



WILDLIFE CONSERVATION: AN ANALYSIS OF MALAYSIA'S LEGAL FRAMEWORK FOR COMBATING ILLEGAL WILDLIFE TRADE AND ENFORCING CITES COMPLIANCE TOWARDS A SUSTAINABLE FUTURE

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Abstract:

Wildlife conservation represents a significant global challenge, particularly in nations abundant with biodiversity like Malaysia, where illegal wildlife trafficking jeopardises ecosystems and threatens endangered species. This paper analyses Malaysia's legal framework concerning wildlife conservation and its harmonisation with international agreements, notably the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Through an extensive examination of statutes and policies, this study elucidates Malaysia's endeavours to combat illegal wildlife trade and uphold adherence to CITES regulations. A central aspect of this analysis involves exploring Malaysia's strategy in reconciling conservation priorities with socio-economic considerations amidst the complexities of sustainable development. By critically assessing Malaysia's conservation landscape, this paper seeks to inform policymakers, engage stakeholders, and catalyse collective efforts towards fostering a more sustainable coexistence between wildlife and humanity.

Keywords:



Introduction

Malaysia boasts an impressive level of biodiversity, with over “15,000 species of vascular plants and 152,000 species of animals”, making it one of the “top 12 most biodiverse places” on the planet (Koshy, E. 2020). Unfortunately, this abundance of wildlife has made Malaysia a target for illegal poaching and wildlife trafficking. Additionally, this illegal trade is facilitated by digital technology, which provides numerous channels for the buying and selling of illegal wildlife products across national boundaries and continents. According to WWF Malaysia, the online marketplace in Asia has experienced significant growth and become a hotbed for the illegal trade of diverse products such as “elephant ivory, rhino horns, marine turtle shells, pangolin scales, tiger parts, live reptiles, birds, and mammals, which are often sold as exotic pets” (Supramani, S. 2022). Moreover, online platforms, such as websites, social media, and e-commerce portals, provide an easy and convenient platform for willing buyers, and traders take advantage of well-established supply chains, with couriers and logistics companies often unwittingly delivering these products to buyers (Supramani, S. 2022).

The significance of Malaysia's wildlife conservation efforts extends beyond its borders, resonating with the objectives outlined in international agreements such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Ratified by Malaysia in 1978, CITES represents a cornerstone of global conservation, aiming to regulate and monitor the international trade of endangered species. By aligning with CITES principles, Malaysia reaffirms its commitment to combatting illegal wildlife trade and promoting sustainable practices in exploiting natural resources.

Moreover, as a developing nation with a growing economy, Malaysia faces the dual challenge of conserving its natural heritage while supporting livelihoods dependent on natural resources. By adopting a holistic approach that integrates conservation objectives with sustainable development goals, Malaysia endeavours to forge a pathway towards a harmonious coexistence between humans and wildlife. Therefore, this paper aims to analyse Malaysia's current legal framework for countering illegal wildlife trade and enforcing compliance with the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) towards a sustainable future.

Literature Review

Numerous research studies have been conducted to investigate the complexities surrounding the illegal trade of wildlife, the enforcement of CITES regulations, and the long-term sustainability of wildlife conservation. “Environmental and wildlife crime” has become a highly profitable crime sector, driving many species towards extinction (INTERPOL, 2023). The illicit market for wildlife commodities, valued at an estimated USD 20 billion annually, has propelled poaching and illegal wildlife trade into prominent roles within organised crime networks, often intertwining with armed conflicts, corrupt practices, and various other criminal activities (INTERPOL, 2023). According to Soni (2021), wildlife is at significant risk due to illegal hunting and poaching, apart from climate change. Moreover, Koshy, E. (2020) highlights, “Malaysia and Southeast Asia are at the heart of a massive wildlife trade”.

Malaysia's role in the global wildlife trade is not to be underestimated. Even before the pandemic, it was recognised as a significant source and transit point for wildlife trafficking, ranking among the top 10 countries with high incidences of such offences (Ainin & Danial, 2023). The Wildlife and National Parks Department (Perhilitan) has been actively combating this issue, addressing 443 instances of illegal wildlife trade on digital platforms since 2020 (Ainin & Danial, 2023). A report by Morhan, S. (2024) further highlights the extent of the problem, documenting 654 unlawful online transactions involving exotic wildlife from 2020 to 2023 across various social media channels.

Soni (2021) mentions that the exploitation of wildlife for trade and other benefits of humans has resulted in enacting and enforcing various legislations and Acts in almost all the world's countries. This resulted in many international conventions and treaties covering various aspects of the illegal international trade in wildlife. Therefore, it is crucial to consider not just national wildlife laws and other laws implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) but also laws implementing the other conventions and treaties that can be used to investigate and prosecute wildlife crimes.

