



# WILDLIFE CRIME ON SOCIAL MEDIA

*Examining How it Works, and How the U.S. Government Can Address It*

*Testimony to the House Subcommittee on Water, Oceans, and Wildlife.  
Delivered at the 27 April 2021 Hearing entitled, "Wildlife Trafficking and the  
Growing Online Marketplace."*

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Thank you for inviting me to testify about wildlife crime on the Internet. My name is Gretchen Peters and I am the executive director of the [Alliance to Counter Crime Online](#).

Our alliance brings together academics, cyber-security experts, conservation groups, and citizen investigators working collaboratively to eradicate serious organized crime from surface web platforms. ACCO has more than 40 members – about half of whom focus on the illegal online wildlife trade. This includes organizations like the Wildlife Justice Commission and the World Parrot Trust as well as academics who track primates, big cats, elephants, rhinos, marine creatures, reptiles, insects and other invertebrates. We also have members like Lady Freethinker that document online cruelty to animals, including the fake animal rescue videos that abound on YouTube and Tik Tok, and the horrific animal fight and torture groups found on Facebook.<sup>1</sup>

Distinguished committee members: The world's largest markets for wildlife crime are right inside your smart phones. The biggest social media platforms, Facebook, Instagram, and WeChat have become ground zero for wildlife crime syndicates to connect with buyers, market their illegal goods, and move money.<sup>2</sup>

This has happened for four reasons:

1. Surface web platforms provide much the same anonymity as the dark web, and a far greater reach of customers – about 40% of the world's population;
2. Social media algorithms help criminals connect cost-free to customers, thus amplifying crime;
3. Outdated U.S. laws provide immunity to the tech industry when tech firms knowingly host illicit content; and
4. This immunity leaves tech firms with little incentive to develop technologies that would block it.

In the wildlife crime sector, this has increased the pressure on multiple already endangered species, including pangolins, elephants, cheetahs, various ape and parrot breeds, and it has created a truly ghastly global market for animal torture and fight videos. I'm submitting for the written record our wildlife Fact Sheet, which provides a summary of the type of content we find.<sup>3</sup>

U.S. tech firms, in particular Facebook, often paint looming competition from China as a reason to let them get away with their monopolistic behavior.<sup>4</sup> Yet when it comes to addressing wildlife trafficking, Facebook is being outdone by its Chinese competitors.

Facebook joined other tech companies like Chinese Tencent in the Coalition to End Wildlife Trafficking Online, in pledging to remove 80% of wildlife crime from their platforms by 2020.

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<sup>1</sup> <https://ladyfreethinker.org/victory-youtube-to-ban-fake-rescue-videos-following-lft-campaign/>

<sup>2</sup> <https://www.nationalgeographic.com/animals/article/how-internet-fuels-illegal-wildlife-trade;>  
<https://www.latimes.com/business/la-fi-facebook-instagram-wildlife-black-market-20190712-story.html>

<sup>3</sup> <https://www.counterincriming.org/wildlife-fact-sheet>

<sup>4</sup> <https://www.rollingstone.com/politics/politics-news/mark-zuckerberg-facebook-antitrust-hearing-1034575/>



alliance to counter crime online

That didn't happen, but Tencent's work with law enforcement did lead to the rescue of hundreds of live endangered animals, the removal of thousands of trafficking accounts, and the dismantling of an illicit trafficking network. (See image, right)

And what did Facebook and Instagram do in the same time period? They launched a reporting mechanism for wildlife sales.<sup>5</sup>

Facebook is not the only American tech platform that hosts wildlife crime, but the world's largest social media platform has an extensive wildlife crime problem, and easy fixes the firm could apply aren't being implemented.

In a 2020 study, ACCO researchers ran manual searches using 17-word combinations in four different languages – simple search terms like “cheetah cubs for sale” or “buy elephant ivory.”

Fifty-seven percent of the Pages we found had the terms “for sale” “sell” or “buy” in their title, as did about a quarter of the Facebook Groups where wildlife appeared to be illegally traded.

You don't need artificial intelligence to find and eliminate this content. Simple “if” code could block search results and flag and remove any Groups and Pages that combine sales terms with animal species terms.

Facebook has chosen not to implement this simple fix. The question lawmakers should be asking the firm is why?

In that same study, Facebook algorithms recommended another 29% of the pages and groups our researchers found. In other words, Facebook isn't just failing to remove wildlife crime; it's algorithms actively accelerate it.

Why haven't these algorithms been dialed back? I'm submitting our report “Two Clicks Away” and request that it be included in the Congressional record of these proceedings.<sup>6</sup>

Facebook could make other changes, like increasing moderation of private and secret groups, and making it explicit to users that the firm will hand over apparent evidence of wildlife crime or animal torture to law enforcement, the same way they must do with toxic content related to children.

Plus, there are legal reforms Congress could enact.




## COMPANY HIGHLIGHTS

### SOCIAL MEDIA

**Facebook** banned the trade in all live animals and all products from species listed on CITES Appendix I, a critical success given the prevalence of trade on the platform globally. To encourage user reporting, Facebook and Instagram launched an animal-specific reporting pathway for users to flag prohibited species listings in real-time.

