



environmental  
investigation  
agency

## Wildlife

### **A Pivotal Player**

Vietnam's ongoing fight  
against the illegal  
wildlife trade

September 2025





ACKNOWLEDGEMENTS

This report was written and edited by the Environmental Investigation Agency (EIA UK) and EIA US. It has been produced with the financial support from the Elephant Crisis Fund, an initiative by Save the Elephants and the Wildlife Conservation Network; the Pangolin Crisis Fund, an initiative by Wildlife Conservation Network; and the Tilia Fund. The contents are the sole responsibility of EIA.

EIA also wishes to thank its numerous other supporters whose long-term commitment to the organisation’s mission and values helped make this work possible.



Cover: Approximately 100 tonnes of elephant ivory, pangolin scales and rhino horns were intercepted globally between 2022-2024

ABOUT EIA

We investigate and campaign against environmental crime and abuse.

Our undercover investigations expose transnational wildlife crime, with a focus on elephants, pangolins and tigers, and forest crimes such as illegal logging and deforestation for cash crops such as palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we work to avert climate catastrophe by strengthening and enforcing regional and international agreements that tackle short-lived climate super-pollutants, including ozone-depleting substances, hydrofluorocarbons and methane, and advocating corporate and policy measures to promote transition to a sustainable cooling sector and away from fossil fuels.

Above: African natural resources continue to be exploited for wildlife crime driven by transnational organised criminal networks

EIA UK

62-63 Upper Street,  
London N1 0NY UK  
T: +44 (0) 20 7354 7960  
E: [ukinfo@eia-international.org](mailto:ukinfo@eia-international.org)  
[eia-international.org](http://eia-international.org)

EIA US

PO Box 53343  
Washington DC 20009 USA  
T: +1 202 483 6621  
E: [info@eia-global.org](mailto:info@eia-global.org)  
[eia-global.org](http://eia-global.org)

Environmental Investigation Agency UK

UK Charity Number: 1182208  
Company Number: 07752350  
Registered in England and Wales

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## Executive summary

Following the publication of our 2021 report Vietnam's Footprint in Africa, which exposed the involvement of Vietnamese criminal networks in smuggling wildlife from Africa to Vietnam, EIA conducted follow-up research and an investigation in Vietnam in 2024 to assess developments three years after our original findings.

*A Pivotal Player* presents an updated analysis of elephant ivory, pangolin scale and rhino horn trafficking implicating Vietnam between 2022-24. Drawing on seizure data recorded by EIA's Global Environmental Crime Tracker, open-source research and public reports as well as findings from EIA's recent investigation, this report also describes the cross-border illicit trade dynamics between Vietnam and China, focusing in particular on the routes, payment arrangements and concealment methods used by criminals to transport a range of illegal

wildlife products across various border crossings in northern Vietnam and onwards into China.

Finally, this report highlights Vietnam's efforts and achievements in combating wildlife crime, while also outlining the key challenges the country continues to face in addressing its role in the illegal wildlife trade.

**Above:** Vietnam remains as one of the countries most affected by rhino horn trafficking

## Key findings

- ▶ Despite reduced demand in Asia and increased enforcement in key countries, **Vietnam remains a significant import hub for illegal wildlife traders** who continue to adapt their methods to illegally transport elephant ivory, pangolin scales and rhino horn from Africa to Asia. **Between 2022-24, Vietnam was implicated in at least 30 per cent, 24 per cent and 16 per cent, respectively, of global elephant ivory, pangolin scale and rhino horn seized by weight.**
- ▶ There has been **less convergence between the trafficking of elephant ivory and pangolin scales en route to Vietnam compared to the period 2018-21**. Between 2022-24, Angola and Nigeria, respectively, were the top countries linked to seized elephant ivory and pangolin scales implicating Vietnam.
- ▶ While there were no public reports of rhino horn seizures linking Vietnam and South Africa between 2022-24, it is likely that **many rhino horns sourced from South Africa were instead exported from third countries to evade detection**. In several seizure cases involving Vietnam, the source of the rhino horn was unreported.
- ▶ As China has intensified its efforts against wildlife crime in recent years, **traffickers have increasingly exploited Vietnam as a transit hub for smuggling wildlife products from around the world into China** via land border crossings.
- ▶ Quang Ninh and Lang Son provinces in northern Vietnam are home to both official and unofficial border crossings used by traders to move illicit wildlife products into China. In these provinces, **frozen food, timber and medicinal materials are common concealment methods for illegal wildlife products transported from Vietnam into China through official crossings**
- ▶ COVID-19 pandemic travel restrictions led to an increased use of online communication between Vietnamese and Chinese wildlife traders. **WeChat is the most popular online platform used by Vietnamese traders to communicate with Chinese traders** and to advertise illegal wildlife products targeting the Chinese market.
- ▶ **Payments by Chinese traders can be arranged through WeChat Pay or bank transactions.** In many cases, Vietnamese traders have family members living in China who can receive payments from Chinese customers on their behalf, before transferring the money onwards to Vietnam.
- ▶ **Corruption usually manifests in the form of monetary bribes to customs officers, border guards and police officers, particularly at border areas and logistics hubs,** to ensure illegal wildlife products are smuggled into and out of Vietnam undetected.
- ▶ **Since 2021, Vietnam has made commendable efforts to tackle wildlife crime,** including successful prosecutions relating to large-scale trafficking incidents involving African ivory and pangolin scales made at seaports; significant custodial sentences have also been imposed on individuals convicted of wildlife crime offences.
- ▶ **Long-term efforts such as conducting intelligence and finance-led investigations and international law enforcement cooperation are needed to target high-level members of wildlife crime networks operating in Vietnam and overseas.** It is also vital to **implement a centralised stockpile management** system for illegal wildlife products seized in Vietnam to prevent the risk of leakage into the illegal market.

## Introduction

Wildlife crime is a critical threat contributing to the triple-planetary crisis of biodiversity loss, climate change and global pollution.

Wildlife crime is a critical threat contributing to the triple-planetary crisis of biodiversity loss, climate change and global pollution.

Despite policy and enforcement efforts at both national and international levels, organised wildlife crime continues to threaten the survival of multiple species, inhibits the ability of natural ecosystems to mitigate climate change and exacerbates corruption and national security risks.

Between 2022-24, approximately 100 tonnes of elephant ivory, pangolin scales and rhino horn were confiscated globally<sup>1</sup> indicating that transnational organised wildlife crime networks continue to exploit natural resources and smuggle wildlife, with the majority sourced from Africa.

While the West and Central Africa region, particularly Nigeria, was recognised as the epicentre for the illegal export of both ivory and pangolin scales between 2015-21, southern Africa, Mozambique and Angola have re-emerged as major export hubs for ivory in the past three years.<sup>2,3</sup> Meanwhile, South Africa continues to dominate as a source country for illicit rhino horn, followed by Namibia.<sup>4</sup>

Vietnam's involvement in the illegal wildlife trade is well documented. A 2019 report by the UN Office on Drugs and Crime (UNODC) described Vietnam as "perhaps the most important South-East Asian country in the illicit wildlife trade".<sup>5</sup> More recently, a report presented at the 78th Standing Committee meeting of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in February 2025 found that criminal networks have significantly targeted Vietnam in recent years.<sup>6</sup>

Between 2022-24, EIA's Global Environmental Crime Tracker indicates that Vietnam was implicated in at least 30 per cent of global ivory seized by weight.<sup>7</sup> This includes the interception of 7.5 tonnes of raw ivory arriving from Angola in 2023 – the world's largest ivory shipment confiscated since 2019.

