

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES  
OF WILD FAUNA AND FLORA

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Interpretation and implementation of the Convention

Compliance and enforcement

Review of Significant Trade in specimens of Appendix-II species

REVIEW OF *MACACA FASCICULARIS* IN CAMBODIA AND VIET NAM

The attached information document has been submitted by the Species Survival Network in relation to agenda item 9.3.

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**Document from the SSN Primate Working Group in response to responses submitted by Cambodia and Viet Nam CITES Management Authorities in AC28 Doc 9.3 Annexes 2 & 3 regarding the Review of *Macaca fascicularis* in Cambodia and Viet Nam under Resolution Conf. 12.8 (Rev. CoP13) on Review of Significant Trade**

## **Summary**

*Macaca fascicularis* was included in the Review of Significant Trade at the 25th meeting of the CITES Animals Committee (AC25) in 2011. *M. fascicularis* is the most heavily-traded species of live mammal listed on the CITES Appendices. Records show that between 2006 and 2013 460,091 live specimens were traded worldwide, including 203,624 reported to have been exported from Cambodia, Laos PDR and Viet Nam (Annex 1 to this document).<sup>1</sup>

AC27 agreed to maintain Cambodia (Possible Concern), Lao PDR (Urgent Concern) and Viet Nam (Possible Concern) in the Review, and agreed to a series of recommendations for the three countries.<sup>2</sup>

The Species Survival Network (SSN) has considered the responses submitted by the CITES Management Authorities of Cambodia and Viet Nam in AC28 Doc 9.3 Annexes 2 & 3.<sup>3,4</sup> No response has yet been submitted by Lao PDR. SSN maintains that the responses submitted by both Cambodia and Viet Nam do not satisfy all of the concerns raised at AC27, and that the evidence submitted supports retaining both countries in the Review of Significant Trade. SSN urges the Animals Committee to recommend that the Standing Committee **suspend trade in this species from Lao PDR** until a response to the recommendations has been received (see Annex 2 for additional concerns), and suspend **trade from Cambodia and Viet Nam** until results of population surveys have been provided and concerns regarding illegal trade have been addressed.

## **AC27 Recommendations and SSN Comments**

### **CAMBODIA**

***“Within 90 days the Management Authority should:***

***“b) Provide detailed information to the Secretariat for transmission to the Animals Committee for review at its 28th meeting of the extent of breeding in captivity of *Macaca fascicularis* in Cambodia and describe measures taken to ensure that there is no detrimental impact on wild populations including, but not limited to, the origin of founder stock, details of the breeding stock, whether the breeding stock is augmented by wild-taken specimens, annual production for last 5 years, whether bred to second generation or beyond, and detailed description of the breeding facilities;”***

### **Population Surveys**

The CITES Management Authority (MA) of Cambodia response references population assessments having taken place between 2001-2010 and, in particular, one conducted in 2009. However, it fails to provide a copy of the relevant population surveys or information on the methodology used and so the studies and results cannot be fully evaluated by the AC. Cambodia states that these surveys indicate that the estimated wild population is approximately 3,000,000, and that “*M. fascicularis* is a very common species.” However, this estimate conflicts with the findings of a number of other published reports from 2006 to 2011 (see, e.g. Eudey 2008). These studies found that *M. fascicularis*,

rather than being very common<sup>5</sup>, is facing a rapid decline<sup>6,7</sup> is at risk of extirpation and that populations are disappearing across Cambodia.<sup>8,9,10</sup>

Studies report that in many areas with suitable habitat for *M. fascicularis*, populations were absent or unobserved. For example, a report by the Wildlife Conservation Society showed that populations in the Seima Protection Forest underwent a dramatic decline (82.8% decrease in abundance) between 2010 and 2013, and appear to be on the brink of local extirpation.<sup>11</sup>

In order to reconcile these contradictory findings, SSN urges the Animals Committee to recommend that a copy of the surveys undertaken by Cambodia be requested, including details on the methodology used.

#### Captive breeding

Cambodia states that the quota for *M. fascicularis* permitted to be captured in the wild for breeding stock between 2003 and 2009 was “37,780 animals in total”, “number reduced to 300 animals by 2008 and 2009”. It further states that in October 2010 permits for the collection and/or harvesting of *M. fascicularis* from the wild were suspended for a minimum of five years.

