

Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) - Singapore's Report to the 71st Meeting of the Standing Committee

Introduction

1. The Elephant Trade Information System (ETIS) report prepared for the 18th meeting of the Conference of the Parties (CoP18, Colombo, May 2019) has categorised Singapore under Category C (“Parties affected by the illegal trade in ivory”). In line with Step 1, paragraph a) of the Guidelines to the National Ivory Action Plans (NIAPs) Process, the ETIS report serves as the foundation for identifying Parties to participate in the NIAP process and the CITES Secretariat will need to put up a recommendation to the CITES Standing Committee (SC). In this regard, the CITES Secretariat has invited Singapore to submit additional information to be considered by the Secretariat in making its recommendations to the 71st meeting of the SC. It is in this context that Singapore is submitting this report.

2. To recap, at the 69th Meeting of the Standing Committee (SC69, Geneva, Nov 2017), the SC agreed not to include Singapore in the NIAP process. As the previous ETIS report for CoP17 did not take into account Singapore's circumstances and context, Singapore submitted two reports to the SC on 19 January 2017 and 27 September 2017¹, providing additional information about Singapore's Whole-of-Government (WOG) approach, robust domestic framework, and strong cooperation with international and local partners to comprehensively combat the illegal trade in ivory and other wildlife. The Secretariat also undertook a mission

¹ SC69 Doc. 29.3 A5

to Singapore from 28-29 April 2017, where the Secretariat was able to observe first-hand Singapore's WOG approach and comprehensive measures to combat illegal wildlife trade, including in ivory. Subsequently, in the Secretariat's Report to SC69 on the NIAP process (SC69 Doc 29.3), the Secretariat recommended that Singapore not be included in the NIAP process, noting that "In the case of Singapore as a Party that serves exclusively as a transit country in the illegal ivory trade chain, the Secretariat believes that **it is unlikely that requesting the Party to develop and implement a NIAP will have any significant impact beyond the measures that the Party has already put in place**". As invited by the SC, Singapore also submitted an update on our efforts to combat illegal wildlife trade at SC70 on 18 June 2018.²

ETIS Analysis and Report for CoP18

3. The ETIS report prepared by TRAFFIC for CoP18 was shared with Singapore on 20 December 2018, and Singapore submitted comments outlining our concerns with the ETIS process to the CITES Secretariat on 18 January 2019. These include the use of unverified ivory trade data, problematic proxy variables, subjective clustering analysis which could lead to questionable conclusions (Annex A).

4. ETIS analysis needs to be clear, transparent and able to stand up to reasoning. For instance, we note that high tonnage of seizures is taken in the ETIS analysis to imply that a country is affected by ivory trade. The country may then be listed in the ETIS report, and potentially subject to the NIAP process. However, Singapore has relatively large-scale seizures

² SC70 Doc 27.4 A19

of ivory because we are a transshipment hub and have a rigorous enforcement regime in place. It would be perverse for the ETIS analysis to interpret this circumstance as an issue that could require participation in the NIAP process. This could also have a negative effect on enforcement efforts by some countries, by dampening efforts to make seizures so as to avoid being listed.

5. In addition, we would like to dispel the continued view held by TRAFFIC on the alleged use of Singapore by organised crime syndicates as a transit point for illegal ivory shipments. This view does not reflect the reality of how shipping lines work, as well as how the Port of Singapore functions, as explained to the Secretariat during their mission to Singapore in April 2017.³

Singapore's Commitment and Measures Against Illegal Ivory Trade

6. Singapore maintains a firm commitment to combat the illegal trade of wildlife, and in particular ivory, as we are determined not to be a conduit for such trade. Singapore continues to build on its measures and efforts to combat the illegal trade. An update on the regular activities that Singapore has conducted since 2018 is in Annex B.

