



## **Written Evidence Submitted by the Alliance to Counter Crime Online (ACCO) and the World Parrot Trust (WPT) to the Online Safety Bill Public Bill Committee**

### **Introduction**

This submission is made jointly by the Alliance to Counter Crime Online (ACCO)<sup>1</sup>, an alliance dedicated to combatting illegal and harmful content online and the World Parrot Trust (WPT)<sup>2</sup>, a wildlife conservation NGO, and ACCO member, based in Cornwall, UK.

ACCO is a global alliance of more than 40 non-profits, academics and citizen investigators collectively fighting the rapid growth of organised crime on social media. We share a commitment to justice, a dedication to fight criminal exploitation in all its forms, and the unblinking courage to investigate some of the worst aspects of humankind. Every ACCO member has taken fundamental risks and made sacrifices to do what we do out of passion for the subjects we seek to protect. Together, we are working towards the emergence of a global cyber ecosystem where illicit organisations struggle to operate online, because technology companies, civil society groups and law enforcement bodies are working collaboratively and effectively to systematically restrict their activities, within a legal framework structured to protect user privacy. We believe that laws should provide a clear path to justice for ordinary people harmed online, and that the tech industry should face the same liabilities for harm caused by their products as every other commercial industry. We are fighting for a world where child sex abuse content does not spread widely on tech platforms, thanks to laws incentivizing the emergence of technologies geared to protect the privacy and safety of vulnerable children. We want online wildlife content that celebrates the splendour of our natural world, rather than accelerating extinction risks for iconic endangered species, and raising the risk of another global pandemic. We envision an internet where violent gangs, drug cartels and extremists can no longer spread their hateful messages widely, sell illegal goods and easily target victims. The technology exists right now to enable much of what we envision, but key policy and legislative reforms are vital in order to make public safety and privacy a tech priority.

The World Parrot Trust was established in 1980 and has since grown rapidly to become a globally influential conservation and welfare organisation dedicated to helping parrots survive in the wild and thrive in our homes. Capture and trade to supply the global pet trade is a major threat to many parrot species and has been central to the Trust's work over the last 30+ years. WPT has been at the forefront of efforts to address harmful trade, leading advocacy for the ban on the importation of Wild birds into the EU which came into effect in 2006, securing important protections for threatened species at CITES and engaging with corporations including airlines and tech platforms to put in place measures to end trafficking. The development of online platforms and increased transport connectivity now present a new challenge and threaten to exacerbate the harms of trade.

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<sup>1</sup> <https://www.counteringcrime.org/>

<sup>2</sup> <https://www.parrots.org/>

## Executive Summary

- The members of ACCO, including WPT, strongly support the principles and objectives of the Draft Online Safety Bill but argue that harms to wildlife from trafficking should also be included in the final drafting of the bill.
- We recommend an **amendment** be added to the list of relevant offences under **Schedule 7 (Priority Offences)** to include **Offences under the Control of Trade in Endangered Species Regulations 2018 (COTES)**.
- Illegal wildlife trade, which increasingly occurs on surface web platforms, poses a grave risk to biodiversity and threatens to undermine ecosystem functioning. This is a threat to human health as much as animal well-being, as it also presents a serious biosecurity risk of zoonotic disease transmission that could spark another global pandemic.
- In the last decade, wildlife trade has expanded rapidly across social media platforms and has now become fundamental to how this harmful, global practice operates.<sup>3</sup> Recommendation algorithms on social media platforms rapidly connect buyers and sellers on a global scale, thus growing illegal wildlife markets and accelerating extinction risks for multiple endangered species, including ape, cat, bird, reptile, marine, and invertebrate species.<sup>4</sup>
- Social media platforms have created community standards aiming to restrict illegal wildlife trading but, as with other online harms, most tech companies have thus far taken minimal action to enforce their own rules, leaving posts, groups and pages where endangered species are openly traded both visible and active.
- The UK has been a global leader in wildlife protection, leading 50 countries to adopt the London 2018 declaration on Illegal Wildlife Trade. The Online Safety bill presents a vitally important opportunity for the UK to again assert its leadership in wildlife conservation.