Cambodia states that the breeding stock in each of the captive breeding farms has been sufficient to produce enough F1 and F2 offspring for export and, as a result, no augmentation with wild *M. fascicularis* has been required. Yet, evidence indicates that farms in Cambodia continue to be supplied with wild-caught animals. In 2012, field investigations found that *M. fascicularis* trapped without permits in Kampong and Siem Reap Provinces were transferred to breeding farms. To avoid detection by the authorities, the animals were reportedly brought into the farms during the night, hidden under packs of ice in vehicles which had been adapted to hold cages.<sup>12</sup>

In 2015, a security worker at one farm in Pursat reported that it was buying illegally-caught *M. fascicularis* and paying the Forestry Department for the relevant authorization papers.<sup>13</sup> He also claimed that the trapping of wild *M. fascicularis* continued around the Tonle Sap area.<sup>13</sup>

Regular export of large numbers of *M. fascicularis* from Cambodia began in 2004. The source codes used for these exports indicate that captive-bred (source ‘C’) exports began in 2004 (1,590 specimens). *M. fascicularis* are reproductively active from around four years of age. In order for a captive-bred animal to have been available in 2004 for export at the age of two (the typical age a *M. fascicularis* is exported for research purposes), the breeding facilities would need to have been established in 2002 at the latest. According to the Cambodia CITES MA statement, however, no farms in Cambodia were established prior to 2003.

#### Illegal international trade

Illegal international trade also continues to be a concern. Studies published in 2008 and 2010 reported that wild *M. fascicularis* were illegally exported from Cambodia to Lao PDR<sup>14,15</sup>, from whence they were illegally exported to Viet Nam for use in breeding farms.<sup>14</sup>

Evidence gathered in 2015 points to the continued existence of a widespread illegal cross-border trade in wild *M. fascicularis* captured in Cambodia and transported to Viet Nam.<sup>13</sup> Animals are bought for around US\$75 by dealers in Viet Nam and sold for around US\$100. For an extra fee, documents can be obtained from a farm in Viet Nam that would (falsely) identify the *M. fascicularis* as having been captive-bred there. One dealer had around twenty *M. fascicularis* in cages on his premises that he claimed he had obtained recently from Cambodia. Another dealer claimed that buyers from Viet Nam were due to arrive in a village in Pursat Province, Cambodia, to buy between 20 and 30 wild-caught *M. fascicularis*. Dealers provided advice on how *M. fascicularis* could be smuggled across the border from Cambodia; some even claimed that they had good relationships with rangers and border officials to facilitate this illegal trade. One dealer in Tây Ninh Province, Viet

Nam, stated that it is easier to get *M. fascicularis* into Viet Nam from Cambodia than it is to smuggle cigarettes.<sup>13</sup> Another dealer in Viet Nam offered to arrange for *M. fascicularis* from Cambodia to be available with relevant documentation from a farm in Tây Ninh Province and commented, “Why breed monkeys when you can get them from Cambodia.”<sup>13</sup>

**c) “Provide detailed information to the Secretariat for transmission to the Animals Committee for review at its 28th meeting on the measures to distinguish between specimens of wild and captive bred sources to ensure that exports of wild specimens are not mis-declared as specimens bred or produced in captivity.”**

Cambodia confirms the use of neck tags (collars) for *M. fascicularis* at breeding facilities in Cambodia. Such tags can be easily removed and replaced. There is the need for a permanent means of identification such as a tattoo or microchip. An absence of permanent methods of marking and identification makes it impossible to verify the source *M. fascicularis* specimens in Cambodian facilities.<sup>13,16</sup>

#### **SSN Recommendation Regarding Cambodia**

SSN urges the Animals Committee to recommend to the Standing Committee to suspend trade from Cambodia until a copy of the population surveys undertaken (including methodology) is provided and concerns regarding illegal trade have been addressed.

#### **VIET NAM**

**“Within 90 days the Management Authority should:**

**a) Provide justification for, and details of, the scientific basis by which it has been established that the quantities of *Macaca fascicularis* exported were not detrimental to the survival of the species in the wild and were in compliance with Article IV, paragraphs 2 (a) and 3;”**

#### Population Surveys

The CITES MA of Viet Nam does not provide information on wild *M. fascicularis* population surveys. It notes that there are some thirty sub-populations, and cites a “quick survey” that found an “overpopulation” of *M. fascicularis* in certain protected areas. Viet Nam does, however, recognise that overall the species is threatened by human activity “in the whole landscape”. The total population size of *M. fascicularis* in Viet Nam is unknown,<sup>17</sup> but it has been recognised that abundance and diversity surveys and effective conservation measures for primates in Central Viet Nam are urgently needed.<sup>18</sup> SSN urges the Animals Committee to recommend that a copy of any surveys undertaken by Viet Nam be requested.

