

Live Animals in Illegal Trade:

A review of selected holding and repatriation costs and enforcement outcomes for local confiscations



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Introduction

The Convention on International Trade in Endangered Species estimates the illegal wildlife trade to be worth USD\$7-23 billion per year, making it one of the largest illicit trades in the world (UNODC 2011). With this in mind authorities in areas which have the unfortunate designation as wildlife trade hubs have an important duty and responsibility to demonstrate that every effort is being undertaken to enforce local and international wildlife laws and to apprehend and convict all wildlife criminals including members of wildlife crime networks.

Unlike most seized goods of illicit trade that can simply be placed in storage facilities following interception by the authorities, confiscated wildlife require careful holding that considers welfare and ethical issues and requires continual input of resources and expert commitment. Seized wildlife which may be considered a commodity by the criminal, becomes part of the court evidence but there may also be conservation concerns related to the species resulting in repatriation or alternative considerations for future placement. The health and welfare needs of different species, apart from their value as court evidence, is a serious consideration and it is common for non-governmental organisations to work in partnership with government authorities to provide holding and rehabilitation of seized animals. It is also common for the judiciary to be unaware of the extent of this support in financial and human resource terms.

From our experience in Hong Kong many animals have to undergo months and sometimes years of 'temporary' care until legal actions are completed and cases receive the legal green light to begin sourcing appropriate long term placement. During this period many resources are required, including the input of veterinarians, wildlife experts and animal carers, the use of medical consumables, animal food, and secure (temperature controlled) facilities. Transportation costs may follow the captive period when animals are shipped to other countries to join long term holding options. Such holding requirements are regularly overlooked during legal cases which lead to prosecution of the criminals involved in the illegal wildlife trade, but they are components of the total costs that result from the criminal activities. In many cases the black market value of the animals far outweighs the financial penalty handed down by the courts and furthermore, judicial sentencing rarely reflects the severity of the crime. Criminals can simply offset the cost of fines against the significant profits which are amassed through wildlife trade.

The present document provides information on selected Hong Kong cases gathered by Kadoorie Farm & Botanic Garden (KFBG) with estimated costs of holding and transporting animals (Section 1) and actual costs (Section 2) generated during a repatriation case involving wildlife intercepted by the Hong Kong SAR authorities and held temporarily at KFBG. These references are provided to raise awareness among the public, NGOs, Government authorities and in particular magistrates in order to reflect the true extent of costs incurred due to the wildlife crime.

The third section comprises wildlife trafficking cases intercepted by the authorities. Each contains species and the quantity involved with an estimated market value based on desktop research among popular trading websites in Hong Kong and China, penalties received by the



offenders are also included. Attachment I also contains the trading value of a number of endangered turtle and tortoise species.

Section 1: Estimated costs incurred during temporary holding and placement of confiscated wildlife

Estimates for some of the costs incurred from 3 placement cases with relatively short holding periods (30-120 days) are provided. The cases may not document all the costs inclusively, but highlight some of the significant costs involved. Also totals may be conservative, as many unexpected costs would arise when caring for wild animals and in fact animal care requires significant time investment from specialist vets and animal care experts.

Commonly, all costs following seizure were borne by the rescue centre, authorities and longterm placement centres. When repatriations and wild release are considered costs may also be incurred by in country conservation organisations.

Rescue operations rarely see quick placement of an animal or group of animals. The Siamang Gibbon (Table 3) was held at Kadoorie Farm & Botanic Garden rescue centre for over five years before a suitable long-term placement option was identified and following completion of the legal case and forfeiture by the authorities.

None of the accumulated costs were transferred to the wildlife criminal nor reflected in the decisions leading to the level of penalty conferred by the courts. In many cases the criminals are not apprehended for these often cruel smuggling cases. A quick glance at the market values for the endangered wildlife nevertheless provides insight into the levels of profit that can be generated by these illegal consignments. In most cases these profits far exceed the present monetary penalties handed down by the courts of the Hong Kong SAR.

