



**TRAFFIC**

June 2021

# WHAT'S INSIDE?

## THE CONTROL OF PARCELS IN THE EU



**AN EFFECTIVE MEANS TO DETECT AND TACKLE  
WILDLIFE TRAFFICKING?**

# PUBLIC SUMMARY REPORT

This Public Summary report is published by WWF Belgium and WWF France with in-kind support from TRAFFIC under the EU Wildlife Cybercrime project, an EU-funded initiative aiming to disrupt and deter criminals and their networks trafficking wildlife in, or via, the EU using the internet and parcel delivery services. This project is implemented by WWF, IFAW, INTERPOL, and Belgian Customs, with in-kind support from TRAFFIC.

## PROJECT WEBPAGE

<https://wwf.be/fr/a-propos-wwf-belgique/resultats-activites/wildlife-cybercrime-EN>

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## REPORT LAYOUT

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This Public Summary report presents the key findings and recommendations of an in-depth confidential report targeted primarily at law Enforcement Authorities in the European Union (EU) involved in tackling wildlife trafficking and the postal and courier sector whose delivery channels might unwittingly be exploited by wildlife traffickers. The complete and confidential study has been disseminated to relevant public authorities (at national and EU levels), postal and courier companies, and the EU Wildlife Cybercrime consortium partners.

## DISCLAIMER

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The content of this report represents the views of the authors only and is their sole responsibility. The European Commission does not accept any responsibility for use that may be made of the information it contains.

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<sup>1</sup> TRAFFIC (2018) TradeMapper – a tool for visualising trade data. Available at [www.trademapper.co.uk](http://www.trademapper.co.uk)

<sup>2</sup> Available at [www.un.org/geospatial/content/map-world](http://www.un.org/geospatial/content/map-world)

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# SUMMARY

THE DETRIMENTAL IMPACTS OF WILDLIFE CRIME ARE WIDE-RANGING, FROM THREATS TO BIODIVERSITY, ECONOMIC DEVELOPMENT, SECURITY, THE RULE OF LAW, AND HUMAN HEALTH.

**Legitimate transport service providers, including postal or courier companies, are used by wildlife traffickers and the companies unwittingly become a link in an illegal wildlife trade (IWT) chain.**

This boom represents a challenge for the authorities in charge of monitoring parcels, especially for Customs officers, as controls require significant resources and skills to detect parcels containing illegal wildlife commodities. A concerted approach between public authorities and the private sector is needed to close the routes used by traffickers to dispatch their contraband.

As part of the EU Wildlife Cybercrime project, this study examined the use of parcel delivery services for wildlife trafficking in the EU, specifically in four target countries: Belgium, France, Germany, and the Netherlands.



**28%**  
**of seizures**  
related to postal  
and courier  
services in the EU.

More than 6000 seizure records of species protected under wildlife trade laws are reported by law Enforcement Authorities each year in the European Union (EU) alone. More than a quarter (at least 28%) of the seizures reported between 2014 and 2017 related to postal and courier services. The volume of international parcel traffic has been booming in recent years due to the growth of e-commerce, further boosted by the COVID-19 pandemic.

## THE STUDY AIMED TO

- Understand the scale and characteristics of the use of parcel delivery services for wildlife trafficking involving the EU.
- Identify the legal and operational regimes applying to the control of parcel services, as well as the key private and public stakeholders intervening along the supply chain.
- Highlight good practices and areas for improvement, leading to recommendations for relevant authorities and companies to increase the rate of detection and reduce the risks of wildlife trafficking through parcel deliveries.

This study combined desk research with interviews of critical stakeholders from Customs and postal or courier companies and on-site visits to parcel distribution centres in the four target countries. Following authorisation from the EU Member States' relevant authorities,

the researchers also carried out an analysis of seizure data from the Europe Trade in Wildlife Information eXchange (EU-TWIX) database relating to parcel delivery services in the EU and, more specifically, in the four target countries.

# WILDLIFE TRAFFICKING THROUGH PARCEL SERVICES IN THE EU

Postal and parcel delivery services are used extensively to transport valuable, illegal wildlife products, parts, and derivatives, and even live animals and plants. Mail centres were the second highest location category for EU wildlife-related seizures in 2018 and 2019.