**Right** Significant seizures of illegal wildlife products continued to occur in Vietnam between 2022-2024

*Vietnam's efforts to tackle illegal wildlife trade have been notable, in terms of both legislation and enforcement measures.<sup>8</sup> Between 2022-24, on average, approximately 98 per cent of wildlife trafficking cases resulted in arrests and 41 per cent of all prosecutions resulted in imprisonment.<sup>9</sup> In addition, for the first time since 2015 there have been successful prosecutions of large-scale trafficking incidents (500kg or more) involving African ivory and pangolin scales at Vietnamese seaports.*

However, intelligence-led and financial investigations are still inadequate. Furthermore, limited international law enforcement cooperation between source and transit countries in Africa and Asia prevents the identification and dismantling of wider networks responsible for large-scale shipments linked to Vietnam.

Although consumption of illegal wildlife products in Vietnam continues, China remains one of the largest markets for trafficked wildlife products due to the demand for traditional Chinese medicine (TCM) ingredients and for use as status symbols and investment pieces.<sup>10,11,12</sup>

Spanning seven provinces in Vietnam and Guangxi and Yunnan provinces in China, the shared border between the two countries is a significant gateway for the smuggling of wildlife specimens into China, which EIA investigations have shown is largely facilitated by corruption.



# PART I

## Vietnam and its ongoing pivotal role in wildlife trafficking

Since the onset of the COVID-19 pandemic, Vietnamese-led syndicates operating in Africa have faced significant disruptions in their efforts to directly source and ship illegal wildlife products to Asia.

Chinese and Vietnamese traders left the thriving wildlife markets in West and Central Africa and returned home, partly due to reduced demand in Asia and increased enforcement in key countries affected by organised transnational wildlife trafficking.

Several convictions of wildlife traffickers in Nigeria between 2022-23, including that of notorious Vietnamese wildlife trader Phan Viet Chi and his accomplices, have influenced trafficking operations by deterring traders from engaging in wildlife crime due to the increased risk of arrest and prosecution.

EIA intelligence indicates that while some traders may have switched to other businesses entirely, others have been stockpiling illegal wildlife products in anticipation of an increase in prices and improved ease of movement.

However, traders still managed to move elephant ivory, pangolin scales and rhino horn from Africa to Asia during the pandemic and continue to do so today, with Vietnam continuing to play a pivotal role as a wildlife crime hub.

Elephant ivory

Between 2022-24, at least 37 tonnes of ivory were confiscated worldwide. Of this, approximately 23 tonnes were linked to 10 large-scale incidents involving Angola, Botswana, Democratic Republic of Congo (DRC), Kenya, Malaysia, Mozambique, Namibia, Nigeria, Spain, Tanzania, United Arab Emirates (UAE), Vietnam and Zambia.<sup>13</sup> Vietnam was responsible for 30 per cent of the ivory seized globally by weight between 2022-24 and accounted for 60 per cent in 2023 alone.<sup>14</sup>

There have been three known large-scale smuggling cases of ivory totalling approximately 10 tonnes exported from Mozambique between 2022-24, of which two were bound for Asia by sea via the UAE. Previously, the UAE had been implicated in ivory smuggling to Asia via air, suggesting the shift to sea routes may be an emerging strategy.

Meanwhile, Angola was the primary country implicated in ivory seizures taking place in Vietnam between 2022-24.<sup>15</sup> In addition to 7.5 tonnes of raw ivory seized in 2023, more than 300kg of worked ivory from Angola were also seized in Vietnam, indicating the availability of ivory carving facilities in the region. This is reminiscent of previous Vietnamese ivory trafficking activities in Angola - in 2018, two ivory workshops run by a Vietnamese group were uncovered in Angola and connected to the trafficking of 535kg of raw ivory, 263kg of worked ivory and 895kg of pangolin scales.<sup>16</sup>

Although the precise scale to which Vietnamese traffickers are returning to southern Africa for wildlife crime activities is currently unknown, there is a worrying indication that the region's role in illegal ivory trade is generally increasing, with more than half of the total weight of large-scale trafficking incidents between 2022-24 linked to southern African countries, either as a source, export or transit country or through the involvement of their nationals.

Questions also remain about the source of ivory, given that elephant poaching rates have, according to CITES data, generally decreased across Africa, with a clear downwards trend in the Southern African region since 2011.<sup>17</sup> The latest UNODC World Wildlife Crime Report in 2024 notes "leakage" of official ivory stockpiles into the illegal trade, implying that the illicit trade may not be solely dependent on new poaching but may be sourced through ivory stolen from government-controlled stockpiles.<sup>18</sup>



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Left: More than 7.5 tonnes of tusks and worked ivory seized in Hai Phong seaport in March 2023, arriving from Angola

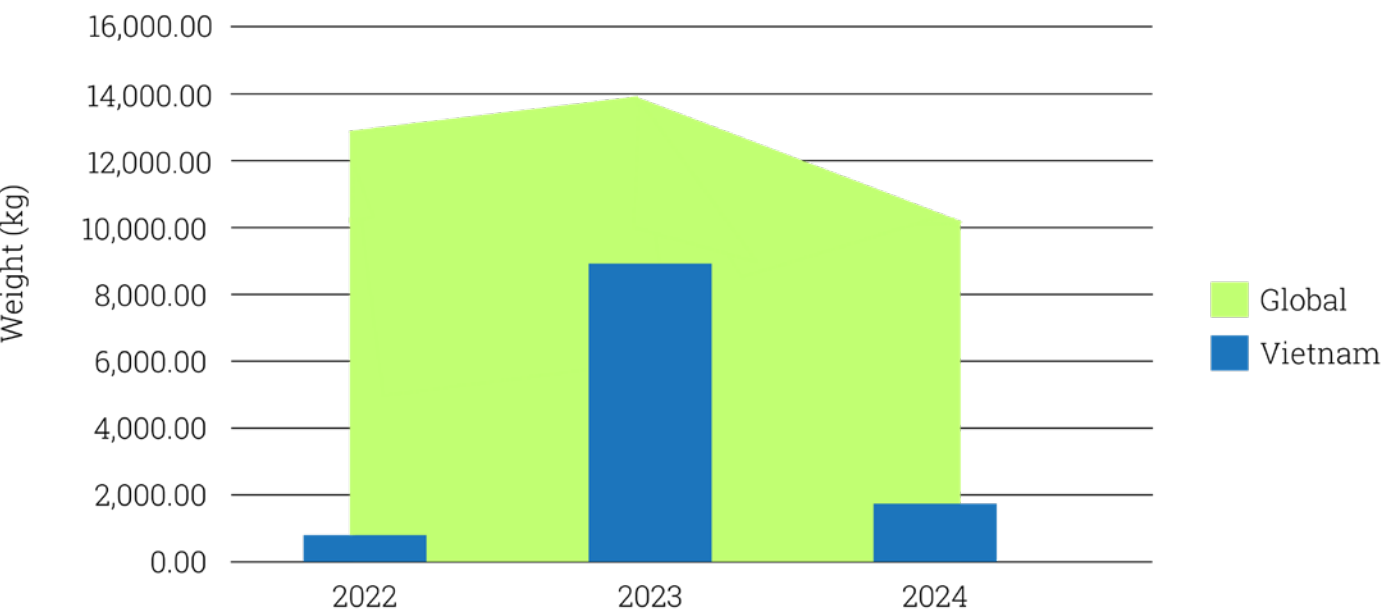


Figure 1: Smuggled elephant ivory seized implicating Vietnam by weight between 2022-2024

