provincial People’s Committee to direct agencies and departments to inspect, correct, and sweep out wildlife trade centers in the area. The Department of Agriculture and Rural Development of Long An Province then asked the People’s Committee of Thanh Hoa to install cameras on the roads in the market to monitor illegal wildlife trading activities, and at the same time requested the Protection of Forest Department to issue a document to guide the management of ornamental birds to help Long An Forest Protection Department monitor, manage and handle illegal traffickers in the area.

At the end of 2020, the team field returned to Thanh Hoa (Long An) and Tam Nong Market (Dong Thap) to survey the implementation of the directives issued from the local and ministerial levels. The results showed that wildlife trade was still taking place usually, although some shippers have had a more cautious attitude, operate more discreetly, and display less rare species at the market. This change in appearance may be due to a part of the Thanh Hoa market area that has been monitored by local cameras, partly due to the impact of Covid-19, so the number of buyers has decreased, and the number of goods sold is less as well. However, the most commonly trafficked species were still snakes, wild birds, and turtles, and according to the shops, they could still provide rare wild animals. They even showed customers the secret “goods” and transported them to the requested address if customers were referred by a trusted person. According to some traders, the cross-border wildlife transport and trade line was still operating normally despite the Covid-19 situation, and they often delivered “goods” from Laos or Cambodia to Vietnam.

Sky birds are burned alive, plucked and sold in bunches at Thanh Hoa market, Long An (Photo: PanNature)



**According to some traders, the cross-border wildlife transport and trade line was still operating normally despite the Covid-19 situation, and they often delivered “goods” from Laos or Cambodia to Vietnam.**



Wildlife farms in Nghe An and Bac Lieu

## 2

## Surveys on Wildlife Breeding Activities



**Although there is no finalized scientific evidence, current studies already suggest that COVID-19 likely originated in wildlife, in which pangolins and bats may be the intermediate source of disease transmission to humans. Before that, pandemics such as HIV/AIDS, SARS, Ebola, MERS, bird flu, etc., also occurred due to transmission from animals to humans.**

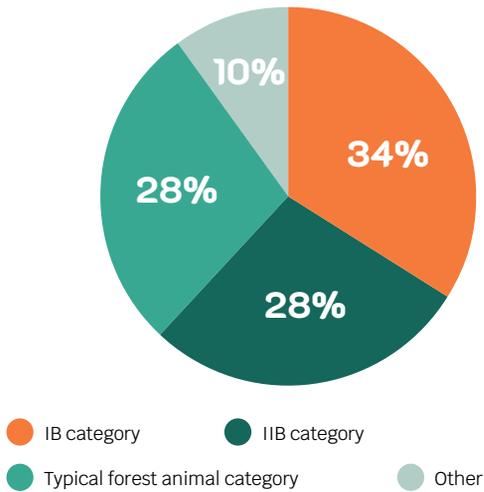
In order to assess the overview of captive breeding conditions and safety, hygiene, and disease prevention at wildlife farms, from August to September 2020, PanNature conducted a quick survey at 21 captive wildlife farms in Nghe An and Bac Lieu. According to the 2017 survey data of the Food and Agriculture Organization of the United Nations (FAO), these are the two localities with the largest number of farms. The results showed that as of October 2019, Bac Lieu had 2,352 breeding facilities (mainly households) with 345,187 individuals, of which 90% were freshwater crocodiles. In Nghe An, as of June 2020,

there were 2,357 breeding facilities with 13,540 individuals of 92 species. Out of the 21 surveyed farms, the team collected 19 valid questionnaires.

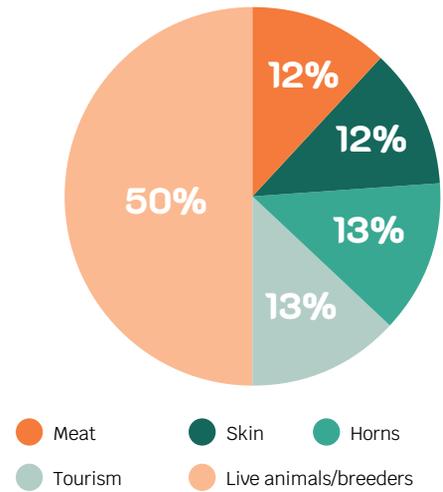
Regarding the location of farm construction, only 16% of breeding facilities were built in specialized areas, and the rest are located between residential areas (31%) and peri-urban/rural areas (53%). Out of 19 facilities, there were 14 breeding and 05 non-breeding facilities.

Regarding the distribution of breeding species, the IB category accounted for 34%;

**Distribution of breeding species**



**Products consumed from breeding facilities**



the IIB category accounted for 28%, the typical forest animal category accounted for 28%, other category accounted for 10%. Regarding the market, mainly wildlife products were consumed domestically and exported to China. In terms of products consumed from such facilities, meat accounted for 12%; skins accounted for 12%, horns accounted for 13%, tourism accounted for 13%, and live animals/breeders accounted for 50%.

