

# Exposing the Hydra:

The growing role of Vietnamese syndicates in ivory trafficking



### We would like to thank

the following donors: Adessium Foundation, EJF Philanthropies, Friedman-French Foundation, Kindy French, Oak Foundation, Steven Stone, The Rufford Foundation, The Elephant Crisis Fund, an initiative launched by Save the Elephants and the Wildlife Conservation Network, in partnership with the Leonardo DiCaprio Foundation.

EIA also wishes to thank its numerous other supporters whose long-term commitment to the organisation's mission and values helped make this work possible.

The Hydra reference in the title of this report refers to the multiplicity of different networks (with many heads) operating in the illegal wildlife trade in Vietnam and should not be confused with the ongoing work being conducted by Freeland on a specific network, code named The Hydra.

### ABOUT EIA

We investigate and campaign against environmental crime and abuse.

Our undercover investigations expose transnational wildlife crime, with a focus on elephants, pangolins and tigers, and forest crimes such as illegal logging and deforestation for cash crops like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduce the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector.

### EIA UK

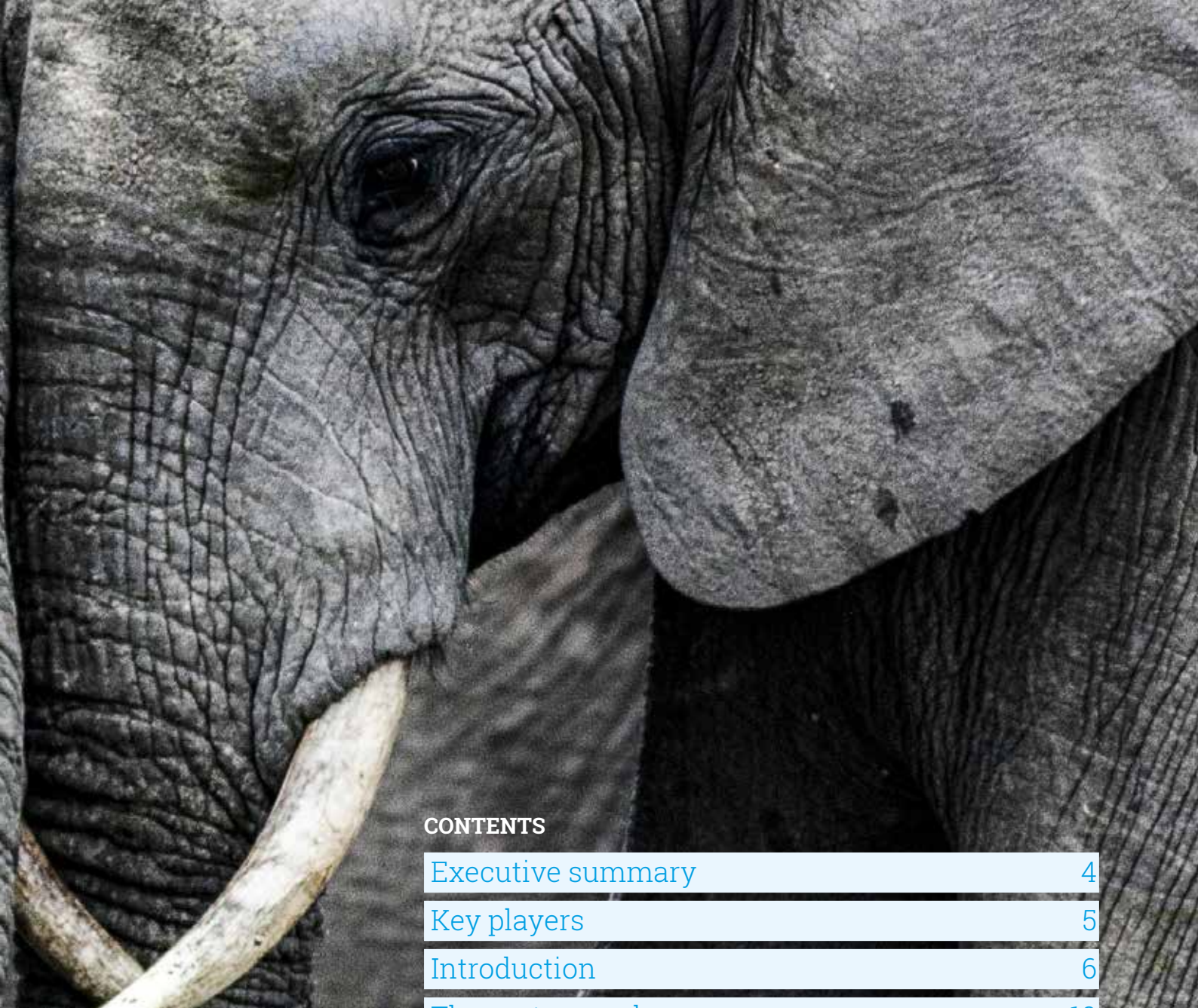
62-63 Upper Street,  
London N1 0NY UK

**T:** +44 (0) 20 7354 7960

**E:** [ukinfo@eia-international.org](mailto:ukinfo@eia-international.org)

[eia-international.org](http://eia-international.org)

Environmental Investigation Agency  
UK. Company Number: 7752350 VAT  
Number: 440569842. Registered in  
England and Wales



## CONTENTS

Executive summary	4
Key players	5
Introduction	6
The routes used	10
The economics	12
The art of concealment	13
Key player profiles	14
- Phan Chi	15
- Nguyen Thanh Trung	16
- Nguyen Tien Son	17
- Le Thi Thanh Hai	18
- Teo Boon Ching	19
- Nguyen Cong Tho	20
- Duong Van Dang	21
Recommendations	22
References	23

# Executive summary

## Despite being the focus of numerous investigations and exposés regarding the country's role in the international illegal wildlife trade, Vietnam continues to be a primary hub for ivory trafficking.

Research and analysis by the Environmental Investigation Agency (EIA) reveals that since 2009, 56 tonnes of ivory have been seized in Vietnam and a further 20 tonnes linked to Vietnam seized in other countries. This is equivalent to ivory sourced from approximately 11,414 elephants.

Failure to take any meaningful action against identified networks and individuals has led to the present situation where international Vietnamese syndicates are operating with impunity across Africa and into Vietnam and its neighbouring countries. Illegal ivory, rhino horn and pangolins are entering Vietnam at alarming rates, accelerating further declines in already-besieged populations of elephants, rhinos and pangolins.

Over the course of two years, EIA conducted an investigation into the modus operandi of some of these criminal networks. What emerged was an international landscape plagued by a significant number of organised Vietnamese syndicates. We have highlighted only a handful of individuals here, but there are many more involved and too many to include in this report.

Key findings are that there are a number of major criminal syndicates operating in Mozambique and other African countries trafficking wildlife into and through Vietnam. They are loosely structured with distinct and hierarchical roles, but with flexibility within the groups to co-operate or switch affiliation. Unlike the Chinese criminal groups EIA has previously investigated, the Vietnamese are prepared to be more 'hands-on'. Sophisticated methods of concealment have been developed and deployed and specialist transporters are used to move the goods along multiple routes. Corruption is a feature all along the trade chain and most

syndicates deal in a variety of contraband wildlife, often shipping mixed cargo.

EIA estimates that since 2015 the ivory traffickers identified during the course of this investigation have been linked to seizures totalling 6.3 tonnes of ivory and 299kg of rhino horn, including the recent record seizure of 50 rhino horns in Malaysia in August 2018. Detailed conversations between EIA investigators and syndicate members identified in this report also reveal that between January 2016 and November 2017 there were at least 22 successful shipments of ivory from Africa, with an estimated weight of 19 tonnes and potential revenue of \$14 million.

Vietnam has also made repeated promises, including under the Convention on Illegal Trade in Endangered Species of Wild Flora and Fauna (CITES), to tackle ivory and rhino horn trafficking – promises that remain unfulfilled.

This is not a lost cause and there are examples of where things have been turned around. Improved enforcement efforts in Tanzania since 2015, for example, have led to a significant improvement, with syndicate members cautioning against working in Tanzania. The illegal traders EIA encountered also raised concerns about working in China because of enforcement efforts there. The activities detailed in this report are serious criminal offences under the laws of Mozambique, Vietnam, Laos, Malaysia and some of the key countries featured.

Actionable information from this investigation has been shared with the relevant enforcement authorities.