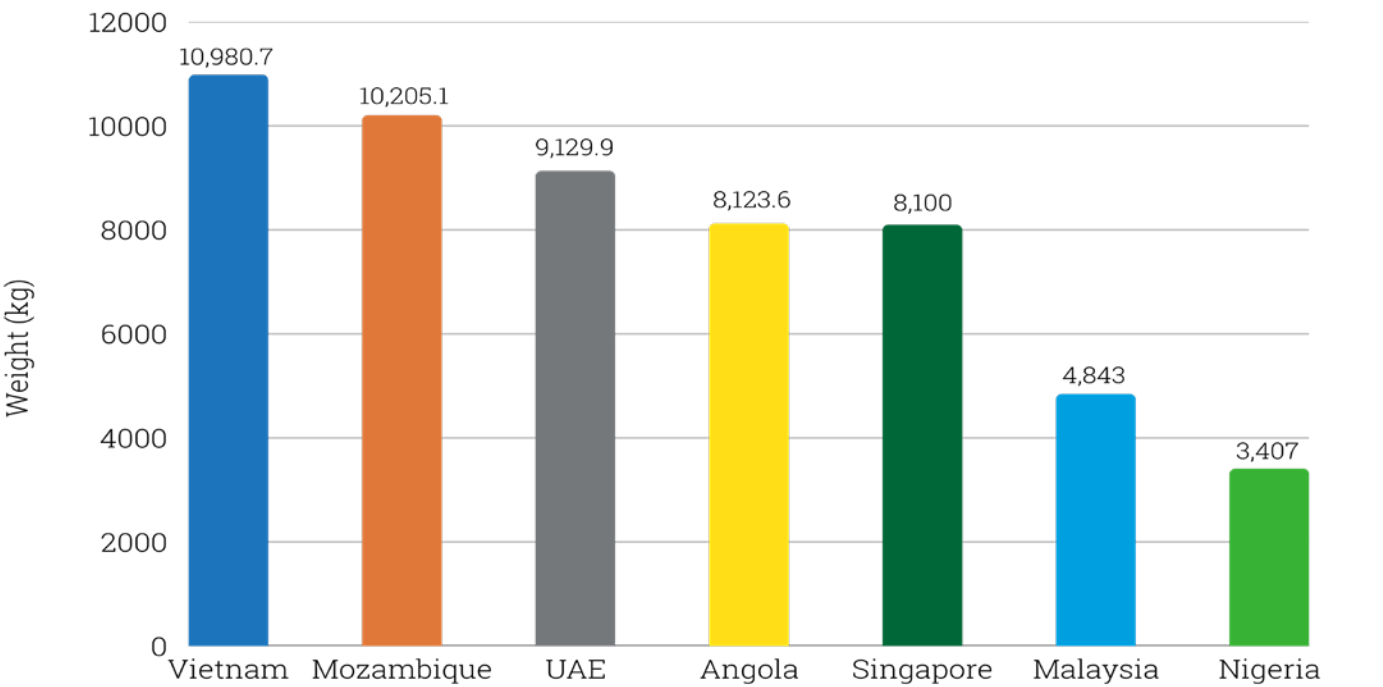
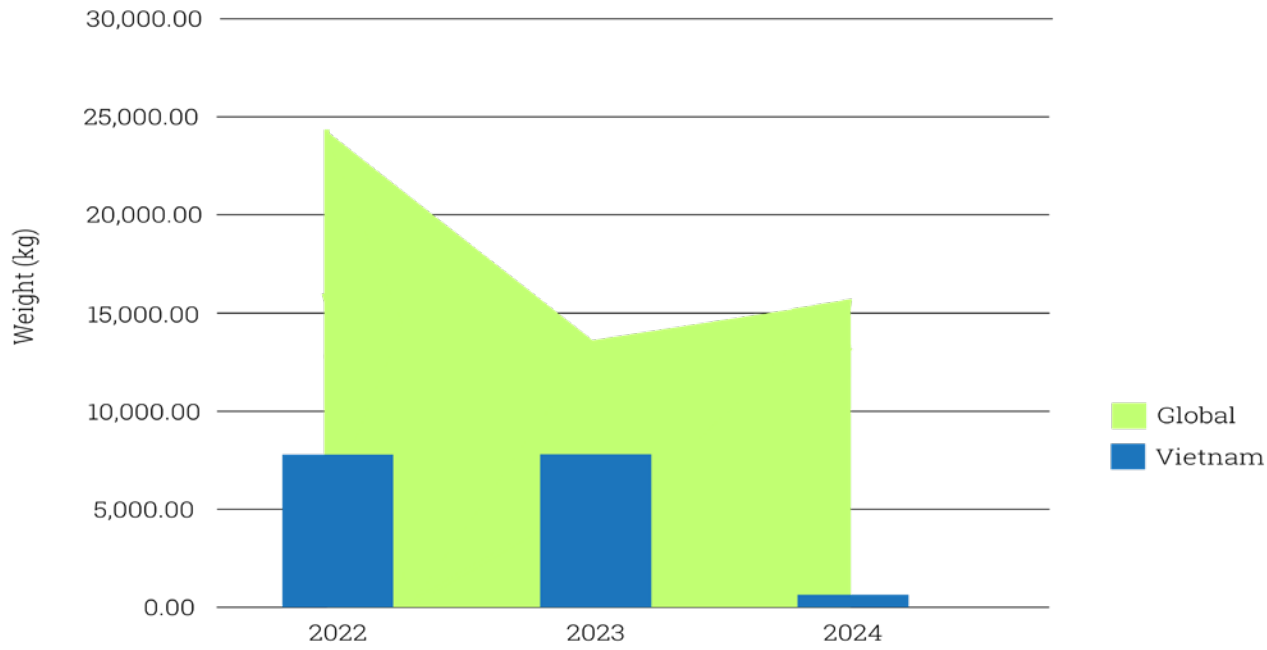
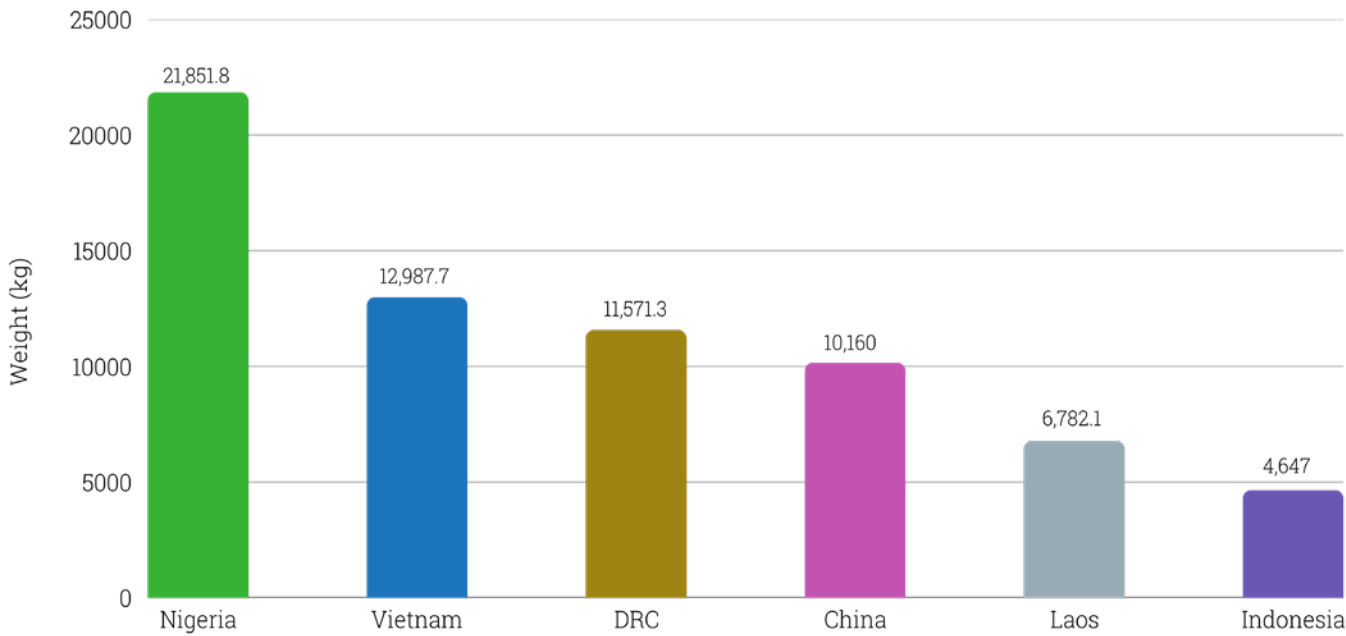


Figure 2: Top countries implicated in global elephant ivory seizures by weight between 2022-2024

**Right:** More than 2.8 tonnes of both African and Asian pangolin scales seized in Nghe An province in October 2023, smuggling from Laos



**Figure 3:** Smuggled pangolin scales seized implicating Vietnam by weight between 2022-2024



**Figure 4:** Top countries implicated in global pangolin scale seizures by weight between 2022-2024



### Pangolin scales

The demand for pangolin scales for the TCM industry is a key driver in the ongoing illegal trade in the species.