Table 1. Estimated cost of holding for 30 days (pre-export quarantine) and transport costs for	one
endangered Black Pond Turtle (Geoclemys hamiltonii) (Based on 2007 values).	

Description	Est. Cost (HK\$)
Facilities set up	100.00
Veterinary treatment consumables ^{#1}	220.00
Export documentation	2,000.00
Air freight to re-homing facility in Asia	1,000.00
Shipping crate	300.00
Labour (30 hrs/month; \$350/hr) ^{#2}	10,500.00
Animal feeds	40.00
Utilities	250.00
Sub-total:	HK\$14,400.00 (approx.US\$1,850.00)
Adjusted to reflect equivalent 2016 ^{#3} cost:	HK\$19,000.00 (approx.US\$2,400.00)

Table 2. Estimated cost of holding for 30 days (pre-export quarantine) and transport costs for 50 freshwater turtles (Based on 2007 values).

Description	Est. Cost (HK\$)
Facilities set up	400.00
Veterinary treatment consumables ^{#1}	11,000.00
Export documentation	2,000.00
Air freight to re-homing facility in Europe	20,000.00
Shipping crate	1,500.00
Labour (30 hrs/month; \$350/hr) ^{#2}	10,500.00
Animal feeds	2,000.00
Utilities	1,000.00
Sub-total:	HK\$48,400.00 (approx. US\$6,200.00)
Adjusted to reflect equivalent 2016 ^{#3} cost:	HK\$ 53,000.00 (approx.US\$6,800.00)

Table 3. Estimated cost of holding for 120 days (pre-export quarantine) and transport costs for one Siamang Gibbon (*Hylobates syndactylus*) (based on 2007 values).

Description	Est. Cost (HK\$)
Facilities set up	3,000.00
Veterinary treatment consumables ^{#1}	4,220.00
Export documentation	2,000.00
Air freight to re-homing facility in Malaysia	4,000.00
Shipping crate	800.00
Labour (30 hrs/month; \$350/hr) ^{#2}	42,000.00
Animal feeds	9,800.00
Utilities	100.00
Sub-total:	HK\$66,000.00 (approx. US\$8,500.00)
Adjusted to reflect equivalent 2016 #3 cost:	HK\$ 84,000.00 (approx.US\$10,800.00)

REMARKS:

[#]1 Under international IUCN guidelines extensive medical tests (vet treatments) are necessary if an animal is to be re-released into its native range. Some of these veterinary tests may also form part of the import license requirements of the receiving countries.

[#]2 Conservative staff costs (estimated based on rate for animal keeper and veterinary input).

[#]3Value is based on actual salary rates for 2016. Source KFBG Human Resources Section.

In the Siamang Gibbon case above a Taiwanese national was apprehended smuggling the infant gibbon in hand carriage by a Customs and Excise officer. The penalty received on December 16th 1999 at the court hearing was HK\$20,000. This pales in comparison with the cost of just 120 days of captive care as indicated above and clearly suggests that the criminal is not receiving an adequate penalty for the illegal act.



Section 2: Pig-nosed Turtle (*Carettochelys insculpta*) illegal trade seizure and subsequent repatriation in 2014

The Hong Kong authorities intercepted an illegal shipment of some 2,700 live Pig-nosed Turtles exported from Jakarta, Indonesia on 12th January 2014. The shipment was declared as live tropical fish but Pig-nosed Turtles were found concealed in the consignment.

The Agricultural, Fisheries and Conservation Department (AFCD) requested support from KFBG regarding the temporary holding of the seizure. Assistance was provided and KFBG and AFCD also investigated whether a swift repatriation of the turtles to Indonesia was a possible option.

Five organisations were involved in the eventual repatriation actions, including AFCD, KFBG, the Indonesian Government, Freeland Foundation and the World Animal Protection (WAP). The air freight from Hong Kong to Jakarta was sponsored by Cathay Pacific.