³ The report SC69 Doc.29.3 A5, that Singapore submitted on 27 September 2017, touched on this aspect of the Secretariat's mission to Singapore. In response to the Secretariat's question whether it was possible to route cargoes through specific ports, Singapore's Terminal Operator, PSA, explained that shipping routes and preferred ports for transshipment would be determined based on many factors such as cost-effectiveness, availability of on-carriers, stowage onboard the vessel, volume to be handled at each port, and the overall vessel's schedule. This is done by a central planner at the carrier's headquarters. When the Secretariat observed that illegal syndicates sometimes had the practice of storing containers with illegal goods at ports before having the containers shipped off when it suited them, PSA explained that our port was busy and had limited land area, which made storage cost for containers prohibitive. As the dwell time is one key performance indicator, it would be conspicuous for any container to be staying unduly long at our port.

7. In particular, through Singapore's robust risk assessment and profiling, Singapore authorities seized 3.5 tonnes of ivory tusks from Africa in March 2018. DNA sampling of the seized ivory was also conducted in collaboration with Professor Sam Wasser (University of Washington) to trace the origins of illegal ivory. Singapore regularly reviews our measures and laws to ensure that they are current in addressing illegal wildlife trade. In this regard, there is an on-going review of the primary legislation to ensure that sanctions remain effective in deterring criminals involved in the illegal trade in wildlife.

8. Singapore also takes an action-oriented approach to intelligence reports to combat the illegal trade in all wildlife, including but not limited to ivory. We continue to assess every intelligence report from our partners, and act upon every credible and actionable piece of information. For instance, in January 2019, Singapore received an intelligence report from China about a falsely-declared shipment (from India to China, via Singapore and Malaysia) containing Red Sandalwood logs (*Pterocarpus santalinus*, CITES Appendix II). Singapore immediately alerted Malaysia, and both countries worked closely to conduct a controlled delivery of the shipment. Arising from this, Malaysia subsequently seized an estimated 12 tonnes of Red Sandalwood logs, and arrested the trader.

Conclusion

9. For the reasons above, Singapore strongly disagrees with our inclusion as a Category C country in the ETIS report. This categorisation is based on methodology that is not sufficiently robust, and does not take into account Singapore's comprehensive and robust measures and firm commitment to combat the illegal trade in wildlife, including ivory. Our

position remains that Singapore should not be included in the NIAP process.

Annex

<p><u>Annex A</u> – Singapore’s comments on the ETIS report for CoP18 (submitted on 18 January 2019)</p>
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<p><u>Annex B</u> – Updates on regular activities since 2018</p>
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Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) – Singapore’s Comments on the Elephant Trade Information System (ETIS) Report for the 18th Meeting of the Conference of the Parties to CITES (CoP18)

Introduction

1 At its 69th meeting (SC69), the Standing Committee requested TRAFFIC to “send the ETIS report to CoP18 to all Parties identified as potentially requiring attention in the NIAP process at least 30 days prior to the release of the report on the CITES website” (SC69 SR). At SC70, the Committee further requested the CITES Secretariat, together with TRAFFIC, to “prepare an annex of the comments received from Parties on the ETIS report and circulate it as part of the document to be considered by the Parties at CoP18; and capture in the document whether comments were received and where possible, respond to issues raised by Parties” (SC70 Sum. 12 Rev. 1).

2 The Secretariat has since shared the ETIS report produced by TRAFFIC for CoP18 with Singapore on 20 Dec 2018, and requested our comments by 20 Jan 2019. In this context, Singapore is submitting the following comments.

Data Verification

3 Singapore previously raised a number of issues regarding the ETIS data collection and validation processes in information dossiers that were sent to the Secretariat in January 2017¹ and February 2018.² In these documents, we brought up specific concerns regarding the verification of data.

4 Upon our request, TRAFFIC sent the ETIS Country Report for Singapore covering the period 2008 to 2017, which included the raw data used for the current ETIS report, on 18 October 2018. As with previous

¹ Please see document SC69 Doc.29.3 Annex 5 (Appendix).

² Please see document SC69 Doc.29.3 Annex 5.

reports, TRAFFIC did not ask Singapore to verify this data prior to using it for the report.