Regarding the conditions of cages and safety and hygiene at the facilities, most

of the cages for captive wildlife animals in the two provinces were poorly built (only a small number of them were made stably). Of which, in 5/19 facilities, animals have escaped due to simple captive breeding cages with large numbers of individuals. The cleaning of the cage was also only done according to the owners' own habits, without specific instructions. Some farms only disinfected (by lime, disinfectant, locust) when animals were already sick, or there was an announcement of disease monitoring from the local authorities. The care of breeding animals was also heavily based on "experience," most of which were self-medicated, disease self-detected, and treated at home. When animals died, they often took advantage of part of the meat and only buried the parts that could not be used. Even just a few households treated it with lime powder when burying animals. Specifically, 15/19 facilities documented dead and sick animals (common and unexplained illness). Particularly in terms of disease response and prevention, facilities were quite subjective. Up to 11/19, facilities said they have no worry about the risk of disease spread.

**In 5/19 facilities animals have escaped due to simple captive breeding cages with large numbers of individuals.**

**15/19 facilities documented dead and sick animals (common and unexplained illness).**

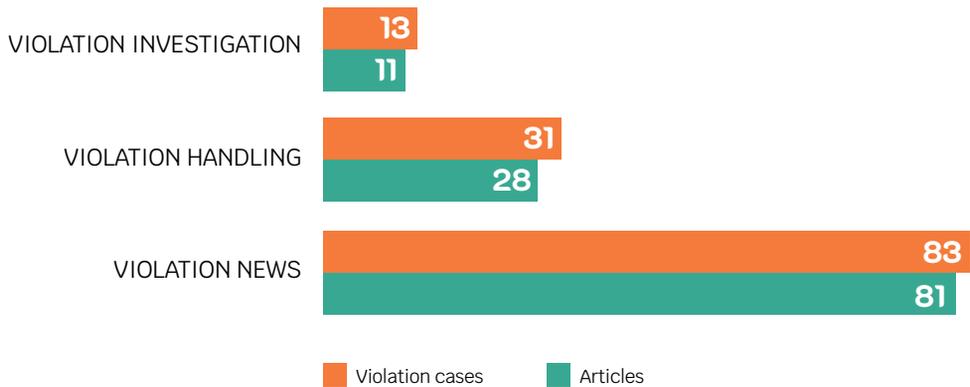
# 3

## Statistics of Violations on Wildlife Trade in Online Newspapers



The survey results showed that in 2019 there were a total of 120 news presses and articles published in 53 newspapers/e-magazines about 127 wildlife-related violations occurring in Vietnam or related to Vietnam, of which some of the news articles were duplicated with other sources. On average, there were ten news and posts per month about 11 violations related to the wildlife trade. Out of 120 news and articles, there were 81 presses and articles reflecting on 83 violations, 28 news and information articles on handling 31 violations, and 11 presses and articles on the investigating of 13 violations.

### STATISTICS OF VIOLATIONS ON WILDLIFE TRADE

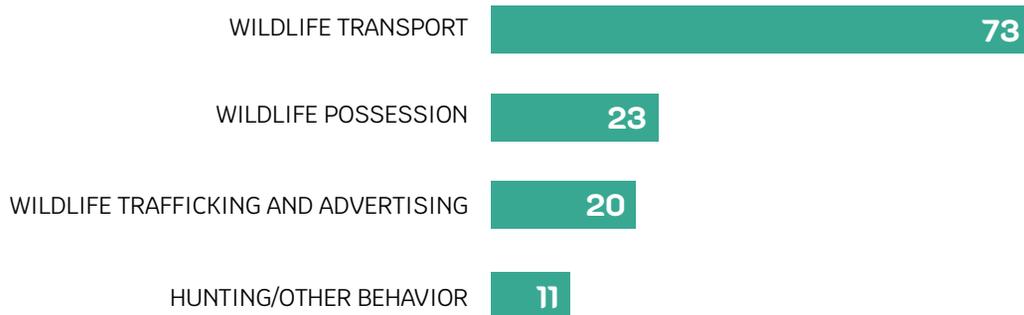


Out of a total of 127 violations reported in the media, 110 violations occurred in Vietnam (domestic violations) and 17 violations related to Vietnam (cross-border violations). Total confiscated products included over 42,086 tons of wildlife, 2,166 individuals, 14 specimens (sea turtles), and 01 skin (tiger) product. Out of a total of 127 violations, there were 73 violations related to illegal wildlife transport, 23 violations of illegal wildlife possession, 11 violations of hunting/other behavior, and 20 violations of trafficking and wildlife animal advertising.



Products advertised as elephant skin (Photo: DDH)

## WILDLIFE TRADE VIOLATIONS ACROSS COUNTRY



Case

With **110** domestic violations, authorities seized over **6 tons** of wildlife products, **1,807 individuals**, **14 specimens**, and **01 skin (tiger) product**.