**Instagram** launched a hashtag pop-up alert in 2017 that educates users about illegal wildlife trade when searching for one of the ~250 search terms associated with wildlife trafficking. An update to this list is currently in process.

**Pinterest** designed an advisory alert for users searching for prohibited wildlife products for sale as well as a special Pinterest board featuring the work of the Coalition.

**Tencent's** support for law enforcement has contributed to a criminal network being uncovered and dismantled, 129 suspects arrested, and 216 live pangolins, 66kg of pangolin scales, 20 Tibetan antelope horns and a batch of other wildlife products being seized, alongside the confiscation of over 18 million Chinese yuan transaction funds in 2018. In 2019, the “Tencent 110” reporting platform of Penguin Loves Earth project initiated by Tencent received nearly 10,000 reports about illegal wildlife trade from WeChat users. A total of 2,000 WeChat accounts with prohibited wildlife products for sale were warned or shut down.

Over 328,000 **Weibo** users have already committed to not consuming illegal wildlife, with 1.4 million interactions reaching over 20.52 million exposures and 38,860 views in their Global Tiger Day messaging.

### E-COMMERCE

Between 2017-2019, **eBay** removed or blocked over 265,000 listings for items prohibited under its Animal Products Policy. In that timeframe, eBay hosted Coalition trainers for an in-person training to their enforcement staff, actioned on data shared through the Coalition Cyber Spotter program and by Coalition wildlife experts, enhanced its policy and enforcement to address new trends and rolled out messaging to the eBay community for World Elephant Day and Global Tiger Day.

<sup>5</sup><https://static1.squarespace.com/static/5b53e9789772ae59ffa267ee/t/5e5c32496b59fb4dac1baf55/1583100496539/Offline+an+d+In+the+Wild+-+Coalition+2020+Progress+Report.pdf>

<sup>6</sup> <https://www.counterincrim.org/wildlife-sales-on-facebook>

We support reforms to Section 230 of the Communications Decency Act to insert a duty of care for tech firms, who should lose their liability shield if they don't take reasonable steps to remove criminal activity, whether it's illegal drug sales, child sex abuse content or wildlife crime.

Distinguished committee members, if it's illegal to do it in real life, it should be illegal to host it online.

We also support the passage of H.R. 864, the Wildlife Conservation and Anti-Trafficking Act, that will be introduced again this year. I'd like to thank the 9 members of this subcommittee who sponsored the bill:

- Don Young
- Aumua Amata Coleman
- Jenniffer González-Colón
- Grace Nolasco
- Debbie Dingell
- Ed Case
- Steve Cohen
- Darren Soto
- And Nadia M. Velázquez

This bill has critical provisions for fighting wildlife crime online, and it establishes a whistleblower program that provides financial incentives, plus crucial anonymity protections for relators of wildlife crime.

Distinguished committee members: Reforming the laws take time, something endangered species don't have. Luckily, the U.S. government has various options.

I'm leading a team of whistleblowers who filed a complaint to the Securities and Exchange Commission about rampant organized crime activity on Facebook, including wildlife crime.

The Department of Justice could investigate Facebook to determine the extent to which there may be racketeering violations under RICO.

Finally, the Federal Trade Commission could investigate the firm's deceptive practices around its willingness and capacity to restrict and remove illicit content, including wildlife crime, from its platforms.

Distinguished committee members, I am calling on you, as our elected representatives to reach out to the SEC, the DOJ and the FTC and urge these agencies to act now. I'm confident we can reign in the tech industry, and make the Internet a safer place for humans and animals alike. Thank you.

**About ACCO:** Every day, ACCO members log onto social media platforms to track and report on illicit activity. We conduct investigations and research on social media, providing evidence we develop to law enforcement, lawmakers and the public. ACCO has provided research and policy support to the Justice Department, the Drug Enforcement Administration, Homeland Security, and the Federal Communications Commission. With few resources, our team of NGOs, university professors and citizen investigators has come together to take on the richest, most powerful industries in the world -- Big Tech. Our greatest asset is the original research produced by the incredible range of experts in our coalition. We formed ACCO because we know we can have more impact as a united force, and also increase our bargaining power. Our approach also works to fight a regulatory system that's allowing crime to explode online across multiple sectors, rather than fighting crime one network at a time. When we succeed, we can bring about systemic change, having substantial impact in reducing multiple dangerous threats.

**About Gretchen:** is also the Executive Director of [CINTOC](#), ACCO's parent company, a strategic intelligence organization made up of experienced investigators, analysts and advisors. Gretchen is an authority in mapping transnational organized crime networks, and pinpointing ways to defeat them. She has advised the governments of Gabon and South Africa on wildlife crime, as well as the OECD, the UN Office on Drugs and Crime and the Elephant Crisis Fund. In 2014 and 2015, she worked on grants from the U.S. State Department, USAID and U.S. Fish and Wildlife to map the supply chains moving ivory and rhino horn from Africa to consumer markets. That's when she and her team discovered that the illegal wildlife trade, like so much other commerce, had shifted onto social media platforms. She co-founded ACCO in 2018.