Vietnam persists as the key import hub, accounting for approximately 24 per cent of the total weight of pangolin scale seized worldwide between 2022-24, while Nigeria remains a major export hub for pangolin scales sourced primarily from Cameroon and DRC.<sup>19,20,21</sup>

During the past three years, there has been less convergence between the trafficking of ivory and pangolin scales en route to Vietnam compared to 2018-21. Instead, it appears that pangolin scales and ivory have been shipped separately, possibly due to increased law enforcement attention and a shift in ivory exporting countries. Only one seizure in Vietnam in 2022 was reported to involve both ivory and pangolin scales, exported from Nigeria.<sup>22</sup>

In addition, more than five tonnes of pangolin scales were smuggled from Laos in two shipments intercepted in Nghe An province. According to forensic analyses, the scales were sourced from both African and Asian pangolins.<sup>23</sup> This indicates that Laos remains a transit country for pangolin scales smuggled into Vietnam.

Rhino horn

For the past two decades, South Africa and Vietnam have been inextricably linked by the international illegal trade in rhino horn. South Africa, home to the largest combined population of white and black rhinos in Africa, is the primary source country for poached rhino horn, while Vietnam functions as the primary hub for rhino horn trafficking in Asia.

Between 2022-24, there were no public reports of rhino horn seizures directly linking South Africa and Vietnam.<sup>24,25</sup> Instead, most seizures involving Vietnam were connected to Angola and Mozambique. However, during this period, South Africa and Vietnam still accounted for more than 45 per cent and 16 per cent of global rhino horn seizures by weight, respectively.<sup>26</sup>

At the SC78 in February 2025, the lack of direct links between Vietnam and South Africa raised concerns.<sup>27</sup> It was suggested that rhino horn from South Africa may have been smuggled through third countries to avoid evade detection, prompting stakeholders to urge Vietnam to share seized rhino horn samples with South Africa for forensic testing using the Rhino DNA Indexing System (RhODIS) to trace their origin.<sup>28</sup>

Indeed, EIA's intelligence indicates that rhino horn is still trafficked from South Africa to Vietnam and onward into China. Moreover, it is highly likely that South African rhino horn comprises a significant portion of the rhino horn incidents implicating Vietnam and Mozambique as the South Africa-to-Mozambique pipeline for rhino horn trafficking has been well-documented.<sup>29,30</sup>

Recent EIA intelligence suggests that stricter enforcement at Vietnamese airports and seaports is leading traffickers to smuggle ivory and rhino horn from Africa to Laos via air cargo, before onward transportation to Vietnam overland through Nghe An province.

EIA has also documented significant quantities of rhino horn offered by traders based in Laos and Myanmar, yet these countries have been implicated in very few publicly reported incidents in recent years.

In addition, Angola, which has no wild rhinos, is a key hub for rhino horn destined for Vietnam. It is understood that rhino horn is smuggled into Angola from Namibia, which experienced a sustained and significant increase in rhino poaching since 2022.<sup>41,42,43</sup> Angolan nationals have been arrested in Namibia in connection with rhino poaching on several occasions over the past five years.<sup>44,45,46</sup>

As such, both countries have been encouraged by the CITES Standing Committee to enhance bilateral cooperation to tackle the illegal trade.<sup>47</sup>



**Qatar and the UAE in the Middle East and Malaysia in South-East Asia play key roles as transit countries for the smuggling of rhino horn and worked ivory from southern Africa to Vietnam via air routes.**<sup>31,32,33</sup>

**Where freight transportation was reported, Qatar Airways was identified as the carrier used in at least six incidents since 2020 to smuggle contraband to Vietnam, mostly from Angola.**<sup>34,35,36,37,38,39</sup>

**This is concerning, not least because Qatar Airways is a member of the United for Wildlife Transport Taskforce, committed to protect wildlife with its policy of zero-tolerance towards transportation of illegal wildlife products.**

**When approached for comment, Qatar Airways highlighted the lack of communication between mandated authorities and airlines.**

**EIA believes this is clearly a gap in the information chain which needs to be improved in order to prevent wildlife traffickers from exploiting airlines and specific routes.**

Left: Rhino horns and worked ivory seized at Noi Bai airport in April 2023, arriving from Angola via Doha, Qatar

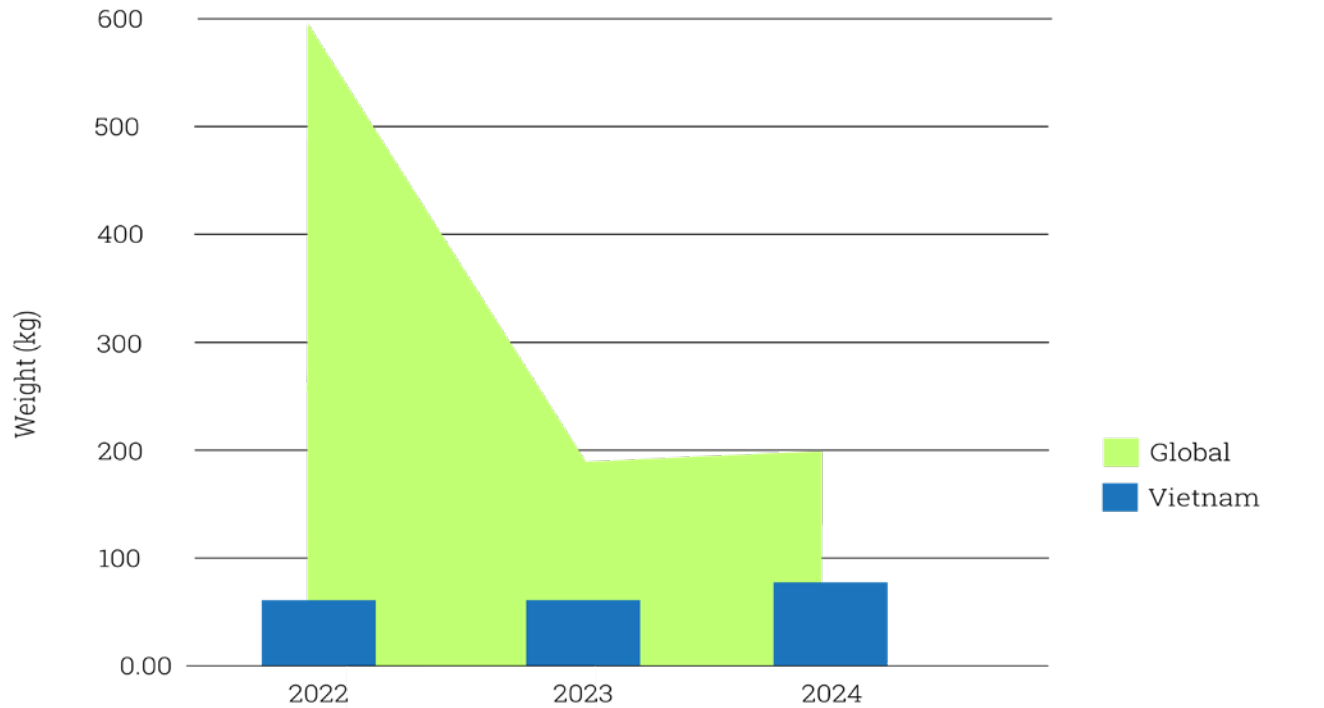


Figure 5: Smuggled rhino horn seized implicating Vietnam by weight between 2022-2024

