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DATE: 01 July 2018
SERIAL: MA-01072018
COUNTRIES: Ghana, Malaysia, Global

ALERT ---- **MARITIME / AIR (CARGO & EXPRESS)**

SUBJECT: **Seashells a Common Misdeclaration Tactic related to Illicit Ivory and Pangolin Shipments**

DATA: Wildlife traffickers regularly falsely declare illegal consignments of illicit ivory and pangolin to be seashells or similar.

Modus Operandi:

Illicit shipments of elephant ivory and pangolin are commonly falsely declared as seashells or similar type goods on bills of lading, air waybills, and other shipping documentation, according to open source and confidential law enforcement reporting.

Wildlife traffickers appear to most consistently use this tactic in air express, air cargo, and containerized maritime shipments, often in combination with other methods of document fraud, such as using false addresses or shipper details. In addition, illegal wildlife consignments falsely declared as seashells appear to often occur in groups of separate shipments occurring within a short amount of time all with the same or similar false goods declaration, according to Taskforce analysis of historic seizures and law enforcement information.

According to available information, the following specific goods declarations are associated with this tactic:

- "Oyster" / "Oyster Shells"
- "Seashells"
- "Shells"
- "Snails" / "Snail Shells" / "Sea Snails" / "Sea Snail Shells"
- "Various Marine Shells"

Available intelligence reporting indicates that this tactic is in current ongoing use by pangolin trafficking networks operating between West Africa (especially Ghana) and Southeast Asia (especially Malaysia).

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PHOTO

Malaysian customs officials with some of 288 kg of illicit pangolin scales seized at Kuala Lumpur International Airport's Free Trade Zone on 13 June 2017. The air cargo shipment originated from Accra, Ghana, and was falsely declared as oyster shells.

(Photo Credit: TRAFFIC, June 2017)

Geography:

According to Taskforce analysis of available information, wildlife trafficker use of seashells as a misdeclaration tactic for illicit ivory and pangolin appears to be most prevalent in air express, air cargo, and maritime shipments originating from West or East Africa with a destination in Southeast Asia or Southern China. Current intelligence indicates that Ghana and Malaysia are particularly vulnerable to this tactic as a country of origin and destination, respectively, especially relating to potential illicit pangolin trafficking.

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 shipments falsely declared as seashells, especially along high-risk routes for wildlife trafficking between Africa and Asia:

- Shipments declared as *Marine Shells, Oyster Shells, Seashells, or Snail Shells*, or similar, originating from countries in West or East Africa (especially Ghana) with a destination of Southeast Asia (especially Malaysia).
- Multiple separate shipments within a short period of time declared as seashells or similar, in particular along high risk routes for wildlife trafficking between Africa and Asia.
- Shipments declared as seashells or similar which have an illogical or unclear business purpose.
- Shipments declared as seashells or similar with counterparty information matching individuals or businesses with a history of involvement in wildlife trafficking.

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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:
transport@unitedforwildlife.org

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END