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<https://www.nationalgeographic.co.uk/animals/2020/12/the-black-market-trade-in-wildlife-has-moved-online-and-the-deluge-is-dizzying>

<sup>4</sup> <https://www.couneringcrime.org/wildlife-sales-on-facebook>

## Online Wildlife Trade

- I. Poorly regulated wildlife trade online poses an urgent and serious threat to wild populations and is a significant contributor to the biodiversity crisis.<sup>5</sup>
- II. Illegal wildlife trafficking persists in the UK. As part of a month-long international operation in 2021, UK border forces seized 250 items including live animals, ivory and animal skins<sup>6</sup>. A similar operation in 2019 led to the seizure of 168 items<sup>7</sup>.
- III. Wildlife trade can facilitate the transmission and international spread of infectious zoonotic diseases, with devastating consequences. Poor welfare conditions, high levels of stress and the dense housing of multiple species create the perfect conditions for the rapid spread of infectious diseases and mutation of new variants<sup>2</sup>. Species may be particularly vulnerable to trade pressure and attempts to smuggle wildlife covertly increase the associated disease risk<sup>8</sup>.
- IV. The illegal online wildlife trade, here defined as trade that contravenes national and international legislation, frequently converges with other types of illegal activity and illicit trade, in particular narcotics, timber and human trafficking<sup>9</sup>.
- V. In the last decade, the Internet - particularly social media and messaging services – have become an intrinsic mode for promoting and facilitating illegal wildlife trade<sup>10</sup>. Social media platforms provide traders of parrots and other threatened species with unparalleled access to an international audience, significantly reducing friction to trade. Websites such as Facebook and Instagram offer a mix of public and private means of communication giving traders huge reach while providing means to arrange sales out of view. Research conducted by the World Parrot Trust and other ACCO members has revealed the vast trade that takes place online in a dizzying range of threatened species, from African Grey parrots, Chimpanzees and Cheetahs to 1000s of lesser-known species of reptiles, fish, and invertebrates<sup>11,12</sup>.
- VI. Social media platform features facilitate harmful and illegal trade and actively help create new trade networks. Sellers can set up fake accounts and direct enquiries to private messaging apps. Facebook Groups, for example, provide focal points for illicit buy and sell activity.
- VII. Most concerningly, algorithms designed to direct individuals towards “Related pages” and groups that may be of interest directly **amplify** trade activity through connecting wildlife traffickers around the world. This feature, which critics have said can serve as an “echo chamber” for hate speech, has the similar effect of amplifying illegal wildlife traffic.

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<sup>5</sup> <https://www.sciencedirect.com/science/article/pii/S0006320721003931>

<sup>6</sup> <https://www.gov.uk/government/news/border-force-seizes-hundreds-of-endangered-species-products>

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<https://www.gov.uk/government/news/thousands-of-border-force-seizures-in-international-operation-against-wildlife-crime>

<sup>8</sup>

[https://www.sciencedirect.com/science/article/pii/S1471492220303470?casa\\_token=kyX8v\\_1nxNQAAAAA:P\\_E8AZqtivjNIJ8kVIWL0Jqf\\_gBmXbJyTxbT8hBPujY\\_NJXnWz07SxXEN4Lh4cO-IA8Vvw1e45Ok](https://www.sciencedirect.com/science/article/pii/S1471492220303470?casa_token=kyX8v_1nxNQAAAAA:P_E8AZqtivjNIJ8kVIWL0Jqf_gBmXbJyTxbT8hBPujY_NJXnWz07SxXEN4Lh4cO-IA8Vvw1e45Ok)

<sup>9</sup> <https://wildlifejustice.org/convergence-of-wildlife-crime/>

<sup>10</sup> <https://www.sciencedirect.com/science/article/pii/S2287884X2030042X>

<sup>11</sup> <https://www.sciencedirect.com/science/article/pii/S2351989418301768>

<sup>12</sup> <https://www.counteringcrime.org/wildlife-sales-on-facebook>

- VIII. British users looking to purchase or import exotic animals may be easily exposed to promotions for other illicit items such as drugs
- IX. Images posted on social media platforms of wildlife in trade frequently show animals in cramped conditions and clear distress, which may cause emotional distress to social media users who come across these posts.