What is particularly concerning is that Vietnam, host country of the Illegal Wildlife Trade Conference in Hanoi in 2016 and supported by the UK Government, claimed to have made great progress in tackling IWT, which is not reflected in the findings of this report.

# Key players

Over two years, EIA investigated a complex network of Vietnamese-led ivory trafficking syndicates. The key players are:



## PHAN CHI

Role in syndicate: **Head**

Countries of operation: **Vietnam, Mozambique, South Africa**

Type of contraband: **Ivory, rhino horn, canines, claws**



## NGUYEN THANH TRUNG

Role in syndicate: **Independent operator**

Countries of operation: **Vietnam, Mozambique**

Type of contraband: **Ivory, rhino horn, canines, claws**



## NGUYEN TIEN SON

Role in syndicate: **Independent operator**

Countries of operation: **Congo, Laos, Mozambique, Nigeria, Vietnam**

Type of contraband: **Ivory, rhino horn, pangolin scales**



## LE THI THANH HAI

Role in syndicate: **Specialist transporter**

Countries of operation: **Laos, Vietnam, Cambodia**

Type of contraband: **Ivory, rhino horn, pangolin scales**



## TEO BOON CHING

Role in syndicate: **Specialist transporter**

Countries of operation: **Malaysia**

Type of contraband: **Ivory, rhino horn, pangolin scales**



## NGUYEN CONG THO

Role in syndicate: **Specialist transporter**

Countries of operation: **Cambodia, Laos, Vietnam**

Type of contraband: **Ivory, rhino horn**



## DUONG VAN DANG

Role in syndicate: **Worker**

Countries of operation: **Mozambique, Vietnam**

Type of contraband: **Ivory**

# Introduction

## Vietnam's role in the global illegal ivory trade has escalated during the past decade. Serving as a prominent transit route for large ivory shipments bound for China, it also has a growing carving industry and is one of the world's biggest markets for ivory sales.



Ivory bangle offered for sale by a Vietnamese trader processed with a bullet intact, possibly from the ammunition used to kill the elephant it was sourced from.

A survey of Vietnam's ivory market found that the number of items on sale had grown sixfold between 2008-15 and that the number of carvers in the country had risen tenfold during the same period. The survey also revealed that Africa was the origin for the vast majority of raw tusks smuggled into the country, a shift compared to a previous study in 2008 which found that most tusks in Vietnam had come from Asian elephants.<sup>1</sup>

Vietnam's growing significance in the international ivory trade has been recognised by CITES, which classifies Vietnam under its National Ivory Action Plan process as one of nine countries most affected by the illegal ivory trade.

A range of factors are behind the emergence of Vietnam as a major ivory trafficking hub. Within Vietnam, wildlife crime syndicates that previously operated in the illicit rhino horn and tiger trades have now diversified into other wildlife contraband such as ivory and pangolins. Due to its geographical position, Vietnam serves as a key transit route for ivory destined for neighbouring China, with bulk shipments often moving through the northern port of Hai Phong and overland across the porous border with China's Guangxi Province. Wildlife trade centres or 'villages' such as Nhi Khe in northern Vietnam have also expanded and cater largely for Chinese customers. Economic

liberalisation has led to increased commerce and transport links with regions such as Africa. In 2016, for example, Vietnam imported 420,000m<sup>3</sup> of raw timber logs from Cameroon, compared with 177,000m<sup>3</sup> in 2013.<sup>2</sup> A growing numbers of Vietnamese nationals are now working in the continent.

Weak enforcement and widespread corruption also facilitate Vietnamese ivory traders. In 2017, Vietnam was ranked 107<sup>th</sup> out of 180 countries in terms of the perceived level of corruption.<sup>3</sup> A review of Vietnam's response to wildlife crime also found a range of enforcement problems, including: inability to bring offenders to court; inadequate sentence provisions; inability to address systemic organisational corruption; and lack of effective channels to share intelligence internationally.<sup>4</sup>

Since hosting a major international conference on wildlife crime in 2016, the Vietnamese Government has started to improve its enforcement response and has amended its Penal Code to accommodate stronger penalties. In April 2017, Vietnamese authorities arrested Nguyen Mau Chien, head of a wildlife crime syndicate implicated in trafficking large amounts of rhino horn, ivory tusks and pangolins from Africa and illegally trading in tigers.<sup>5</sup> His arrest

**Key  
Seizures  
Exposés**

**2008: Widespread  
illegal ivory trade in  
Vietnam reported<sup>6</sup>**

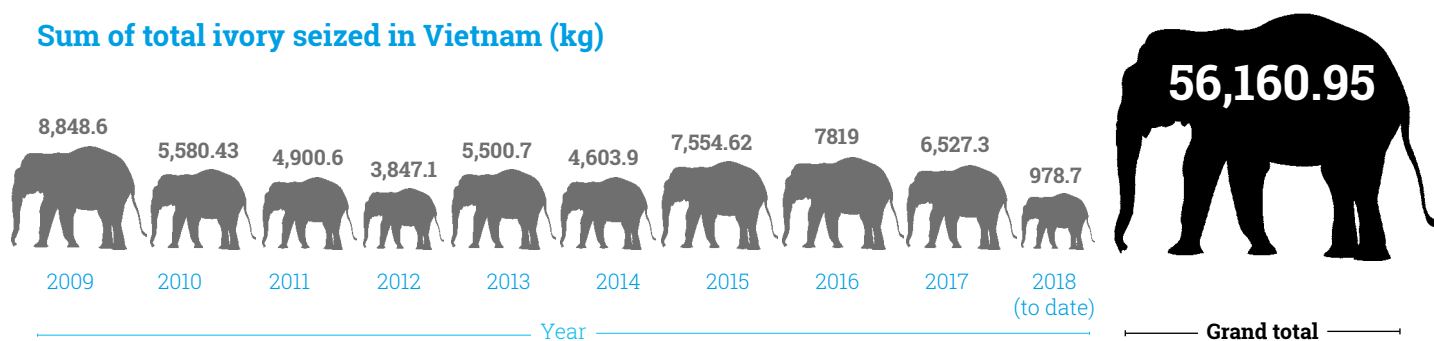
**2012: Vietnam ranked  
'worst in wildlife crime'<sup>8</sup>**



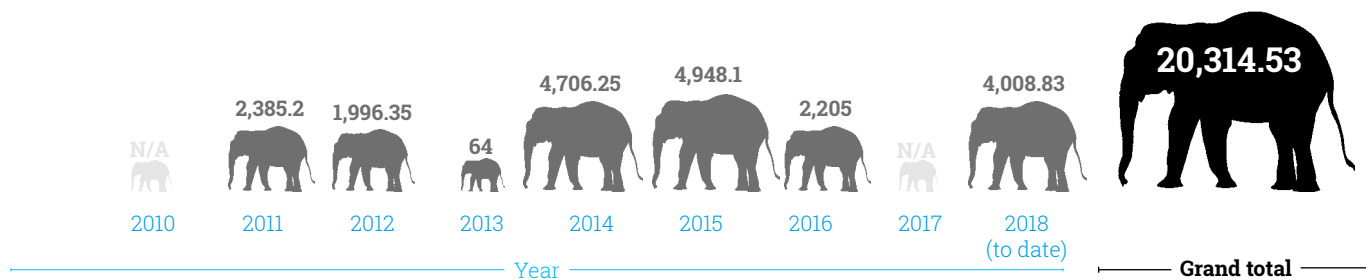
**June 2009: Vietnam's  
largest ivory seizure (over  
six tonnes)<sup>7</sup>**

**March 2012: Mong Cai,  
Vietnam, exposed as wildlife  
trafficking hub<sup>9</sup>**

## Sum of total ivory seized in Vietnam (kg)



## Sum of total ivory seized outside of, but linked to, Vietnam (kg)



was initially hailed as a breakthrough but ultimately resulted in a jail sentence of only 13 months.

Analysis of significant ivory seizures confirms Vietnam's burgeoning role in ivory trafficking, especially linked to Africa. EIA's database of ivory seizures reveals that since 2009, 56 tonnes of ivory have been seized in Vietnam and a further 20 tonnes seized in other countries en route to Vietnam. As seizures represent a small fraction of the total trade, it is clear that huge volumes of ivory are flowing into, and through, Vietnam with the majority of in-country seizures failing to lead to arrests.

Scrutiny of individual seizure incidents provides insights into the organised nature of Vietnamese-led ivory trafficking syndicates, their smuggling

methodologies and the expanding scope of their activities, especially in Africa.

