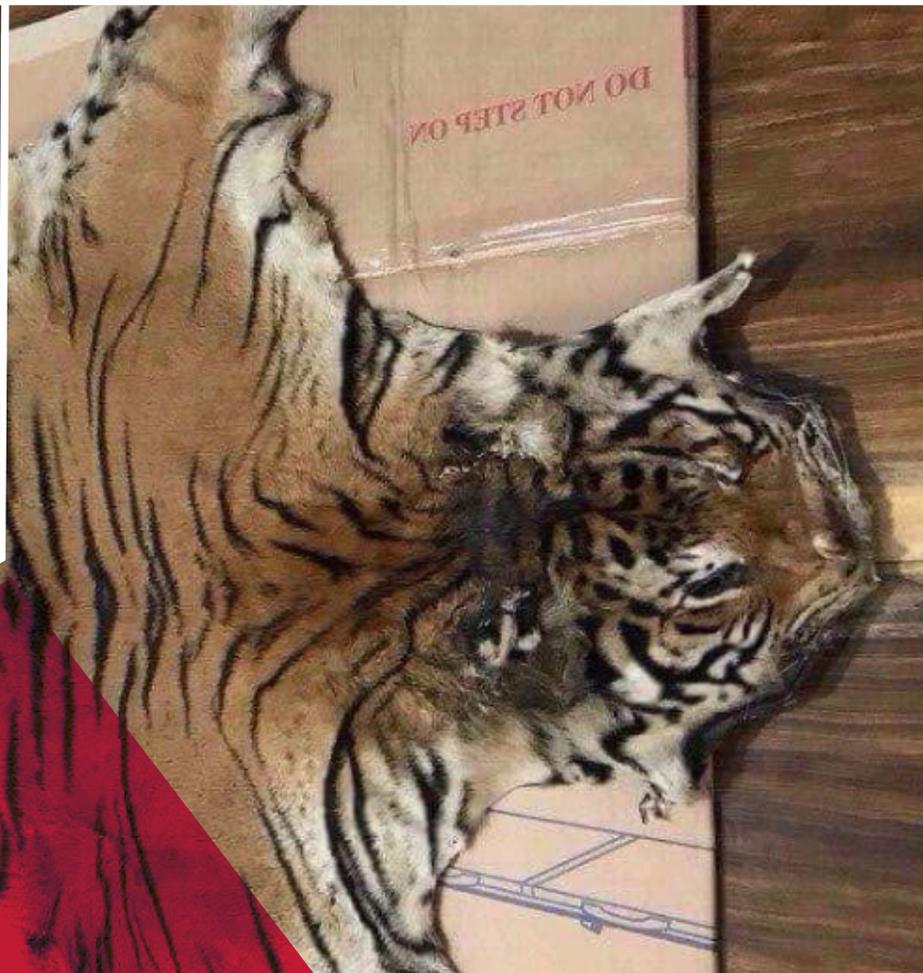


October
2020

ANIMALS IN PERIL



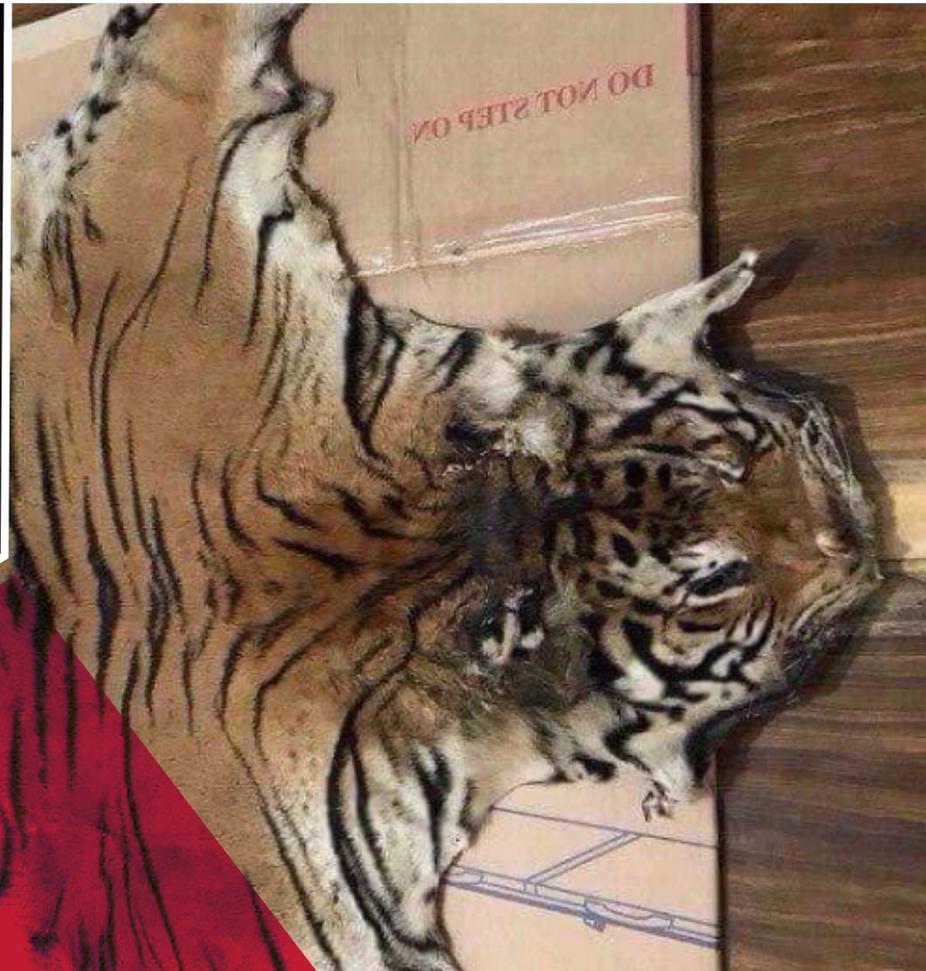
Assessing Facebook's Failure to
Stem the Illegal wildlife Trade


Alliance to Counter Crime Online



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ANIMALS IN PERIL



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Executive Summary

In March 2018, Facebook joined the [Coalition to End Wildlife Trafficking Online](#), pledging alongside 30 other tech firms to remove 80% of wildlife trafficking content from their platforms by 2020. Two years on, the [Alliance to Counter Crime Online](#) (ACCO) found that Facebook has failed to keep that promise.

This ACCO project was specifically designed to mimic the search process an average person might employ if looking to buy wildlife products like ivory or exotic pets. Our prior research had suggested that most wildlife trading on social media takes place in plain sight for the simple reason that sellers need to operate openly so that buyers can locate them. Researchers for this project used 17 combinations of search terms in four languages—English, Arabic, Indonesian and Vietnamese.

Using this approach, the ACCO team recorded 473 Facebook Pages openly trading wildlife. Fifty-seven percent of these Pages operated openly, with the terms “for sale” “sell” or “buy” in their title. According to Facebook’s transparency tools, the oldest have operated since 2009. Researchers also recorded 281 public and private Facebook Groups in the four study languages, a quarter of which had “for sale,” “sell,” or “buy” in their title. Many of these Groups have also existed for years, with the oldest in uninterrupted operation for more than a decade. On the minority of Pages and in Groups where obfuscation was occurring, page administrators often provided instructions for how to avoid being moderated. Videos and still images on Pages and in Groups often showed animals in pitiable conditions or in clear signs of distress.

The fact that more than half the Pages ACCO identified had the term “sale,” “sell,” or “buy” in the title – and on the English-language Pages a full 88% (196 Pages) included one or more of these terms – reveals that Facebook could locate and eliminate the majority of wildlife trafficking content on its platforms with relative ease. There’s no need for complicated Artificial Intelligence (AI) tools; basic “If” code could flag and remove Groups and Pages combining these sales terms with species names. Facebook has chosen not to implement such simple fixes. The question for regulators, lawmakers and conservationists is why.

Even more disheartening is the fact that Facebook algorithms recommended another 29% of the Pages we found, primarily through the “Related Pages” feature. Facebook, in other words, is not reducing wildlife trafficking but rather accelerating it by connecting users to Pages they might not otherwise have found. Another question for Facebook, then, is why haven’t these AI tools been dialed back?

ACCO’s researchers concluded that wildlife trafficking content for multiple endangered species appears to have increased since 2018, and that Facebook’s rules against wildlife sales are sporadically enforced, especially in languages other than English. Of the wildlife sale Pages identified, more than half were created since March 2018—the date Facebook joined the Coalition to End Wildlife Trafficking Online.

At a moment when the globe is reeling from the COVID-19 pandemic, which began as a result of an animal-to-human spillover event, the unregulated online traffic in live animals and wildlife products poses an acute threat to public health and the global economy. The world is also in the midst of an unprecedented extinction crisis, with the United Nations and leading conservation groups warning that illicit trafficking is contributing to perilous declines in biodiversity that could critically degrade entire ecosystems. In the face of these grave threats, Facebook’s stunning failure to implement basic fixes to its systems warrants urgent scrutiny from lawmakers and regulators.