In 2015, field investigators were repeatedly told that, although there were *M. fascicularis* living in areas of Viet Nam, only a few were left. In order to catch large numbers of monkeys one had to go to Cambodia. A manager at Thanh Cong farm in Lang Son Province (Viet Nam) stated that most *M. fascicularis* have disappeared from Viet Nam and Lao PDR due to commercial trapping, but that trapping in Cambodia is still taking place. He claimed there have been no accurate surveys carried out on wild populations in Viet Nam, and any kind of census done has been by making phone calls and asking roughly how many *M. fascicularis* there are in a certain area.<sup>13</sup>

## Poaching and Illegal Trade

Viet Nam states that *M. fascicularis* live in protected areas where trapping and trading are prohibited. However, evidence suggests that this prohibition is not enforced, and that trapping and trading appear to be widespread.<sup>19</sup> *M. fascicularis* had already disappeared from many protected areas by 2008 due to illegal trade.<sup>20</sup> A 2013 study of the Katu ethnic group in Viet Nam found that they continue to hunt *M. fascicularis*; the animals are considered to be valuable and are sold at markets for \$3.95 per kg (USD).<sup>21</sup> Hunters were aware that trapping was strictly prohibited in the Saola Nature Reserve, but continued hunting as “no one had ever been punished by local authorities for trapping or trading”.<sup>21</sup>

Continued hunting has negative effects on *M. fascicularis* populations. Interviews conducted in the Ta Kou Nature Reserve, where hunting is still common practice, found that local people have noticed a decline in *M. fascicularis* over the last 30 years.<sup>22</sup>

Illegal trade in the species in Viet Nam is not uncommon. *M. fascicularis* is considered to be “one of the most common primates in the illegal trade in Viet Nam.”<sup>18</sup> This species is among the most commonly-smuggled animals through illegal crossings along the Viet Nam-China border.<sup>23, 24, 25</sup> In January 2015, at least 100 infant *M. fascicularis* were found being smuggled from Viet Nam to China.<sup>26</sup> Even more recently, field investigators in Viet Nam were told about a dealer who had a team of trappers capturing wild *M. fascicularis* in a village close to the border at Hoang Dieu.<sup>13</sup>

**“b) Provide detailed information to the Secretariat for transmission to the Animals Committee for review at its 28th meeting of the extent of breeding in captivity of *Macaca fascicularis* in Viet Nam and describe measures taken to ensure that there is no detrimental impact on wild populations including, but not limited to, the origin of founder stock, details of the breeding stock, whether the breeding stock is augmented by wild-taken specimens, annual production for last 5 years, whether bred to second generation or beyond, and detailed description of the breeding facilities;”**

## Captive-breeding Facilities

SSN is concerned that the facilities listed by Viet Nam may not be complete.

Viet Nam states that “There are four legal captive breeding facilities of sub-species *M. f. fascicularis* in Viet Nam...The CITES MA of Viet Nam only issues permit to export specimen born in captivity from second generation in compliant with CITES Resolution 10.16. According to Decree No. 82/2006/ND-CP, all *Macaca fascicularis* breeding facilities must be registered with, and supervised by the Provincial Forest Protection Department (PFPD)...”

Viet Nam identifies four facilities exporting *M. fascicularis* in the country but it is unclear whether Viet Nam is referring to individual facilities or to businesses which may manage one or more facilities. Not included in the list is a company called Thanh Cong, based in Lang Son Province. In June 2015, according to one of its managers, Thanh Cong was holding 5,000 *M. fascicularis*.<sup>13</sup> Also, for example, the Binh Long Company, which is included in the list provided by Viet Nam, has three premises in Viet Nam. In 2006, Nafovanny, the main primate company in Viet Nam, and which is included in the list provided by Viet Nam, owned two facilities but also had links to “satellite farms” close to the Cambodian border near Ho Chi Minh City.<sup>27</sup>

## Captive-breeding Production

Details regarding breeding capabilities and production are provided for one company, Nafovanny, but no details or breeding data are provided for the other farms present in Viet Nam.