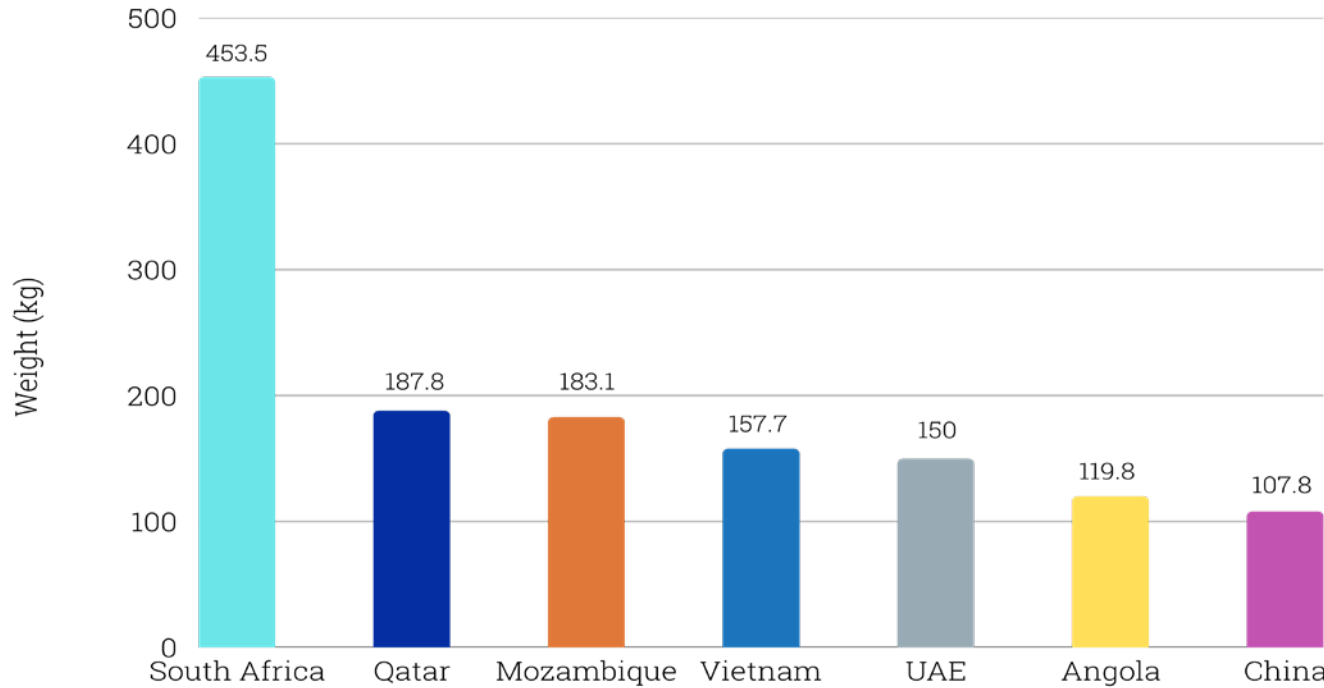


Figure 6: Top countries implicated in global rhino horn seizures by weight between 2022-2024

# PART II

## Cross-border illicit wildlife trade between Vietnam and China - a 2024 snapshot

Since 2019, CITES documents report that Vietnam has overtaken China to become the world's leading destination for illicit ivory.<sup>48</sup>

Vietnam's infamous role as a global wildlife trafficking hub is furthermore substantiated by several large-scale shipments of pangolin scales and rhino horn being detected at Vietnamese seaports and airports in recent years.

Despite the shift in destination for these illegal shipments, and despite strengthened interventions by China to tackle illegal wildlife trade, including the domestic ivory ban in 2018, China remains a key consumer market for illicit wildlife products transported through Vietnam.<sup>49</sup>

EIA's intelligence shows that since the COVID-19 pandemic, there has been a decline in demand for certain wildlife products in China due to increased transportation costs and stricter law enforcement.

However, EIA's 2024 investigations and research found that between 2020-24, illicit products, including parts and derivatives from CITES-listed species, continue to be purchased, concealed and smuggled from Vietnam into China through various land borders to meet this ongoing demand.

### Wildlife products illegally traded

Between 2015-24, there were at least 193 documented smuggling cases across the Vietnam-China border involving elephants, pangolins, rhinos and big cats.<sup>50</sup>

Of these, 46 seizures were made on the Vietnamese side of the border while Chinese authorities detected 147 cases. During this period, 80 per cent of these cases were detected prior to the COVID-19 pandemic. The introduction of tighter border restrictions between Vietnam and China during the pandemic from 2020-22 may have helped to disrupt illicit trade.<sup>51</sup>

However, EIA's intelligence indicates that following the COVID-19 pandemic, regular shipments of pangolin

scales, rhino horn and tiger parts to China may have been indicative of higher demand for these products, with fewer shipments of ivory detected in this period.

Parts and products of other wildlife were also trafficked across the border, including primates, birds, bear paws and bile, saiga horn, rosewood and aquatic species such as turtle, dried seahorse and totoaba.<sup>52</sup>

Vietnam has also been recognised as a key hub for dried seahorses<sup>53,54</sup> and totoaba fish maws (swim bladders)<sup>55</sup> smuggled into China. Between May and July 2021, Chinese authorities seized more than 10,000 dried seahorses and 136 dried totoaba bladders in two smuggling incidents coming from Vietnam.<sup>56</sup> In addition, recent seizure records indicate that Vietnam may be an emerging market for totoaba maws.<sup>57</sup>

**Below:** Land borders between Vietnam and China have been exploited to smuggle wildlife products into China



### Trafficking routes

There are 29 land border gates connecting Vietnam to China across seven provinces including Quang Ninh, Lang Son, Cao Bang, Ha Giang,<sup>58</sup> Lao Cai, Lai Chau and Dien Bien.<sup>59</sup> These gates are managed by Vietnam's Customs and Border Force and play a crucial role in cross-border travel and the import and export of goods between Vietnam and its largest trading partner; however, they are also exploited by smugglers, including for the illegal wildlife trade.

Given the perceived high levels of security at official border crossings, traffickers are more likely to use unofficial border crossings in the nearby mountains, known as the "hill route." In particular, border crossings in Quang Ninh and Lang Son are believed to be the most exploited by traffickers smuggling wildlife parts and products into China, in part due to their beneficial geographical locations. Quang Ninh is the only province that connects to China through both land and water routes while mountains and forest comprise 80 per cent of Lang Son, which provides good cover for moving contraband.



## Mong Cai-Dongxing

Mong Cai's international border gate is Quang Ninh's main passage for trade between Vietnam and China. It is also a hotspot for smuggling a wide variety of goods, including wildlife, into China via Dongxing – the only port connecting Vietnam to China by both land and water routes.<sup>60,61</sup> Therefore, smuggling activities can be facilitated by either taking boats across Ka Long River or driving trucks and other vehicles through Bac Luan II Bridge.

In many cases, illegal goods and irregular migrants have also been transported to China through informal crossings accessed via hidden trails and openings in the mountainous areas close to the border gate.<sup>62</sup>

Of 193 smuggling cases involving elephants, pangolins, rhinos and big cats which were reported across the border between 2015-24, Mong Cai-Dongxing was used in 50 cases (26 per cent).<sup>63</sup> However, no incidents involving the species were publicly reported between 2022-24.

One of the latest incidents involved Mong Cai-Dongxing was recorded in 2021 when more than 800kg of Sunda pangolin scales and approximately 200 turtles destined for Dongxing were seized in Mong Cai.<sup>64</sup> The scales were reportedly bought from Nghe An province, a significant domestic wildlife hub in Vietnam.

EIA's recent investigations and research in 2024 indicate that Mong Cai and Dongxing are still exploited by wildlife traffickers despite a decrease in the overall scale of the illegal wildlife trade. From Mong Cai, illicit wildlife is usually sent to the border town Dongxing for consolidation, before being transported further to Nanning for delivery arrangements to final destinations in China.