### Lomé, Togo 2014

In January 2014, Togolese authorities intercepted almost four tonnes of ivory concealed within timber destined for Vietnam. Investigations led to the arrest of Vietnamese national Dinh Huu Khao, ostensibly involved in the timber business in West Africa. Khao revealed that the boss of the timber company, named Dao Van Bien, had orchestrated the smuggling attempt from Vietnam.<sup>10</sup>

### Danang, Vietnam 2015

In August 2015, officers at Tien Sa port made three separate seizures of ivory tusks.<sup>11</sup> The first case involved 700kg of ivory and rhino horn in two containers shipped from Mozambique and discovered hidden inside blocks of fake

**December 2012: Over 1.8 tonnes of ivory and rhino horn seized in Kenya destined for Vietnam<sup>12</sup>**

**January 2014: Four tonnes of ivory seized in Togo destined for Vietnam<sup>14</sup>**

**March 2013: Vietnam identified as country of 'primary concern' under CITES<sup>13</sup>**

stone. A few days later, another 2.2 tonnes of ivory was detected concealed inside containers of timber sent from Nigeria. Both shipments were intended for the same Vietnamese company. This was followed by the seizure of another tonne of ivory and four tonnes of pangolin scales concealed in a shipment of beans loaded at Port Klang, Malaysia.

### **Phnom Penh, Cambodia 2016**

In December 2016, Cambodian customs officials at the inland cargo terminal in Phnom Penh discovered 1.3 tonnes of ivory and other illegal wildlife products concealed within hollowed-out square logs and sealed with wax. The shipment had originated in Mozambique. Documents revealed that the recipient was Cam Transit Import, a company owned by Vietnamese national Nguyen Tien Chuong. Media reports linked this company to a previous ivory seizure which had occurred at the main port in Ho Chi Minh City, Vietnam.<sup>15</sup> Later that month, Kenyan officials at the port of Mombasa seized almost two tonnes of ivory from a container which had been recalled to the port after leaving for Cambodia. The ivory tusks were once again found concealed inside hollowed-out logs. In December 2017, at the Cambodian port of Sihanoukville, police seized almost a tonne of ivory tusks hidden inside logs in three shipping containers. The consignment had arrived from Mozambique a year earlier but had not been claimed. The intended recipient was once again Cam Transit Import.<sup>16</sup>

### **Organised crime indicators**

The Vietnamese criminal syndicates investigated by EIA all presented characteristics of transnational organised crime. Two of the more prolific traffickers, Phan Chi and Le Thi Thanh Hai, for example, make use of fake companies and oversee multiple shipments of illicit wildlife products. These syndicates are organised in structure and are enabled by corruption at the highest levels. Most of the syndicates also make huge profits from their illicit trade.

The syndicates investigated for this report are characterised by the following organised crime indicators:

- Organised structure to poaching

- Use of financial investment
- Sophistication of smuggling techniques and routes
- Use of fake or front companies
- Use of mules or couriers
- Huge profits
- Use of multiple shipments
- Collaboration with other organised crime groups
- Geographic sphere of operations and influence
- Money laundering
- Use of persons of high political or social status
- Organised crime group members use/ownership of wildlife

### **EIA investigations**

In April 2016, EIA began a two-year investigation into Vietnamese-led syndicates trafficking ivory and other illegal wildlife from Africa to Asia. Posing as wildlife traders, EIA investigators sought to infiltrate the different layers of ivory trafficking syndicates, from lowly packers to well-connected transporters and syndicate bosses. The aim was to build up an understanding of the methods used and the scale of operations.

Through a series of meetings in Mozambique, Vietnam and Malaysia, EIA gained unique insights into the structure of Vietnamese ivory smuggling groups, the different functions within the groups, major trafficking routes and concealment methods, prices for ivory at different stages in the supply chain and links to other forms of wildlife crime.

### **Characteristics and modus operandi**

EIA's investigation commenced in Maputo, Mozambique, a hub for Vietnamese wildlife traffickers who originally came to the city to trade rhino horn sourced from neighbouring South Africa. EIA met with Nguyen Thanh Trung, a well-connected Vietnamese individual who was running a Vietnamese restaurant. Trung was increasingly involved in the wildlife trade and had made efforts to source both ivory and rhino horn from local poachers,

**November 2016: Nhi Khe exposed as a major trafficking hub**<sup>17,18</sup>

**November 2016: EIA reports that Vietnam continues to play a significant role in wildlife trafficking**<sup>20</sup>



**November 2016: Vietnam hosts the high-level Conference on Illegal Wildlife Trade in Hanoi**<sup>19</sup>



even travelling to remote areas to recruit local poachers.

It was through Trung's connections that EIA investigators were able to secure a meeting in Maputo with syndicate head Phan Chi in November 2016. Based in South Africa on a 'retirement' visa, Chi has a timber front business to facilitate his activities in the illegal ivory trade and claimed to have 10 'soldiers' working for him in Mozambique. Chi claimed he had the capacity to source up to 1.5 tonnes of ivory a month.

By April 2017, EIA had secured a meeting in Hanoi with Nguyen Tien Son, a prolific ivory trader with operations in East and West Africa. Son offered investigators the chance to buy eight separate batches of ivory tusks weighing a total of 10.5 tonnes. In October 2017, EIA was able to view a sample of 500kg of tusks from one of these consignments at a warehouse in Nhi Khe.

Son subsequently introduced the EIA investigators to two individuals specialising in transporting ivory from Africa to Vietnam via Laos, using both sea and air freight. In early December 2017, EIA met with Malaysian national Teo Boon Ching and Vietnamese national Le Thi Thanh Hai in Ho Chi Minh City. It soon emerged that these individuals were cooperating on an active smuggling route. Teo transported ivory and other wildlife that had arrived by shipping container to Johor Port in Malaysia onward to Vientiane in Laos by airfreight. On arrival in Laos, Hai took over to transport the contraband by land into Vietnam.

**Detailed activity of the ivory traffickers encountered by EIA are set out in the next section of this report. Key modus operandi include:**

**Structure:** The Vietnamese-led wildlife crime syndicates active in Africa conform to a loose hierarchical structure of roles and responsibilities, although there is also a fluidity between the groups that allows for increased cooperation and enables workers and transporters to switch affiliations.

**Poaching and collection:** Compared with Chinese ivory smuggling groups previously documented by EIA, which usually rely on local associates in Africa to organise poaching and ivory collection, the Vietnamese syndicates are more involved at the lower level with

soldiers despatched to important hubs such as Maputo for months at a time to gather and pack ivory for shipment.

**Concealment:** Vietnamese syndicates use sophisticated concealment methods for ivory shipped in containers; hollowed-out logs, stacks of sawn timber and the use of fake stones are notable examples.

**Diversification:** Most of the Vietnamese syndicates trade in a variety of contraband wildlife and often despatch mixed cargoes including ivory, rhino horn and pangolins.

**Trafficking routes:** Syndicates use specialist transporters to send illegal wildlife to Vietnam and switch routes to avoid detection following major seizures. At the time of publication, the busiest route was via Malaysia and Laos.

**Corruption:** Most of the higher-level members of the Vietnamese syndicates boasted that their connections with corrupt officials facilitate the passage of their ivory shipments. Teo Boon Ching, for example, claimed to be able to move ivory through Johor Port unhindered because of his connections with senior customs officers.

**Sales:** Ivory smuggled into Vietnam is mainly bought by Chinese nationals, who purchase simply processed items such as jewellery and larger sections of raw tusks. The village of Nhi Khe in northern Vietnam remains an important ivory hub. Nguyen Tien Son, who operates out of Nhi Khe, claimed the village could sell up to 10 tonnes of ivory a month, depending on supply.

EIA estimates that since 2015, the ivory traffickers identified during the course of this investigation have been linked to seizures totalling 6.3 tonnes of ivory and 299kg of rhino horn. Detailed conversations between EIA investigators and traders also reveal that between January 2016 and November 2017 there were at least 22 successful shipments of ivory from Africa, with an estimated weight of 19 tonnes and potential revenue of \$14 million.