The proportion of wildlife seizures relating to postal or courier services varies significantly between Member States: between 2014 and 2017, Germany and Austria combined accounted for 70% of reported seizures.

The main types of wildlife commodities seized during that period in the EU were medicinal products and extracts (especially Aloe plants and Costus roots), followed by wildlife leather products (especially crocodile and python leather), elephant ivory, live animals, and plants (especially orchids and cacti), corals and shells. Trafficking routes were very diverse and depended on the type of specimen shipped. For example, the USA and Switzerland were the principal countries of export for medicinal products during the period.

**70%**  
**of reported seizures**  
related to parcels comes from Germany and Austria.

## LEGAL FRAMEWORKS GOVERNING WILDLIFE TRADE AND PARCEL CONTROL

RELEVANT LEGAL FRAMEWORKS ARE:

- **THE CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES)**

Implemented in the EU through the EU Wildlife Trade Regulations, directly applicable in the EU Member States.

- **THE UNION CUSTOMS CODE (UCC)**

Which provides the common legal framework to all EU Member States for Customs rules and procedures, as well as for businesses moving or trading goods, including postal and courier companies.

- **THE UNIVERSAL POSTAL UNION (UPU)**

Which provides further provisions to the Designated Postal Operators (DPOs) in charge of postal services in a specific country.

These frameworks are often complemented by national legislation, specific policies, or interagency agreements to provide further guidance on priorities and responsibilities towards controlling illicit trade. Furthermore, the Import Control System 2 (ICS2), a new EU programme started on 15th March 2021, intends

to provide a strengthened integrated approach to Customs risk management by exchanging information between economic operators and Customs authorities and between Customs authorities across the EU. The programme will apply to both postal and courier operators.

**CITES**  
Convention on International Trade in Endangered Species of Wild Fauna and Flora.

# CHARACTERISTICS OF POSTAL AND COURIER SERVICES

PARCEL DELIVERY SERVICES FALL WITHIN TWO DISTINCT SYSTEMS:

## THE POSTAL SYSTEM

Bound by the Regulations of the Universal Postal Union and usually the “secrecy of correspondence” principle.

The major global players in the latter are DHL, FedEx/TNT Express, and UPS whose main parcel centres act as entry points into the EU for imported parcels for distribution to the various Member States.

## THE COURIER SYSTEM

Governed by different freight-related rules.

## MONITORING OF PARCELS: ROLES AND RESPONSIBILITIES

The primary contact point for postal and courier companies transporting goods internationally is Customs agencies whose responsibilities include control of parcels exported from or imported into the EU for contraband, including illegal wildlife products, using a mix of targeted controls based on risk profiling information, semi-random and random checks of parcels. They are also responsible for checking the CITES permits accompanying parcels.

Different controls might apply along the transport chain, from the EU entry hub up to the point a consignment reaches its destination country (the latter being responsible for validating the CITES permits). Countries with major parcel hubs used as entry points to the EU have a responsibility in implementing adequate controls against illegal goods as they act as bottlenecks in parcels flows entering the EU, but national authorities from additional transit or destination countries might also control parcels against their national profiles.

Customs agencies collaborate with various authorities including CITES Management Authorities (CITES MAs), environmental inspectorates, and wildlife experts when confronted with potential breaches of wildlife trade legislation. Species identification may be a real challenge for Customs agencies, often requiring consultation with experts and

sometimes requesting laboratories to carry out DNA testing.

Postal and courier companies must systematically implement security checks on all parcels transported by air to look for dangerous products such as explosives. They must also comply with Customs requirements and legislation relating to wildlife and submit necessary information and supporting documentation to obtain Customs clearance, including that proving the legality of the commodities they are transporting, such as CITES permits. Some companies have proactively adopted procedures to increase their due diligence over transported parcels, but so far with limited application to the wildlife trafficking threat. Companies sometimes rely solely on the limited information provided by the sender, and often with no special vigilance to CITES issues. Although companies are increasingly expected to adopt due diligence procedures, postal and courier operators are not required by law to apply safety risk assessment measures on their shipments. Furthermore, the secrecy of correspondence applying to the postal operations may prevent postal companies from looking at the content of parcels. Opening a postal parcel requires the intervention of a Customs officer under the supervision of a postal staff member.