5 Singapore has attempted to verify the raw data used by TRAFFIC, where possible. We have identified at least one inaccurate data point, relating to a seizure made by Australia in 2016 of alleged ivory which passed through Singapore. The seized item was later identified to be of whale origin. We are currently seeking information on the remaining unverified cases, but while contact has been made with the relevant authorities, responses have not been forthcoming. Nonetheless, we remain concerned that unverified data, including possibly incomplete and/or inaccurate data, continues to be used in the analysis by TRAFFIC.

Cluster Analysis

6 Singapore also earlier registered our concerns with the ETIS cluster analysis in the information dossier sent in January 2017.³

7 First, while the cluster analysis seeks to “identify countries with similar trade characteristics”, the report acknowledges that “not all groups have a clear cohesion in terms of all definable characteristics”. This can result in generalisations at the cluster level that misrepresent individual countries’ positions. For instance, the report comments that Group 8, in which Singapore was placed, “ranked low in terms of the frequency measure as seizures are rarely made and reported to ETIS”. However, Singapore continues to report all ivory seizures through ETIS, INTERPOL Eco-messages, and the CITES Secretariat.

9 Second, Singapore remains concerned about the use of proxy variables to obtain the estimates used for the cluster analysis. Singapore earlier highlighted that the proxy variables are likely weakly related to both

³ Please see document SC69 Doc.29.3 Annex 5 (Appendix).

seizure and report rates, and also pointed out issues with the use of Deviance Information Criteria⁴ to select these proxy variables.⁵

10 With regard to specific proxy variables, Singapore has raised issues on the use of the *Law Enforcement (LE) Ratio* as a proxy variable to determine seizure rates across countries as the LE Ratio is likely to be biased against countries at the start of the trade chain.⁶ While TRAFFIC has introduced the new Trade Chain Index to attempt to reduce this bias, the use of the LE Ratio as a proxy variable to determine seizure rates across countries remains questionable. The ETIS analysis also uses the *proportion of large-scale ivory seizures to mean weight* as a proxy variable to measure organised crime. We disagree with the assumption that “large-scale movements of ivory are likely to represent organised criminal activity”. The alleged use of Singapore as a transit point for illegal ivory shipments by organised crime syndicates was addressed during the CITES Secretariat’s mission to Singapore in April 2017.⁷

11 Finally, it remains unclear to us why clustering, which is a descriptive technique, is used as a basis for decision-making or inference about individual countries. We had previously pointed out the lack of justification and inconsistencies across ETIS reports (e.g. the cut-off point in the dendrogram⁸, which determines the number of clusters). The report

⁴ Deviance Information Criteria (DIC) is implemented in OpenBUGS which is a software for the Bayesian analysis of complex statistical models.

⁵ Li et al (2015) and Chan and Grant (2016).

⁶ The LE Ratio of a country is defined as the number of seizures made within a country divided by the total number of seizures a country was involved in. It is more likely for a source country at the start of the trade chain to have a lower LE Ratio compared to a destination country at the end of the chain. This is because a source country has more opportunity to be implicated in other countries’ seizures down the chain, thereby increasing its total number of seizures.

⁷ The report SC69 Doc. 29.3 A5, that Singapore submitted on 27 September 2017, touched on this aspect of the Secretariat’s mission to Singapore. In response to allegations that illegal syndicates could choose to route their cargoes through Singapore, we clarified that neither shippers nor consignees can choose to route their cargoes through any specific transshipment port, as shipping routes are worked out by a central planner at carriers’ headquarters. We have also explained that illegal syndicates would not store containers with illegal goods at our port as the costs are prohibitive, given our port’s limited land area and high traffic. In addition, as dwell time is a key performance indicator, it would be conspicuous for any container to be staying unduly long.

⁸ Refer to Figure 7 of the ETIS report. In 2009, the cut-off height was well under 5 on the y-axis. In 2013, it was above 5. In 2016, it was under 5. In 2018, it was again above 5.

acknowledges that the clustering method is “subjective to a degree”. It is especially given this subjectivity that we are concerned that the categorisation of Parties, which forms the foundation for recommendations for the NIAP process, is done on the basis of clustering instead of prioritising countries’ individual contexts.