Out of 17 cases of cross-border violations, authorities seized more than 36 tons, and 359 wild animals, including 14/17 cases of smuggling ivory and pangolin scales and 10/17 cases were detected in Hai Phong with total confiscated products including 4.39 tons of ivory and 16,826 tons of pangolin scales. In some other localities, although the number of detected violations was less, the volume of products confiscated was also relatively large. For example, the Da Nang Customs Branch collected 9.1 tons of ivory in the case of violation. In March 2019, the Southern Anti-Smuggling Control Team collected more than 5.2 tons of pangolin scales at Cai Mep Port in May 2019.

With 110 domestic violations, authorities seized over 6 tons of wildlife products, 1,807 individuals, 14 specimens, and 01 skin (tiger) product. Among these, there were some commonly trafficked species such as snakes, turtles, weasel, bamboo rats, civets, etc. In addition, there were many cases of smuggling of ivory, rhino horn, pangolin scales, skin/bone of tigers with a considerable amount of seizure. The localities where many violations of wildlife trade occur are Nghe An, Dak Lak, Hanoi, Quang Ninh, Kon Tum, Thai Nguyen, and Quang Nam.



Many deer heads are displayed at a facility's warehouse in Thanh Oai district, Hanoi in 2017 (Photo: PanNature)

Notably, out of a total of 181 species that were illegally traded in 127 violations, elephants and pangolins account for the largest number. There were 23 violations related to elephants with a total volume of over 13.8 tons of ivory, mainly violations of illegal transport and trade and advertising of ivory. With pangolins, authorities detected 24 cases of illicit transportation, storage, and hunting of 616 individuals and over 22 tons of scales. Of these, only one case of pangolin poaching occurred in the forest area near the Ham Thuan - Da Mi Hydropower Reservoir, Di Linh District, Lam Dong Province.

Many other endangered and rare animals such as tigers, bears, monkeys, and turtles were also targets for exploitation and smuggling by wildlife criminals. Statistical results showed that 100% of the species trafficked in 17 transboundary violations were within the IB category, and this number accounted for 46% of 110 domestic violations.

Regarding the issue of sanctioning violations, only 18/127 violations were penalized with a total penalty of more than 75 years in prison; 9/127 violations were

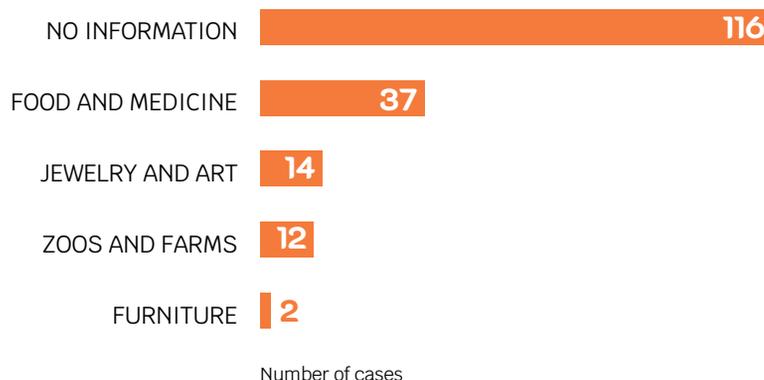


Animal horns at a facility in Thuy Ung village, Thuong Tin district, Hanoi (Photo: PanNature)

administratively handled with more than 1.13 billion VND in fines; 97 violations then had no sanction information; 3 violations were not sanctioned (as counted for animal rescue cases). Notably, only 10/18 criminal cases of violations had specific information on sanctioning results.

Regarding the purpose of violation, most of the cases did not specify the purpose of the violation at the time of providing information to the press, or the information was still under investigation, so it was not ready to be published.

## PURPOSE OF WILDLIFE TRADE VIOLATION



In addition to PanNature's survey, a similar statistic of WCS was also conducted in 2020. The results showed that this year, there were 129 wildlife violations reported by the press (including 4 cases discovered since 2019) with 2,102 wildlife found and confiscated, including live or dead individuals (WCS, 2020b) (WCS, 2020a) (WCS, 2021).

In general, wildlife violation data reflected in the press/e-newspaper was often much more modest than other detailed reports and statistics. Partially, it is because this information source was mainly derived from the press releases of Ministries and their lower authorities. It thus should be considered as only a very small part of wildlife trafficking violations that were actually taking place in Vietnam, and many violations were likely to be missed or not reported in reality. For example, the Education for Nature Vietnam (ENV) alone said that in 2019, it received 1,777 notices of wildlife violations via Hotline 1800-1522, much higher than in previous years (ENV, 2020). In particular, the advertising and selling of wildlife products on the Internet have been very alarming. ENV's Wildlife Protection Department recorded more than 2,400 cases of wildlife advertising on Facebook, YouTube, Zalo, Tik Tok, and other websites in 2019, and this number showed no sign of decline in 2020 (Thu Trang, 2020). Notably, the number of wildlife violations in 2020 recorded from the ENV hotline was even nearly twice as high as in 2019, with 2,907 cases, including 98 cases of illegal animal trafficking and transportation (Hoàng Phan, 2021).