	Description	Actual Cost (US\$)	Covered by
	Husbandry for 18 Days (Food and consumables)	1,243.59	KFBG
BG)	Holding facility labour	1,384.62	KFBG
Kon KF	Shipping containers and materials	2,051.28	KFBG
Hong Kong (AFCD + KFBG)	Veterinary care (4 hours)	256.41	KFBG
HcAFC	Ground transportations	100.00	AFCD
	Air freight from Hong Kong to Jakarta	840.00	Sponsored by Cathay Pacific
	Outbound Sub-total:	US\$ 5,875.90	
	Husbandry for 7 days (Food and consumables)	170.61	Freeland
a land	Holding facility labour	33.91	Freeland
nesi: Freel	Cargo, Warehouse, Tax	2,187.18	Freeland
Indonesia (WAP + Freeland)	Ground Transportations	326.28	Freeland
I WAI	Air freight	471.28	Freeland
\smile	Personnel expenses (hotel, meals, phone credit)	178.10	Freeland
	Inbound Sub-total:	US\$ 3,367.36	
	Grand Total:	US\$ 9,243.26	

Table 4. Actual holding and transport costs for the Pig-nosed Turtles from Hong Kong to Indonesia.

Section 3: Seizures of trafficked wildlife and penalties received

This section highlights how penalties handed down by the courts lack enough severity to deter criminals from repeating their unlawful acts, by drawing comparisons between the penalty and the prospective trade value. Four cases with prosecution outcomes are selected each with species and quantity of animals involved. The estimated value per individual is based on desktop research from Chinese websites (see Attachment I: Illicit trade value of protected turtles and tortoises) and observations from the local pet trade.

The Protection of Endangered Species of Animals and Plants Ordinance (Cap. 586) controls import and export of animals listed under CITES. The maximum penalty for illegal import, export and illegal possession of controlled CITES Appendix I specimens is a fine of HK\$5,000,000 and imprisonment for 2 years (Cap 586 section 10). For CITES Appendix II or III (Cap 586 section 16) a fine of HK\$500,000 and 1 year imprisonment the maximum suggested.

A number of issues will be considered for each case, including quantity involved and recurrence of offence. The court will take into account the value of the items in handing down a sentence. From our observation, species listed under CITES Appendix I have higher trade value in general, compared to those under CITES Appendix II and III even under the same taxon. However the actual value may be open to some degree of subjectivity as morphological variation within species and rarity of special features may play a role in deciding value. Demands from the Traditional Chinese Medicine (TCM) trade can also promote high prices for certain animals and plants.

Seizure on 1 October 2013 Remark ^1						
Species	Quantity	Est. value per individual [#]	Sub total	CITES App.		
Black Pond Turtle (Geoclemys hamiltonii)	338 HK\$2,000 HK\$676,000 I					
Total estimated commercial value HK\$676,000 (approx. US\$86,600)						
Actual sentence and penalty: Imprisonment for three months and three months imprisonment for cruelty to						

animals. The sentences to serve concurrently (total of 3 months).

Seizure on 14 January 2014 Remark ^2							
Species	Quantity	Est. value per individual [#]	Sub total	CITES App.			
Black Pond Turtle (Geoclemys hamiltonii)	116 HK\$2,000 HK\$232,000 I						
Tricarnate Hill Turtle (Melanochelys tricarinata)	2 HK\$2,500 HK\$5,000 I						
Total estimated commercial valueHK\$237,000 (approx. US\$ 30,300)							
Actual sentence and penalty: Three months imprisonment to the offenders.							



Seizure on 24 January 2014							
Species	Quantity	Est. value per individual [#]	Sub total	CITES App.			
Radiated tortoise (Astrochelys radiata)	70	HK\$9,000	HK\$ 630,000	Ι			
Greek Tortoise (Testudo graeca)	39	HK\$1,000	HK\$39,000	II			
Spider Tortoise (Pyxis arachnoides)	9 HK\$10,000 HK\$90,000 I						
Total estimated commercial valueHK\$759,000 (approx. US\$97,300)							
Total estimated commercial value TIK\$737,000 (approx. 05\$77,500)							

Actual sentence and penalty: Two defendants each given 2 month suspended jail sentences, one fined HK\$45,000 (~US\$5,800) the other HK\$40,000 (~US\$5,100).