Regular Review and Improvement of Measures

12 Singapore regularly reviews its measures and laws to ensure that they are current in addressing the illegal wildlife trade. New risk profiles and risk indicators are also continually developed and refined based on seizures, intelligence reports, active engagement with international organisations and partners, as well as open source information. This approach once again led to the successful seizure of 3.5 tonnes of ivory tusks from Africa in March 2018. The case is before the Courts.

13 Singapore is finalising the details of a domestic ivory ban. The Government recently concluded a public consultation on this proposed ban and is in the process of analysing the responses to it.

ETIS Analysis and Technical Outputs

14 Singapore will separately submit written observations on the ETIS methodology review to the Secretariat by 28 February 2019 as indicated in agenda item 49.3, SC70 Sum. 12 (Rev. 1).

15 Singapore notes, from document SC69 Inf. 47, that the ultimate aim of the ETIS review is to ensure that the ETIS analysis will be “understood, accepted and used confidently and appropriately by the Parties in the fulfilment of the requirements set out in Resolution Conf. 10.10 (Rev CoP17).” Singapore would like to reiterate the importance of the ETIS analysis being fair, robust, transparent and scientifically sound.

Conclusion

16 Singapore does not condone the illegal trade in wildlife and is determined not to be a conduit for such illegal trade. Singapore remains firmly committed to combatting the illegal trade in ivory and wildlife.

Singapore has adopted a comprehensive and robust approach to combat the illegal trade in wildlife, including ivory. At the same time, we are continually reviewing our measures and laws to enhance the effectiveness of our overall regime. **We hope that Singapore's comments in this report will assist TRAFFIC and the Secretariat to understand Singapore's unique context and the steps that Singapore has taken to combat the illegal ivory trade.**

Updates on Regular Activities since 2018

Robust Domestic Framework

1. **Singapore reiterates that our strong and effective enforcement efforts are underpinned by a solid legislative framework.** As part of our continual effort to ensure that our legislation keeps up with technological and other developments, we have started a review of the Endangered Species (Import and Export) Act, which is the principal legislation governing trade in wildlife that gives effect to CITES. The review will consider enhancing the Government's legislative powers, including increasing penalties on shipping agents and freight forwarders involved in cargo shipments of illegal wildlife.

Strong and Effective Enforcement Efforts

Action-Oriented Approach to Intelligence Reports

2. **Singapore continues to assess every intelligence report from our partners, and act upon every credible and actionable piece of information.** On 27 November 2018, through our risk profiling, Singapore received 3 seafreight containers declared as Kosso logs (*Pterocarpus erinaceus*, CITES Appendix II) originating from Nigeria En route to China via Singapore and Vietnam. Although the shipment was accompanied by a CITES permit, checks with CITES Secretariat confirmed that the suspension on trade in Kosso logs from Nigeria is still in place. Singapore worked with China and Vietnam and the decision was to direct the shipping line to return the containers back to Nigeria.

3. On 28 January 2019, Singapore received intelligence of a shipment containing Red Sandalwood logs (*Pterocarpus santalinus*, CITES Appendix II) transiting through Singapore. Checks revealed that the shipment was falsely declared as building materials that originated from India, en route to China via Singapore and Malaysia. Singapore sought Malaysia's cooperation to conduct a controlled delivery, to which Malaysia agreed. Arising from this, Malaysia subsequently seized an estimated 12 tonnes of Red Sandalwood logs, and arrested the trader. CITES Secretariat was also informed of this operation.

Robust and Comprehensive Risk Assessment Framework

4. **Singapore continues to enhance our risk assessment capabilities.** New risk profiles and risk indicators are developed and refined regularly based on seizures, intelligence reports, active engagement with international organisations and partners, as well as open source information.