**In particular, the advertising and selling of wildlife products on the Internet have been very alarming. ENV's Wildlife Protection Department recorded more than 2,400 cases of wildlife advertising on Facebook, YouTube, Zalo, Tik Tok, and other websites in 2019, and this number showed no sign of decline in 2020 (Thu Trang, 2020).**



# DISCUSSIONS

*Turtles are publicly sold at Thanh Hoa market, Long An (Photo: PanNature)*

The results of field investigations and data surveys showed that the wildlife trade situation in Vietnam is still complex, despite the determination of the Government leadership and the efforts of conservation organizations. When the Covid-19 epidemic broke out, the Prime Minister signed and promulgated Directive No. 29/CT-TTg on a number of urgent solutions to wildlife management, which required stopping the import of wildlife until there were new instructions and resolutely eliminating illegal wildlife markets and trading centers. However, the actual evidence showed that wildlife animals were still traded both openly and secretly, in a smaller and more organized manner to be hidden better from the authorities. The enforcement officers were also reported to have little capacity to distinguish the real and fake products.

In most of the surveyed localities, the authorities have not been closely involved with the task of reviewing and managing wildlife captive and wildlife trade activities. This is not difficult to come to a conclusion because while it is easy for journalists to access, record, and take photos of wildlife trade, in many localities, authorities still believe that this activity is difficult to detect or they have no human resources to handle the cases. Wildlife advertising and transactions that were publicized on social networking sites have

also received little attention, not to mention many cases that have received reports and denunciations but have not been handled. Out of the 4 cases of investigation and handling of violations mentioned after the field visits, there were 2 cases that required the direction and direct involvement of central agencies (the Forest Protection Department and the Environmental Crime Prevention Police Department). This showed that the control, investigation, and handling of wildlife violations in localities need more determination from local leaders in direction, urging, inter-sectoral supervision, and accountability of the law enforcement departments at the local level.

As for ivory smuggling, out of the 3 cases of confiscation of exhibits mentioned, there were 2 cases where the initial confiscation volume at trading centers was 6 kg and 3 kg. However, after the inspection, the quantity that was confirmed to be natural ivory was under 2 kg, 0.76 kg, and 1.7 kg, respectively, even though the seller had previously confirmed and used all means to prove it to the buyers (undercover journalists) that his goods are natural ivory. According to the provisions of Article 244 of the 2017 Penal Code, trading in ivory with 2 kg or more of ivory may be subject to a criminal investigation. This raises the question of whether there was a “special

interest group” in the process of assessing and handling violations of the ivory trade? Is there any collusion and self-interest of the law enforcers themselves in exchange for “to a slap on the wrist” of the violators?

Besides lax/loose management, one of the difficulties at the local level is that it is difficult to identify which animals are prohibited from being poached, traded, transported, used, and which are allowed to be poached for commercial purposes. Although Decree No. 06/2019/ND-CP and Decree No. 160/2013/ND-CP have listed the list of endangered, precious, and rare species of forest flora and fauna and endangered, endangered species with prioritized protection demands, however, authorities and forest rangers in many localities admitted that they do not have the capacity to identify the status and level of protection of species, thus facing difficulties in identity, inspect, supervise and manage wildlife trade activities.

Finally, surveys on wildlife farms and breeding facilities showed that this activity has not been paid enough attention, both in terms of captive management and ensuring stable conditions, hygiene, and veterinary medicine. The breeding of wildlife in some localities seemed to be no different from the breeding of common animals. This observation is particularly concerning in the context of scientific studies that have demonstrated that diseases such as SARS, African swine fever (ASF), Middle East Respiratory Syndrome (MERS-CoV), and especially the case with COVID-19, all originate from wildlife. Allowing wildlife breeding with a lack of strict control and management can pose risks to human health and wildlife animals. Additionally, not to mention, surveys in 2018 by PanNature showed that wildlife was “legalized” through these facilities to become domestic animals and legally transported and traded.



Wild animals are traded at Thanh Hoa market, Long An (Photo: PanNature)

**The control, investigation, and handling of wildlife violations in localities need more determination from local leaders in direction, urging, inter-sectoral supervision, and accountability of the law enforcement departments at the local level.**



# CONCLUSIONS

*Animal traps seized at Pu Mat National Park, Nghe An (Photo: PanNature)*

Many research and practical evidence showed that wildlife trafficking in Vietnam is causing serious consequences for natural ecosystems and negatively impacts the goal of sustainable socio-economic development. The fact that Vietnam becomes one of the hubs for transition, smuggling, and consumption of wildlife not only reduces national resources but also increases the risk of epidemics of animal origin, violating international commitments, agreements, and conventions that Vietnam has signed, and affecting Vietnam's image in the international arena.