## Illegal International Trade

SSN is concerned that facilities in Viet Nam continue to acquire specimens from illegal sources. In 2007, wild *M. fascicularis* were reportedly smuggled from Cambodia to Viet Nam where they were kept on a farm in Tay Ninh, and from whence they were exported as captive-bred.<sup>28</sup> In 2013, T. Nadler (in litt to UNEP-WCMC) reported that wild-caught *M. fascicularis* were smuggled from Cambodia to breeding facilities in Viet Nam, from whence they were exported as captive-bred animals.<sup>17</sup> In 2007, evidence was obtained that Tan Hoi Dong farm had used forged documents to claim that *M. fascicularis* smuggled into the country from Cambodia had originated from Lao PDR.<sup>28</sup> A 2008 investigation revealed that thousands of illegally-taken *M. fascicularis* (likely sourced from Cambodia) were being laundered into *M. fascicularis* breeding farms in Viet Nam.<sup>15</sup>

A 2015 report stated that *M. fascicularis* trapped in Cambodia were bought for around US\$75 each by dealers in Viet Nam, and sold on for about US\$100 each. For an extra fee, documents could be obtained from a farm to (falsely) label animals as captive-bred in Viet Nam. Dealers provided advice on smuggling animals across the border; some claimed that they had good relationships with rangers and border officials. One dealer had around twenty *M. fascicularis* in cages on his premises he claimed he had obtained recently from Cambodia. Another dealer in Tây Ninh Province stated that it is easier to get *M. fascicularis* into Viet Nam from Cambodia than it is to smuggle cigarettes. Another Viet Nam dealer, who stated that he can arrange for *M. fascicularis* from Cambodia to be available with relevant documentation from a farm in Tây Ninh Province in Viet Nam stated, "Why breed monkeys when you can get them from Cambodia."<sup>13</sup>

***"c) Provide detailed information to the Secretariat for transmission to the Animals Committee for review at its 28th meeting on the measures to distinguish between specimens of wild and captive bred sources to ensure that exports of wild specimens are not mis-declared as specimens bred or produced in captivity."***

Viet Nam states that the main method of identification for *M. fascicularis* in Viet Nam is the use of neck tags. Such neck tags can be easily removed and replaced at will. A more appropriate and permanent method of marking and identification for *M. fascicularis* would be a tattoo or microchip.

## SSN Recommendation Regarding Viet Nam

SSN urges the Animals Committee to recommend to the Standing Committee to suspend trade from Viet Nam until a copy of the population surveys undertaken (including methodology) is provided and concerns regarding illegal trade have been addressed.



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## Annex 1

The UNEP-WCMC CITES Trade Database records 203,624 live *M. fascicularis* reported to have been exported from Cambodia, Lao PDR and Viet Nam between 2006 and 2013<sup>1</sup>.

### Cambodia (Possible Concern)

According to the UNEP-WCMC CITES Trade Database, 92,915 live *M. fascicularis* were reported to have been exported from Cambodia between 2006 and 2013 (Table 1).

**Table 1. Gross exports of *M. fascicularis* from Cambodia, 2001-2013.**

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
<b>Code C</b>	0	1,590	7,550	15,990	5,780	2,480	2,720	3,000	6,400	2,220	0
<b>Code F</b>	0	0	0	0	1,800	14,820	16,460	7,580	4,320	5,684	3,661
<b>TOTALS</b>	0	1,590	7,550	15,990	7,580	17300	19180	10,580	10,720	7,904	3,661

### Lao People's Democratic Republic (Urgent Concern)

According to the UNEP-WCMC CITES Trade Database 46,235 live *M. fascicularis* were exported from Lao PDR between 2004 and 2013 (Table 2).

**Table 2. Gross exports of *M. fascicularis* from Lao PDR, 2001-2013.**

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
<b>Code W</b>	0	5,985	2,000	0	0	0	120	0	0	0	0
<b>Code F</b>	0	0	0	0	0	0	900	0	0	0	0
<b>Code R</b>	0	0	0	1,000	1,000	6,580	8,500	0	0	0	0
<b>Code C</b>	0	0	0	2000	7,500	2,050	2,000	4,600	2,000	0	0
<b>TOTALS</b>	0	5,985	2,000	3,000	8,500	8,630	11,520	4,600	2,000	0	0

### Viet Nam (Possible Concern)

According to the UNEP-WCMC CITES database, between 2006 and 2013, 64,174 live *M. fascicularis* were exported (Table 3).