Seizure on 14 February 2014							
Species	Quantity	Est. value per individual [#]	Sub total	CITES App.			
Radiated tortoise (Astrochelys radiata)	116 HK\$9,000 HK\$1,044,000 I						
Ploughshare Tortoises (Astrochelys yniphora)	10 HK\$20,000 HK\$200,000 I						
Leaf Chameleons (Brookesia sp.)	96 HK\$1,000 HK\$96,000 II						
Total estimated commercial valueHK\$ 1,340,000 (approx. US\$ 171,700)							
Actual contance and penalty 6 weeks imprisonment for the CITES Appendix I species and 4 weeks							

Actual sentence and penalty: 6 weeks imprisonment for the CITES Appendix I species and 4 weeks for the Appendix II species. The two sentence to serve concurrently (total of 6 weeks). The sentences were suspended.

Seizure on 29 August 2014							
Species	Quantity	Est. value per individual [#]	Sub total	CITES App.			
Black Pond Turtle (Geoclemys hamiltonii)	332 HK\$2,000 HK\$ 664,000 I						
Indian Roofed Turtles (Pangshura tecta)	ndian Roofed Turtles (<i>Pangshura tecta</i>) 266 HK\$1,000 HK\$266,000 I						
Total estimated commercial valueHK\$ 930,000 (approx. US\$119,200)							
Actual sentence and penalty: A fine of HK\$180,000							

REMARKS:

 $HK\$7.8\approx US\1

[#] value of unsexed juvenile individual

^{^1}Hong Kong Customs on 1 October 2013 intercepted three hundred and thirty-eight (338) freshwater turtles at the arrival hall at the Hong Kong SAR International Airport. They were found in a passenger's luggage. A 26-year-old man was prosecuted by the Agriculture, Fisheries and Conservation Department (AFCD).

^{^2} 66 Black Pond Turtles were discovered inside the luggage of two incoming passengers from Thailand on the same flight (14/2014). The smuggler was caught red-handed. The turtles under case 15/2014 (50 Black Pond and 2 Tricarnate Hill Turtles) were found inside luggage of the second smuggler.

^{^3} A 27-year-old man was prosecuted after he brought 358 black pond turtles and 266 Indian roofed turtles into Hong Kong from Jakarta on August 29.



Conclusions

Generally the courts will hear the details of the case resulting from the apprehension of a criminal, which will include details of the smuggled consignment and its trade value. Rarely do we see considerations given to the incurred cost to the caretakers as a result of the illegal act. The judiciary should look at all expenses incurred from the point of seizure to the point of release or placement (or estimations of future costs) and follow the audit trail created as a result of the crime as part of an assessment of its severity. In many cases these costs significantly outweigh the market values of the animals, which are commonly underestimated in the first place. The judicial system should review this area of the legal case and promote mechanisms that put more emphasis on the costs accumulated and passed on by the criminals as a result of the crime they have committed.

Presently the judiciary is not using the powers they can wield to make meaningful convictions which would go a long way in stopping the wildlife trade in endangered species. The significant sums of money made through this trade continue to provide an incentive to criminals and with the relatively light penalties and sentencing handed down the criminals and king-pins behind the trafficking will not see a major dis-incentive regarding their actions. The cases above help to demonstrate that present penalty systems are not having the desired effect in helping to combat the multibillion dollar global wildlife trade. One of the objectives of this document is to raise awareness among the judiciary and in turn get more significant penalties handed down under local legislation/law. The cases above provide real costs related to wildlife trafficking.