In order to promote the prevention of illegal wildlife trade and strengthen the management of wildlife farming nationwide, and limit the risk of outbreaks of zoonotic diseases, authorities should prioritize the reviewing and closing of all markets and illegal wildlife trading locations, clearly define the responsibilities of local authorities at all levels when violations of illegal wildlife trade and consumption occur in their localities. Training and communication should be promoted at the local level so that people can detect violations of the law and support authorities in monitoring, managing, and handling wildlife trade violations.

**Many research and practical evidence showed that wildlife trafficking in Vietnam is causing serious consequences for natural ecosystems and negatively impacts the goal of sustainable socio-economic development.**

According to information from the field investigations of the team, the main source of wildlife sold in many markets is now partly poached in the surrounding areas of protected areas/national parks and partly smuggled from nearby countries in the region. These items are then brought to wildlife farms in Vietnam in various ways to legalize the source of goods before being sold to the market. Wildlife "legalization" this way is quite common in some localities with wildlife consumption locations adjacent to border areas such as An Giang, Long An, and Dong Thap. Therefore, it is necessary

to tighten the management of commercial captive breeding of wildlife in combination with the research, assessment, and categorizing of permitted species.

**In particular, there should be a mechanism to periodically share and update this data system in order to help people participate in monitoring the management and handling of violations.**

Besides the danger of smuggling and the “legalization” of wildlife, while many farms also pay little or no attention to securing breeding conditions, safety, and hygiene. Disease response and prevention are quite sketchy and subjective as well. Therefore, it is necessary to develop captive breeding procedures and techniques for each group of species and closely monitor hygiene and disease prevention at farms as well.

Along with measures to strengthen the management and supervision of wildlife trade and captive breeding, it is also important to establish a common database system on wildlife-related violations. In particular, there should be a mechanism to periodically share and update this data system in order to help people participate in monitoring the management and handling of violations.

Finally, it is necessary to promote control of illegal wildlife products advertising and sale activities on mass media and e-commerce platforms; communication to raise public awareness of the risks of illegal wildlife consumption; encourage press agencies to promote propaganda against illegal wildlife trade, increase information on wildlife trafficking violations, and not promote foods or remedies derived from wildlife.



*Many turtle species are illegally traded at Thanh Hoa market, Long An (Photo: PanNature)*



## Pangolins

Pangolins are now the world's most trafficked mammal, with the number of smugglers seized originating in Africa and destined for Asian markets increasing tenfold since 2014 (Hoa Lan, 2020). Between 2014 and 2018, an estimated 370,000 pangolins were seized globally, with the number of pangolins being seized mainly in West and Central Africa.

In early 2020, the Wildlife Trade Monitoring Network (TRAFFIC) reported that about 895,000 pangolins were trafficked between 2000 and 2019 in Southeast Asia. An average of 33 countries and territories are involved in the international smuggling of pangolins each year. Smuggling organizations used more than 150 special routes to transport pangolins between 2010 and 2015 and developed about 27 new routes each year. The report indicates that the ten countries most involved in pangolin trafficking are China, Vietnam, Malaysia, Hong Kong, Thailand, Laos, Indonesia, the US, Nigeria, and Germany (Nhật Anh, 2020e), of which Vietnam South and China are the two largest consumers of pangolins.

The Center for Advanced Defense Studies (C4ADS) affirmed that 2019 was a record year for pangolin smuggling in terms of both the number of scales seized as well as the number of arrests (Nhật Anh, 2020d). In Vietnam, in 2019, there were also tens of tons of pangolin scales seized at seaports, of

which the largest seizure ever took place at Hai Phong port in March 2019 with a volume of more than 8 tons of scales imported from Nigeria. The reason for the fierce poaching of the pangolin is simply because many people are fanatical about using pangolin scales to treat diseases such as cancer, detoxification, anti-inflammatory, antipyretic, asthma, blocked milk. In addition, pangolin meat is also considered a specialty in some areas. Given the rise of pangolin trafficking, the Wildlife Justice Commission (WJC) recommends that pangolin smuggling should be treated as a transnational organized crime (BVR&MT, 2020).

In early 2020, under the impact of Covid-19, pangolin smuggling activities decreased sharply in many countries because this animal is considered the leading "suspect" in the transmission of the new strain of coronavirus to humans (Nhật Anh, 2020b). *While offering no threat to humans in their own habitat, but allowing them to be trafficked, slaughtered, and sold in illicit markets along with other wild species greatly increases the risk of transmission of viruses and other pathogens.*" warned UNODC Executive Director Ghada Waly.

There are currently only eight species of pangolin in the world, of which four are found in Asia and 4 in Africa. Since 2016, all eight species have been listed in Appendix I of the Convention on International Trade in Endangered Species (CITES), meaning all trade in pangolins is banned. In Vietnam, two species of pangolins, including the Chinese pangolin (*Manis pentadactyla*) and the Javan pangolin, are also protected by the law at the highest level. Any act of illegally poaching, killing, breeding,

confining, possessing, transporting, or trading of pangolins, their body parts, or products of a pangolin may be subject to criminal prosecution. However, due to low reproduction rates, food specialization, and great pressure on poaching, trade, and habitat loss, pangolin species in Vietnam are still at high risk of extinction.