Introduction

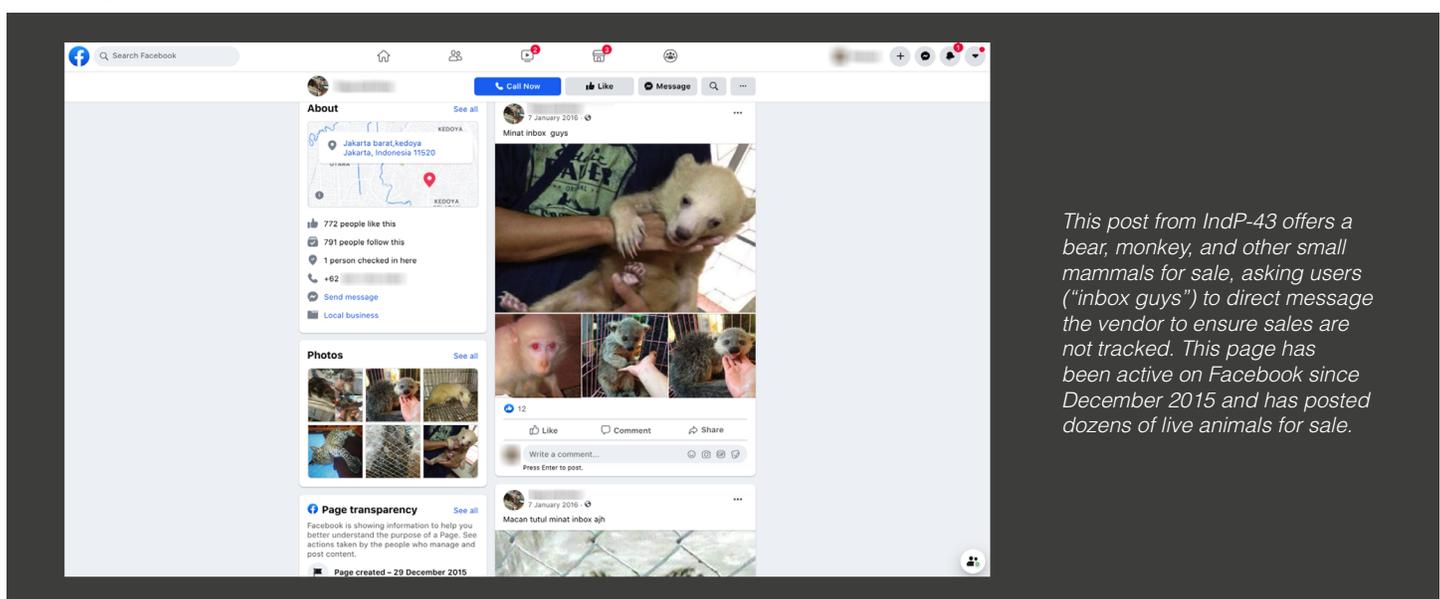
This project was specifically aimed at surveying whether the world's largest social media platform, which claims to connect 2.7 billion monthly users around the world, has taken substantial action in fulfilling its pledge to remove 80% of wildlife trafficking content from its platforms by 2020.

In contrast to past projects by ACCO members that involved complex operations penetrating closed and secret Facebook Groups, or the use of cutting-edge machine-learning tools to identify wildlife traffickers, this investigation aimed to duplicate the behavior of ordinary users, applying simple search terms in 17 different word combinations associated with commonly sought-after wildlife species and products. Research was conducted in four languages: English, Arabic, Indonesian, and Vietnamese. Our objective was to determine if Facebook had at least removed easily-findable, "low hanging fruit" from its platform.

Our findings are disheartening. Not only was there no measurable reduction in wildlife trafficking content on Facebook, but the number of Pages and Groups devoted to the trade in endangered species and their parts has actually grown. Our findings align with those of a recent study conducted by the World Wildlife Fund, one of the founders of the Coalition to End Wildlife Trafficking Online, which in May 2020 reported that the volume of wildlife products sold online had approximately doubled in all key markets since 2015.¹

Using simple, intuitive search terms in four languages, the ACCO team found 473 Facebook Pages where wildlife was being traded, 57% of which had the words "sale" "sell" or "buy" in the title. According to Facebook's own transparency tools, a number of these public Pages date back to and have been in operation since 2009. The ACCO team also recorded 281 public and private Facebook Groups, roughly a quarter of which had the terms "sale," "sell," or "buy" in their titles. Many of these had also existed for years, with the oldest operating uninterrupted on Facebook for more than a decade.

ACCO's research underscores the need for a fundamental policy shift at Facebook with regards to wildlife crime in particular and illicit content in general. Facebook executives routinely declare that the platform removes "content that goes against our standards as soon as we become aware of it."² Coming at a time when the world is reeling from a global pandemic that began as a result of an animal-to-human spillover event, our findings suggest that Facebook is playing with fire by passively waiting for users to report illegal wildlife content as opposed to proactively seeking out and removing it.



¹ <https://www.reuters.com/article/us-myanmar-wildlife/facebook-purges-ads-for-illegal-wildlife-in-southeast-asia-as-online-trade-surges-idUSKCN2520C3>; See also: <https://www.traffic.org/publications/reports/illicit-ivory-trade-in-indonesia-thailand-and-viet-nam/>

² <https://about.fb.com/news/2019/04/remove-reduce-inform-new-steps/>

Methodology

This project set out to identify Facebook Pages and open Facebook Groups that sell wildlife in clear violation of Facebook’s community standards.

All of the data collected by ACCO researchers was obtained using open-source research and non-participant observation methods of investigation. ACCO researchers created unique Facebook accounts for this project in order to identify Pages and join Groups for monitoring, observation, and recording. To ensure that observed behavior was not influenced in any way, ACCO’s Profiles did not maintain any friends nor interact with users or their posts.

This project’s data collection methodology was established by a founding ACCO member, the ATHAR Project, to track the illicit antiquities trade on Facebook. This allows for comparative analysis of the wildlife and antiquities black markets on Facebook.³ Research was conducted in four languages—English, Arabic, Indonesian, and Vietnamese—using the same fixed set of key word terms. All data was collected manually to ensure no information in the form of posts, replies or embedded images was missed.

Methodology: Pages and Groups



1. Searches within the Facebook platform using a pre-designated list of word combinations. The same phrasing searches were conducted in English, Arabic, Indonesian, and Vietnamese. The phrases selected mimicked the type of search that would generally be conducted by an average user. In other words, we avoided the code and slang words typically employed by traffickers.



2. Utilizing the “Related Pages” and “Suggested Groups” features on Facebook that recommend Pages and Groups with similar users or characteristics. This also helped identify “Wildlife Sale” Pages that served as Group admins or moderators.



3. Identifying Pages or Groups recommended in post discussions or suggested by Group users, admins, and moderators.

Broad search terms used:

- Animals + for sale
- Exotic + Animals + for sale
- Rare +Animals + for sale

Species- or item-specific terms used:

- Cheetah + for sale
- Lion + for sale
- Tiger + for sale
- Primate + for sale
- Monkey + for sale
- Ape + for sale
- Chimp + for sale
- Gibbon + for sale
- Ivory + for sale
- Tusk + for sale
- Elephant + for sale
- Rhino horn + for sale
- Bird + for sale
- Parrot + for sale

³ <http://atharproject.org/wp-content/uploads/2019/06/ATHAR-FB-Report-June-2019-final.pdf>

The data collected Pages and Groups provided a topline number of how many of such Pages/Groups are present on the platform, how long they have been active, and how many people engage with them.

We did not count Pages or Groups that surfaced in our searches that did not appear to engage in illegal activity. For example, we did not include Pages or Groups belonging to conservation organizations or ones that were created to raise awareness about wildlife trafficking. Pages and Groups were individually canvassed for key characteristics of sale activity, most notably posts in which wildlife was being offered for sale. Pages and Groups selling only livestock or common domestic pets like cats or dogs also were not included. Pages and Groups identified selling wildlife such as primates alongside domestic animals were included.

Methodology: Monitoring Pages and Groups



The ACCO study gathered data on wildlife sales that take place using two Facebook features: Pages and Groups. Pages are entirely public and can be accessed by anyone regardless of whether or not one has a Facebook account.⁴ Groups, on the other hand, can be either public, meaning anyone can view them, or private, which requires approval to view the content.⁵

Searches in Facebook can be filtered by feature such as “people,” “Groups,” and “Pages.” ACCO researchers filtered each search term in our methodology by Group and by Page to gather the data surfaced in Facebook searches for those features. Each Group or Page identified was surveyed for obvious or potential evidence of wildlife sales. In the case of private Groups that could not be viewed publicly, ACCO’s monitoring profile submitted a request to join the Group. Groups that displayed no evidence of wildlife sales were not added to the final count.

In some cases, requests to join a Group required admin approval. In others, the requesting Profile was required to answer a series of questions. Some questions entailed simple inquiries about location, while others provided directions on how to get around Facebook’s rules on sales and providing information on the type of code language to use to avoid being moderated.

Background



When Facebook has officially banned the trade in all live animals and all products made from endangered species listed on CITES Appendix I. In 2019, the firm made it possible for users to report species-specific violations of the platform’s Community Standards and Commerce Policies.⁶

Conservation organizations, academics and investigative groups, including multiple ACCO members, began tracking the rapid growth of the wildlife trade on Facebook about five years ago. Multiple published reports subsequently exposed the widespread use of Facebook by wildlife traffickers to market products in key consumer markets and criticized Facebook’s apparent foot-dragging in searching for and removing illegal wildlife content unless flagged by the media.⁷ Under pressure from conservation groups, Facebook in March 2018 joined the Coalition to End Wildlife Trafficking Online, thereby embracing a tech industry-wide pledge to eliminate 80% of wildlife content on social media platforms by 2020.⁸

The results of Facebook’s pledge to the Coalition to End Wildlife Trafficking Online have been mixed at best. In a statement to ACCO, Crawford Allan, senior director at Traffic, one of the conservation groups overseeing the coalition,

⁴ <https://www.facebook.com/business/Pages/set-up>

⁵ <https://www.facebook.com/help/1629740080681586>

⁶ “Offline and in the Wild: A progress Report of the Coalition to End Wildlife Trafficking Online.” Available at: <https://static1.squarespace.com/static/5b53e9789772ae59ffa267ee/t/5e5c32496b59fb4dac1baf55/1583100496539/Offline+and+In+the+Wild+-+Coalition+2020+Progress+Report.pdf>

⁷ See for example: <https://www.traffic.org/site/assets/files/2434/trading-faces-facebook-malasia.pdf>; <https://www.theverge.com/2016/11/15/13635054/facebook-ivory-rhino-horn-trafficking-vietnam>; <https://www.latimes.com/business/la-fi-facebook-instagram-wildlife-black-market-20190712-story.html>; <https://www.dw.com/en/illegal-wildlife-trade-thrives-on-facebook-internet-forums/a-50141184>

⁸ <https://abcnews.go.com/US/google-facebook-join-global-fight-stop-online-wildlife/story?id=53603114>

said that Facebook, “made earnest efforts to strengthen their prohibited wildlife policies, including the ban on live animal trade last year, train enforcement staff, educate users through a pop-up alert, and remove suspicious content provided from regular online monitoring.”⁹ A former coalition insider interviewed agreed that various simple fixes implemented at Facebook-owned Instagram—such as blocking search results and launching pop-up conservation messages when users typed search terms such as “rhino horn for sale”—had yielded positive results initially, but said these initiatives were never scaled. The insider also said Facebook briefly expended effort in developing AI tools to crawl for wildlife content but jettisoned the initiative after other crises like the Cambridge Analytica scandal and voting interference sucked away the attention of Facebook security team. “Facebook is basically doing this as a PR exercise,” said the former insider. “They are not really doing anything substantial. In fact, the smaller ecommerce companies are doing a better job of moderating content.”¹⁰



Wildlife Sales on Facebook: Just Two Clicks Away

The purpose of the ACCO study was twofold: To see if Facebook had kept its promise to crack down on wildlife trafficking on its platform and to understand how accessible the wildlife trade is to the average Facebook user.