**Adequate wildlife-related controls in major parcel hubs are essential.**

# AWARENESS AND CAPACITY

Customs officers must be familiar with and deal with a wide range of legislation, among them CITES regulations, the complexity of which may hinder their operationalisation. The legal framework governing wildlife trade is particularly complex and keeps changing, necessitating the need for extensive and ongoing training.

In the four target countries, Customs officers receive training on CITES as part of their curriculum, with a varying level of depth and frequency. CITES training is voluntary in some instances, depending on officers' particular interests. Some officers interviewed have become CITES champions within their organisation thanks to practical learning and networks such as EU-TWIX and peer-to-peer learning. France and the Netherlands have appointed CITES referees within their Customs agencies, who receive in-depth training on the

Convention. When a frontline officer detects a suspicious item, the CITES referee can identify the species and act upon their findings.

Among the postal and courier companies approached, only DHL had a good level of awareness of wildlife trafficking issues. The company takes actions to address the risk within their transport chain and proposed training its entire workforce on CITES considerations. The level of awareness of risks associated with wildlife trafficking seemed low or non-existent among other companies. National federations of transport and logistics companies in Belgium and France were identified as relevant outlets to increase awareness of illegal wildlife trade risks in the sector. Several untapped training resources are also now available online for transport company staff.



**Awareness** of risks associated with wildlife trafficking is low or non-existent in most companies.



# RISK PROFILING AND TECHNOLOGICAL SOLUTIONS

The growing international trade in parcels has not been matched with an increase in Customs staff resources. The development of technological solutions and improved risk profiling are therefore deemed extremely important. The data accompanying a parcel, such as its route and its physical characteristics, are valuable to intelligence units and Customs officers to identify high-risk parcels. The ICS2 programme is expected to help address shortcomings over the lack and quality of electronic data and help align risk analyses in the EU. A future assessment of the ICS2 programme is needed to evaluate whether it has achieved these aims.

A common EU understanding of CITES-related risks is important but lacking. For example, EU-level Risk Information Forms (RIFs) are reportedly rarely used for CITES matters.

Germany and the Netherlands however, do have well-advanced risk profiling systems for CITES specimens, refined based upon open-source information, EU-TWIX, information received through other CITES-related authorities and empirical data from previous controls for instance. Such risk analyses could eventually serve other countries with less advanced CITES profiling systems.

Technological tools are available and used by Customs and companies to monitor parcels, although they are usually tailored to detect other types of commodities such as drugs or arms. Their current use to detect wildlife commodities is only nascent and limited and is an area that warrants expansion.

**Technology** the use of technological tools to detect illegal wildlife is too limited.

# CO-OPERATION

Networking between Customs officers, and between Customs agencies and company staff creates stronger connections, trust and co-operation. Joint Customs operations involving officers from several EU countries promotes opportunities to combat transnational criminal activities in the EU more effectively, and is particularly important to counter postal and courier-enabled wildlife trafficking. There are several examples of successful transnational co-operation between authorities in countries that act as hubs for parcels entering or leaving the EU and colleagues in sender and receiver countries that have led to the uncovering of broader wildlife trafficking cases.

The main challenge in promoting collaboration between companies and Customs agencies lies in building a seamless transport chain where the Customs agencies' fiscal and control duties

have limited impact on the postal and courier operations. To streamline collaboration with law Enforcement Authorities, some companies have negotiated specific agreements to strengthen dialogue and information sharing.

Mutual information sharing between Customs and companies is an essential element for practical cooperation to fight illicit trade, including wildlife trafficking, and improve the vigilance of relevant stakeholders towards wildlife trafficking issues. This is mutually beneficial: Customs agencies can benefit from critical information shared by companies, while the companies receive input from Customs agencies to inform their risk analysis systems and staff training. However, companies currently have scant information on wildlife trafficking risks and there is no feedback mechanism on alerts sent by companies to Customs agencies.



# INVESTIGATION AND PROSECUTION

Although investigations arising from the seizure of CITES specimens in parcels tend to be limited, interviewees provided several examples of how they can successfully lead to uncovering larger wildlife trafficking cases. Prosecutors may lack appropriate training or consider CITES-related

infringements not serious. To overcome this, Belgium and the Netherlands have centralised such violations to a dedicated prosecutor with extensive knowledge of CITES to ensure the cases are dealt with appropriately.



