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DATE: 31 May 2018  
SERIAL: A-MAC-31052018  
COUNTRIES: Congo (B), DR Congo, Uganda,  
Malaysia, Thailand, Lao PDR

## **ALERT ---- AIR CARGO & MARITIME**

SUBJECT: **Dried Fish Maws a Concealment Method for Illicit Ivory and Pangolin Scales**

DATA: Wildlife traffickers utilize consignments of dried fish maws and/or shipments falsely declared as fish maws to conceal illegal shipments of ivory and pangolin scales.

### **Modus Operandi:**

Fish maws (HS Code headers 0302, 0303, and 0305 – the commercial name for the dried swim bladders of large fish), are a common method for physical concealment and misdeclaration of illegal wildlife products, as well as, potentially, for trade-based money laundering schemes related to wildlife trafficking. Use of this concealment method has been documented to occur in both air cargo and maritime transport and is likely to be ongoing, according to open source and confidential reporting.

Traffickers conceal illegal wildlife products both within consignments of legal fish maws, as well as falsely declare shipments of illegal wildlife products as fish maw, according to available reporting. Additionally, Asia-based wildlife traffickers have in multiple cases identified themselves as international fish maw traders, according to law enforcement sources.

Wildlife traffickers may be attracted to this concealment technique because fish maws can be made to very roughly resemble pangolin scales. In addition, fish maws are also relatively valuable commodities in themselves in the same major destination markets in Asia as ivory and pangolin, indicating that fish maw shipments may also be used to justify large payments and otherwise facilitate trade-based money laundering schemes related to illegal wildlife shipments.

Fish maws have been used to conceal several recent larger scale illegal consignments of illicit ivory and pangolin scales resulting in enforcement actions against wildlife traffickers, including the following cases:

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1. NOVEMBER 2017 (*pictured*): Thai customs at Suvarnabhumi Airport in Bangkok (IATA: BKK) seized 116 kg of ivory and 15 kg of pangolin scales worth an estimated \$340,000 in an air cargo shipment from Brazzaville, Republic of Congo via Istanbul, Turkey. The illegal items were packaged in cardboard boxes and had been falsely declared as fish maw. Thai customs believe this illegal shipment is related to another 41kg of ivory seized in September 2017 using the same route.



PHOTO: Sakchai Lalit, 9 November 2017

2. AUGUST 2017: Royal Malaysian Customs officers confiscated 300.9 kg of pangolin scales concealed in sacks in an air cargo consignment originating in the Democratic Republic of Congo DRC with a final destination in Malaysia, transiting via Addis Ababa, Ethiopia. The shipment was falsely declared as fish maw.
3. FEBRUARY 2017: Thai customs seized 1,066 kg of pangolin scales at Bangkok's Suvarnabhumi Airport falsely declared as fish maw and worth an estimated total of \$1.15 million. The illegal scales were concealed in 22 separate air cargo packages, all originating from Lubumbashi, Democratic Republic of the Congo, transiting Nairobi, Kenya, and with a final declared destination of Vientiane, Lao PDR.

**Geography:**

According to Taskforce analysis of available information, wildlife trafficker use of fish maws as a concealment method for ivory and pangolin scales appears to be most prevalent in air cargo and maritime shipments originating from East or Central Africa with a destination in Southeast Asia, although use of this concealment method should be considered a contributing risk factor along all high risk wildlife trafficking routes.

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**Red Flags:**

Although traffickers regularly modify their tactics and routings to avoid detection, the following, alone or in combination, may indicate a higher risk of wildlife trafficking activity related to the use of fish maws as a concealment method, especially along high-risk routes for wildlife trafficking between Africa and Asia:

- Shipments declared as fish maws with destinations in Southeast Asia originating from Uganda, Republic of Congo (Brazzaville), or Democratic Republic of Congo.
- Shipments of fish maws with an illogical or unclear business purpose.
- Shipments of fish maws with declared counterparty information matching individuals or businesses with a history of involvement in wildlife trafficking.

**ACTIONS:** This alert is assessed as most relevant to the general categories of action checked below.  
\*\*All decisions and actions informed by this alert are the sole responsibility of the receiving organization\*\*

- Conduct reasonable checks on shipments fitting a similar profile
- Execute / enhance internal controls or procedures relevant to this information
- Report / share information to customs / law enforcement
- Information has potential security implications for company employees

**SOURCE:** This advisory is based on UfW Transport Taskforce analysis of recent enforcement actions as well as open source and confidential reporting from partners. We have *high* confidence in the reliability and validity of this information, with the following caveat: the data upon which this analysis is based is exclusively anecdotal and is therefore inherently limited to available information and likely incomplete.

**PRIORITIES:** This alert is related to the following Transport Taskforce information sharing priorities (checked):

- Wildlife trafficker networks, behavior, intentions, and operational tactics and strategy
- Indicators of suspicious or higher risk activity ('red flags') related to wildlife trafficking
- Data potentially reportable to or shareable with law enforcement
- Security/physical risks and vulnerabilities to transport company operations, facilities, or staff
- Unintentional facilitation of illegal wildlife demand or retail trade

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CONTACT:	For questions or additional data/analysis relevant to this alert, or to report suspicious shipments or indicators of wildlife trafficking activity, please contact the UfW Transport Taskforce: <a href="mailto:transport@unitedforwildlife.org">transport@unitedforwildlife.org</a>
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END