Recommendations

Invoke OSCO for Wildlife Crime

Import/export/re-export of any specimen of scheduled species not in accordance with the requirement of the Protection of Endangered Species of Animals and Plants Ordinance (Cap 586) is an offence. The maximum penalty is a fine of HK\$5 million and imprisonment for 2 years upon conviction. Any breach of a license condition is an offence, and the licensee is liable on conviction to a fine of HK\$50,000 and the license may be cancelled. The Ordinance is also the local legislation that gives effect to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

Presently the conviction level does not trigger the Organised and Serious Crime Ordinance (OSCO Cap. 455) under Hong Kong's Import and Export Ordinance (Cap. 60). The only reason for a summary offence to be heard in a higher court with greater sentencing powers would be if the case was transferred to the District Court as there is an indictable offence on the same charge sheet, or if the case upon being heard in the Magistrates' Court was appealed to the High Court. Ten years imprisonment is sufficiently long enough to trigger OSCO.



Under OSCO, the Hong Kong Police are able to leverage the full range of investigative powers of their Commercial Crimes Bureau and their Organised Crime and Triad Bureau. This would enable enforcement units to tackle the organised crime syndicates based in Hong Kong and share pertinent information with the crime fighters across the border with China and worldwide.

In order to effectively eradicate the trade in endangered wildlife and wildlife products, it is important that appropriate offences are created of sufficient seriousness that capture all key activities of import, export, re-export, possession, control, dealing, trading, use of proceeds etc., so that the OSCO regime may also be available for the investigation and prosecution of relevant wildlife crime offences. This will help ensure that organisers and kingpins of wildlife crime can be investigated and prosecuted rather than just the carriers of smuggled wildlife.

There are insufficient wildlife crime offence provisions in local laws and the Hong Kong SAR Police and its specialized task forces are seldom involved in investigating such crime, despite the extremely high value of the contraband and links with organised crime syndicates. It is inconsistent to not consider the import and export or re-export of endangered species under Cap.586, Cap.60 and Schedule 1 of OSCO Cap.455. By comparison, offences of theft, false accounting and handling stolen goods are listed under OSCO Schedule I.

Use of Victim Impact Statements

In the process of making fair and balanced judgements during legal cases, it should be a requirement to include all relevant information available that relates to a particular case, the 'hidden' or true costs above should be considered as should the black market value of the traded wildlife and victim impact statement (VIS) that pertain to the cases should also be a prerequisite of proceedings prior to judgements (The Scottish Government, 2015). The VIS should state in terms of environmental, sociological and conservation costs associated with the species that has been poached. The VIS should also consider the impacts caused to in range communities through the removal of endemic resources, this relates to the broader global damage that the criminal has caused due to the illegal actions.



References

United Nations Office on Drug and Crime (2011). Estimating Illicit Financial Flow Resulting From Drug Trafficking and Other Transnational Organized Crimes Research Report.

The Scottish Government (2015). *Wildlife Crime Penalties Review Group Report*. ISBN 978 1 78544 831 7 (web only publication). URL: http://www.gov.scot/Resource/0048/00489228.pdf

Further Readings

ADM Capital Foundation *et. al.* (2016). *Wildlife Crime* — *Is Hong Kong Doing Enough?* URL: <u>http://www.kfbg.org/upload/Publications/Wildlife-CrimeReport-FiNAL-Dec-18-(2).pdf</u>

United Nations Office on Drug and Crime (2016). World Wildlife Crime Report Trafficking in Protected Species.

URL:<u>https://www.unodc.org/documents/data-and-analysis/wildlife/World_Wildlife_Crime_Report_2016_final.pdf</u>

United Nation Environment Programme. *Analysis of the Environmental Impacts of Illegal Trade in Wildlife*. URL:

http://www.unep.org/about/sgb/Portals/50153/UNEA/FINAL %20UNEA2 Inf%20doc%202 8.pdf

United Nation Environment Programme. *The Rise of Environmental Crime- A Growing Threat to Natural Resources, Peace, Development and Security.* URL: http://unep.org/documents/itw/environmental_crimes.pdf

Wilson-Wilde, L. (2010). *Wildlife crime: a global problem*. Forensic science, medicine, and pathology, 6(3), 221-222.