July 2017: EIA exposes a criminal syndicate trafficking ivory via Vietnam<sup>22</sup>

March 2018: 3.5 tonnes of ivory seized in Singapore bound for Vietnam<sup>24</sup>



2016: Vietnam flagged as one of the largest importers of illegal ivory<sup>21</sup>



July 2017: Second largest ivory seizure in Vietnam (2.7 tonnes)<sup>23</sup>



BURMA

## The routes used

**EIA has identified a number of major routes in use by the Vietnamese syndicates to traffic ivory from African countries through Malaysia and Laos before reaching Vietnam for sale in-country or for onward transportation into China. These criminals make use of sea, air and land routes.**

Mozambique is a major **source** of ivory. Other possible source countries include South Africa, Tanzania, Zimbabwe, Angola, Malawi and Nigeria. Ivory is shipped out of Africa to Vietnam via Mozambican ports, with Pemba, Nacala and Beira as prominent ports of export. Although traders consider the direct route from Mozambique to Vietnam as difficult and risky, some traders do attempt this, in particular to Hai Phong port and smaller ports in the north of Vietnam.

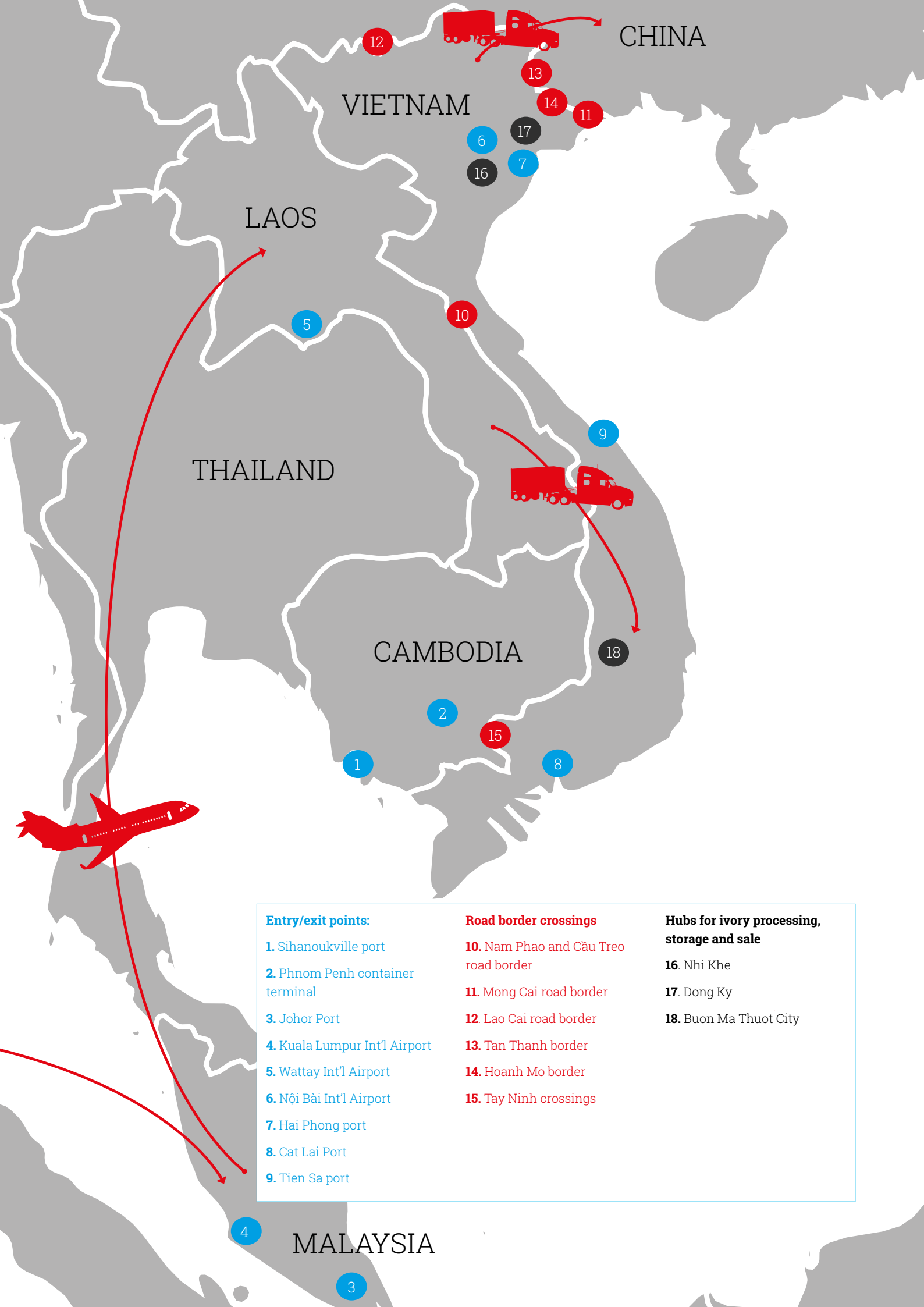
Most syndicates, however, avoid the direct route and use **transshipment** locations to obscure the origin of the shipments and to 'break the route'. Malaysia is one such key transshipment country. Ivory destined for Vietnam is routinely cleared by corrupt officials at Johor Port and is transferred to Kuala Lumpur International Airport after being repackaged at a warehouse. The ivory is then transported to Laos' Wattay International Airport by air cargo before being transferred overland into Vietnam via the border gates at Nam Phao/Câu Treo. EIA has also found that ivory may transit through Cambodia before transportation overland into Vietnam.

China and Vietnam are key **destinations** for illicit ivory. Once in Vietnam, illicit ivory is processed, stored and/or sold across the country. Onward transportation into China can also take place by road through different border gates in Northern Vietnam.

### Key

Routes	
By sea	
By air	
By road	

FROM AFRICA



**Entry/exit points:**

- 1. Sihanoukville port
- 2. Phnom Penh container terminal
- 3. Johor Port
- 4. Kuala Lumpur Int'l Airport
- 5. Wattay Int'l Airport
- 6. Nội Bài Int'l Airport
- 7. Hai Phong port
- 8. Cat Lai Port
- 9. Tien Sa port

**Road border crossings**

- 10. Nam Phao and Cầu Treo road border
- 11. Mong Cai road border
- 12. Lao Cai road border
- 13. Tan Thanh border
- 14. Hoanh Mo border
- 15. Tay Ninh crossings