# CONCLUSIONS AND RECOMMENDATIONS

Parcel monitoring can be an effective means to detect and investigate wildlife trafficking cases but improvements are needed. This study has led to 25 recommendations targeted at CITES Enforcement and Management

Authorities, postal and courier companies, EU institutions and agencies, EU Member States, and non-governmental organisations (NGOs). A summary of these is below, the full set of recommendations can be found on page 10.

## TO ALL STAKEHOLDERS TARGETED IN THIS REPORT:

Curtailling wildlife trafficking should be given a higher level of priority and more resources, particularly in major parcel hubs used as entry points into the EU to increase the chance to detect those containing illegal wildlife commodities. Enhanced cooperation between CITES Management Authorities, law enforcement authorities and postal and courier companies in detecting wildlife trafficking should continue to be promoted.

## TO LAW ENFORCEMENT AUTHORITIES:



**Co-operate, build trust and shared understanding** between CITES law enforcement authorities within the EU, with countries outside the EU, with companies and other relevant stakeholders (including NGOs);



**Develop technology**, share information and data to improve risk profiling and rate of detection of wildlife trafficking involving the EU;



**Provide appropriate awareness** and capacity both to Customs agencies through training, information sharing, peer-to-peer learning, and designation of CITES specialists in parcel centres;

## TO POSTAL AND COURIER COMPANIES:



**Provide appropriate awareness** and capacity to company staff through training, information sharing, peer-to-peer learning, and designation of CITES referees in the organisation;



**Encourage stakeholders** from the postal and courier sector to engage against wildlife trafficking and with NGOs to access information, adapt practices and share experience;

## TO DECISION-MAKERS AT EU AND MEMBER STATES LEVELS:



**Ensure companies are aware of their responsibilities** in detecting and deterring wildlife trafficking, and promote their role in supporting law enforcement of CITES/EU Wildlife Trade Regulations;




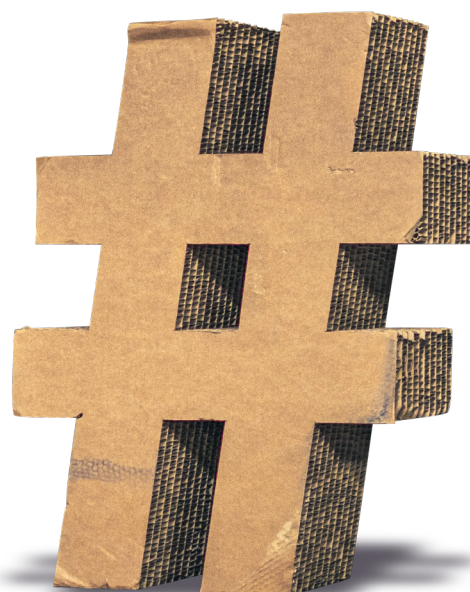
**Encourage the investigation** and prosecution following the seizure of illegal wildlife commodities.

# RECOMMENDATIONS

Based on the above findings, this study leads to the following recommendations aimed at public and private stakeholders to detect and disrupt

wildlife trafficking exploiting postal and courier services, in the EU.

RECOMMENDATIONS	RELEVANT STAKEHOLDERS
 <b>PRIORITISING WILDLIFE TRAFFICKING</b>	
1	<p>Give a high level of priority to combating wildlife trafficking through parcel delivery services with sufficient resources to strengthen controls within the EU, in order to increase the chance of detecting illegal wildlife parcels and to ensure even and consistent enforcement across the EU.</p> <ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>● EU Member States</li> <li>▲ CITES Enforcement Authorities</li> <li>□ Postal and courier companies</li> </ul>
2	<p>Adopt a shared approach and a common but differentiated responsibility in controlling parcels against wildlife trafficking risks. EU Member States with major parcel hubs used as entry points into the EU have a specific responsibility in controlling parcels and shall collaborate with other EU Member States to enhance information sharing and investigate wildlife trafficking cases.</p> <ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>● EU Member States</li> <li>▲ CITES Enforcement Authorities</li> </ul>
3	<p>Include CITES issues as a priority in the annual national enforcement plans guiding Customs controls.</p> <ul style="list-style-type: none"> <li>● EU Member States</li> <li>▲ CITES Enforcement Authorities</li> </ul>
4	<p>Adopt relevant company policies to tackle wildlife trafficking. These policies should be openly communicated to their staff, contractors and clients.</p> <ul style="list-style-type: none"> <li>□ Postal and courier companies</li> </ul>