In 2020, under the impact of the Covid-19 pandemic, China closed wildlife farms, banned the trade of wildlife for food, and removed pangolin scales from the pharmacopeia. However, a survey by the International Environmental Investigation Agency (EIA) showed that pangolin scales are still listed as an ingredient in some of China's national medicine. Two hundred twenty-one pharmaceutical companies were issued with approvals to produce medicine products containing pangolin scales; 56 pharmaceutical companies were identified to be advertising a total of 64 pangolin scale medicines; six pangolin scale medicine products manufactured in China available for purchase with international shipping on e-commerce platforms (EIA, 2020).

In order to protect pangolins from extinction, many countries such as Singapore and Nepal have developed conservation plans and enacted regulations to protect and prohibit the capture and commercial trade of this animal. It is being threatened with extinction. Vietnam is also expected to invest more than 85 billion VND for the conservation of pangolin species according to the "Emergency action plan for the conservation of pangolin species in Vietnam for the period 2020 - 2030". However, the biggest challenge is still stopping the consumption and smuggling of pangolins in Asia and Africa.



## Rhinos

Rhinos are one of the most endangered wild species today. Their existence is threatened by poaching and the smuggling of rhino horns for medicine. The world currently has five rhino species, of which the white rhinoceros and the black rhinoceros are distributed in Africa. The remaining three species, including Sumatran rhinoceros, Indian rhinoceros, and Javan rhinoceros, are distributed in Asia. As of 2019, the world has only about 27,300 rhinos left in the wild, a decrease of 1,700 rhinos compared to 2017 (IRF, 2019).

According to data released by South Africa, from 2018 to now, the rate of rhino poaching has decreased compared to the previous period. In 2018 there were 749 rhinos killed in South Africa, and in 2019 this number was 594 individuals, much lower than the 4,420 rhinos killed between 2014 and 2017. However, rhino horn trafficking activities in the countries are still very active. Most of the rhinos are killed to meet the demand for horns in Asian countries, including Vietnam. It is worrisome that with the support of several African countries, at the CITES CoP18 Conference, South Africa was allowed to nearly double the number of black rhinos that could be killed as trophies after arguing that the amount obtained will support the conservation of critically endangered species (Nhật Anh, 2019a).

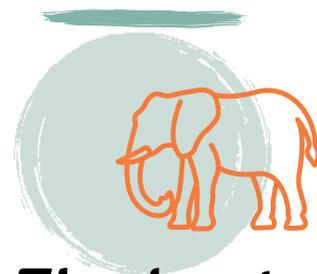
# APPENDIX: ILLEGAL TRADE OF SELECTED ENDANGERED SPECIES

In 2019 there was a lot of bad news for rhinos when up to 15 individuals were killed in Botswana in October and November (Nhật Anh, 2019c) or South Africa arrested hundreds of rhino poaching suspects; Sumatran rhinoceros extinct in Malaysia; Indonesia lost another Javan rhino; the world's oldest rhino died in Tanzania; The last male North African white rhino died in Kenya. In 2020, under the overarching impact of Covid-19, wildlife smuggling activities had somewhat slowed down, but the risk to some species, especially rhinos, is still very high.

In addition to the loss in numbers, in 2019 - 2020, the world also recorded efforts to conserve rhinos by many non-profit organizations and research groups. Many initiatives have been proposed and implemented to save rhinos from poaching, such as: injecting a toxic mixture into rhino horns; sawing off horns; making fake horns from horsehair; breeding; artificial insemination; Ex-situ conservation; scanning wildlife products on the Internet; DNA identification for criminal investigation; cross-border rhino conservation cooperation; digitally recreation of rhinoceros; issuing rhino bonds; the establishment of anti-poaching groups; raising awareness programs on rhino conservation.

Vietnam was once home to one of the world's five rhino species - the Javan rhinoceros or Vietnam's Rhinoceros (*Sondaicus annamiticus*). But the event that the last Javan rhinoceros was shot dead in 2010 marked the extinction of this subspecies in Vietnam. Currently, Vietnam is considered the world's number one transit point and destination for rhino horn and tiger parts, ivory, and pangolin scales. (Vân Anh, 2019). Statistics showed that in 5 years (2013-2017), law enforcement agencies arrested 41 cases with more than 380 kg of rhino horn confiscated (WCS, 2017). In 2018 - 2019, many

rhino smuggling cases were detected and arrested. In particular, in September 2020, Vietnam proceeded the first instance trial of the case of the transnational rhino horn smuggler Nguyen Mau Chien and sentenced him to 23 months in prison, seven months heavier than the initially previous judgment. Notably, in 2019 there was a case of a 22-month-old patient in Ho Chi Minh City. HCM City suffered from rhino horn poisoning after being given powder from rhino horn by his family in the hope of treating fever. This is a wake-up call for individuals who are fanatical about the exaggerated effects of rhino horn that can cure diseases such as cancer, detoxification, high fever, and coma.