While laws governing the ownership and sale of wildlife vary from country to country, Facebook’s Community Standards globally ban “attempts to buy, sell, trade, donate, gift, or solicit endangered species or their parts,” as well as content that, “attempts to buy, sell or trade live, non-endangered animals between private individuals.”¹¹

“

Facebook makes posts selling wildlife easily [accessible] to people outside of the existing wildlife trading community, further attracting more potential customers and expanding the market. In our research we have identified posts selling following specie: elephants, rhinos, hawksbill turtles, whales, tigers, walrus, Tibetan antelope, bears and African spurred tortoise.

Qing Xu, Research Associate at the Global Health Policy Institute, an ACCO member

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Despite this ban, ACCO researchers easily identified hundreds of Facebook Pages and Groups developed solely for the purpose of selling wildlife and wildlife parts. A basic Facebook search followed by a single click is all that is required for a user to find multiple endangered species for sale.

⁹. Email correspondence, September 2020.

¹⁰. Telephone interview, 10 August 2020.

¹¹. https://www.facebook.com/communitystandards/regulated_goods





Findings

The ACCO study gathered data on wildlife sales that take place using two Facebook features: Pages and Groups. Pages ACCO found the most Groups and Pages selling wildlife in the English language. This is understandable given that English is the most common language on the platform, but also concerning given that the firm’s content moderation and AI were trained in English, and the US-based company has more resources focused on English than any other language.¹²

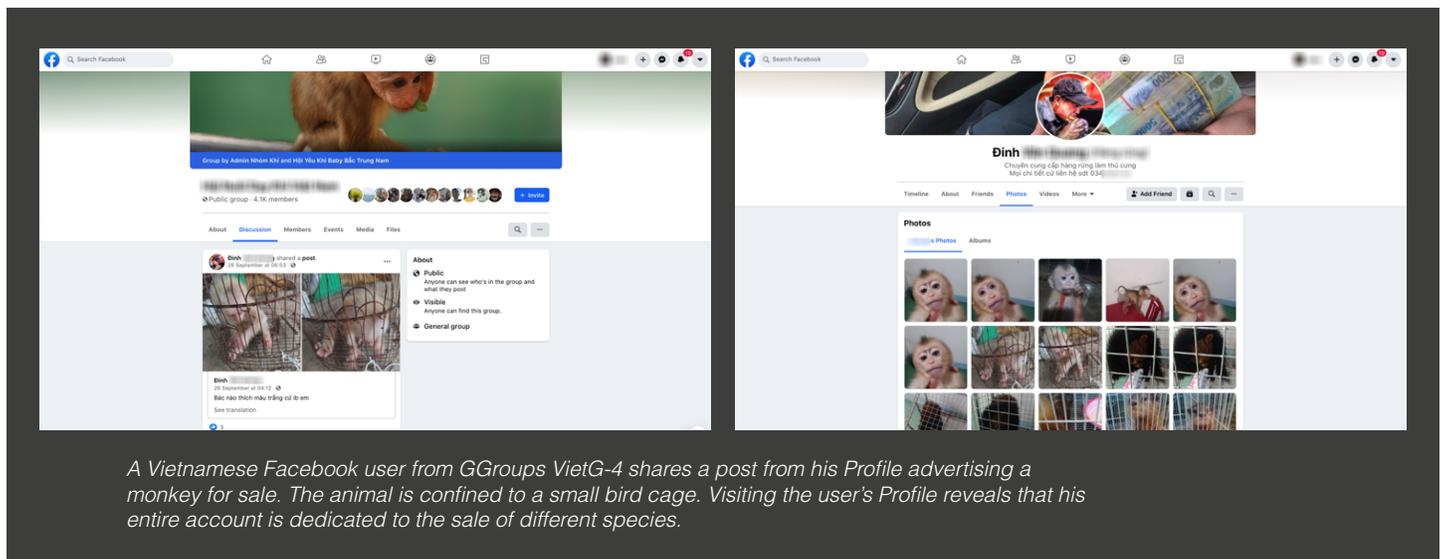
Facebook Wildlife Sale Groups

Language	Groups Identified	Group Member Totals
Arabic	65	579,958
English	136	662,885
Indonesian	28	66,438
Vietnamese	52	148,709
All Languages Combined	281	1,457,990

Facebook Wildlife Sale Pages

Language	Groups Identified	Group Member Totals
Arabic	93	814,876
English	223	273,277
Indonesian	49	151,337
Vietnamese	108	104,758
All Languages Combined	473	1,344,248

ACCO also found that the way wildlife sellers use Facebook tools varies by region. For instance, wildlife traffickers in Indonesia and Vietnam tend to primarily operate their illicit sales from their public Profiles as opposed to posting items for sale solely in Pages or Groups. In many cases users in Indonesia and Vietnam will first post an animal for sale on their public profile and then share that profile post to a Page or Group. By using their profile as the primary posting mechanism, these users expand the audience able to see their available animals and share their posts.



A Vietnamese Facebook user from GGroups VietG-4 shares a post from his Profile advertising a monkey for sale. The animal is confined to a small bird cage. Visiting the user's Profile reveals that his entire account is dedicated to the sale of different species.

Similar Profile-use trends were identified by the ATHAR Project when examining Thailand-based antiquities trafficking Groups. Thailand, like Indonesia and Vietnam, has access to the Facebook Connectivity Free Basics data service. It is possible that truncated access to a free data version of Facebook has driven the widespread use of Profiles to market wildlife goods in some parts of the world, leading to a higher rate of wildlife trafficking through individual Profiles as opposed to Groups.¹³

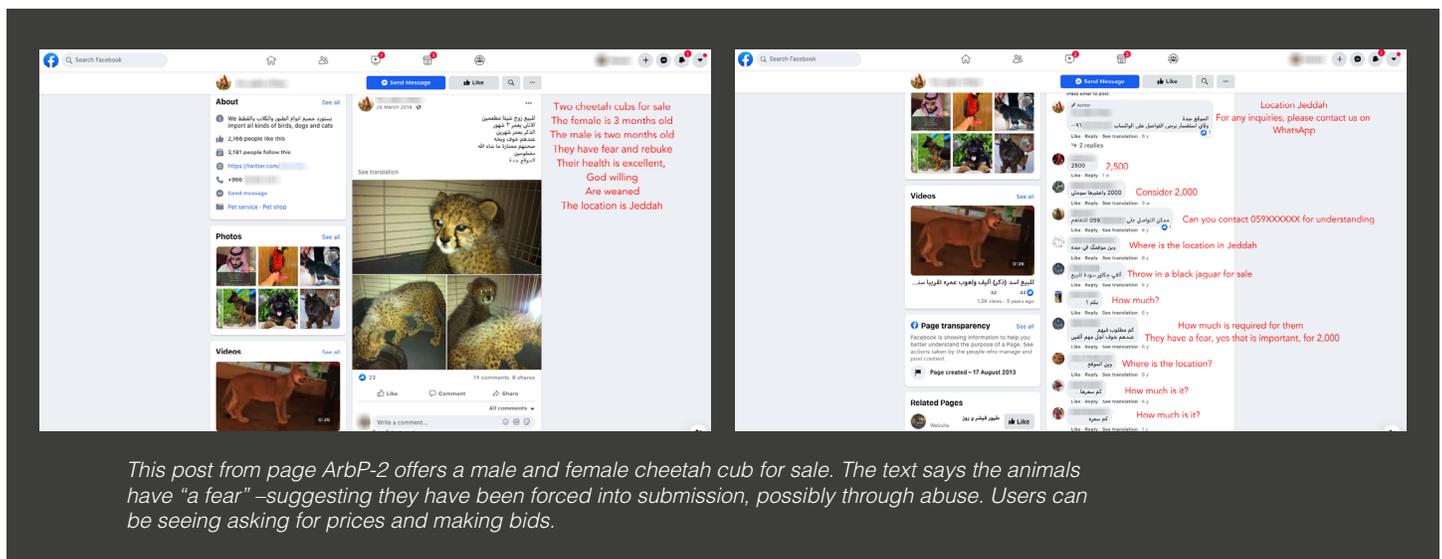
¹² Facebook content moderation is so heavily focused in English that a 2018 article revealed that Facebook only issued its content moderation rules to its foreign moderators in English, so moderators had to rely on Google translate to do their jobs. <https://www.indiatoday.in/technology/news/story/leaked-rulebook-reveals-startling-details-about-facebook-s-content-moderation-practices-1418885-2018-12-28>

¹³ <https://www.facebook.com/help/1278187755533783>



Regional Variations

Searching in multiple languages helped identify regional variations in interest in particular species. For example, searches in Arabic yielded the highest rate of interest in big cats (including endangered cheetahs) for sale. Photos and video from multiple Pages, a public feature accessible even without a Facebook account, showed clearly distressed animals being trafficked. Wildlife, including endangered species, were also offered for sale in the Facebook Groups feature. Groups are a semi-walled garden on Facebook that come in both public and private formats. Anyone can view content posted in public Groups, although users must join a Group and be approved by an admin in order to contribute. Meanwhile, the content in private Facebook groups can only be viewed by Group members, who must be admitted by an admin in order to see or contribute content. Facebook's private group feature is popular for illicit actors across a range of crime sectors, not just trading wildlife.



This post from page Arbp-2 offers a male and female cheetah cub for sale. The text says the animals have “a fear”—suggesting they have been forced into submission, possibly through abuse. Users can be seeing asking for prices and making bids.

In the U.S., primates and parrots were of major interest to buyers and were openly traded on Facebook Pages and in Groups. In some cases, Group admins actively provided instructions on how users could avoid Facebook moderation. This was in stark contrast to Facebook Pages in Indonesian, where Group rules provided specific instructions on how to sell wildlife. The English moderators' efforts to help their members obscure sales versus the Indonesian moderators' instructions on how to sell suggests major gaps exist between Facebook's moderation efforts in English versus moderation efforts in foreign languages.