EIA's intelligence reveals that there are three main transport methods used by traders to move illicit goods from Mong Cai to Dongxing.



## Transportation by trucks

First, wildlife specimens are concealed in containers of legal export products for transportation by trucks through formal border crossings. This option often involves arrangements with customs agents or bonded warehouses.

Bonded warehouses are owned and operated by private businesses, under the authority and supervision of customs agencies, where goods can be stored for a set period of time without the payment of customs duties.

In Vietnam, bonded warehouses can carry out customs declarations and submit relevant documents relating to imported and exported goods to customs on behalf of the owner of the goods.<sup>65</sup> By allowing traders to conceal consignments of illegal wildlife products among items stored legally, these warehouses present a significant enforcement loophole which is regularly exploited by companies involved in illegal trade.



**Above:** Illegal wildlife products can be concealed in legal exported products for transportation from Vietnam to China by trucks



## Transportation by foot

The second option involves moving goods on foot overland via the "hill route". In this instance, porters are employed by transporters to carry goods to designated locations along the border fence built by China in 2019.<sup>66</sup> In some cases, porters are known to use motorbikes for easier transportation.

In order to evade detection, transporters usually bribe border officials to coordinate "safe transit

windows" of two to four hours. This "window" can entail officials avoiding the designated area or turning off security cameras at the agreed time and signalling to the transporters when it is clear to send porters to specified gates in the border fence. Once goods reach the Chinese side of border, Chinese porters bring them to warehouses or safe locations in Dongxing operated by Chinese transporters.



## Transportation by speedboats

The third option is to employ high-power speedboats to transport large quantities of goods from Mong Cai. The boats deliver goods between Vietnam and China just offshore of the mainland in the Beibu Gulf, where the Ka Long River empties into the South China Sea.

In order to mitigate the risks of seizures and associated economic losses, traffickers are known to split and conceal consignments among different boats. For this transportation, traffickers must pay bribes to corrupt border officials and it is considered to be more expensive than the alternatives.



**Above, top:** Porters can be hired to transport illegal wildlife specimens from Vietnam into China through unofficial crossings

**Above, bottom:** High-power speedboats can also be used to transport illicit wildlife products from Mong Cai in Vietnam to Dongxing in China



**Above:** Tan Thanh border gate in Lang Son province is a hotspot for smuggling wildlife products into China via Pingxiang

**Tan Thanh-Puzhai**

Due to its mountainous terrain, Lang Son remains one of the most exploited regions for smuggling activities across the border.

While the Huu Nghi or “Friendship international border gate” is the most utilised for the legal export and transportation of goods in the province, the Tan Thanh and Puzhai border gates connecting Dong Dang in Lang Son to Pingxiang in Guangxi has been more vulnerable to wildlife traffickers.

This border crossing specialises in the export of goods such as vegetables, fruits and frozen foods – all common concealment products for wildlife specimens due to their large quantity and regular export.

Since 2018, there have been limited public reports on wildlife crime cases relating to the trafficking of elephant ivory, rhino horn and pangolin scales which involve either Tan Thanh or other border gates in Lang Son.<sup>67</sup> One of the latest cases was recorded in 2024 involving the confiscation of 105 turtles near the border in which three offenders were each convicted and sentenced

to 10 years in prison.<sup>68</sup> EIA’s intelligence indicates that specialist transporters have also been sending other illicit wildlife goods through the Tan Thanh-Puzhai border gate in the past few years.

As with Mong Cai, wildlife products can be smuggled into China using either the formal border crossing or the hill route through Tan Thanh. While the latter has been limited in use due to increased surveillance and camera installations along the border fence, some transporters still manage to consolidate goods such as pangolin scales and timber in warehouses near Tan Thanh before porters carry them to Pingxiang.

According to EIA’s intelligence, illegal timber is usually sourced from Dong Ky, a wood processing centre known for targeting Chinese customers near Hanoi.<sup>69</sup>

In parallel, these transporters can also arrange transportation of the contraband through the formal border crossing by concealing them in containers of legal products destined for export.

EIA intelligence indicates that both routes involve bribery payments to corrupt border officials to ensure smooth delivery to Pingxiang or Nanning. Thereafter, goods are transported to other parts of China by courier services, for example SF Express and ZTO Express, two of the leading courier companies in China.<sup>70,71,72,73</sup>

According to transporters, pangolin scales are commonly sent to Guilin while timber is destined for Fujian.

**Concealment methods**

While porters use jute bags or carton boxes to conceal illicit contraband for transport via the hill route, various legal commodities are used to disguise the movement through formal border crossings. These include frozen foods, timber and medicinal ingredients, which are Vietnam’s primary exports to China.

A specialist transporter who engages in direct trade in wildlife and arranges movement of consignments across borders revealed to EIA that frozen foods such as chicken feet are often used to conceal illegal wildlife products smuggled into China through the Tan Thanh border gate. China is a major importer of chicken feet from Vietnam – in August 2024 alone, Vietnam made 121 export shipments of chicken feet, an increase of 210 per cent over the same period in 2023.<sup>74</sup> In addition, medicinal materials such as herbs and plant extracts were also used by this specialist transporter to conceal illegal wildlife products, in particular pangolin scales given the similarity in shape between the scales and the medicinal materials.

Meanwhile, illegal timber is often concealed in legal timber consignments. A substantial amount of the timber trade from Vietnam into China previously involved illegal activities.<sup>75,76</sup> Due to the ban on commercial logging in its natural forests, China relies



heavily on imported timber for its wood processing industry.<sup>77</sup> In 2024, Vietnam was the second largest export country of wood products to China, behind Russia.<sup>78</sup>

According to traders and transporters involved in the timber business from Dong Ky, it is common for wildlife products such as ivory and pangolin scales to be hidden in timber containers being sent to China either through Mong Cai or Tan Thanh. Wooden furniture embedded with ivory and marketed to Chinese customers is also available for sale in Dong Ky.

#### Communication between traders

Travel restrictions due to the COVID-19 pandemic led to an increased use of online communication between Vietnamese and Chinese wildlife traders. A range of platforms are used by Vietnamese traders such as Facebook, WhatsApp, Zalo and Telegram to connect with potential buyers.

However, WeChat appears to be the most popular platform used to communicate with Chinese traders. WeChat also seems to be the main platform for the online advertisement of illegal wildlife for the Chinese market.<sup>79</sup>

Furthermore, while Chinese buyers previously travelled directly to Vietnam to buy illicit wildlife products, EIA spoke with traders who operated in Dong Ky and who estimated that the number of Chinese buyers had reduced to approximately one third of pre-pandemic levels due to travel restrictions and the economic impacts of the pandemic.

As a result, many shops in Dong Ky have closed and those remaining no longer openly display or stock wildlife products. Instead, sales are conducted through the sharing of photos and videos of goods with both regular and new Chinese buyers.

In some instances, EIA intelligence suggests Chinese traders may visit to view goods and

take photos and videos for their customers to review before making a purchase remotely. These traders appear to travel to Vietnam only when they have secured customers and will bargain with local traders to set prices.

#### Payment arrangements

EIA intelligence highlights that traffickers rely on intermediaries to facilitate illicit financial transactions across borders. In many cases, Vietnamese traders have family members living in China who can receive payments from Chinese customers on their behalf, before transferring the money onwards to Vietnam.

To purchase goods, Chinese buyers will usually pay a deposit when placing an order and then pay the remaining balance upon receiving the goods. Small transaction amounts are typically paid using WeChat Pay, a leading third-party payment platform in China.

The use of WeChat for communications and payments has been reported in several Chinese criminal verdicts involving wildlife crime.<sup>80,81,82,83</sup> WeChat is widely available, accessible also to foreigners living in China with a Chinese bank account.<sup>84</sup> The daily maximum for transfer made through WeChat Pay is significant, amounting to RMB200,000 per day (\$27,000).<sup>85</sup>

For larger transactions, traders often use the bank accounts of companies linked to themselves or their family members in both Vietnam and China to move money. For example, EIA intelligence uncovered a trader based in Mong Cai who uses the accounts of his family's seafood company to transfer money from China to Vietnam, making the transactions appear to be legitimate business deals.