## Elephants

Every year, at least 20,000 African elephants are illegally killed for their ivory, mainly for the Asian market, in which the three largest ivory consumers are China, Vietnam, and Thailand (UNODC, 2016). In late 2019, early 2020, the impact of the Covid-19 epidemic caused a decrease in demand for ivory in countries (Nhật Anh, 2020a), including the Chinese market. However, ivory seizure data Illegal elephants and rhino horns showed that 2019 is still a record year for trafficking of these two product groups. Even according to a nearly year-long investigation by the Wildlife Justice Commission (WJC), changes in legislation and improved enforcement

measures appear to be resulting in a level of crime displacement from China and Vietnam to Cambodia, a country not previously recognized as a major illegal ivory hub (WJC, 2020). Evidence has been gathered that Cambodia is becoming a center for carving and manufacturing ivory items aimed at Chinese customers, not just a regular retail market. In addition, WJC also found that the price of raw ivory has been on a downward trend because of the pandemic, but this decline has prompted criminal organizations to switch to smuggling manufactured ivory instead of natural ivory for more accessible transportation (Nhật Anh, 2020c). In terms of transition methods, an increasing number of criminal groups have used the marine smuggling route instead of the airway, in which ivory is often disguised in fake wooden boxes.

Vietnam is not only an end market and a consuming country but also a transition point for ivory and other wildlife products from Africa to Southeast Asian countries and China. It is estimated that in the past ten years, the volume of ivory imported into Vietnam has exceeded 76 tons, equivalent to more than 11,500 elephants killed (Phạm Thùy, 2020). Only from the beginning of 2010 to the end of 2018, the Education for Nature Vietnam (ENV) recorded about 150 cases of ivory smuggling with a total volume of ivory seized up to more than 53 tons (Hùng Võ - Văn Hoàng, 2019). In 2019 alone, authorities arrested three significant ivory smuggling cases with over 21 tons of tusks confiscated, equivalent to thousands of elephants killed.

Although it is a prohibited item, ivory is sold quite openly at gold shops, souvenir shops, commercial centers, and tourist centers. Research published in 2016 by Save the Elephants showed that out of 49 stores they surveyed in Buon Ma Thuot (Dak Lak), there were 24 outlets

displaying for selling 1,965 ivory items, in Buon Don (Dak Lak), there were 16/23 shops selling 703 souvenirs of ivory items (Vigne & Martin, 2016). In 2017, Traffic's survey also showed that *"Physical outlets in Ho Chi Minh City and Buon Ma Thuot had the highest number of items for sale. However, two villages (Ban Don and Lak) represented a disproportionately high number of items when compared to the number of outlets selling ivory"*. (Nguyen et al., 2018).

Notably, target groups increasingly used online platforms to advertise and sell ivory. The phrase *"mua bán ngà voi"* ("ivory trade") will result in millions of results in just 1/3 of a second. A survey by the WildAct Foundation showed that from mid-2015 to early 2016, there were nearly 21,000 elephant products, including ivory and tail feathers, for sale on social networks (Nhật Anh, 2020c). TRAFFIC also recently published a report warning that thousands of ivory items were traded each month on social media in Indonesia, Thailand, and Vietnam from 2016 to 2019, of which Vietnam is the largest share of ivory items traded (Indraswari et al., 2020).

In order to limit ivory smuggling, Vietnam has tightened regulations on handling violations related to illegal ivory storage, transportation, and trade. Accordingly, the 2017 Consolidated Penal Code stipulated that illegal possession, transportation, and trade of ivory weighing 2 kg or more may be considered for criminal prosecution. At the end of 2016, Vietnam also destroyed 2 tons of ivory and 70 kg of rhino horn illegal products. It is estimated that there were tens of tons of ivory and rhino horn illegal products seized in cases that have yet not been destroyed. Education and Nature Vietnam

(ENV) recommends that management agencies organize annual destruction of confiscated ivory, rhino horn illegal products, and other exhibits to contribute to preventing wildlife crime and reducing illegal overload in state reserves.



## Tigers

Time for wild tigers is running out. The population of these big cats in 2019 is estimated to be 3,900 minimum (Ramacandra Wong & Krishnasamy, 2019). The number has decreased by over 96% after a century compared with 100,000 a century ago. Except for India, which is currently home to over 2,900 individuals, the remaining 12 Asian countries are in an alarming state because of tiger decline. In particular, five countries are on the verge of tiger extinction, including Cambodia (0 individuals), Laos (two individuals), Myanmar (no data available), Vietnam (<5 individuals), and China (just more than seven individuals) (WWF, 2016). According to a study published at the end of 2019, tigers are extinct in Laos (WWF, 2019).