“

FB platforms, especially Instagram and WhatsApp, are definitely a threat to the species we track. In the case of cheetahs, they offer sellers the ability to connect among themselves and with all kinds of potential buyers in privacy. Historically, the vast majority of cheetah advertisements found on social media are from Saudi Arabia, and those have not decreased significantly.

Patricia Tricorache, ACCO member and Expert on the Illegal Cheetah Trade

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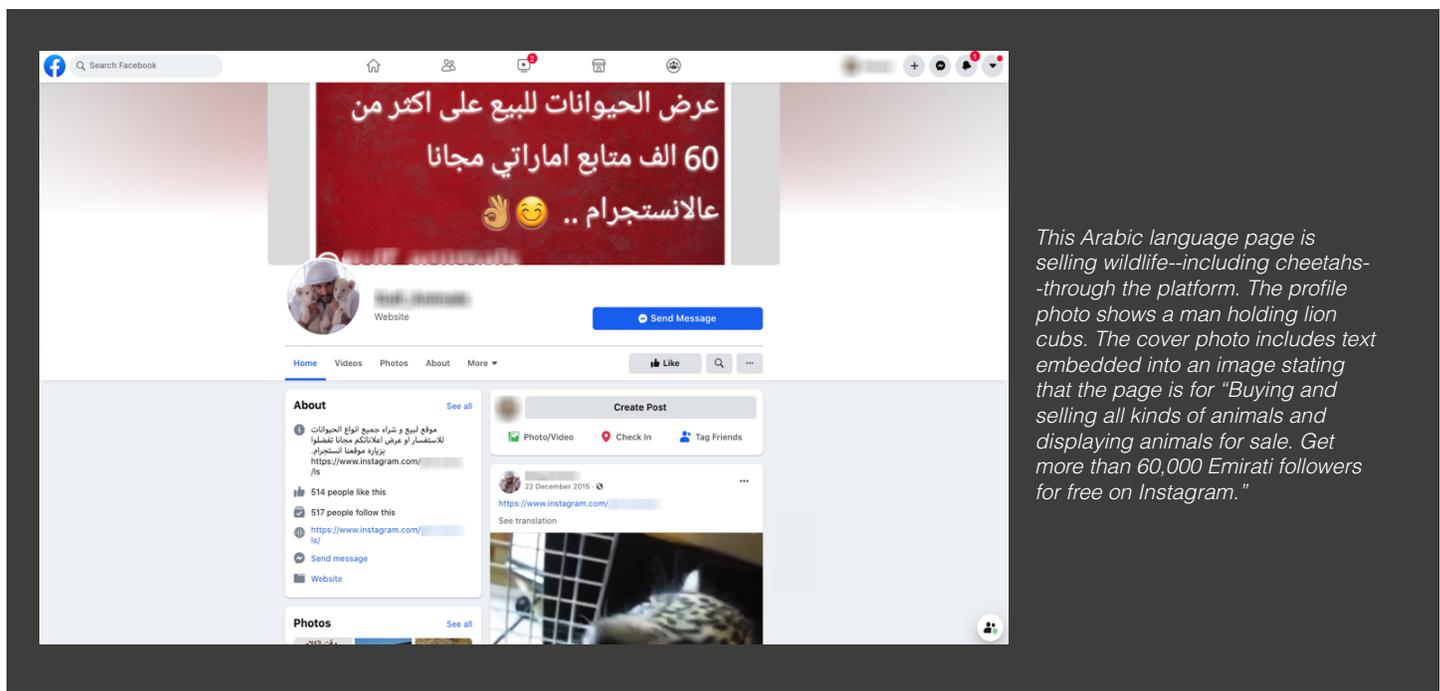
Pages: Openly Flaunting Community Standards and Driving Traffic



Our findings also show that Facebook Pages were more often explicitly engaged in the sale of wildlife than were Groups, with more than half advertising their role as wildlife sale outlets in the name of the page.¹⁴ Of the 473 total Pages identified, 57% (271 Pages), included “sale,” “buy,” or “sell,” in the page name. Because these Pages are openly accessible, the inclusion of sale terms guarantees that sellers can get more eyes on their goods. It also means that Facebook engineers would not have to develop sophisticated machine-learning algorithms to find and remove this content. Basic “If” code combining the 17 search terms we employed could be used to quickly find and remove these unverified Pages from the platform.

ACCO researchers also tracked a pattern of Facebook users engaging in wildlife sales using images rather than terms to advertise their activity. In many cases this includes the image of a particular species in the profile and cover photo of the page, often with sale terms superimposed in the image. (See figure below)

This follows a similar pattern observed by ACCO in a previous investigation focused on antiquities trafficking.



This Arabic language page is selling wildlife—including cheetahs—through the platform. The profile photo shows a man holding lion cubs. The cover photo includes text embedded into an image stating that the page is for “Buying and selling all kinds of animals and displaying animals for sale. Get more than 60,000 Emirati followers for free on Instagram.”

Parallel Project: ACCO Expert Uses Machine Learning Tools to Find Wildlife Traffickers

In a parallel project to this one, ACCO expert Dr. Tim Mackey and his team developed and implemented machine learning tools, which are algorithms that automatically improve through continued experience, to collect data about wildlife sales on Facebook. Using Facebook’s search bar, Dr. Mackey was able to identify thousands of Facebook posts selling wildlife in Mandarin Chinese on the platform. The study was carried out without access to Facebook’s application programming interface (API), which was restricted following the 2018 Cambridge Analytica data breach. Despite their lack of access to Facebook’s backend tools, Mackey and his fellow researchers were still able to easily identify thousands of posts in which wildlife was illegally traded. The deployment of Facebook’s internal tools would naturally allow for even easier identification of such Pages. However, Facebook has proven unwilling to deploy these available resources to tackle the trade in illegal wildlife occurring on its platforms.

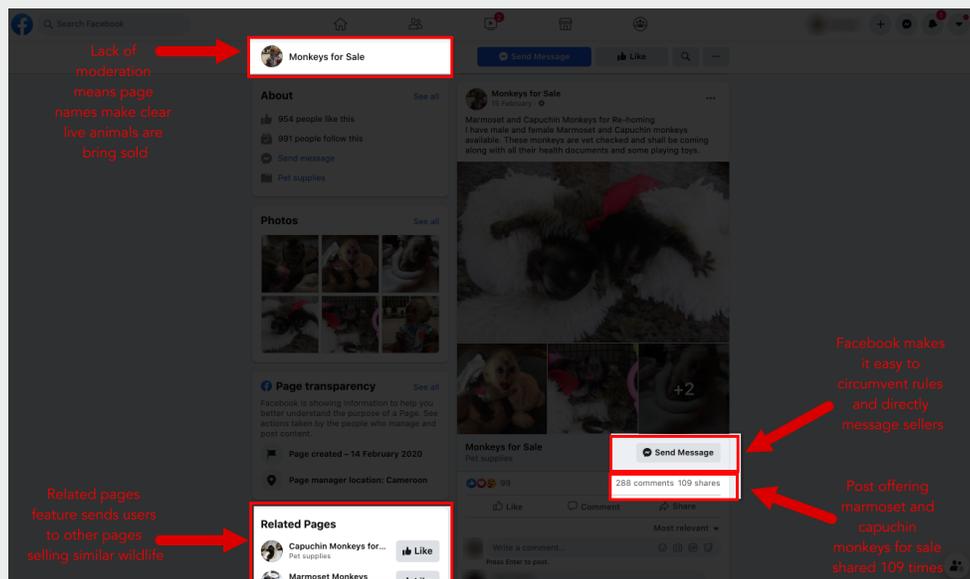
ACCO researchers found that Facebook is not just failing at removing wildlife sale Pages and Groups, it’s succeeding—massively—at pointing users in their direction. Of the Pages selling wildlife identified by ACCO, 29% (137 Pages) were located using Facebook’s “Related Pages” feature, which recommends Pages similar to one a user has visited or “liked.”

¹⁴. See Appendix for all data

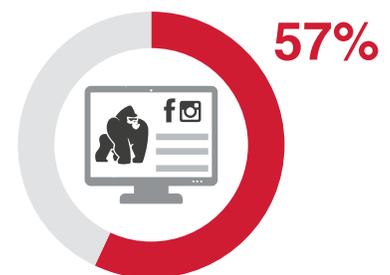
This feature, which critics have said can serve as an “echo chamber” for hate speech,¹⁵ has the similar effect of amplifying illicit traffic. Among the 137 Pages identified by Facebook algorithms, 71% (97 Pages) did not include key words such “sale,” “buy,” or “sell” but did sell wildlife or wildlife parts. This demonstrates that Facebook algorithms work to connect users to wildlife content that might not otherwise have surfaced in their searches.

How It Works: Facebook Pages Accelerate Wildlife Sales

One page, entitled “Monkey for Sale,” makes clear how Facebook features drive users toward a seemingly endless supply of animal sale content, should a user fail to find their desired exotic pet on the first page they visit. Facebook’s sharing features allow a page with less than 1,000 likes to have its sale posts shared widely to generate more eyes — and potential buyers — for their content. For many Facebook Pages, users are encouraged to contact sellers through private messages in an effort to circumvent Facebook’s scant moderation efforts. Facebook tools even allow sellers to enable a function to direct message buyers through a Facebook post.



In total, more than half — 57% (268 Pages) — of all Pages identified selling wildlife were created from March 2018 onward, after Facebook joined the Coalition to End Wildlife Trafficking Online. The earliest Pages in ACCO’s dataset go back to September 2009. This means that from September 2009 through February 2018, Pages selling wildlife were created at a rate of about 24 Pages per year. (These Pages remain on the platform). Pages created between March 2018 and September 2020 appeared at a rate of about 107 Pages per year.