**Table 3. Gross exports of *M. fascicularis* from Viet Nam, 2001-2013.**

	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013
<b>Code W</b>	390	0	4,200	1,400	2,500	2,000	0	0	0	0	0	0	0
<b>Code C</b>	5,365	5,139	5,794	7,911	6,021	10,324	7,912	8,258	7,089	6,823	2,931	5,520	5,105
<b>Code F</b>	0	0	0	0	1,190	1,690	790	2,420	1,200	0	0	892	1,220
<b>Total</b>	5,755	5,139	9,994	9,311	9,711	14,014	8,702	10,678	8,289	6,823	2,931	6,412	6,325

## ANNEX 2

### **Relevant information on the status and trade of *M. fascicularis* in Lao PDR for use by the Animals Committee when reviewing the position of Lao PDR in the Review of Significant Trade.**

#### **The take of thousands of wild *M. fascicularis* in Lao PDR has likely had a detrimental impact on wild populations:**

The present distribution and current population status of *M. fascicularis* in Lao PDR are not known.<sup>1</sup> Distribution is described as naturally small.<sup>2</sup> One population estimate for the southern region, which is believed to be the only area where *M. fascicularis* is found<sup>3</sup>, suggested that only 420-4,200 individuals remain.<sup>1</sup> A more recent study estimated the country-wide population size at 3,000-5,000 individuals, with a decreasing trend.<sup>4</sup> Therefore, exports of 4,200 wild-caught *M. fascicularis* in one year alone (2004) may have comprised more than half the country's total wild population at that time.

#### **Marking measures are inadequate:**

*M. fascicularis* at breeding facilities in Lao PDR are not given a permanent means of identification such as a tattoo or microchip. Instead, facilities use neck tags which can be easily removed and replaced.<sup>1,5</sup> Field investigators were told by a person at one farm that *M. fascicularis* are exported to China with no identification at all because the Chinese company wanted the animals in a “natural state.”<sup>5</sup> An absence of permanent methods of marking and identification for *M. fascicularis* makes it extremely difficult to verify the source and provenance of each primate at captive-breeding facilities.

#### **Thousands of *M. fascicularis* specimens have been exported under source code ‘R’:**

Between 2006 and 2011 Lao PDR exported 20,600 *M. fascicularis* identified as source code ‘R’ (Table 2). The term ranching as defined by CITES is “the rearing in a controlled environment of animals taken as eggs or juveniles from the wild, where they would otherwise have had a very low probability of surviving to adulthood” (Resolution Conf. 11.16 (Rev. CoP15)). Source code ‘R’ is not appropriate for primates, which are considered K-selected species, because primate juveniles do not have a very low probability of surviving to adulthood. In addition, in the case of *M. fascicularis*, takes of wild individuals are not limited to juveniles.<sup>6</sup>

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<sup>1</sup> Hamada, Y., Kurita, H., Goto, S., Morimitsu, Y., Malaivijitnond, S., Pathonton, S., Pathonton, B., Kingsada, P., Vongsombath, C., Samouth, F. and Praxaysombath, P. (2011) Distribution and present status of long-tailed macaques (*Macaca fascicularis*) in Laos and their ecological relationship with Rhesus macaques (*Macaca mulatta*). In: Gumert, M. D., Fuentes, A. and Jones-Engel, L. (eds.) *Monkeys on the Edge* Cambridge University Press

<sup>2</sup> Timmins, R. (2008) Birds. In (eds M.R. Bezuij en, R. Timmins & Seng T.) *Biological surveys of the Mekong River between Kratie and Stung Treng Towns, northeast Cambodia, 2006-2007*, pp. 81-90. World Wide Fund for Nature (WWF) Greater Mekong - Cambodia Country Programme, Fisheries Administration and Forestry Administration, Phnom Penh, Cambodia

<sup>3</sup> Duckworth, J.W., Salter, R.E. and Khounbolin, K. (compilers). (1999) *Wildlife in Lao PDR: 1999 status report*. Vientiane: IUCN-The World Conservation Union/Wildlife Conservation Society/Centre for Protected Areas and Watershed Management. Samsean Printing, Bangkok

<sup>4</sup> UNEP-WCMC (2010). *Review of Significant Trade: Species selected by the CITES Animals Committee following CoP14*.