Several recommendations can be considered to address the challenges facing wildlife conservation in Malaysia. Strengthening law enforcement capacity, enhancing cross-border cooperation, and promoting sustainable livelihood alternatives are essential for combating illegal wildlife trade. For instance, the Wildlife Department has implemented various measures to address the growing illegal trade in wildlife, including “strengthening legislation through amendments to Act 716 by adding specific provisions, increasing penalties to a maximum of 15 years’ jail and a maximum fine of RM1 million as a deterrent” (Morhan, S. 2024). Moreover, under the International Trade in Endangered Species Act 2008 (Act 686), “the illegal import and export of wildlife without a permit could result in a maximum fine of RM1 million or imprisonment for up to seven years or both for individuals and a maximum fine of RM2 million for corporate bodies” (Morhan, S. 2024).

Methodology

This paper adopts qualitative doctrinal legal research as it intends to discuss it in depth and detail. For this purpose, the discussion adopts the doctrinal content analysis method by examining the primary sources such as ‘Wildlife Conservation Act 2010’, ‘Wildlife Conservation Amendment Act 2022’, ‘Wildlife Conservation Enactment (No. 6 of 1997)’ and ‘Wildlife Protection Ordinance 1998’ and other laws on wildlife crimes in Malaysia. The national policy referred to is the National Policy on Biological Diversity 2016–2025. This paper also refers to the ‘Convention on the International Trade in Endangered Species of Wild Fauna and Flora (CITES)’. The secondary data are collected from cases, journal articles, newspaper articles, textbooks, and government reports. In addition, online databases such as ‘Lexis Nexis’ and ‘Current Law Journal (CLJ)’ website are used for this purpose. The research methodology employed in this study involved content analysis of primary data and literature reviews of secondary data to provide additional contextual support. This approach aimed to evaluate Malaysia’s legal framework for countering illegal wildlife trade and implementing CITES. A thorough assessment of both data sets provides a comprehensive understanding of the country's current state of illegal wildlife trade and commitment at the international level.

Findings and Discussion

Definition of Illegal Wildlife Trade (IWT)

The illegal wildlife trade is a complex and multifaceted issue encompassing many “species, products, geographies, actors, and networks” (Phelps, J. 2016). While there is no universally accepted definition of illegal wildlife trade or its associated wildlife crime, the term generally refers to the unlawful harvest and trade of wild species that contravene national laws, including harvest quotas, protected species lists, protected areas regulations, and obligations to the Convention on International Trade of Endangered Species of Wild Fauna and Flora (CITES) (UNODC, 2020).

According to Mozer & Prost (2023), illegal wildlife trade is classified as "green crimes or environmental crimes," which refers to illegal activities that harm the environment and are intended to benefit individuals, groups, or companies through the exploitation, damage, trade, or theft of natural resources. Illegal wildlife trade includes a range of activities, such as “capturing, poaching, smuggling, importing, exporting, processing, possessing, collecting, and consuming wild flora, fauna, and fungi, whether aquatic or terrestrial, dead or alive, including their derivatives, parts, and products which are protected by national and international laws” (Mozer & Prost, 2023).

National Strategies and Policies

According to McCormick (2001), environmental policy is ‘aimed at managing human activities to prevent, reduce or mitigate the harmful effects on nature and natural resources and ensure that man-made changes to the environment do not have any harmful effects on human beings’. Malaysia has implemented environmental policies to address the disparity between economic and social activities and the need for environmental protection. The National Policy on Biological Diversity 2016-2025 provides the direction and framework for conserving and using our biodiversity sustainably in the face of increasingly complex challenges.

Table 1. National Policy Relevant to Illegal Wildlife Trade

Policy document	Wildlife Protection provisions
National Policy on the Biodiversity 2016-2025	Target 9: By 2025, the extinction of known threatened species has been prevented, and their conservation status has been improved and sustained. Target 10: By 2025, poaching, illegal harvesting and illegal trade of wildlife, fish and plants will be under control and significantly reduced.

(Source: Reorganize from National Policy on the Biodiversity (2016-2025))

Wildlife ‘Crime’ Legislation in Malaysia

Malaysia has a unique legal landscape in terms of wildlife legislation. The enforcement of such legislation is the responsibility of three distinct regions (Peninsular Malaysia, Sabah, and Sarawak), each with its own jurisdiction (Mohamad Sirat et al., 2023). In addition to the domestic wildlife legislation, other relevant laws are crucial to investigating and prosecuting transnational wildlife crime in Malaysia, which will be briefly discussed in this section.