**Hubs for ivory processing, storage and sale**

- 16. Nhi Khe
- 17. Dong Ky
- 18. Buon Ma Thuot City

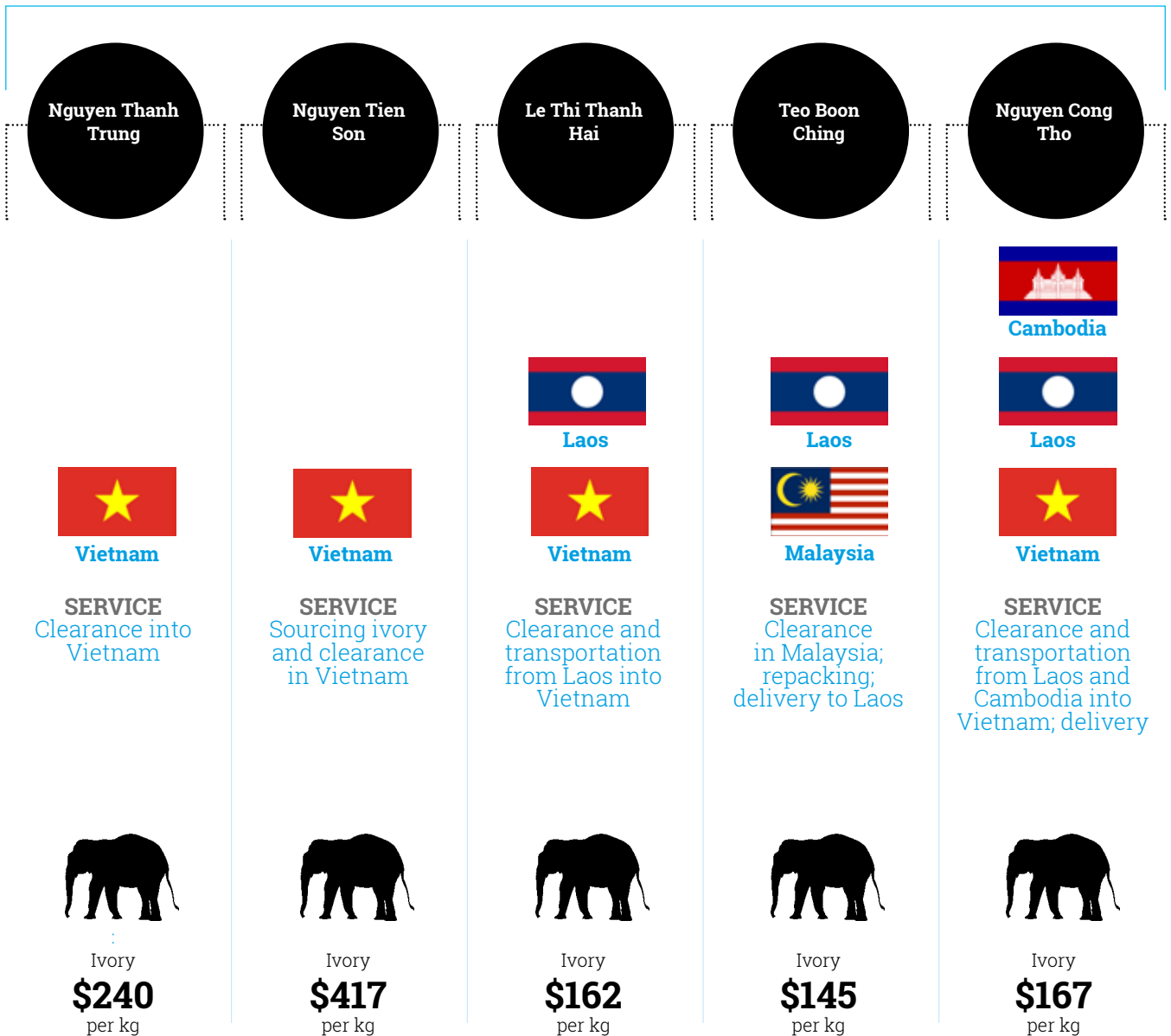
# The economics

## The Vietnamese syndicates highlighted in this report operate an illicit chain of supply.

Ivory is sourced, either in person or via intermediaries, in different African elephant range countries such as Malawi or Mozambique, at different prices depending on the size of the ivory tusks/pieces. Depending on their role, the syndicates will then use their connections to different customs authorities or clearing agents to facilitate the passage of the illicit

ivory across border points by air, sea or by road. Once the illicit ivory consignments arrive in Vietnam, the syndicates will sell the ivory at wholesale prices to buyers. Below is a break down of this chain of supply and associated 'rates' offered by syndicate members for their specialist 'services'.


























### SYNDICATE SERVICE COSTS: Examples of rates charged by specialist transporters for smuggling ivory



# The art of concealment

The wildlife traffickers investigated for this report were found to use a wide array of concealment methods to facilitate the transportation of their illicit products.

The syndicates conceal ivory with legal goods such as timber, agricultural products or plastics to avoid detection. The following table provides more information about these concealment tactics.

Legitimate concealed goods	Wildlife	Mode of transport
Agricultural products		
Art objects		Unknown
Bean/soy bean/peanut/green bean, red bean, cashew nuts		
Buffalo and cow horn		Unknown
Drilling machine parts		
Fertilizer		
Fish		Unknown
Metal		
Motorbike accessories		
Plastics/plastic scraps		
Soil sample		
Stone Quartz		
Timber		
Wooden statues		

# Key player profiles

**The Vietnamese-led wildlife crime syndicates active in Africa and Asia conform to a loose hierarchical structure with clear roles and responsibilities. These organised criminal groups rely on corruption to facilitate the trafficking of wildlife from Africa to Asia. Some of these syndicate members are already known to enforcement authorities yet continue to operate with impunity.**

## Tier 1: Syndicate head

Oversees the group, recruits transporters and soldiers, builds connections with corrupt officials and makes high profits. Said to be about a dozen separate syndicates operating between Africa and Asia.

**EIA target: Phan Chi**

## Tier 2: Specialist transporters

Able to move consignments across borders to end markets, close connections to corrupt officers and also engaged in direct trade in wildlife

**EIA target: Teo Boon Ching, Le Thi Thanh Hai and Nguyen Cong Tho**

## Tier 3: Independent operators

Not linked to a single syndicate, able to source ivory and other wildlife from Africa and sell in Asia

**EIA target: Nguyen Tien Son and Nguyen Thanh Trung**

## Tier 4: Workers

Employed by syndicates to work in source countries to collate, pack and despatch ivory shipments, also known as 'soldiers' or BLs (abbreviation of "buôn lậu", Vietnamese for smuggler). Also includes 'pilots', recruited by syndicates to bring back contraband wildlife, especially rhino horn, as passengers on international flights.

**EIA target: Duong Van Dang**

# PHAN CHI



**Role in syndicate:** Head  
**Countries of operation:** Vietnam, Mozambique, South Africa  
**Type of contraband:** Ivory, rhino horn, canines, claws

**Summary:** Phan Chi is a major ivory and rhino horn trafficker who leads an organised criminal syndicate of at least 10 individuals ('soldiers'). He claims to have been in the wildlife trafficking business for over 10 years, during which time he has travelled extensively between Vietnam and Africa. He has evaded any enforcement action by employing a number of soldiers at each level of the trade chain to deal with the necessary sourcing, packing, transportation and sale of ivory and rhino horn.



Chi is well connected to Nguyen Van Trung, then Vietnam's Ambassador to Mozambique, who has since moved to take up a new post in June 2018 as Deputy Editor in Chief of Vietnam's Ministry of Foreign Affairs newspaper *The World and Vietnam Report*. Chi claimed that Trung had introduced him to high-ranking officials in the police and Customs departments of the Government of Mozambique who he called on when he needed help.

When in Vietnam, he is based in Hanoi but he also rents several houses in Mozambique and boasts of owning a large mansion adjacent to a golf course in Pretoria, South Africa, where he lives comfortably on a 'retirement' visa issued by the South African authorities.<sup>25</sup>

Chi stated that in 2015 he smuggled nearly 13.5 tonnes of illegal ivory in three separate shipments by sea from Mozambique to Vietnam. He explained that because he is prepared to pay a higher price for ivory than his competitors, he is able to source as much as two tonnes of ivory a month. Although he buys ivory from Mozambican suppliers, it is likely sourced from elephants in other countries as well, such as South Africa.

Some of Chi's syndicate members are known to enforcement authorities. In July 2017, four of Chi's soldiers were arrested in Maputo in possession of illegal claws and canine teeth; only one of these individuals was convicted, receiving a custodial sentence of 11 years.

Chi also smuggles rhino horn from Mozambique to Vietnam and is able to source 100-150kg of rhino horn per month, stating that, at that time, he had 100kg of rhino horn in Vietnam ready to be sold. Given that Mozambique lost its last wild rhino to poaching in 2013, it is almost certain that the horn is being procured from rhinos in neighbouring South Africa.

He can arrange to have the illegal horn delivered to Vietnam from Mozambique in 48 hours, in passenger luggage on flights, typically from Nampula or Maputo airports in Mozambique, stopping-over in Nairobi, and destined for Hanoi. This method of smuggling is facilitated by his network of contacts in Nairobi's Jomo Kenyatta International Airport and Hanoi's Noi Bai International Airport.

While governments globally are failing to use specialised investigation techniques such as controlled deliveries to disrupt wildlife trafficking networks, criminal syndicates are one step ahead. Chi recounted how a GPS tracker had been deployed to monitor a shipment of 23-25kg rhino horn from Mozambique to Vietnam via Doha.

**“EIA: Can you transport [illegal ivory] from port to warehouse [in Vietnam]?  
Chi: To my warehouse, yes.  
EIA: How about my warehouse, also in Vietnam?  
Chi: It's also okay as long as it's in the territory.  
EIA: As long as it's in Vietnam?  
Chi: Yes.”**  
\*\*\*  
**“Chi: I send a lot [of money] to Vietnam ... normally will be two million per month.  
EIA: You need to send two million?  
Chi: Per month.  
EIA: RMB?  
Chi: USD.”**

# NGUYEN THANH TRUNG



**Role in syndicate:** Independent operator  
**Countries of operation:** Vietnam, Mozambique  
**Type of contraband:** Ivory, rhino horn, canines, claws

**Summary:** Trung operates independently, sourcing ivory and rhino horn from local Mozambican traders and either selling it to the highest Vietnamese bidder in Mozambique or shipping it to Vietnam himself. He has worked with multiple syndicates implicated in large-scale organised trafficking from Mozambique into Vietnam.



Little Vietnam – a Vietnamese restaurant in Maputo previously owned by Trung which helped him to branch into the ivory and rhino horn trade.