¹⁵ <https://www.techtransparencyproject.org/articles/hate-Pages>

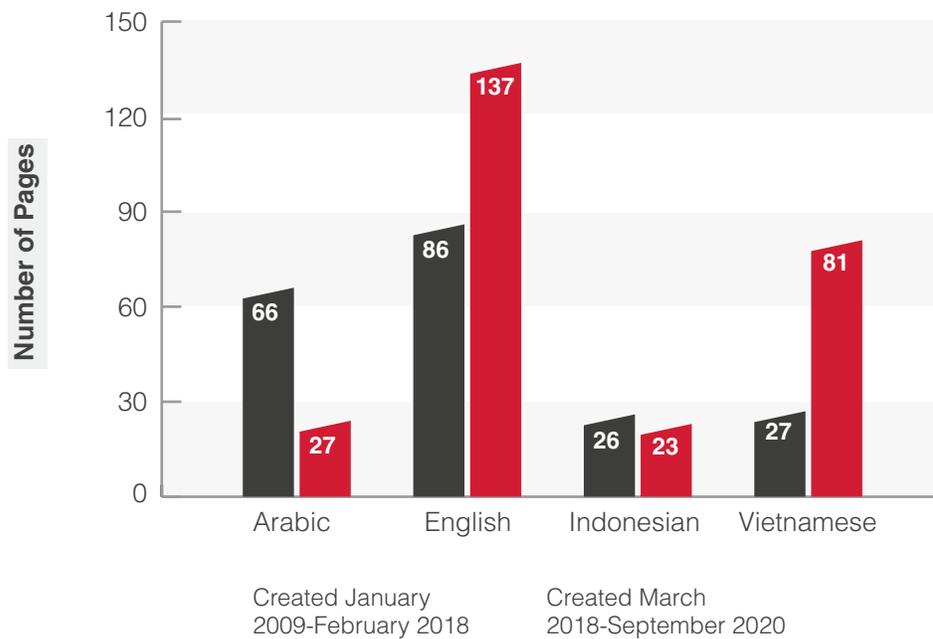




Examining Facebook’s Efforts to Remove Wildlife Pages

It’s unclear how many Pages Facebook has removed since it joined the coalition because Facebook does not include statistics on wildlife removals in its annual transparency reports.¹⁶ But what ACCO’s research does make clear is that many Pages have remained active for at least a decade. It’s also clear that Facebook has been ineffective at removing new Pages.

During this six-month study, which ran from March 2020 through September 2020, multiple Pages identified by ACCO researchers were deactivated. Roughly 59% (132) of the Pages in English were no longer active as of October 3, 2020. It’s unclear if the Pages were taken down by Facebook or the Page owners. The 41% (91 Pages) of English-language Pages that remained included some of the most-followed and active wildlife sale pages, accounting for 71% (194,383) of the total Page “likes” in the dataset.



It’s also pertinent to note that the 473 Facebook Pages identified by ACCO in total garnered a collective 1,344,248 “likes.” Of those 473 pages, 31% (146) of the Pages were deactivated, but those pages left up on the platform garnered 90% (1,203,281) of the total Page “likes.” In other words, the deactivated Pages represented just a small portion of the overall audience for wildlife sales, suggesting that pages generating the most engagement do not get removed.

Facebook may have had some success in removing English-language Pages, however it has a dismal track record in taking down Pages in the other languages investigated—Arabic, Indonesian and Vietnamese. Over the course of the ACCO study only 2.2% (2) of the 93 Pages identified in Arabic had been deactivated by October 3; only 2% (1) of the 49 Pages identified in Indonesian were removed; and only 10.2% (11) of the 108 Pages identified in Vietnamese were taken down.¹⁷

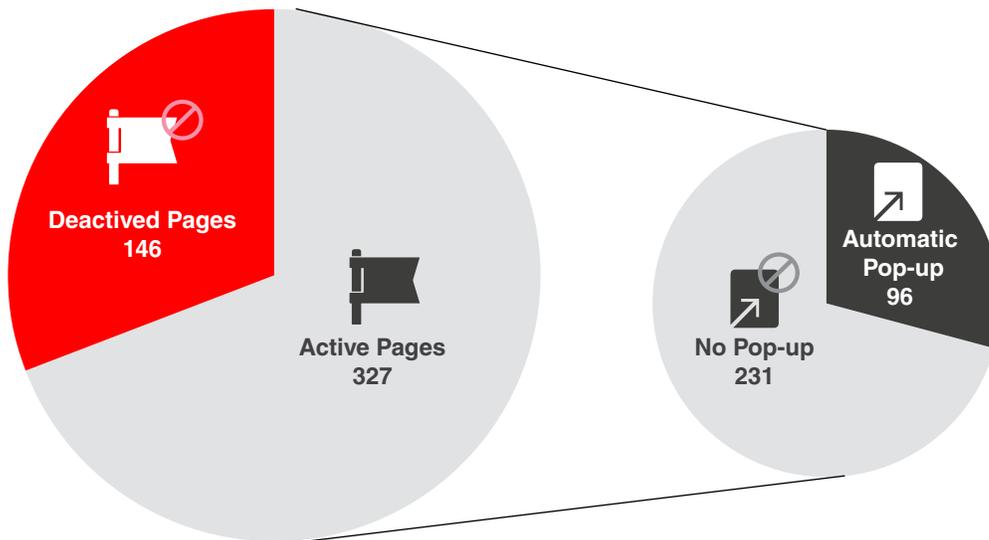
¹⁶ <https://transparency.facebook.com/>

¹⁷ See Appendix for all data

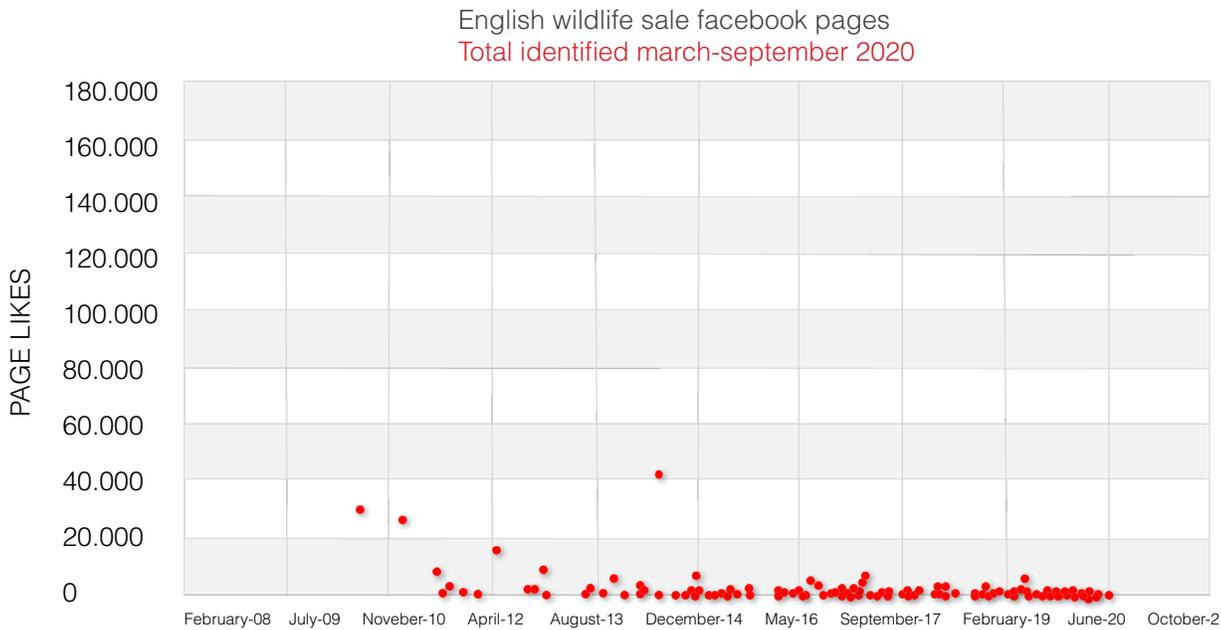


	Pages	Page Like Totals	Deactivated as of Oct 3, 2020	Active as of Oct 3, 2020	Likes of Pages Active as of Oct 3, 2020
Arabic	93	814,876	2	91	765,029
English	233	273,277	132	91	194,383
Indonesian	49	151,337	1	48	151,061
Vietnamese	108	104,458	11	97	92,808
All Languages Combined	473	1,344,248	146	327	1,203,281

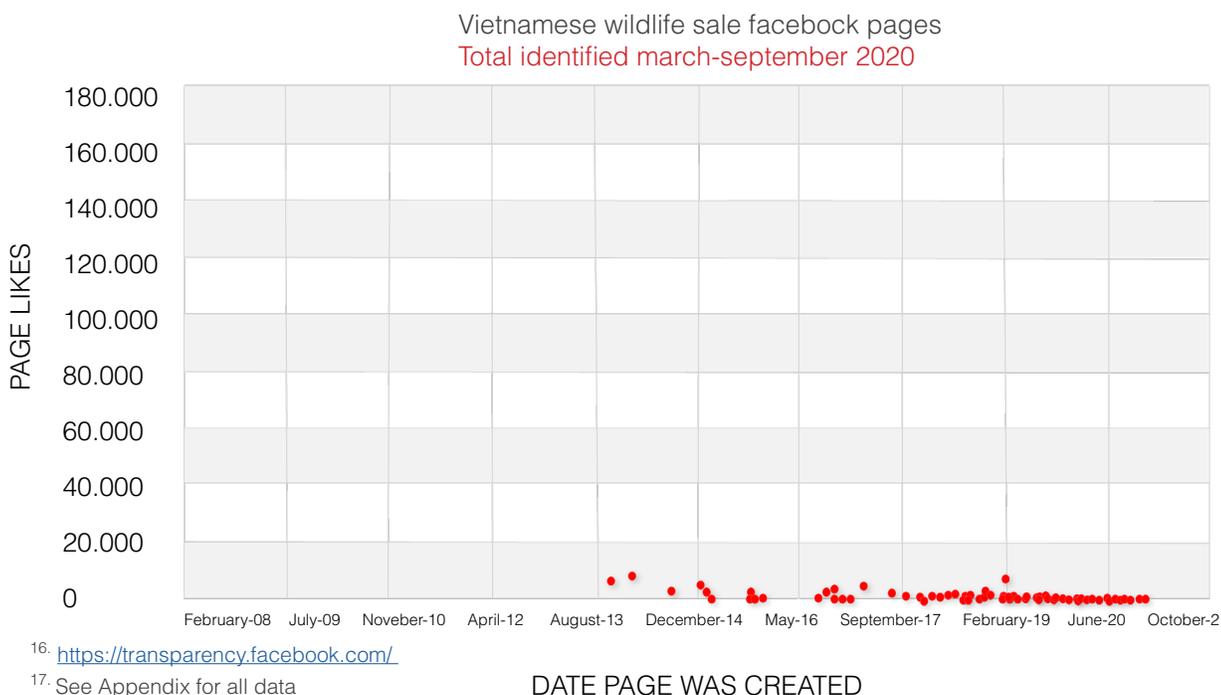
The data shows that, as of October 3, 2020, 327 of the Pages in the four study languages identified between March and September 2020 remained active. Nearly one-third (96) of these remnant Pages use a feature that deploys an automatic Facebook Messenger pop-up prompting a user to securely (and privately) communicate with the vendor.