Using the accounts of legitimate companies for illicit financial transactions is a common example of layering in money laundering and takes advantage of the overlap between legal and illegal trade to evade detection.

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# PART III

## Vietnam's efforts to combat wildlife crime

### Custodial sentences imposed on wildlife crime offenders

Under Vietnam's Penal Code (2017), wildlife crime is treated as a "serious crime" with maximum sentences of up to 15 years' imprisonment.

This brings penalties in line with recommendations under the UN Convention Against Transnational Organised Crime (UNTOC), which is a critical step in counter-wildlife trafficking efforts.

Vietnamese law enforcement agencies and the judiciary have made concerted efforts to increase the prosecution of wildlife crimes and to impose more severe custodial sentences.

This includes the conviction of Cao Xuan Manh from Nghe An province, a primary hotspot for illegal wildlife trade in Vietnam.<sup>86</sup> Manh, one of the province's high-level traffickers, was convicted and sentenced to seven years' imprisonment in May 2025 for illegally trading tigers, rhino horn, pangolin scales and other wildlife to Vietnamese and Chinese customers.

Two recent cases involving large-scale shipments of ivory and pangolin scales arriving at Vietnamese seaports from Africa were also successfully prosecuted and resulted in custodial sentences.

This includes Hoang Van Hao, who was sentenced to 10 years' imprisonment for illegally importing 615kg of ivory to Hai Phong seaport.<sup>87</sup> Another trafficker, Nguyen Duc Tai, was sentenced to 13 years' imprisonment for his involvement in trafficking approximately 10 tonnes of ivory, pangolin scales, rhino horn and lion bones in two major shipments from Nigeria and South Africa to Da Nang seaport.<sup>88</sup>

In addition, since Do Minh Toan was sentenced to a record 14-year prison sentence for illegally trading 55 rhino horns in December 2021,<sup>89</sup> rhino horn prosecutions in Vietnam have continued to result in significantly higher sentences than in previous years. This includes 12 years' imprisonment for Ninh Ba Dien who smuggled four rhino horns and worked ivory from Angola to Vietnam in April 2023.<sup>90</sup>

However, despite these commendable convictions, there are ongoing concerns about Vietnam's lack of long-term strategies to effectively investigate and dismantle the wider networks operating between Africa and Vietnam.

In most cases, only transporters or low-level members of criminal networks have been arrested and prosecuted, pointing potentially to a lack of in-depth investigations that could expose higher-level criminal figures.

Furthermore, since 2018 there have been at least 15 large-scale seizures detected at Vietnamese seaports amounting to 25 tonnes of ivory and 42 tonnes of pangolin scales – volumes which strongly suggest the involvement of transnational organised crime networks.<sup>91</sup> Unfortunately, only the two cases outlined above resulted in arrests and convictions, underscoring that follow-up investigations and enforcement actions remain inconsistent and are not yet standard practice.

### International law enforcement cooperation to tackle wildlife crime

In another demonstration of Vietnam's commitment to tackling its role in transnational wildlife crime, in August 2025 it signed a Mutual Legal Assistance Treaty (MLAT) in Criminal Matters with Angola, as well as a Memorandum of Understanding (MoU) on combating transnational organised crime, including illegal wildlife trade.<sup>92</sup>

Vietnamese traffickers continue to operate in Angola, which has been documented as an export country for ivory and rhino horn to Vietnam. As such, these new agreements provide critical bilateral mechanisms to facilitate cooperation between Vietnam and Angola regarding criminal investigations and legal proceedings to better tackle wildlife crime.



Above: Defendant Hoang Van Hao was sentenced to 10 years' imprisonment for smuggling more than 600 kg of ivory from Nigeria to Hai Phong seaport

This latest development brings Vietnam in line with requirements under CITES, including CITES Decision 19.118 (Rev. CoP19) and its National Ivory and Rhino Action Plan (NIRAP) which call for strengthened international law enforcement cooperation. However, signing an agreement is one thing and implementing it is another, making it essential that Vietnam and Angola now take concrete steps to translate the agreement into meaningful investigative and prosecutorial outcomes.

For example, in 2018 Vietnam signed a similar MLAT with Mozambique,<sup>93</sup> but since then there have been limited updates on activities taken under the agreement to target criminal network members operating in the two countries.

Similarly, very little information is available regarding law enforcement cooperation between Vietnam and South Africa under an MoU signed in 2012 to combat rhino horn trafficking.<sup>94</sup> It has been reported that rhino horn samples seized in Vietnam were sent to South Africa for forensic analysis, but it remains unclear whether these analyses have actually contributed to enforcement actions or prosecutions of traffickers involved in these cases.

Furthermore, while the recent prosecutions of Hoang Van Hao and Nguyen Duc Tai for trafficking large-scale shipments of ivory and pangolin scales from Nigeria to Vietnamese seaports are encouraging, it remains unclear whether Vietnam and Nigeria have engaged in joint investigations or prosecutions of other individuals connected to these cases.

### Status of wildlife stockpiles in Vietnam

Vietnam's role as a key source, transit and consumer country for illegal wildlife products has led to the accumulation of significant stockpiles of seized items including elephant ivory, pangolin scales and rhino horn.

According to EIA's seizure data, Vietnam is expected to hold an estimated 81 tonnes of ivory, 61 tonnes of pangolin scales and 1.2 tonnes of rhino horn in Government stockpiles. These figures exclude nine tonnes of ivory, pangolin scales and rhino horn destroyed in two events in Vietnam in 2016 and 2023 as well as 240kg of ivory and 6.1kg of rhino horn stolen from Hanoi Customs warehouse in 2017.<sup>95,96,97</sup>

In a report to CITES SC78 in early 2025, Vietnam reported that 162 pieces of rhino horn weighing approximately 315kg were present in the National Stockpile where they are "stored in a warehouse with 02-layer iron doors, equipped with a 24/24h camera surveillance system".<sup>98</sup> The Vietnamese CITES Management Authority has stated that current domestic laws prevent it from sharing additional details on rhino horn and elephant ivory stockpiles, but that the Government is working toward amending its legislation to allow for more transparent reporting.<sup>99</sup>

According to the Vietnamese Ministry of Finance, as of September 2024 no ivory or rhino horn has been removed from or added to the national stockpile since 2019.<sup>100</sup> This is concerning since approximately 460kg of rhino horn and 11 tonnes of ivory have been seized in Vietnam between 2020-24.<sup>101</sup> The absence of updates to the national stockpile suggests either that the seized items are still being held as evidence in customs and police warehouses or that the traceability of these items cannot be assured. EIA could not ascertain the current status of pangolin scale stockpiles due to a lack of public information under CITES.

Under CITES's Resolution Conf. 10.10 (Rev. CoP19), countries where ivory stockpiles exist are urged to put in place comprehensive legislative and enforcement measures to prevent leakage into the illegal market. Unfortunately, Vietnam does not currently have a centralised stockpile management system for seized

wildlife products.<sup>102</sup> This may present administrative and traceability challenges, open to exploitation by criminals.

For example, in 2017 a customs Officer and his accomplice stole 240kg of ivory and 6.1kg of rhino horn from Hanoi Customs Department's warehouse. Both individuals were subsequently sentenced to 16 years in prison for embezzlement.<sup>103</sup>

Encouragingly, Vietnam has demonstrated a willingness to destroy stockpiles of seized wildlife products, which alleviates the enforcement, administrative and financial challenges associated with stockpile security. Vietnam would benefit from adopting a formal policy of stockpile destruction for seized illegal wildlife products to prevent leakage. However, as seized wildlife products are invariably evidence of organised crime, destruction should occur only once criminal investigations and prosecutions have concluded.