5. On 5 March 2018, Singapore authorities seized a container of groundnuts from Nigeria while en route to Vietnam and uncovered 61 bags of elephant ivory tusks (1,787 pieces), weighing about 3,500kg. The illegal shipment was flagged out for further inspection as a result of Singapore's robust risk assessment framework. In accordance to Res Conf. 10.10 (Rev. CoP17), the seizure was reported to ETIS, and DNA sampling of the seized ivory was conducted. This was performed in collaboration with Professor Sam Wasser (University of Washington). The information was shared with the relevant authorities in Vietnam. The case is before the Courts.

Strict Inspections of Travellers and Cargo

6. Singapore agencies continue to conduct inspections on the millions of travellers who pass through our checkpoints each year.

At all checkpoints, officers are trained to look out for travellers exhibiting suspicious behaviour. Such travellers are interviewed and detailed checks may be conducted on their personal belongings. These efforts resulted in the successful prosecution of five cases involving illegal import of CITES listed species, and one case is currently before the Court.¹

7. Singapore continues to leverage on technology to comprehensively screen and check travellers and goods at our checkpoints.

As part of the efforts by the Immigration and Checkpoints Authority (ICA) to enhance Bus Security Clearance at Tuas Checkpoint, bus scanning portals are on trial to scan arriving buses to better detect anomalies such as hidden compartments. ICA also continues to deploy and upgrade its use of a variety of technologies, including radiographic scanning and handheld screening devices, to ensure that goods entering Singapore are lawful and legitimate. Any cargo with anomalies is diverted for further X-ray screening and physical inspection.

¹ In January 2018, a Singaporean illegally imported 6 tarantulas at the checkpoint and found to have another 92 tarantulas at home. The offender was prosecuted and fined S\$12,800. In February 2018, a Malaysian attempted to smuggle 44 Fischer's Lovebirds into Singapore. The offender was jailed 8 months. A Singaporean was found attempting to import a live Greek Tortoise concealed in a compartment in his vehicle. The offender was prosecuted and fined S\$3,500. In April 2018, a Singaporean was stopped at a checkpoint and a leopard tortoise was found in his vehicle. Follow up investigations uncovered an African spurred tortoise and Mekong snail-eating turtle in his home. The offender was fined S\$7,600. In May 2018, a Malaysian and a Singaporean illegally imported a Black hornbill chick. The two men were each fined S\$4,000. In December 2018, a Singaporean attempted to smuggle 29 Fischer's Lovebirds, 4 Sun conures and 3 Crimson-bellied conures. The case is pending prosecution.

Upskilling of Enforcement Officers

8. **Singapore continues to invest in intensive training of our enforcement officers focussed on the illegal wildlife trade.** On 28 August 2018, Singapore participated in the Combatting Illegal Wildlife Trade in Transit Workshop, hosted by the British High Commission Singapore. Singapore shared on the CITES enforcement in Singapore and how inter-agency cooperation was important to curb the illegal wildlife trade. The session strengthened the relationship between the government agencies and stakeholders. This led to Singapore's cooperation with Maersk Group, a signatory to the Buckingham Palace Declaration against Illegal Wildlife Trade in the management of the 64 containers of African rosewood (*Pterocarpus erinaceus*) seized by Singapore in September 2017.²

Solid Legislative Framework with Heavy Penalties

9. In line with Singapore's broader commitment to tackle the illegal ivory trade and to support elephant conservation, the Singapore Government is looking into legislating a domestic ban on the sale of ivory, even though the existing domestic market is small and inactive, and our enforcement efforts ensure that it does not contribute to illegal trade in ivory. The Singapore Government has completed a public consultation of the domestic ivory ban in December 2018 and the results are being analysed. The government will be announcing the details of the domestic ivory ban in 1st half of 2019.

² On 26 September 2017, Singapore received an intelligence report containing credible information about the transshipment of 64 containers of African rosewood (*Pterocarpus erinaceus*) from Guinea-Bissau to Viet Nam without CITES permits. In our subsequent enforcement action, Singapore seized a total of 1238.67 tonnes of African rosewood logs. Court proceedings have concluded and the wood logs were forfeited to Singapore in January 2018.