Studying the dates these Pages were created by language provides additional insights into what drives users to create public Pages for wildlife sales.¹⁸ Pages in English, for instance, appear to have increased significantly in 2020, which may correlate with the COVID-19 lockdowns that drove more people online, and the reduction of human Facebook moderators that occurred as a result of the lockdown.



The graph below shows a cluster of Vietnamese-language Pages established from 2017 onward. To understand this spike in Page creation one needs to look at Facebook Inc.’s global expansion efforts. In May 2017 Facebook partnered with Vietnamese mobile company MobiFone to launch Facebook Flex and Free Basics.¹⁹ Free Basics was born out of Facebook’s Internet.org initiative to get as many people connected globally as possible.²⁰ The Free Basics program now falls under Facebook Connectivity and provides limited access to the Internet through partnerships with local mobile data providers.²¹

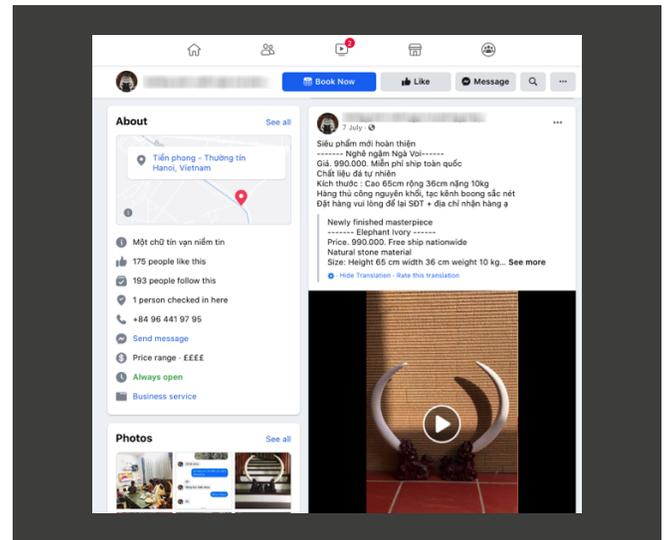


¹⁶ <https://transparency.facebook.com/>

¹⁷ See Appendix for all data

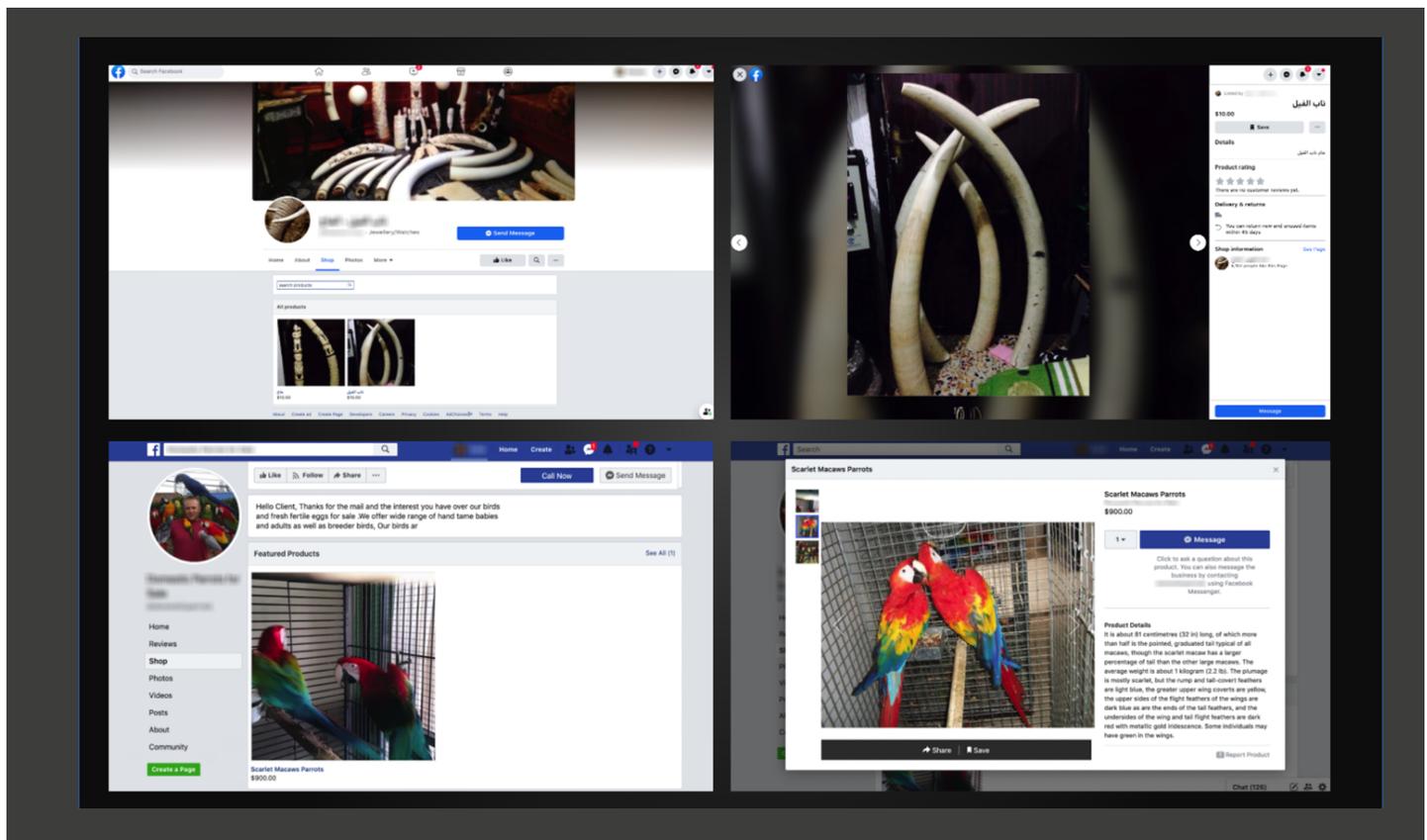
DATE PAGE WAS CREATED

Facebook's free availability in countries like Vietnam means that for many people, particularly in Southeast Asia, Facebook is the Internet.²² The explosive growth of web access in many parts of the world, coupled with Facebook's limited moderation efforts, has enabled illicit actors to thrive across a range of crime sectors. In Vietnam, this is demonstrated by a spike in post 2017 Pages developed to traffic ivory. Of the 108 Pages Vietnamese-language Pages identified by ACCO as selling wildlife, a full 56% were devoted to selling raw or worked ivory. This was not the case with English-language Pages, where ACCO searches for ivory yielded comparatively few results.



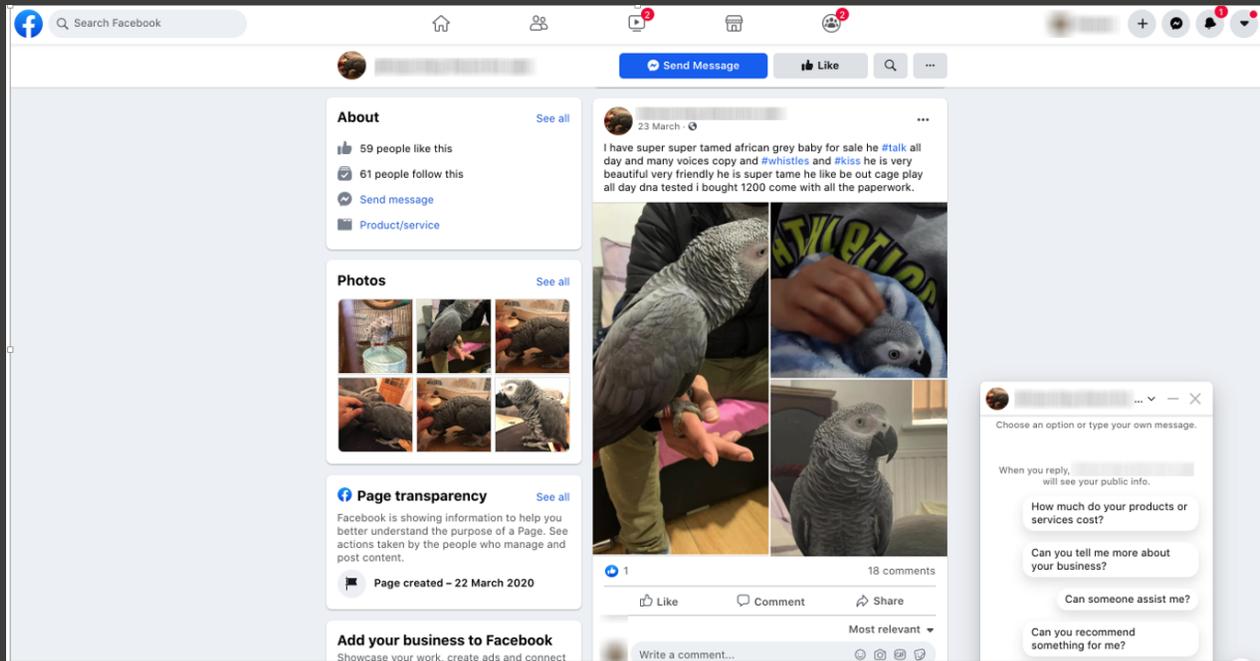
Facebook Pages also provide the option for admins to utilize another platform feature: Facebook Shops. These shops serve as storefronts for individuals to purchase items from a particular seller without having to leave the Facebook platform. Facebook takes a 5% transaction fee for every sale that takes place in a Facebook Shop,²³ where ACCO researchers found products like live animals and elephant ivory for sale.

The utilization of the Facebook Shops feature to sell illicit goods was not observed in ATHAR Project's investigations into antiquities trafficking on Facebook. The use of this feature means that the company is actually profiting from the illegal wildlife trade, in direct violation of its own policies, the Lacey Act, and various international endangered species laws.