Attachment I: Trade value of selected turtle and tortoise species Exchange rate for ¥6.3 RMB : \$1 USD; \$7.8HKD : \$1 USD

Species	English Common Name	Traditional Chinese Common Name	Qty.	Size	Price in local currency	Price \$US [Date of adver	t Source
Geoclemys hamiltonii	Black Pond Turtle	黑池龜	1	30 cm plastron	RMB¥2,500	\$400	June 2014	http://bbs.reptilesworld.com/
Astrochelys yniphora	Ploughshare Tortoise	安哥洛卡陸龜	1	18cm plastron	RMB¥40,000	\$6,400	June 2014	http://bbs.reptilesworld.com/
Cuora amboinensis couro	Malaysian box turtle	馬來盒龜	1	5-6cm plastron	HKD\$1,000	\$130	Dec 2014	http://petrade.hk/forum.php?mod=viewthread&tid =14919 http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=115578&extra=page%3D2
Sacalia bealei	Beal's-eyed Turtle	眼斑龜	1	Adult Male	HKD\$2,000	\$260	Dec 2014	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=115573&extra=page%3D2
Cuora flavomarginata	Yellow-margined box turtle (claims to be China mainland clade)	黃頭盒龜/ 食蛇龜	1	hatchling	HKD\$4,800	\$600	Dec 2014	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=112633&extra=page%3D3
Cuora flavomarginata	Yellow-margined box turtle	黃頭盒龜/ 食蛇龜	1	Adult	HKD\$5,800	\$750	Dec 2014	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=115975&extra=page%3D2
Centrochelys sulcata	African spurred tortoise	盾臂陸龜	1	20 cm	HK\$2,500	\$300	Dec 2014	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=75284&highlight=%E7%9B%BE
Centrochelys sulcata	African spurred tortoise	盾臂陸龜	1	Juv/Sling	HK\$1,000	\$120	Dec 2014	http://www.fishmanshop.com/cdb/product- show.asp?refno=2112
Centrochelys sulcata	African spurred tortoise	盾臂陸龜	1	Sub-Adult	Est. HK\$ 6,500	\$840	Dec 2014	Estimate by the authors