With the intention of directly sourcing illegal ivory and cutting out any intermediaries, Trung claimed he travels to remote areas himself to actively recruit local villagers to poach elephants and other wildlife in Mozambique and South Africa. Trung's activities have led to a direct human toll when one of the villagers he recruited was shot and killed. In February 2017, Trung was operating out of Maputo and had five employees on his payroll, including a Vietnamese ivory carver.

Trung stated that it was “very simple” to smuggle ivory out of Mozambique:

**Step 1:** Set up an import/export company for trading in legal commodities under the name of a local Mozambican.

**Step 2:** Load the shipping containers with the contraband, using the name of the local company on paperwork and fraudulently declaring the contents as legal commodities.

**Step 3:** Negotiate a ‘price’ with the concerned customs officer in Mozambique.

**Step 4:** Pay the agreed bribe to the customs officer at the chosen port of exit in Mozambique so the containers with the contraband are exported quickly without being checked.

When any of the Vietnamese run into trouble, they contact a Vietnamese lawyer based in South Africa called Nam (Le Hoai Nam). According to Trung, Nam provides ‘legal support’ for Vietnamese syndicates.

He advises them on how to arrange shipments using passenger luggage. Trung stated that Nam's advice to avoid being charged if detected authorities was to check in the passenger and the luggage separately. Nam represents individuals who have been arrested and charged with smuggling in South Africa and Mozambique. He is also connected to Phan Chi and helped him when one of Chi's soldiers was arrested with rhino horn in Mozambique. EIA research confirms that Nam also arranged rhino hunting permits for Vietnamese hunters as well as CITES export permits for rhino trophies from South Africa to Vietnam.

Trung stated that he is colluding with two employees of DHL in Mozambique who help him send parcels containing rhino horn.

On the Vietnam side, Trung stated it is safer to transport illegal goods to Vietnam than to China. He explained that he had contacts at all the key border points in Vietnam and, given his transport network across Vietnam, he also claimed to be able to smuggle goods into China from Vietnam. He further alleged he had sold ivory to some members of the former Vietnamese President's delegation during their visit to Mozambique in March 2016.

As with Phan Chi, Trung also claimed to have connections with the then-Vietnamese Ambassador to Mozambique, stating he had been advised by the Ambassador to be more careful because he was being watched by INTERPOL.

“**Trung: To be honest, it's easy to get things out from here [Mozambique]. There should not be any problems. You can get it out in anyway ... It's simple to go from here.**”

\*\*\*

**Trung: If things run smoothly, this [wildlife trafficking] business makes more profit than trading drugs. ”**



# NGUYEN TIEN SON



**Role in syndicate:** Independent operator  
**Countries of operation:** Congo, Laos, Mozambique, Nigeria, Vietnam  
**Type of contraband:** Ivory, rhino horn, pangolin scales

**Summary:** Nguyen Tien Son is reputedly one of the biggest ivory and rhino horn wholesale traders in Nhi Khe, with a processing factory operated by his wife. He is directly involved in the sourcing and export of ivory and rhino horn from Africa. He has connections with a number of other key actors, including Le Thi Thanh Hai and Teo Boon Ching who are operating clearance and transportation service into and through Laos, Vietnam, Cambodia, Malaysia and China. He also claims to have contacts who can provide clearance at Hai Phong Port, Noi Bai International Airport, Wattay International Airport, Johor Port and Kuala Lumpur International Airport. Son claimed to have successfully exported shipments of ivory from Nigeria to Vietnam.

“People in the village can process 10 tonnes per month (ivory). If there were 1,000 tonnes, they could also cut them up. If they can buy and pay later, they will buy all up. Only 20-30 tonnes, they will use up within a month.”



In November 2017, along with three other Vietnamese nationals, Chien was sentenced to 20 months imprisonment for his role in the investment and transportation of 423kg of ivory in Hanoi in January 2017.<sup>1</sup>

In an attempt to expand his activities in Mozambique, he entered into a partnership with Nguyen Thanh Trung in early 2017. He continues to scope new source areas and products and recently conducted a trial export of goods from Nigeria and clearance of 20 tonnes of pangolin scales from Malaysia in October 2017.

Son claims to be able to transport ivory into Vietnam through Laos and is prepared to guarantee \$387/kg for the goods. He collaborates with Le Thi Thanh Hai, who operates the Laotian route, involving clearance at Wattay International Airport in Vientiane and land transportation through Laos-Vietnam border gates and onward transportation to warehouses in Vietnam. Son's role includes providing access to buyers in Vietnam as well as introducing potential clients to his transportation service. He may also negotiate with the trader to buy the goods himself to augment his wholesale trade.

Son also utilises Malaysia as a transshipment route in partnership with a Malaysian national, Teo Boon Ching, who provides clearance for goods from Africa and then onwards into Laos by air cargo.

He provided copies of a number of Bills of Lading (BoL) allegedly used in the Malaysia-Laos route to convince EIA investigators of his capabilities. On two of the BoLs, the company name (consignee) in Laos was CFEP Food and Drinks, likely to be a short-lived 'ghost' company used as a cover. He also claimed he had received three tonnes of ivory over a two-week period in October 2017 using the Malaysia-Vietnam route as well as 1.5 tonnes of pangolin scales, all facilitated by Teo Boon Ching.

## EIA undercover ivory viewing

The ivory viewing took place in Nhi Khe village in October 2017 in a timber processing factory. Nhi Khe has been well documented as a centre for illegal ivory and ivory carving equipment was also observed in the factory. The ivory allegedly entered Vietnam in shipping containers and still had traces of wax, suggesting this was part of the concealment process.

Owned by Son, EIA observed about 500kg of illegal ivory (allegedly a portion of a further 1.5 tonnes being stored in a Hanoi warehouse) which Son offered at an initial selling price of \$660/kg although he was prepared to reduce the price to \$658/kg. Larger solid pieces were offered at \$748/kg. Based on the lower prices, the cost of the total two tonnes would be in the region of \$1.3 million. Son did not attend the viewing but delegated the arrangements to Nguyen Ba Chien (also known as “Trung”, but likely to be a fake name).

# LE THI THANH HAI



**Role in syndicate:** Specialist transporter  
**Countries of operation:** Laos, Vietnam, Cambodia  
**Type of contraband:** Ivory, rhino horn, pangolin scales

**Summary:** Le Thi Thanh Hai is a Vietnamese national, based in Ha Tinh province near the Cầu Treo gate on the border of Vietnam and Laos. She heads a transportation network operating routes for illicit wildlife products. Despite serving a custodial sentence of one year (approximately 20 years ago) for her involvement in a seizure of three tonnes of pangolin, she has continued her involvement in the illicit wildlife trade since her release.

For the past decade, Hai has been operating a route with a Malaysian national, Teo Boon Ching, to facilitate the illicit movement of goods from Africa to Johor Port, Malaysia, and on to Wattay International Airport in Laos via air cargo. She has a partnership with an unknown male who provides clearance for illicit goods and land transportation to the Laos-Vietnam border gate. This individual runs a company which offers clearance services and allegedly uses the influence of a relative who holds the post of Deputy Chief of the Department of Taxes. According to Hai, this company also has its own scanner and scales at the airport.

Goods are exchanged at a duty-free warehouse between the borders of Laos and Vietnam. Once the goods have arrived at the warehouse they are checked by Hai or one of her soldiers and then loaded onto Vietnamese vehicles. They are then transported by the Vietnamese transportation networks which control the route and are responsible for moving the goods into Vietnam. These networks “cover the border” by making the necessary payments to clear customs and border control. Once inside Vietnam, the goods are transferred to Hai’s fleet of luxury cars before delivery to the designated owner.

Hai also provides a guarantee for her services. When she is able to view the goods, she will provide a payment up front to the owner as a guarantee of delivery. If she only sees the BoL, then she goes through an intermediary in Hanoi

for the guarantee deposit. She charges about \$160/kg for her services, which include clearance costs at Laos Airport and the Laos/Vietnam border, as well as transportation costs to Hanoi.

Bribery, or the payment of ‘taxes’, are a feature throughout Hai’s trade route, with alleged links to Vietnamese officials at both provincial and district level to ensure the smooth movement of goods along the trade route.

She claims to have the monopoly over the Laotian route, maintaining she is the only one able to provide the clearance service with her Laotian partner. Despite Hai’s assertions, there is another company involved in the operation, although the route is unreliable with some goods getting stuck at Wattay International Airport.