### Response by Social Media Companies

- I. Facebook and other platforms have taken some steps to address harmful content shared on their platforms, including changing community standards and removing posts and pages reported to them. Numerous major platforms have signed up to commitments as part of the Coalition to End Wildlife Trafficking Online<sup>13</sup>.
- II. However, there is ample evidence that standards and commitments are not being effectively implemented as content facilitating sales of live endangered wildlife remains widespread.<sup>14</sup>
- III. ACCO published a 2020 report demonstrating that current moderation by Facebook is ineffective at capturing large amounts of wildlife trade content and is heavily biased towards English-language pages and groups (which are unlikely to represent the majority of wildlife trade content)<sup>15</sup>.
- IV. In the study, 57% of pages and groups ACCO researchers found selling wildlife had terms ‘for sale’ ‘sell’ or ‘buy’ in their title. Many groups and pages had existed for years without being removed, with the oldest being uninterrupted for over a decade. This content is hiding in plain site, since platforms have no legal incentive to remove it.
- V. The same report identified basic steps that could be taken by Facebook, and other platforms, to improve their response to wildlife trade, including
  - a. Implementing code to block content for wildlife species in multiple languages coupled with key sale terms, to more efficiently remove harmful content.
  - b. Changing its policy from passively waiting for civil society to report harmful content to taking a proactive approach to identify prohibited wildlife trafficking content.
  - c. Collaboration between moderators and key taxa experts to remove wildlife traffickers from the platform, identify and remove trafficking networks and reporting evidence of illegal activity to relevant law enforcement.

### Algorithms and User Agency

- I. Algorithms on social media play an active role in connecting users involved in wildlife trade around the world. Thus, when these networks are conducting illegal trafficking, the platforms

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<sup>13</sup> <https://www.endwildlifetraffickingonline.org/>;

<sup>14</sup> <https://news.mongabay.com/2022/03/coalition-against-online-wildlife-trafficking-shares-little-evidence-of-success-analysis/>

<sup>15</sup> <https://www.counteringcrime.org/wildlife-sales-on-facebook>

play an **active** facilitating role. This feature, which critics have said can serve as an “echo chamber” for hate speech, has the similar effect of amplifying illicit wildlife traffic.

- II. In their 2020 report, ACCO found that 29% of the pages their researchers found were recommended through the ‘Related Pages’ feature<sup>15</sup>
- III. It is vital that social media services monitor and adjust their algorithms and other products appropriately so that they prevent illicit activity rather than amplify it. Such actions should be part of their duty of care under the Online Safety Bill.

### **Inclusion within the Online Safety Bill**

- I. We recommend an amendment should be added to the list of relevant offences under Schedule 7 (Priority Offences) to include Offences under the Control of Trade in Endangered Species Regulations 2018 (COTES).
- II. The UK has taken an international leadership role in Illegal Wildlife Trade, hosting the London Conference on Illegal Wildlife Trade in 2018, in which 50 countries committed to action to protect endangered species around the globe<sup>16</sup>. It has also taken a leadership position in animal welfare, stating that “We will use our position as a global leader for international advocacy on animal welfare... to promote high animal welfare” in the Action Plan for Animal Welfare recently published by DEFRA<sup>17</sup>. Therefore, the omission of animal welfare or conservation concerns from this Bill is a major oversight and could undermine the UK’s leadership role in these areas.
- III. While much wildlife trade content on social media is not sourced from the UK, the Draft Online Safety Bill states that ‘...*no account is to be taken of whether or not anything done in relation to the content takes place in any part of the United Kingdom*’<sup>18</sup> when determining whether content amounts to an offence.
- IV. In order to capture illegal wildlife trade content, service providers should be working closely and proactively with subject-area and taxa experts to develop effective algorithms for flagging concerning content. Furthermore, they should work closely with conservation groups and law enforcement to identify trafficking networks on the platform, disrupt their activity and support law enforcement in relevant investigations<sup>19</sup>.
- V. OFCOM, in reviewing the effectiveness of platform actions and policies, should have the legal power to request internal documents and research regarding wildlife trade to independently evaluate whether platforms are taking appropriate action. This may include how platforms have engaged with subject-matter experts.

<sup>16</sup><https://www.gov.uk/government/news/iwt-conference-2018-declaration-commits-over-50-countries-to-action-for-endangered-species>

<sup>17</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/985332/Action\\_Plan\\_for\\_Animal\\_Welfare.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/985332/Action_Plan_for_Animal_Welfare.pdf)

<sup>18</sup> Draft Online Safety Bill, s 44 (3)

<sup>19</sup><https://theconversation.com/big-tech-regulators-and-conservationists-must-unite-to-tackle-online-wildlife-trade-173431>