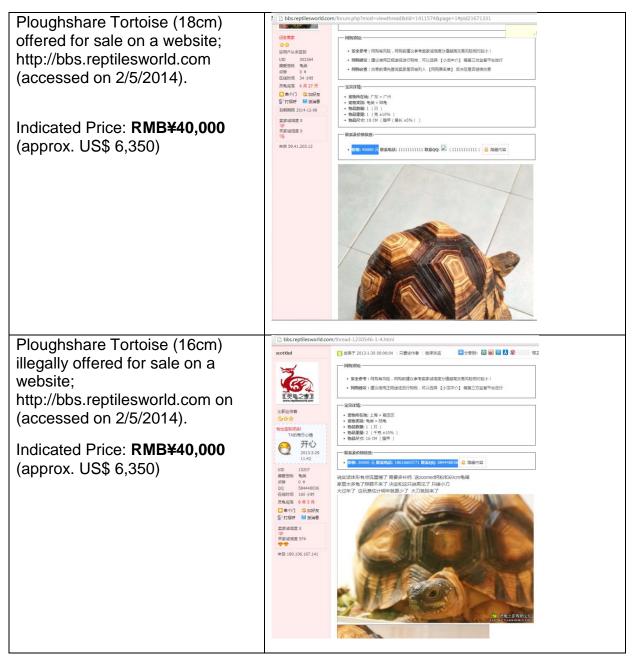
Clemmys insculpta	North American wood turtle	木雕龜	Pair	Adult	HK\$23,800	\$3,000	Nov 2011	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=63088&highlight=%E6%9C%A8%E9%9B%95
Clemmys insculpta	North American wood turtle	木雕龜	1	6cm plastron	HK\$5,800	\$750	May 2014	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=103273&highlight=%E6%9C%A8%E9%9B%95
Terrapene carolina major	Gulf Coast box turtle	灣岸箱龜	1	4cm plastron	HK\$2,880	\$370	Mar 2015	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=120665&highlight=%E7%AE%B1%E9%BE%9C
Terrapene carolina triunguis	Three-Toed Box Turtle	三趾箱龜	1	4cm plastron	HK\$2,380	\$300	Mar 2015	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=120650&highlight=%E7%AE%B1%E9%BE%9C
Terrapene carolina carolina	Eastern Box Turtle	東部箱龜	1	2014 hatchling	HK\$2,980	\$380	Oct 2014	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=114490&highlight=%E7%AE%B1%E9%BE%9C
Terrapene carolina bauri	Florida box turtle	佛羅里達箱龜	1	8cm plastron	HK\$2,500	\$320	Sep 2014	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=111589&highlight=%E7%AE%B1%E9%BE%9C
Terrapene carolina triunguis	Three-Toed Box Turtle	三趾箱龜	pair	7cm plastrom	HK\$5,200	\$670	Oct 2013	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=89711&highlight=%E7%AE%B1%E9%BE%9C
Malaclemyas terrapin	Diamondback terrapin	鑽石龜/ 鑽紋龜	1	9cm plastron	HK\$600	\$90	Oct 2013	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=89353&highlight=%E9%91%BD%E7%9F%B3
Cuora aurocapitata	Yellow-headed box turtle	金頭閉殻	1	unknown	HK\$130,000	\$16,000	Mar 2015	http://petrade.hk/forum.php?mod=viewthread&tid =21233&extra=page%3D1
Kachuga tecta	Indian roofed turtle	印度锯背龟	1	Hatchling	HK\$1,300	\$170	Mar 2015	http://petrade.hk/forum.php?mod=viewthread&tid =21920&extra=page%3D1
Cuora serrata	Serrata	瓊崖閉殻龜	1	1.3 catty (0.65 Kg)	>HK\$20,000	\$2,600	Mar 2015	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=121513&extra=page%3D1
Cuora serrata	Serrata	瓊崖閉殼龜	1	Hatchling	HK\$7,000	\$900	Sep 2015	anonymous informant
Siebenrockiella leytensis	Palawan Forest Turtle	雷島東方龜	1	1 catty (0.5 Kg)	RMB¥800	\$130	Apr 2015	http://guiyou.wang/thread-3288-1-1.html