Hai also claimed she has two individuals who can clear containers in Cambodia in advance of transportation into Vietnam by road. One of these is a Vietnamese national who goes by the nickname Hung ‘Lop’, also known by Son. The second individual, who is married to a Vietnamese national, is a former head of Sihanoukville’s province border guard.



Images of ivory packed in bags sent by Le Thi Thanh Hai.

**“I also have to spend some ‘yard money’.”**

“Yard money” is understood to be the fee to clear the shipment out of a cargo terminal.

**“In general, my group of vehicles always have to pay “law money” ... when it’s on the road, the “law” must be covered. As long as it’s on the route, money needs to be given.”**

“Cover the law” is verbatim translation of Vietnamese “bao luật”, which means that Hai has protection of the authorities in this area who have been paid to allow her operating the transportation business.

# TEO BOON CHING



**Role in syndicate:** Specialist transporter  
**Countries of operation:** Malaysia  
**Type of contraband:** Ivory, rhino horn

**Summary:** Malaysian national Teo Boon Ching has been involved in the wildlife trade for two decades with business links in Guangzhou, China and Bangkok, Thailand. He operates a transportation service for illicit wildlife products from Johor in Malaysia on to other destinations including Laos and China.

Teo uses Malaysia-based companies to receive shipping containers from Africa.

He provides concealment and packing instructions to clients to smuggle ivory:

- at least eight tonnes of beans or peanuts for a 20-foot container
- the ivory to be covered with nylon bags
- the filler is packed between two layers of bags to ensure the bags don't break.

He advises the owners of the ivory to buy rather than rent containers to reduce inspection risks should the shipment be delayed or the rental agreement expires.

Once the ivory shipment enters Malaysia, Teo arranges for the owner to enter the customs warehouse at Johor Port to verify the goods and quantity. Once cleared, the consignment is moved to Teo's own warehouse for repacking into multiple standard air cargo packages for onward transportation.

Goods destined for Laos are sent by air cargo from Kuala Lumpur International Airport on Air Asia flights, which operates the only direct service to Wattay International Airport from Malaysia. Teo's connections at Johor customs let the illicit cargo through for a fee. Teo's transport fees are \$145/kg and \$100/kg for ivory and pangolin scales respectively, including clearance at Johor Port and Kuala Lumpur International Airport as well as repacking and delivery to Laos.

Teo's relationship with Le Thi Thanh Hai is key to successful clearance in Laos. Once everything has been repackaged and loaded onto the plane to Laos, Teo sends the BoL to Hai. Teo's role in the trade route then ends.

Teo is also said to offer a direct charter service to Hanoi for the same price. He claims to have repeatedly smuggled at least six tonnes of pangolins from Malaysia to China. He also claims to have provided clearance for approximately 80 containers with only one seizure since he started operations.

Teo may have played a key role in the recovery of two shipments of pangolin scales linked to the seizure of 7.2 tonnes of ivory in Hong Kong in July 2017, the world's largest ivory seizure.

According to Teo, shipments seized in the Hong Kong seizure shared the same consignor in Malaysia. Although Teo was not initially involved in these shipments, a Xianyou-based shareholder of the goods named Lin, asked for Teo's assistance to recover further shipments which were likely to be seized. Teo made requests to the originating country, believed to be Nigeria, and successfully re-routed the shipments from Sabah to Johor. The container of pangolin scales was repacked in Johor and successfully sent to China.

Teo was unable, however, to get four other containers of ivory and pangolin scales re-routed and they were seized by Sabah Port Authorities in 2017. Lin later revealed to Teo that he was joint owner of the Hong Kong seizure, along with another individual named Ou. EIA believes that Ou is Ou Guanchao, the uncle of Ou Haiqiang – both of whom were named in EIA's 2017 report *The Shuidong Connection* as having a significant role in the ivory trade.



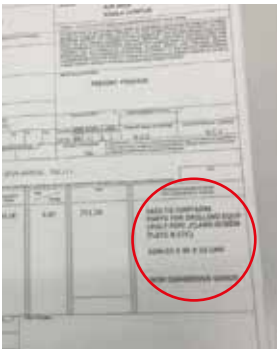
Teo Boon Ching was arrested in Thailand in March 2015 along with his Thai partner Sririchai Sridanont for possession of 135kg of African elephant ivory. Despite his arrest he evaded prosecution and continues his wildlife smuggling exploits. He is implicated in a recent rhino horn seizure in August 2018.

# NGUYEN CONG THO



**Role in syndicate:** Specialist transporter  
**Countries of operation:** Cambodia, Laos, Vietnam, Nigeria  
**Type of contraband:** Ivory, rhino horn

**Summary:** Tho reportedly hails from a family of wildlife smugglers and became involved in the family business when he was a university student, helping his uncle transport tiger and other illegal wildlife products. After his uncle's 'retirement', Tho became a prominent wildlife trafficker, claiming to have smuggled at least 100 tonnes of ivory since 2014 using a number of different routes with the final destination being Vietnam.



Tho runs a successful ivory smuggling operation into Laos and onwards to Vietnam. He is very confident about clearing ivory shipments through the Vientiane airport in Laos to Vietnam and provided the above BoL to demonstrate he successfully smuggled ivory into Laos from Malaysia by claiming it contained drilling equipment on the paperwork.

EIA's engagement with Tho confirmed that demand for ivory in Vietnam is massive and that enforcement efforts were largely cosmetic. For example, in August 2017 Tho stated that despite raids of ivory shops in Nhi Khe, a village which is well known for ivory carving, continues to consume around three tonnes of ivory a month. It also appears that some of the trafficking groups originally based in Nhi Khe have simply moved to other areas in Vietnam such as Dong Ky, about an hour's drive from Nhi Khe. Tho also stated that, for security purposes, he stores his best-quality ivory tusks in a warehouse in Dong Ky.

Tho successfully runs the Laos-Vietnam route, claiming he can clear at least one ivory shipment (about 500kg) a week through Wattay International airport and have it transported across the border into Vietnam. In order to provide a more secure service for his clients, Tho verifies himself that the shipment contains ivory. Tho also provides transport services for the Cambodia-Vietnam route, although he complained that this route was not very stable. It would also appear that Tho is working in partnership with a man named Cuong who operates the Malaysia-Vietnam route using fishing boats whereby goods are transferred at sea from a Malaysian boat to a Vietnamese before docking at the Vietnamese mainland.

Tho started buying ivory from his customers, for whom he had previously arranged transport services, sending photos of the ivory to prospective buyers

and inviting them to Laos to view the goods. As his business expanded, he also started visiting Africa to purchase ivory more cheaply at source. In late 2016, Tho travelled to Nigeria to smuggle ivory from Nigeria to Da Nang's Tien Sa Port in Vietnam. He stated this ivory shipment contained 'yellow ivory' (ivory sourced from endangered forest elephants) and was sourced in Cameroon. The Customs officer who facilitated clearance in Vietnam was a relative.

Tho also stated that his operation in Nigeria is facilitated by his contact, who previously worked at the Nnamdi Azikiwe International Airport in Nigeria's capital city Abuja. He added he was planning to visit Mozambique to start trading rhino horn.

**“Tho: My profession is transportation, so I know almost every trader in the north [in Vietnam], most of the big players.\*\*\***

**Tho: Everyone wants money, but money is not everything. The brand name is more important. That we can survive is thanks to our customers.”**

# DUONG VAN DANG



**Role in syndicate:** Worker  
**Countries of operation:** Mozambique, Vietnam  
**Type of contraband:** Ivory

**Summary:** Dang is an expert in using sophisticated methods to conceal ivory and rhino horn in shipments from Africa to Vietnam and was taught the tricks of the trade by his brother, who has been in the business for several years.

Dang provides his packing services on a freelance basis, although he was previously employed by Nguyen Mau Chien, the previously mentioned wildlife trafficker, in packing ivory in Pemba and Maputo in Mozambique.

A key facilitator for trafficking ivory on a large scale, Dang is only brought in to begin the work of packing when at least 100-200kg of ivory has been collected. Dang claimed to have smuggled ivory and rhino horn out of Mozambique concealed in materials such as stone/quartz (most likely imported from South Africa) or timber. When he used stone, Dang explained, it was essential to procure silicone moulds of different shapes. These were then sent to Mozambique from Vietnam, although Dang said he could also make these moulds in Mozambique if the required materials were available.

