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DATE: 15 February 2018
SERIAL: M-15022018
COUNTRIES: Malaysia, Global

ALERT ---- MARITIME

SUBJECT: **Malaysian Ports Highly Vulnerable to Illicit Ivory in Transit**

DATA: Maritime ports in Malaysia are highly vulnerable to illicit wildlife trafficking activity, in particular related to the illegal transit of elephant ivory. Multiple major cases of wildlife trafficking involving Malaysian ports have been documented in recent years, with open source and confidential reporting indicating that this activity is ongoing and may be increasing.

Modus Operandi:

Criminal networks are able to consistently traffic large and small quantities of illegal ivory, as well as rhino horn, pangolin, protected timber, and other wildlife products, via Malaysia's major seaports, Port Klang, Port of Penang, Pasir Gudang Port, and Sapangar Port, according to open and confidential sources.

Multiple major cases of wildlife trafficking involving Malaysia as a transit country have been documented in recent years, with open source and confidential reporting indicating that this activity is ongoing. The following current critical trends related to illicit wildlife trafficking involving Malaysian seaports are evident in open source and confidential reporting as well as Taskforce analysis of past seizures and enforcement actions:

1. **KEY TRANSIT COUNTRY FOR IVORY:** Malaysia is likely currently the single most significant transit country for illicit ivory trafficked between Africa and Asia, as well as a key transit location for trafficked pangolin, illegal timber, and other wildlife products. This includes both as an intermediary point for maritime shipments from Africa with final destinations in Viet Nam, Thailand, Cambodia, China, or elsewhere in Asia, or as a final declared destination country with onwards later transit in separate maritime shipments. Malaysia is not considered a major consumer country for most illicit wildlife products.
2. **SPLIT & CONSOLIDATED ONWARD SHIPMENTS COMMON:** A pattern is evident in which ivory is trafficked initially in shipments from Africa with Malaysian ports as the final declared

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destination and then again in separate shipments to onwards destinations, typically elsewhere in Southeast Asia or China, according to available information. Many larger shipments of illegal ivory out of Malaysian ports appear to have been consolidated from multiple separate illegal consignments of ivory previously imported into Malaysia, indicating the presence in Malaysia of criminal facilitation networks involved in transcontinental wildlife trafficking. In other cases, individual consignments of ivory seem to have been stored in Malaysia for a time and then later shipped in their entirety to a final end destination.

3. COMMODITY DECLARATION PATTERNS: Most documented cases of illicit wildlife trafficking shipments via Malaysian ports have involved shipments declared as food (both perishable and dry foodstuffs), plastics, and timber, according to analysis of historic seizures involving shipments transiting Malaysia.



PHOTO: Part of a 7.2 ton shipment of illegal ivory seized in Hong Kong in July 2017. The shipment, declared as frozen fish, originated in Port Klang, Malaysia with final destination Hong Kong. (Photo credit: Alex Hofford/EPA, 2017)

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Geography:

The following four ports in Malaysia are most vulnerable to illicit ivory trafficking activity, according to available information.

- *Port Klang* (UN/LOCODE: MYPKG, 2.9841° / 101.35875°) is the country's largest port and the 12th busiest container port in the world, and is located near the capital Kuala Lumpur. It consists of three main seaport facilities (Northport, Southpoint, and Westport), each of which is administered as a separate entity.
- *Pasir Gudang Port* (UN/LOCODE: MYPGU, 1.432973° / 103.91185°), also commonly referred to as 'Johor Port,' is located at the southern tip of West Malaysia in Johor state, near Singapore.
- *Penang Port* (UN/LOCODE: MYPRA, 5.4025° / 100.347°) is located in Penang state, in the northern western part of West Malaysia, near the city of George Town and about 150km from Malaysia's land border with Thailand.
- *Sapangar Port* (6.083333° / 116.15°), also referred to as 'Sabah Port,' describes various separately administered and named container and non-container seaport facilities located at the northern end of Sabah state, East Malaysia, near Kota Kinabalu.



Illicit wildlife trafficking shipments transiting Malaysia have been documented in connection with the following specific origin and destination countries, according to available information, although other routings may be undetected.

- *Documented Countries of Origin:* Indonesia, Kenya, Mozambique, Nigeria, South Africa, Tanzania, Togo, United Arab Emirates
- *Documented Destination Countries:* Cambodia, China, Hong Kong, Taiwan, Viet Nam

Red Flags:

Although traffickers regularly modify their tactics and routings to avoid detection, the following – especially in combination with one another or with an illogical or unclear business purpose – may indicate a higher risk of wildlife trafficking activity related to shipments transiting via Malaysian ports:

- Commodity declared as timber, fish, or plastics
- Country of origin is in East, Southern, or West Africa, with declared destination country Malaysia.
- Shipments transiting via or stored in Malaysia, for final destinations in China, Viet Nam, Thailand, or Cambodia.

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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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