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DATE: 1 October 2017  
SERIAL: A-M-01102017  
COUNTRIES: Global**ALERT ---- MARITIME**SUBJECT: **Switching Bills of Lading Mid-Shipment**

DATA: Wildlife traffickers regularly attempt to manipulate shipping documentation by switching bills of lading mid-shipment, often in collaboration with complicit or unscrupulous freight forwarders/shipping agents.

**Modus Operandi:**

Manipulation of bills of lading, including in mid-shipment, appears to be a common tactic used by certain wildlife traffickers in order to obscure the true destination and origin of shipments of illegal wildlife products, according to open and confidential sources. The tactic of switching bills of lading mid-shipment involves modifying bill of lading information – by filing a “switch bill of lading”, or via physical document fraud – after the shipment has been confirmed but before it has arrived at the destination port.

Manipulating bill of lading information mid-shipment is perceived by traffickers as a way to obscure the true origin/destination/routing of a shipment, reduce the likelihood of illegal shipments to be flagged for inspection, and hinder after-the-fact investigations if the contraband is seized.

In general, switching bills of lading mid-shipment in support of a shipment of illegal wildlife products requires traffickers to cooperate with a complicit or unscrupulous freight/shipping agent, who typically will file the new bill of lading in accordance with the wishes of the trafficker in exchange for payment. According to published reports, complicit freight agents are known to charge according to the size of the illegal shipment they facilitate, with one reportedly charging \$45 per kg of smuggled pangolin scales and \$145 per kg for ivory.

A switch bill of lading refers to when a freight or shipping agent files a new bill of lading for a shipment that is *en route*. Switch bills of lading can have legitimate business purposes (most often to protect proprietary supply chain information), but are considered misdeclaration or fraud if done to obscure criminal activities or if it involves modification of any of the following information from the original bill of lading: port of loading (POL); port

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of discharge (POD); or weight/number of packages. [NB: It is generally legal to alter shipper, consignee, and notify party details, as well as make truthful revisions of the cargo description, as long as doing so is not done with criminal intent.]



*Port of Pemba, Mozambique. According to a recent [NGO investigation](#), several recent major illegal ivory shipments have originated from Pemba, including at least one 2016 shipment that utilized switching bills of lading mid-shipment as a trafficking tactic. In that case, the routing for the consignment of ivory was originally declared to be Pemba to Busan, South Korea, via Mombasa, Kenya and Singapore, with a switch bill of lading filed mid-shipment for actual delivery to Hong Kong. (Photo: EIA, 2012)*

### **Geography:**

Switching bills of lading to assist with wildlife trafficking attempts likely occurs globally, although with particular apparent concentration in shipments of illegal wildlife products to destinations between known source countries in Africa and destination countries in Asia.

### **Red Flags:**

Although traffickers regularly modify their tactics and routings to avoid detection, the following may indicate a higher risk of wildlife trafficking activity, or warrant enhanced due diligence on related shipments:

- Discrepancies in or apparent modification of declared port of loading (POL), port of discharge (POD), or weight/number of packages information on a switched bill of lading.
- Declared routing which does not appear to have a logical business case, especially involving high risk ports of origin or destination known for wildlife trafficking. For instance, a declared location of origin is a high risk port combined with final destination that is a major transit hub, especially if there is no apparent business case for this routing.

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**ACTIONS:** This alert is assessed as most relevant to the general categories of action checked below.  
\*\*All decisions and actions informed by this alert are the sole responsibility of the receiving organization\*\*

- Conduct reasonable checks on shipments fitting a similar profile
- Execute / enhance internal controls or procedures relevant to this information
- Report / share information to customs / law enforcement
- Information has potential security implications for company employees

**SOURCE:** This advisory is based on UfW Transport Taskforce analysis of recent enforcement actions as well as open source and confidential reporting from partners. We have *high* confidence in the reliability and validity of this information, with the following caveat: the data upon which this analysis is based is exclusively anecdotal and is therefore inherently limited to available information and likely incomplete.

**PRIORITIES:** This alert is related to the following Transport Taskforce information sharing priorities (checked):

- Wildlife trafficker networks, behavior, intentions, and operational tactics and strategy
- Indicators of suspicious or higher risk activity ('red flags') related to wildlife trafficking
- Data potentially reportable to or shareable with law enforcement
- Security/physical risks and vulnerabilities to transport company operations, facilities, or staff
- Unintentional facilitation of illegal wildlife demand or retail trade

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**CONTACT:** For questions or additional data/analysis relevant to this alert, or to report suspicious shipments or indicators of wildlife trafficking activity, please contact the UfW Transport Taskforce:  
[transport@unitedforwildlife.org](mailto:transport@unitedforwildlife.org)

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