Dang described the process in significant detail. The ivory or rhino horn is first dipped into melted wax to create a protective layer, then – using the moulds and composite materials such as stone, fibre glass or plaster – the ivory or horn is concealed inside what appears to be a large single piece of stone. One tonne of ivory can be concealed in 30 ‘stones’. The ‘stones’ concealing ivory are then placed along with real stones into large crates and moved to the container loading area. With timber, logs are hollowed out and the ivory or rhino horn is placed in the hollow before the logs are sealed and painted. Dang’s preference is to use the timber concealment method as it is cheaper than quartz and he claimed timber containers were not checked by authorities in Pemba port. Whichever concealment method used, the paperwork declares the

contents as exports of legitimate goods (quartz or timber).

In February 2016, following an order from Chien, Dang and another associate accompanied three suitcases containing about 100kg of rhino horn from Mozambique to Vietnam. Dang stated he was specifically directed not to check in the suitcase himself at the airport; instead, the luggage was checked in by another person but tagged with the name and details of Dang. On arrival at the airport in Hanoi, Dang and his colleague picked up the suitcases by checking the luggage codes and he was directed to exit through a specified gate at the airport. With help from contacts at the airports in Mozambique and Hanoi, Dang’s boss was clearing three shipments of rhino horn per week with three to four suitcases in each shipment.

**“Dang: I went to Mozambique, I stayed with people of the house (syndicate). There were people to buy the goods and put them in warehouse. I just went to the warehouse to pack and put the goods into stone. After a month, when we packed enough goods, they would send the container out, but that was their business. My work is only packing then returning home – how they send the container is the responsibility of other people not mine.**

\*\*\*

**EIA: How long would it take you to pack one tonne of goods?**

**Dang: If there are enough goods, it only takes 10 days.”**

# RECOMMENDATIONS

**EIA urges Vietnam, Mozambique, South Africa, Laos, Malaysia and Cambodia to strengthen international co-operation and conduct a thorough investigation into the information presented in this report, which was also previously provided as confidential briefing documents to enforcement authorities.**

## ADDITIONAL RECOMMENDATIONS

### FOR VIETNAM:

- Investigate and prosecute offenders involved in the corruption that enables wildlife trafficking in Vietnam, including at key entry and exit points for ivory such as airports, ports and land crossings
- Investigate the disappearance or leakage into trade of seized ivory held by Government authorities and prosecute corrupt players involved
- Ensure effective inter-agency cooperation and intelligence-led enforcement to disrupt and convict organised ivory trafficking networks
- Improve international cooperation (for example, through extradition, evidence-sharing and use of controlled deliveries) with relevant source, transit and destination countries such as Angola, China, Laos, Malaysia and Mozambique
- Increase capacity to investigate illegal ivory and other wildlife trade through online/social media channels, including WeChat, Zalo and Facebook

### FOR SOUTH AFRICA AND MOZAMBIQUE:

- Conduct a thorough investigation of offences resulting in prosecution under a range of laws, including immigration and customs laws, in relation to Vietnamese criminal syndicates implicated in wildlife trafficking
- Collaborate with the private sector (freight forwarding companies, airlines and courier companies) to ensure that effective systems are being deployed to detect and stop ivory and rhino horn trafficking

### FOR ALL RELEVANT COUNTRIES

- Increase detection of ivory and other wildlife smuggling at key entry and exit points highlighted on page 10-11 of this report
- Eliminate the high profits associated with wildlife trafficking, by conducting financial investigations that result in the seizure of assets and proceeds of crime (for example cash, property, and vehicles)
- Increase awareness among key stakeholders such as customs authorities, airlines, and shipping companies regarding the modus operandi of wildlife trafficking syndicates.

# REFERENCES

1. Save the Elephants, Vietnam's Illegal Ivory Trade Threatens Africa's Elephants, 9 July 2016.
2. UNCOMTRADE data.
3. Transparency International, Corruption Perceptions Index 2017.
4. UN Office on Drugs and Crime, ICCWC Wildlife and Forest Crime Analytic Toolkit Report for Vietnam, 2015.
5. Education for Nature Vietnam, Alleged Rhino Horn Kingpin Arrested, 4 May 2017.
6. Daniel Stiles, "An assessment of the illegal ivory trade in Viet Nam", TRAFFIC, available from: [http://www.trafficj.org/publication/08\\_Assessment\\_illegal\\_ivory\\_trade\\_VietNam.pdf](http://www.trafficj.org/publication/08_Assessment_illegal_ivory_trade_VietNam.pdf) (last accessed 08/08/2018).
7. TRAFFIC Bulletin Vol. 22 No. 2, June 2009; The tusks were seized at Dinh Vu Port from a container carrying plastic waste.
8. WWF Wildlife Crime ScoreCard, available from: [http://wwf.panda.org/\\_core/general.cfc?method=getOriginalImage&uImgID=%26%2AR%2C%28%22NW4%0A](http://wwf.panda.org/_core/general.cfc?method=getOriginalImage&uImgID=%26%2AR%2C%28%22NW4%0A) (last accessed 08/08/2018).
9. WCS, March 2012, "In Plain Sight: An Analysis of Transnational Wildlife Crimes in Quang Ninh Province, Viet Nam".
10. National Geographic, Locating Suspected Kingpin in Vietnam, 9 November 2014.
11. Viet Nam News, Eight tonnes of smuggled wildlife products seized, August 27, 2015
12. Business Daily Africa, Two in court over Sh91m ivory seized at Mombasa port, October 1, 2015.
13. CITES, CoP17 Doc. 57.6 (Rev. 1), available online at: <https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-57-06-R1.pdf> (last accessed 13/08/2018).
14. VOA, Togo seizes nearly 4 tons of ivory headed for Vietnam, February 3, 2014; The ivory had been declared as cashew nuts.
15. The Phnom Penh Post, Ivory Bust Firm Has History, 23 December 2016.
16. Khmer Times, Cambodia Police Seize Nearly One Tonne of Ivory Shipped from Mozambique, 5 December 2017.
17. WJC Bulletin, "Wildlife Justice Commission Public Hearing: Viet Nam Investigation the Hague, the Netherlands, 14-15 November 2016", available from: <http://enb.iisd.org/download/pdf/sd/enbplus211num1e.pdf> (last accessed 08/08/2018); WJC uncovered an industrial scale crime hub dealing in wildlife, including ivory, worth US\$53.1 million in Nhi Khe.
18. Al Jazeera, Exclusive: Vietnam's 'double standards' in ivory trade, November 14, 2016; The exclusive exposed Vietnam's 'double standards' in light of the Conference on Illegal Wildlife Trade, hosted by the Vietnamese government in Hanoi in 2016.
19. Hanoi Conference on Illegal Wildlife Trade, available online at: <http://iwthanoi.vn/> (last accessed 13/08/2018).
20. EIA, "Time for Action: End the criminality and corruption fuelling wildlife crime," available online at: <https://eia-international.org/wp-content/uploads/EIATime-for-Action-FINAL-1.pdf> (last accessed 08/08/2018).
21. Save the Elephants, "Vietnam's Illegal Ivory Trade Threatens Africa's Elephants", available online at: [http://savetheelephants.org/wp-content/uploads/2016/07/2016\\_VietnamReportFINAL.pdf](http://savetheelephants.org/wp-content/uploads/2016/07/2016_VietnamReportFINAL.pdf) (last accessed 08/08/2018); The report exposed an extensive illegal internal ivory processing and carving business.
22. EIA, "The Shuidong Connection: Exposing the Global Hub of the Illegal Wildlife Trade", available online at: <https://eia-international.org/report/shuidong-connectionexposing-global-hub-illegal-ivory-trade> (last accessed 13/08/2018).
23. PhysOrg, Three tonnes of ivory seized in Vietnam, July 9, 2017.
24. VNExpress, Singapore seizes 3.5 tons of ivory en route to Vietnam, March 8, 2018; The ivory had been shipped from Nigeria.
25. According to information provided by the Government of South Africa, a person who wishes to retire in South Africa may apply for a "retired person visa", provided that he or she receives at least R37,000 per month from a pension fund or an irrevocable retirement annuity or has a net worth or a combination of assets realising a minimum monthly income of R37,000. South African Department of Home Affairs. Types of Temporary Residency Visas. [Online]. Available from: [dha.gov.za/index.php/immigration-services/types-of-temporary-permits](http://dha.gov.za/index.php/immigration-services/types-of-temporary-permits) (last accessed: 03/08/2018).