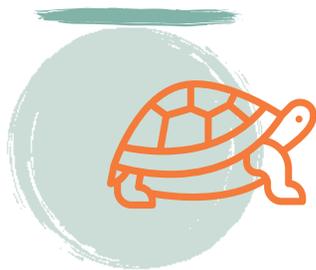
In addition to decreased population, the tiger's habitat has also shrunk by 93% (Hồng Vân, 2011). This decline stems mainly from illegal hunting, tiger smuggling and habitat loss, and prey decline. Traffic's survey showed that from 2000 to 2018, the functional force seized 2,359 tigers in 1,142 violations across 32 countries and territories globally (Ramacandra Wong & Krishnasamy, 2019). Of these, 95% of seizures were recorded

in countries where tigers live. India - the country with the largest wild tiger population in the world is home to the highest total number of seizures and the largest number of tigers seized, accounting for 40.5% of the total number of cases and 26.5% of the total number of tigers. (Ramacandra Wong & Krishnasamy, 2019). In particular, tiger skin and bones are the two most smuggled parts.

In terms of the number of tigers kept on farms, the world has more than 12,000 individuals, of which 6,057 are raised in China. It is worth mentioning that many of these establishments are involved in trafficking networks (UNODC, 2020). Traffic's research showed that up to 58% of tigers caught in Thailand and 30% in Vietnam were identified as originating in captivity, with the largest proportion coming from a single capture of 187 tigers at the Tiger Temple in Thailand in 2016 (Ramacandra Wong & Krishnasamy, 2019). Recently, due to the impact of Covid-19, tiger smuggling activity decreased. However, UNODC warned that smugglers increasingly tend to use body parts of lions, jaguars, and leopards to replace tigers. The rise in seizures of tiger products, which often include wine bones or tiger extract in China and Vietnam, has prompted smuggling groups to gradually shift to sourcing parts from other big cats such as clouded leopards, snow leopards, and jaguars.

The world has nine tiger subspecies; three subspecies have become extinct, including Java tiger, Bali tiger, and Caspian tiger; the South China tiger subspecies is almost extinct in the wild; The remaining five subspecies are Bengal tiger, Indochinese tiger, Sumatran tiger, Siberian tiger, and Malayan tiger. Vietnam is located in the

distribution area of the Indochinese tiger species, but in the past five years, the biodiversity survey reports have not recorded tigers in the wild. Many forecasts suggested that after the rhinoceros, the tiger will be Vietnam's next large mammal to be listed as extinct in the wild (Thu Trang, 2019). Since 2010, Vietnam has participated in the global tiger conservation program and in 2014 approved the National Program on tiger conservation for the period 2014 - 2022. However, resources for implementation are still very limited, not to mention that the demand for tiger parts is still increasing, and the tiger smuggling activity shows no signs of slowing down.



## Tortoise and Freshwater Turtle

For decades, turtles have been illegally traded in large numbers, especially for tortoises and freshwater turtles. From eggs, chicks to adults and body parts – all are exploited and smuggled for food, medicine, and livestock. Since 2010, Conservation International (CI) has warned that more than a third of the 280 species of freshwater turtles in the world are at risk of extinction (ENN, 2010), including the Swinhoe's softshell turtle (*Rafetus swinhoei*) and the Vietnamese pond turtle (*Mauremys annamensis*).

Turtles are distributed across all continents, but Asia is home to 17 of the world's most threatened species. China and India are two

critical markets for turtle smuggling. In particular, China is the world's largest consumer of turtles with a total value of 750 million USD/year, with more than 300 million turtles being trafficked annually. In India, statistics from 2009 to 2019 showed that at least 111,310 wild freshwater turtles were trafficked (Nhật Anh, 2019b). In Vietnam alone, nearly a third of the more than 26,000 wildlife parts confiscated between 2013 and 2017 were turtles (WCS, 2017).

Vietnam has 26 species of tortoise and freshwater turtles, but up to 23 species are listed as Critically Endangered or Endangered in the IUCN Red List. Since 2011, the Turtle Conservation Coalition has included three Vietnamese turtle species, namely the Swinhoe's softshell turtle (*Rafetus swinhoei*), The Golden coin turtle (*Cuora trifasciata*), and the Vietnamese pond turtle (*Mauremys annamensis*), into the list of 25 most endangered tortoises and freshwater turtles in total 331 species of turtles in the world (Nguyễn Hằng, 2019). At the CITES Conference (CoP 18) held in Geneva in August 2019, Vietnam also proposed to elevate three endemic and endangered turtle species distributed in Vietnam from Appendix II to Appendix I, including the Southern Vietnamese box turtle (*Coura picturata*), the Vietnamese pond turtle (*Mauremys annamensis*), Bourret's Box Turtle (*Coura bourreti*) and this proposal received high consensus from member countries. In 2019, Vietnam's Endangered Turtle Species Conservation Program to 2025, with a vision to 2030, was also approved. However, the road to turtle conservation is still challenging due to a lack of resources and rampant trafficking.

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