<sup>5</sup> BUAV (2012) *Investigation into the trade in primates for research in Laos* [online] Available at: [http://cbydata.org/cfi/BUAV\\_Report\\_2010\\_Trade\\_in\\_Macaques\\_in\\_Laos.pdf](http://cbydata.org/cfi/BUAV_Report_2010_Trade_in_Macaques_in_Laos.pdf)

<sup>6</sup> Letter from European Commission to the BUAV. Received 02 June 2010. Ranching is defined in Resolution Conf. 11.16 (Rev. CoP. 15)

**Evidence indicates that *M. fascicularis* breeding facilities are involved in fraudulent and illegal trade:**

A 2010 study<sup>7</sup> reported that *M. fascicularis* breeding facilities in Lao PDR may temporarily hold wild-caught animals for re-export to Viet Nam and/or China. During visits conducted to wildlife breeders in Bolikhamxay and Champasak provinces in 2005 and between 2007 and 2008, no infants were found on the farms, suggesting that captive breeding was not taking place. Due to the small populations of *M. fascicularis* in Lao PDR, the origin of the wild-caught specimens was thought to be Thailand and/or Cambodia. The number of *M. fascicularis* exported from Lao PDR was considered to far exceed the capacity of the national population and the breeding facilities.<sup>7</sup>

Lao PDR also is home to the single largest known illegal wildlife trafficker in Asia, Vixay Keosavang and his Xaysavang network. In 2012, the owner of Xaysavang Trading Company told field investigators that his company was involved in an unofficial trade in *M. fascicularis* exported to Viet Nam.<sup>5</sup> This syndicate was involved in laundering thousands of illegally traded *M. fascicularis* from Cambodia into Viet Nam through Lao PDR with falsified permits.<sup>8</sup> It is involved in poaching and international trafficking of tigers, rhino horn, ivory, endangered turtles and pangolins.<sup>9</sup> The United States government has offered a reward of up to \$1 million for information leading to the dismantling of the Xaysavang Network.<sup>10</sup>

**Exports do not match reproduction capabilities of breeding farms:**

Recent field investigations have raised concerns regarding the validity of claims regarding the captive breeding of *M. fascicularis* in Lao PDR. In order for a captive-bred two-year old animal to be available for export in 2006 (as recorded by Lao PDR) the breeding facilities should have been established around 2004. Yet, the earliest farm in Lao PDR was the Xaysavang Trading Company, established in 2005. Vientiane Xinling received its first primates in 2005 and Binh Long was completed in late 2010 / early 2011.<sup>1,9</sup>

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<sup>7</sup> Hamada, Y., Kurita, H., Goto, S., Morimitsu, Y., Malaivijitnond, S., Pathonton, S., Pathontone, B., Kingsada, P., Vongsombath, C., Samouth, F. and Praxaysombath, B. (2010) Distribution and present status of Macaques in Lao PDR. In: Nadler, T., Rawson, B. M. and Thinh, V. N. (eds.), Conservation of primates in Indochina, Hanoi, Viet Nam: Frankfurt Zoological Society and Conservation International, p.27–42.

<sup>8</sup> Hoang Quoc Dung. (2008) Articles on Illicit Wildlife Trading in South East Asia. A trans-border wildlife trade network unmasked, in 4 parts. Tien Phong Newspaper, Hanoi, Viet Nam. Unofficial translation, Earth Journalism Network. [online] Available at:

[http://cmsdata.iucn.org/downloads/hoang\\_quoc\\_dung\\_articles\\_on\\_illicit\\_wildlife\\_trading\\_in\\_asia.pdf](http://cmsdata.iucn.org/downloads/hoang_quoc_dung_articles_on_illicit_wildlife_trading_in_asia.pdf)

<sup>9</sup> Rademeyer, J. (2014) Untouchable? Kingpin of Wildlife Crime. [online] Available at: <http://www.eia-international.org/vixay-keosavang-an-untouchable-kingpin-of-wildlife-crime>

<sup>10</sup> U.S. Department of State, 'First Reward Offer For Transnational Organized Crime Information'. N.p., (2015) [online] Available at: <http://www.state.gov/secretary/remarks/2013/11/217558.htm>.