RECOMMENDATIONS	RELEVANT STAKEHOLDERS
 <b>AWARENESS AND CAPACITIES</b>	
5	<p>Develop and promote a CITES curriculum to ensure Customs officers gain and sustain expertise throughout their career, and specifically ensure regular capacity-building on CITES matters for officers based in parcel centres, with an emphasis on hubs used as EU entry points.</p> <ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>● EU Member States</li> <li>▲ CITES Enforcement Authorities</li> </ul>
6	<p>Designate CITES specialists within Customs agencies, who can supportw frontline officers in detecting CITES contraband in parcels, identify species and take subsequent necessary actions.</p> <ul style="list-style-type: none"> <li>▲ CITES Enforcement Authorities (i.e. Customs)</li> </ul>
7	<p>Ensure companies are aware of their responsibilities and roles in detecting and deterring wildlife trafficking.</p> <ul style="list-style-type: none"> <li>● EU Member States</li> <li>▲ CITES Management Authorities</li> </ul>
8	<p>Include CITES and wildlife trafficking in staff training, risk assessment tools and due diligence processes. Staff awareness on wildlife trafficking should regularly be raised, particularly for front desk officers in charge of accepting parcels. The use of existing resources is encouraged, such as the online training provided to the transport sector via the <i>ROUTES</i> partnership and the <i>FIATA/TRAFFIC</i> training on preventing wildlife trafficking.</p> <ul style="list-style-type: none"> <li>□ Postal and courier companies</li> </ul>
9	<p>Ensure prohibitions and rules on the shipping of wildlife are clearly accessible to clients, contractors and staff. Senders could be asked to acknowledge that shipping respects any company policy and legal requirements.</p> <ul style="list-style-type: none"> <li>□ Postal and courier companies</li> </ul>
10	<p>Encourage national federations for the transport and logistics sector to act as catalysts to raise awareness among their members of wildlife trafficking related risks, to disseminate existing initiatives, encourage peer-to-peer sharing of knowledge and experience, and to support the adoption of risk mitigation measures in the sector (such as due diligence plans, inclusion of wildlife trafficking in risk management tools, etc.).</p> <ul style="list-style-type: none"> <li>▲ CITES Management Authorities</li> <li>▲ CITES Enforcement Authorities</li> <li>□ Postal and courier companies</li> <li>■ NGOs</li> </ul>
11	<p>Encourage postal and courier companies to engage with NGOs to access information, adapt practices and share experience on addressing wildlife trafficking (e.g. subscribe to the United for <i>Wildlife Transport Taskforce</i> and sign up to the <i>Buckingham Palace Declaration</i>).</p> <ul style="list-style-type: none"> <li>□ Postal and courier companies</li> <li>■ NGOs</li> </ul>