**Corruption as a key facilitator of wildlife crime**

Corruption is one of the most significant barriers to addressing illegal wildlife trade and other types of organised crime around the world and is also one of the most difficult to eradicate. Vietnam is no exception, with corruption remaining a significant challenge undermining good governance and the rule of law.<sup>104</sup>

Vietnam ranks 88th out of 180 countries in Transparency International's 2024 Corruption Perception Index (CPI).<sup>105</sup> Vietnam's CPI score decreased by two points from 2022 to 2024, suggesting ongoing challenges in public sector transparency. Furthermore, Vietnam remains on the Grey List of the Financial Action Task Force (FATF) and is therefore subject to increased monitoring as it addresses shortcomings to tackling money laundering and terrorist financing.<sup>106</sup>

**Bribery**

For wildlife crime, corruption usually plays out in the form of bribery payments to Government officials who in return ensure wildlife products are smuggled into and out of Vietnam undetected.

EIA's 2018 report *Exposing the Hydra* revealed how a Vietnamese-led syndicate relied on corruption to traffic ivory and rhino horn from South Africa and Mozambique to Vietnamese seaports and airports.<sup>107</sup> Our 2024 investigation found that corruption linked to wildlife trafficking remains prevalent in Vietnam, particularly at border areas and logistics hubs.

During the investigation, traffickers operating in northern provinces of Vietnam, including Quang Ninh, Lang Son and Cao Bang, told EIA that they make payments to local border guards and customs officers, which they consider to be an essential cost of doing business.

Traffickers also claimed that they make regular payments to contacts in the provincial and district police force to enable smooth passage of illegal wildlife products across the Vietnam-China border.

**International obligations to tackle corruption facilitating illegal wildlife trade**

In 2019, at the eighth session of the Conference of the States Parties to the UN Convention against Corruption (UNCAC), Resolution 8/12 was adopted in recognition of the interlinkages between corruption and environmental crimes.

Under the Resolution, member states, including Vietnam which ratified the Convention in 2009, were urged to "... *investigate and prosecute corruption offences established in accordance with the Convention, including in circumstances where they may be linked to crimes that have an impact on the environment...*".<sup>108</sup>

CITES provisions<sup>109</sup> also call for the implementation of anti-corruption measures to address wildlife crime. However, under CITES, Vietnam's efforts address corruption that facilitates wildlife crime remains unclear. For example, Vietnam's current National Ivory and Rhino Action Plan 2018-20 (NIRAP) does not include anti-corruption activities and there is currently no other obligatory process which directs Vietnam to report on its anti-corruption progress to CITES.<sup>110</sup>

*Reducing corruption is essential if Vietnam is to successfully eliminate its infamous status as a major wildlife trafficking hub. This will require strong political will, comprehensive and systemic reforms, institutional integrity and a cultural shift toward transparency. External pressure from international organisations can complement internal reform efforts by fostering greater oversight and accountability.*

*Without such measures, corruption will continue to perpetuate the illegal wildlife trade in Vietnam and beyond.*

**Right:** A multi-faceted approach is required to effectively tackle illegal trade in ivory and other wildlife products in Vietnam



**Conclusion**

Wildlife crime is a complex global problem driven by transnational organised crime networks.

China's strengthened enforcement efforts against wildlife crime in recent years have made it increasingly difficult for traffickers to move goods directly from Africa and other parts of Asia to China via Chinese airports and seaports. As a result, Vietnam, where enforcement capacity has faced ongoing challenges, continues to be exploited by wildlife traffickers as a transit point for smuggling illicit wildlife products from around the world into China.

Vietnam's concerted efforts to strengthen its legislation and law enforcement responses, together with behavioural change and demand-reduction initiatives are encouraging, although greater commitment from the Vietnamese authorities is still needed to more effectively

reduce serious and organised wildlife crime in the long term. Moreover, Vietnam cannot solve this problem alone. A multi-faceted approach is needed to address transnational wildlife crime effectively, with support and collaboration from a range of stakeholders including international governments, law enforcement agencies, procuracies, academics, inter-governmental and non-governmental organisations.

In recent decades, numerous national and international initiatives have been introduced to support Vietnam and neighbouring countries in tackling wildlife crime. Vietnam should now be encouraged to strengthen its efforts to fully implement these initiatives and ensure their continued impact over time.

# Recommendations

## Recommendations to Vietnam

### Law enforcement responses

- ▶ Increase international law enforcement cooperation with counterparts in source and transit countries, particularly Angola, Mozambique, Namibia, Nigeria and South Africa in Africa and China, Laos, Qatar, Singapore and the UAE in Asia to identify and disrupt criminal networks responsible for large-scale illegal wildlife shipments detected in Vietnam.
- ▶ Enhance bilateral law enforcement cooperation with counterparts in China to strengthen patrols and tackle illegal wildlife trade across the border more effectively.
- ▶ Conduct intelligence-led investigations to detect and prosecute mid- to high-level members of wildlife crime networks, including financial investigations into money laundering, bribery and tax evasion linked to these major traffickers.
- ▶ Strengthen anti-corruption measures and interventions at major ports and border crossings to identify, prosecute and deter actors and entities involved in the illegal transportation of wildlife into and out of the country. This includes financial investigations into bribery payments to corrupt officials facilitating wildlife crime.
- ▶ Promote an inter-agency approach to tackle wildlife crime at the national level through regular information exchange between police, customs, Border Force and procuracy departments. Collaboration with other relevant stakeholders is also encouraged such as with the CITES Management Authority, transport and financial sectors, inter-governmental and non-governmental organisations.

### Policy responses

- ▶ Develop adequate systems for the inventory and management of seized elephant ivory, pangolin scales, rhino horn and other wildlife products to prevent leakage into the illegal market.
- ▶ Adopt a formal policy of stockpile destruction for confiscated elephant ivory, pangolin scales, rhino horns and other wildlife products upon conclusion of criminal investigations and prosecutions, accompanied by transparent auditing.
- ▶ Regularly report on seizures, prosecutions, stockpiles and other relevant information in relation to illegal trade in elephant ivory, pangolin scales and rhino horn in compliance with CITES.
- ▶ Prioritise implementation of the strategies and proposed outcomes to combat illegal trade in rhinoceros that were agreed at the 2025 CITES Rhinoceros Enforcement Task Force meeting and illegal trade in big cats agreed at the 2023 Big Cats Task Force Meeting.
- ▶ Share samples from all past and future rhino horn seizures made in Vietnam, irrespective of provenance, with South Africa for forensic analysis using the Rhino DNA Indexing System (RhODIS).

## Recommendations to the CITES Secretariat and Standing Committee

- ▶ Urge Vietnam to step up implementation of actions in Pillar 3 on international and regional enforcement collaboration of its National Ivory and Rhino Action Plan (NIRAP) and to amend its NIRAP to include anti-corruption measures and report on progress thereon pursuant to Resolution Conf. 17.6 (Rev. CoP19).
- ▶ Urge Vietnam to undertake joint operations and strengthen intelligence exchange with relevant countries, including Angola, China, Mozambique and South Africa, to address illegal trade in rhino horn in accordance with Decision 19.118 and recommendations resulting from the 78th meeting of the CITES Standing Committee (SC78).
- ▶ Urge Vietnam to regularly report on pangolin seizures, illegal trade and stockpiles in line with Resolution Conf. 17.10 (Rev. CoP19) on Conservation of and trade in pangolins.
- ▶ Urge all countries involved in wildlife trafficking incidents implicating Vietnam to increase information and intelligence exchange using existing mechanisms, in particular the World Customs Organization Customs Enforcement Network (CEN) via Regional Intelligence Liaison Offices (RILOs) and through INTERPOL's National Central Bureau network and NEXUS platform as it is rolled out.





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62-63 Upper Street, London, N1 0NY, UK  
[eia-international.org](http://eia-international.org)  
+44 (0)20 7354 7960

PO Box 53343, Washington, D.C. 20009, USA  
[eia.org](http://eia.org)  
+1 202 483 6621