Reducing Demand for Ivory by Increasing Public Awareness

10. **Singapore continues to make every effort to combat the illegal wildlife trade of ivory and other products by raising public awareness.** All significant seizures and subsequent prosecutions are publicised via mainstream and social media platforms. Singapore continues to participate in public engagement sessions in partnership with non-governmental organizations. For example, in February 2019, TRAFFIC shared with the Agri-Food & Veterinary Authority (AVA) and the National Parks Board on the illegal wildlife trade trends in the region. Singapore also continues to work with Wildlife Reserves Singapore to increase public awareness about the illegal wildlife trade by placing messages at wildlife exhibits in the Singapore Zoo.

11. Singapore continues to hold regular training sessions with freight-forwarding companies to train them on how to better spot and recognise tell-tale signs of attempts to smuggle illegal wildlife into or through Singapore. 35 attendees from 29 companies attended the most recent session held on 9 January 2019. This is in addition to the 364 attendees from 266 logistics companies who attended 11 sessions between September 2017 and January 2019. Singapore has also held a training session for Ground Handling Agents at the Singapore Changi Airport.

Strong International Cooperation

Regular Participation in International Forums and Law Enforcement Efforts

12. **Singapore continues to cooperate with our international and regional partners against the illegal wildlife trade.** Singapore continues to work closely on the CITES Tortoises and Freshwater Turtles

Task Force by reporting on seizures of illegal imports. Singapore is also receiving United for Wildlife Transport Taskforce Alerts through our partners in the aviation industry. These alerts provide updated information on recent illegal wildlife crime involving the transport industry and the information is shared amongst enforcement agencies.

13. Singapore participated in Special Meeting of the ASEAN Working Group on CITES and Wildlife Enforcement in Bangkok, Thailand on 25 January 2019 to discuss on regional enforcement efforts, ahead of a Special ASEAN Ministerial Meeting on Illegal Wildlife Trade, which will be held in March 2019 in Chiang Mai, Thailand.

14. On 11-12 October 2018, Singapore was represented at the London Conference on Illegal Wildlife Trade (IWT) held in London, UK, and delivered the Singapore position in support of the London Conference Declaration. The London Statement on IWT was adopted by participating countries, including Singapore at the London Conference.

15. On 28 August 2018, Singapore also participated in the Combatting Illegal Wildlife Trade in Transit Workshop, hosted by the British High Commission Singapore. Representatives from the Customs (UK, Singapore, World Customs Organisation), US Embassy, Industry (DHL, International Air Transport Association, Bangkok Airways) and NGO (Wildlife Conservation Society) shared about measures to combat the illegal wildlife trade. We shared a presentation on CITES enforcement in Singapore and how inter-agency cooperation was important to curb the illegal wildlife trade. The networking session was useful to build contacts and exchange information.

Reporting

16. **Singapore continues to report all ivory seizures**, including the ivory seizure in March 2018 through ETIS, INTERPOL Eco-messages, and the CITES Secretariat. Singapore also reports to the CITES Secretariat and through Interpol Eco-messages, all other seizures of CITES-listed wildlife specimens, such as rhinoceros' horns.

Regular Review of Measures

17. Singapore regularly reviews our measures and laws to ensure that they are current in addressing the illegal wildlife trade. In this context, our ongoing review of the Endangered Species (Import and Export) Act to ensure that its sanctions remain effective in deterring criminals involved in the illegal trade in wildlife.

Conclusion

18. **Singapore remains firmly committed to combatting the illegal trade in ivory and wildlife and is determined not to be a conduit for such illegal trade.** Singapore has a robust legislative and enforcement framework supported by committed officers, effective measures, and the use of high-tech equipment. We also adopt a Whole-of-Government approach to ensure the effective implementation of these measures.

19. Singapore has adopted a comprehensive and robust approach to combat the illegal trade in wildlife, including in ivory. At the same time, we are continually reviewing our measures and laws to enhance the effectiveness of our overall regime.