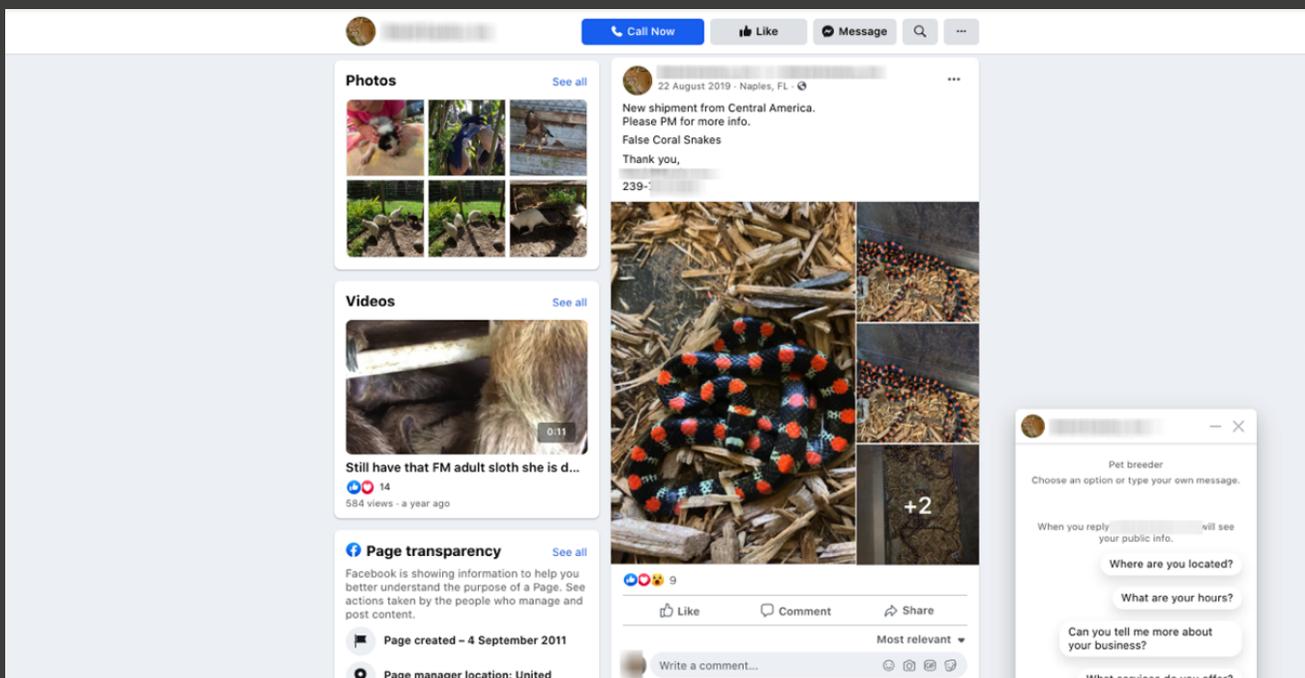
²² <https://www.smh.com.au/world/asia/facebook-is-the-internet-for-many-people-in-south-east-asia-20180322-p4z5nu.html>

²³ Section 4 – Country-specific terms Merchants in the US, 17 d. “We charge a fee of 5% per transaction, with a minimum fee of USD 0.40 (“Selling Fee”). With respect to goods, the sale of a good or goods which are delivered together are a “transaction” for the purpose of this section. The Selling Fee will be calculated based on the entire amount of the transaction (including the sale price(s) of good(s), any delivery fees and Applicable Taxes). You will also be charged a fee of USD 20 per chargeback, which will be waived upon successful representation, provided that you are compliant with these Merchant Terms and all applicable laws and policies.” https://www.facebook.com/legal/commerce_product_merchant_agreement



Page EngP-184 was created on March 22, 2020, at the beginning of the COVID-19 lockdown in the United States. By the following day it was offering African Gray parrots for sale. To the right is an automatic pop-up messenger box that provides Page viewers with a range of pre-written inquiries to send to the vendor.

In the U.S., some wildlife sellers who operate Pages under the guise of being breeders openly declare that the animals they are selling have recently been shipped from Central America. Images on these posts display direct phone numbers to ensure Facebook does not detect sales taking place. And in cases where a Page owner doesn't provide a phone number, Facebook automatically opens a pop-up window enabling private direct messaging between the buyer and vendor. These pop-up boxes contain a range of pre-written inquiries such as "How much do your products or services cost?"



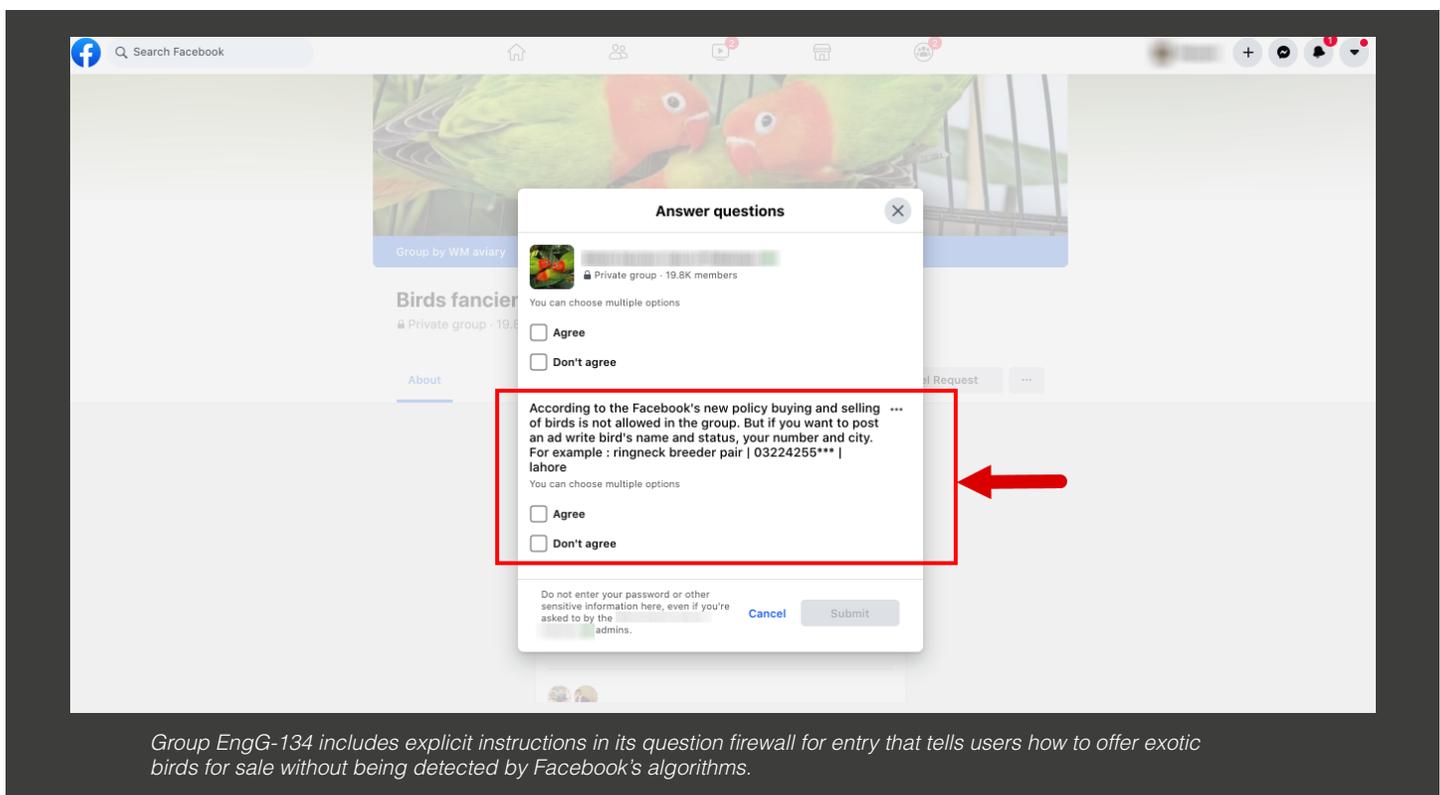
This post, from page EngP-10, includes information about a recent shipment from Central America along with a direct phone number. According to Facebook's transparency tools, the page has been actively selling animals on Facebook for nearly a decade.



Findings: Groups Often Take a More Covert Approach

Facebook Groups often take a more covert approach to selling wildlife than Facebook Pages.²⁴ Of the 281 Groups identified by ACCO, just 24% (68 Groups), included “sale,” “buy,” or “sell,” in the Group name. Groups are generally not as public as Facebook Pages which means that the insulated communities they house often take longer to build. In examining Facebook Groups selling wildlife, ACCO found evidence of special efforts by admins and moderators to help groups avoid being moderated. In English-language Groups, which appear far more heavily moderated than their foreign-language counterparts, admins post instructions on how users can avoid detection by Facebook’s systems. For example, researchers found multiple examples of moderators advising users to use terms like “adoption” or “rehoming” instead of “sale.”

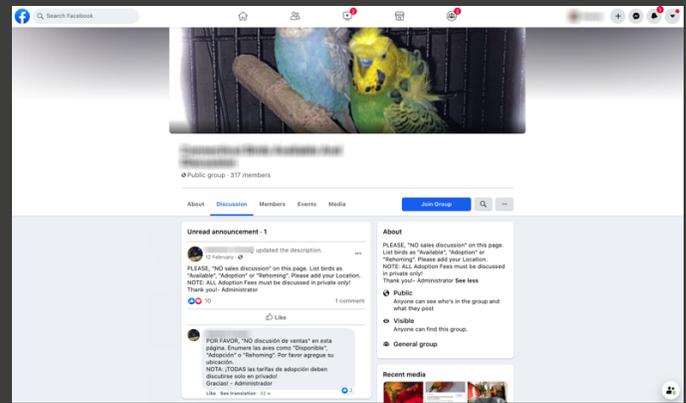
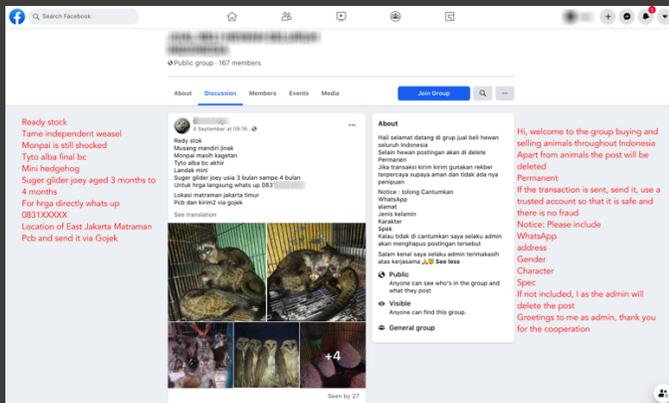
One English-language group based in Lahore, Pakistan, includes instructions in the questions a user must answer to become a member of the private Group. The Group, EngG-134, was created on September 4, 2019 and has 20,430 members, meaning the Group has gained an average of 51 new members a day since it was created.