RECOMMENDATIONS

RELEVANT STAKEHOLDERS

 CO-OPERATION

12	Use the EU Wildlife Trade Enforcement Group, the European Multidisciplinary Platform against Criminal Threat (EMPACT), <i>EU-TWIX</i> and other relevant law enforcement platforms is encouraged to strengthen co-operation between law enforcement agencies and consolidate intelligence on wildlife trafficking via parcels to input into the CRMS.	<ul style="list-style-type: none"> <li>▲ CITES Enforcement and Management Authorities</li> <li>● EU institutions and agencies</li> </ul>
13	Collaborate to build trust and a shared understanding of the wildlife trafficking issue is encouraged between law enforcers and companies to enhance co-operation in detecting wildlife trafficking.	<ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>● EU Member States</li> <li>▲ CITES Enforcement Authorities</li> <li>□ Postal and courier companies</li> <li>■ NGOs</li> </ul>
14	Encourage multi-stakeholder co-operation (i.e. between companies, their professional organisations, law enforcement authorities, EU agencies, NGOs and academia) to allow for the development of tailored responses to address wildlife trafficking through postal and courier services.	<ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>● EU Member States</li> <li>▲ CITES Management Authorities</li> <li>▲ CITES Enforcement Authorities</li> <li>□ Postal and courier companies</li> <li>■ NGOs</li> </ul>
15	Inform companies of the scope of an enforcement operation so they can encourage their staff to provide hints and alerts on the commodities targeted.	<ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>● EU Member States</li> <li>▲ CITES Enforcement Authorities</li> </ul>
16	Develop specific internal control Customs guidelines on CITES, incorporating the experience of field officers and the knowledge of CITES MA and NGO staff.	<ul style="list-style-type: none"> <li>▲ CITES Enforcement Authorities</li> <li>● EU Member States</li> <li>▲ CITES Management Authorities</li> <li>■ NGOs</li> </ul>
17	<p>Create lists of single points of contact :</p> <ul style="list-style-type: none"> <li>• Within EU Member State's main courier centres for companies to report wildlife trafficking to Enforcement Authorities;</li> <li>• Within courier companies for Customs to request or share information</li> </ul>	<ul style="list-style-type: none"> <li>● EU Member States</li> <li>▲ CITES Enforcement Authorities</li> <li>□ Postal and courier companies</li> </ul>

RECOMMENDATIONS		RELEVANT STAKEHOLDERS
 <b>INFORMATION, TOOLS AND DATA</b>		
18	Develop CITES-specific Risk Information Forms to support EU Customs in their wildlife risk profiling, with the support of the European Commission's Directorate General for Taxation and Customs Union (DG TAXUD)	<ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>▲ CITES Enforcement Authorities</li> </ul>
19	Support the entry into force of the second phase of the ICS2 programme by learning from good practices of Member States who are already using it to assist with curtailing wildlife trafficking.	<ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>● EU Member States</li> <li>▲ CITES Enforcement Authorities</li> </ul>
20	Share information between companies and law Enforcement Authorities on wildlife trafficking cases is encouraged, to support the continued improvement of risk assessment tools.	<ul style="list-style-type: none"> <li>▲ CITES Enforcement Authorities</li> <li>□ Postal and courier companies</li> </ul>
21	Invest in the research and development of high-performance technological tools, such as smartphone apps for species identification, scanners for suspicious wildlife detection and dogs trained in wildlife detection.	<ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>● EU Member States</li> </ul>
22	Increase data analysis capacities to make the most of the data collected via ICS2, improve risk analyses and ultimately contribute to the development of algorithms calibrated to detect wildlife.	<ul style="list-style-type: none"> <li>● EU institutions and agencies</li> <li>● EU Member States</li> </ul>
23	Submit details of relevant seizures to the Customs Enforcement Network and EU-TWIX for appropriate authorised use in the CRMS, to support data analysis, information sharing and awareness-raising among relevant stakeholders.	<ul style="list-style-type: none"> <li>▲ CITES Enforcement Authorities</li> <li>▲ CITES Management Authorities</li> </ul>
 <b>INVESTIGATION AND PROSECUTION</b>		
24	Encourage law enforcement investigations following CITES-wildlife seizure in parcels as a means to uncover larger wildlife trafficking cases, including through co-operation with the country of dispatch and/or country of destination	<ul style="list-style-type: none"> <li>□ Prosecutors</li> <li>▲ CITES Enforcement Authorities</li> </ul>
25	Consider the appointment of a dedicated prosecutor/prosecutor's office to handle illegal wildlife trade cases in parcels to ensure consistency and effectiveness in procedures.	<ul style="list-style-type: none"> <li>□ Prosecutors</li> <li>▲ CITES Enforcement Authorities</li> </ul>

## OUR MISSION

WWF, IFAW, INTERPOL, the Belgian Customs and TRAFFIC (through in-kind support) have joined forces through the EU-funded Wildlife Cybercrime Project to disrupt and deter wildlife criminals and their networks using the internet and parcel delivery services in the European Union. Wildlife law enforcement in isolation cannot stop wildlife crime. The project team engage with online technology companies and parcel delivery companies in the EU to help them prevent traffickers from exploiting their services.

### OUR ORGANISATIONS

- WWF: [wwf.panda.org](http://wwf.panda.org)
- TRAFFIC: [traffic.org](http://traffic.org)

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