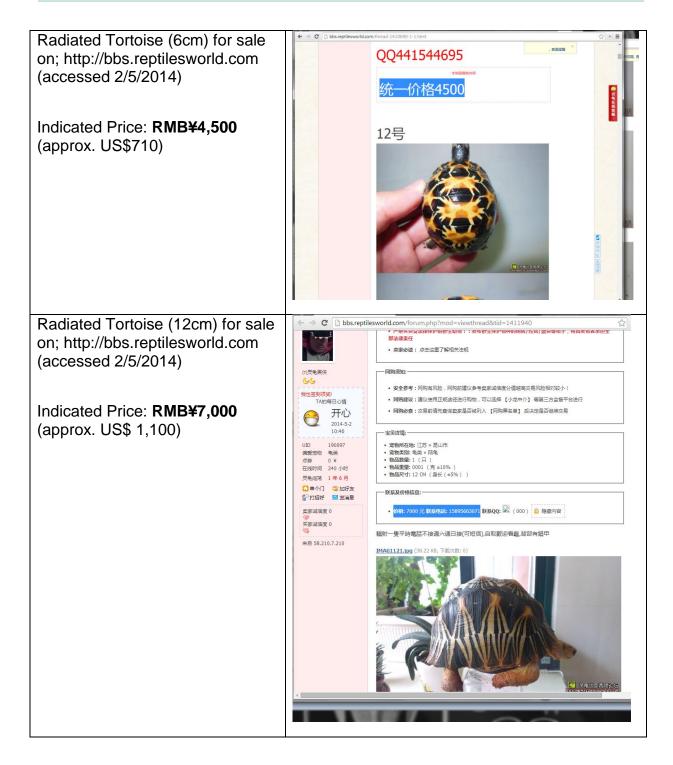
Astrochelys radiata	Radiated Tortoise	放射龜/ 輻射龜	1	yearling	RMB¥4,500	\$700	May 2014	bbs.reptilesworld.com/thread-1410690-1-1.html
Astrochelys radiata	Radiated Tortoise	放射龜/ 輻射龜	1	adult 12 cm carapace	RMB¥7,000	\$1,000	Apr 2015	bbs.reptilesworld.com/forum.php?mod=viewthread &tid=1411940
Astrochelys radiata	Radiated Tortoise	放射龜/ 輻射龜	1	yearling	~ HK\$6,000- 7,000	\$700- 900	Jul 2015	http://petrade.hk/forum.php?mod=viewthread&tid =28498&highlight=%Aeg (price concealed)
Terrapene carolina carolina	Eastern Box Turtle	東部箱龜	pair	adult	HK\$22,000	\$2,800	Sep/2015	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=130745&highlight=%E7%AE%B1
Glyptemys insculpta	US Wood Turtle	北美木雕	1	adult	HK\$10,000	\$1,200	Dec 2012	http://www.hkturtle.org/forum.php?mod=viewthre ad&tid=64738&highlight=%E6%9C%A8%E9%9B%95
Glyptemys insculpta	US Wood Turtle	北美木雕	1	hatchling	US\$395		Sep 2015	http://www.theturtlesource.com/i.asp?id=1002003 07
Erymnochelys madagascariensis	Madagascar Big-headed Turtle	馬達加斯加大頭 龜	1	Adult Male	HK\$18,000	\$230	Dec 2015	http://petrade.hk/forum.php?mod=viewthread&tid =33771&extra=page%3D1
Erymnochelys madagascariensis	Madagascar Big-headed Turtle	馬達加斯加大頭 龜	1	Adult Female	HK\$14,000	\$1,790	Dec 2015	http://petrade.hk/forum.php?mod=viewthread&tid =33771&extra=page%3D1



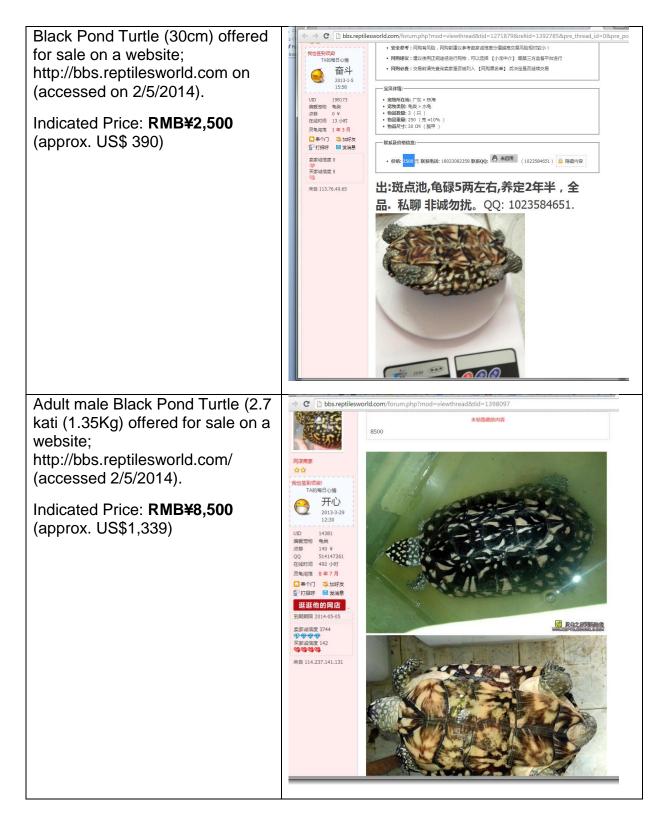
Attachment II: Screen capture from selected online sales











END