The instructions and guidance from Group admins in different languages across the globe share one feature: they all aim to help users avoid Facebook’s moderation efforts. If Facebook is serious about combatting wildlife sales, it should develop typologies that track these tricks, and build countermeasures against them.

In multiple Groups ACCO found based in Southeast Asia, there are explicit messages in the “rule” section instructing members how to sell animals effectively. This illustrates another key trend in Groups: quality over quantity. Although some of the Groups were small, they were laser-focused on wildlife sales

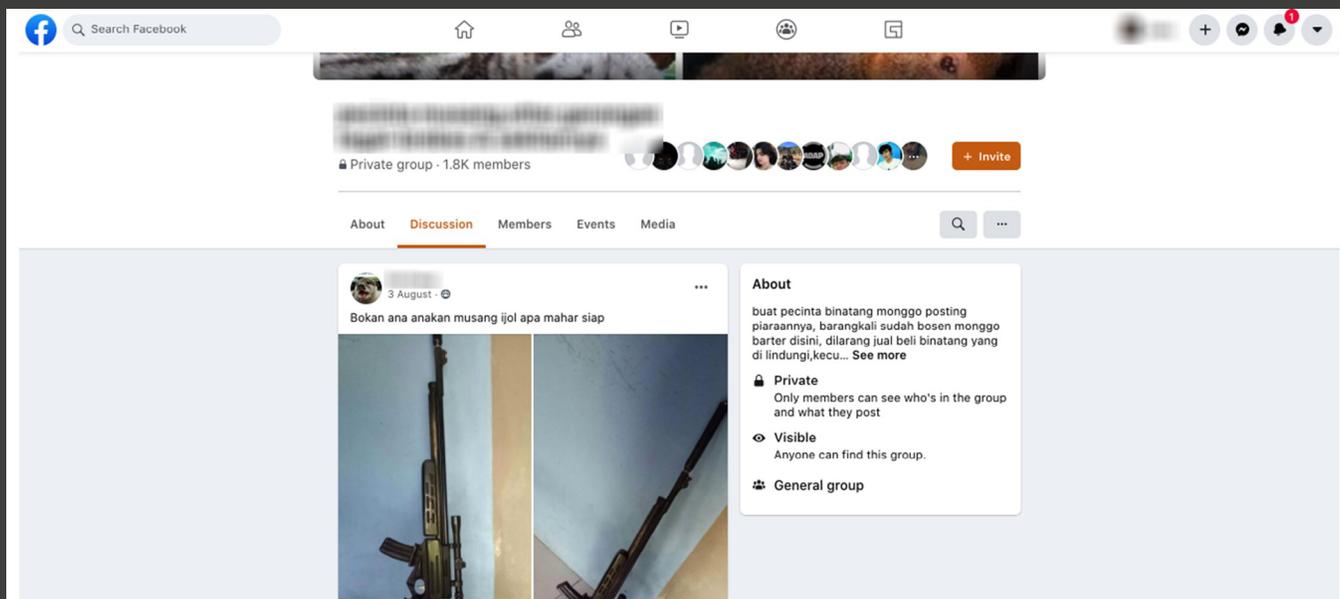
²⁴. See Appendix for all data



(Left) Indonesian wildlife sale group IndG-4 includes instructions on how users should post animals for sale. (Right) The admin of an English wildlife sale Group EngG-123 has a pinned post at top urging users to avoid sale discussions and instead to use words like “adoption” and “rehoming” instead before moving discussions to private messages.

The Groups trafficking wildlife identified by ACCO researchers were created at a higher annual rate after March 2018, when Facebook joined the Coalition to End Wildlife Trafficking Online than in the preceding decade, indicating that serious wildlife sellers are increasingly trying to obfuscate their activities. Of the Groups identified by ACCO, 141 were created between March 2009 and February 2018, a rate of roughly 15.8 new Groups per year. The rate of wildlife sale Groups per year since Facebook joined the coalition is nearly four times that rate—140 Groups created between March 2018 and September 2020 at a rate of 56 new Groups per year. Roughly half of the Groups—50% (140)—identified selling wildlife were created from March 2018 onward, after Facebook joined the coalition. The earliest Groups in the dataset stem back as far as March 2009.

The 281 total Facebook Groups identified had a collective 1,457,990 members. ACCO researchers found these Groups by conducting basic searches. But the Group descriptions and rules make clear that the content within is more illicit than what can be found on an average public wildlife sale page. Everything from wild-caught animals to weapons are available in the private walled-gardens that Facebook enables through its Groups feature.



A member of the private Indonesian group IndG-23 posts a gun for sale, one of several on offer in a private wildlife trafficking Group.

²⁵. See Appendix for all data

The ACCO study also found that Groups are removed at a far lower rate than Pages, perhaps another reason why wildlife sellers are gravitating to these “walled gardens.” Only 8.2% (23) of all 281 Groups identified March 2020 through September 2020 were deactivated as of October 3, 2020. It’s unclear if the Groups were removed by Facebook or by the group admins. Unlike Pages, Facebook’s moderation efforts in Groups did not have a high success rate in any language. Roughly 5.2% (7) of the Groups in English were no longer active as of October 3, 2020, compared to 59% of wildlife sale Pages in English deactivated during the same time period. For wildlife sale Groups in Arabic only 6.2% (4) of the 65 Groups identified were deactivated as of October 3, 2020; for Groups in Indonesian only 14.3% (4) of the 49 Groups identified were deactivated as of October 3, 2020; and in Vietnamese only 15.4% (8) of the 52 Groups identified were deactivated as of October 3, 2020.

	Groups	Group Member Totals	Deactivated as of Oct 3, 2020	Active as of Oct 3, 2020	Members of Groups Active as of Oct 3, 2020
Arabic	65	579,958	4	61	569,430
English	136	662,885	7	129	649,892
Indonesian	52	66,438	4	24	62,274
Vietnamese	28	148,709	8	44	128,235
All Languages Combined	281	1,457,990	23	258	1,409,831

Conclusions and Recommendations



illicit wildlife trade continues to flourish on Facebook. Although the firm claims it is committed to fighting wildlife trafficking on its family of platforms, our research found that at every turn Facebook’s internal policies — and in some cases national and international laws — had been violated. Our findings echo the comments of the former insider at the Coalition to End Wildlife Trafficking Online: Public relations, not proactive or effective response, is the motivation behind Facebook’s efforts. In short, Facebook’s pronouncements and commitments are meaningless without follow up and enforcement.

Facebook’s lack of proactive enforcement is further complicated by the company’s failure to include any action it does take in its transparency reports. Facebook has repeatedly relied on researchers, journalists, and activists to serve as unpaid content moderators to report illicit content on its platform. But even an army of researchers reporting content will not solve Facebook’s bigger problem of enabling the transnational wildlife trade. Each of its features serves as an additional tool to perpetuate and enhance the sale of wildlife, even when such content is an obvious violation of the company’s policies.

²⁶ <https://www.getrevue.co/profile/themarkup/issues/are-journalists-and-researchers-the-real-content-moderators-277640>

Facebook is currently fighting to avoid regulatory changes from Congress so that it can continue to enjoy the full immunity granted under Section 230 of the Communications Decency Act. But Facebook's failure to address transnational crime at every turn, whether it's trafficking in endangered wildlife, people, drugs, weapons, or antiquities have repeatedly shown that the company is unwilling to address these problems without a regulatory incentive that would open them to liability if they failed to do so. There are concrete technical and policy reforms that Facebook can and should be taking to address the ongoing sale of wildlife on its platform. The risk of not doing so is too great to continue to ignore.

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There is still plenty of wildlife content out there, especially in the Middle East and Southeast Asia. Facebook, Instagram and WhatsApp offer an organized online service that greatly enhances the ability of traffickers to network, market, learn of what's available, meet new clients and conduct business in privacy. They are more efficient and fluid than e-commerce sites, which require a cumbersome portal and registration to operate in private.

Daniel Stiles, ACCO member and Senior Consultant at the Global Initiative Against Transnational Organized Crime

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Technical and Policy Reforms



- Facebook engineers should immediately implement code to block Pages, Groups, hashtags and search results for wildlife species in multiple key languages when coupled with the terms “sell,” “for sale” and “buy.” This would cost the firm little time or money to implement but could result in substantial reductions in the amount of wildlife trafficked openly across Facebook platforms.
- Facebook's security team should also develop typologies mapping how wildlife traffickers behave online, and train their AI tools to search for data patterns that match that behavior, such as the efforts employed by wildlife sellers to circumvent current AI detection.
- Facebook should change its policy of waiting for users to report wildlife and other serious crime and proactively search for and remove serious crime content.
- Facebook should strengthen its policy towards criminal activity on its platforms, and should warn its users that anyone caught selling illegal goods risk having their data handed over to law enforcement in the relevant jurisdiction.
- Facebook should increase scrutiny of users who create Groups, especially private and secret Groups, and advise users of this new policy. Users who create Groups, and group admins should be required to provide official identification, and should agree to increased moderation by Facebook to ensure their Groups are not used for nefarious or illicit purposes.

27. See Facebook policies on countering terrorism <https://newsroom.fb.com/news/2017/06/how-we-counter-terrorism>





Moderation Reforms



- Facebook should establish a public-private partnership, funding and authorizing trained experts in key species with relevant language skills to identify and remove wildlife traffickers from Facebook platforms, and report their existence to relevant law enforcement authorities.
- These moderation teams should also partner with relevant law enforcement units to develop and implement approaches for finding, removing and prosecuting wildlife criminals.
- These teams should be funded to launch network-focused operations, working to remove wildlife crime networks and prolific traders of wildlife products and live animals, as well as Pages and Groups that operate as global marketplaces.

Educational Initiatives



- Facebook should develop and distribute a global counter-narrative effort on its family of platforms, posting informational messages in multiple languages about the threats posed by the illegal wildlife trade. The company already employs similar counter-narrative methods for addressing terrorism on the platform.
- Facebook should re-implement the use of pop-ups in multiple languages that appear when users type search terms indicating they aim to buy endangered wildlife or illegal wildlife goods.

27. See Facebook policies on countering terrorism <https://newsroom.fb.com/news/2017/06/how-we-counter-terrorism>.