Table 2: National Legislation

Legislation	Description	Sources
International Trade in Endangered Species Act 2008 (Act 686)	This Act aims to regulate the international trade of wild animals and plants and ensure Malaysia's compliance with the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) obligations.	https://cites.org/sites/default/files/projects/NLP/Malaysia_a_wildlife_Act686-5_8_2014.pdf
Customs (Prohibition of Imports) Order 2017 under the Customs Act 1967	The legislation has four Schedules that allow customs officers to restrict entry/exit and prevent smuggling of prohibited items. Schedule 3, Part 1 prohibits certain goods imported into Malaysia, including wildlife species, parts, and products. The import of these items is only allowed by specific regulations.	https://faolex.fao.org/docs/pdf/mal205597.pdf
Malaysian Anti-Corruption Commission Act 2009 (Act 694)	The Act allows MACC officers to receive and investigate complaints related to offences under the Act, including detecting and investigating suspected offences, attempted offences, or conspiracies.	https://www.sprm.gov.my/admin/files/sprm/assets/pdf/penguatkuasaan/act-694-bi.pdf
Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act (AMLA) 2001 (Act 613)	The Act 613 of 2001 lists possession, import, transit, export, re-export, introduction from the sea, and breeding of scheduled species as predicate offences.	https://www.sprm.gov.my/admin/files/sprm/assets/pdf/penguatkuasaan/amlatfpuaa-2001-akta-613-bi.pdf
Malaysia Quarantine and Inspection Services Act 2011 (Act 728)	The Malaysia Quarantine and Inspection Services (MAQIS) Act provides the requirements for permits, licences, and certificates to import or export any plant, animal, carcass, fish, agricultural produce, soil, or microorganism.	https://www.maqis.gov.my/wp-content/uploads/2023/06/ACT-728.pdf

Table 3: Legislation of Peninsular Malaysia

Legislation	Description	Sources
Wildlife Conservation Act 2010 (Act 716)	There exist two distinct levels of wildlife protection. The First Schedule encompasses protected wildlife, which includes CITES Appendix II species, while the Second Schedule comprises entirely protected wildlife, including CITES Appendix I species.	https://faolex.fao.org/docs/pdf/ma1107883.pdf
National Forestry Act 1984 (Act 313)	This law provides for the administration, management, and conservation of forests and forestry development. It applies to individuals and legal entities throughout Peninsular Malaysia and the Federal Territories of Kuala Lumpur and Labuan (section 109).	https://www.forestry.gov.my/images/JPSM/warga_perhutanan/Akta APN_en.pdf

Table 4: Legislation of Sabah

Legislation	Description	Sources
Wildlife Conservation Enactment 1997 and Wildlife Conservation (Amendment) Enactment 2016	This Enactment regulates the administration of protected areas, the protection of plants and animals, and the possession, trade, and utilisation of wildlife. Plants and animals are categorised into three levels of protection. The Enactment also applies to CITES species listed in Appendices I, II, and III.	https://sagc.sabah.gov.my/sites/default/files/law/WildlifeConservationEnactment1997.pdf
Forest Enactment 1968	This Enactment provides for the management of forest reserves, forest products on State and alienated land, and the issuance of licences to access and harvest timber or forest products.	https://sagc.sabah.gov.my/sites/default/files/law/ForestEnactment1968_3.pdf

Table 5: Legislation Sarawak

Legislation	Description	Sources
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Wildlife Protection Ordinance 1998	The Ordinance classifies wildlife and plants into three categories of protection. The First Schedule identifies animals that may be imported/exported under license. The Second Schedule identifies protected plants and those that may be imported/exported under license. All CITES Appendix I and II species are protected animals/plants, excluding those native species already listed as totally protected species.	https://www.sarawakforestry.com/pdf/laws/wildlife_protection_ordinance_98_chap26.pdf
The Wildlife Protection Rules 1998	These rules support the implementation of the Wildlife Protection Ordinance and contain provisions for the conditions and licensing/permitting procedures for keeping animals in captivity, commercial wildlife farms, and importing/exporting.	https://web.archive.org/web/20210311013354/https://forestry.sarawak.gov.my/page-0-423-150-The-Wild-Life-Protection-Rules-1998.html
Forests Ordinance 2015	It provides for the protection and management of forests in Sarawak and regulates the taking of forest products.	https://lawnet.sarawak.gov.my/lawnet_file/Ordinance/ORD%20Cap.%2071%20Forest%20LawNet%202022.pdf

International Regulation: The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

The Convention on International Trade in Endangered Species of Wild Fauna and Flora, or CITES, is an international agreement among states to regulate and prevent the trade of endangered species. CITES has over 184 member countries, including Malaysia, which have become parties, forming a global network committed to wildlife conservation. CITES is designed to protect wildlife threatened by international trade. It focuses on species at risk of extinction or those that may be affected by trade. CITES has 25 Articles, and the provisions related to the trade of wildlife are as follows:

Table 6: Provisions Related to Trade of Wildlife in CITES

Provisions	Description
Article II	Categories ‘species’ into ‘three appendices’ based on their conservation status: ‘Appendix I’ – ‘species facing the highest risk of extinction, and trade in these species is strictly regulated or prohibited’. ‘Appendix II’ – ‘species that may become endangered if trade is not controlled’. ‘Appendix III’ – ‘species protected in at least one country, which seeks cooperation from other parties to regulate their trade’.
Article III	‘All trade, import, and export of the ‘listed species’ must get approval or authorisation from the state's authority where the import or export is taking place’.
Article VIII	‘Parties to the convention can take necessary steps to enforce its provisions, including imposing penalties for violations and encouraging collaborative efforts among member countries to address wildlife crime’.
Article XIV	It outlines ‘the relationship between CITES and the domestic laws of the parties’, ‘emphasising that the convention's provisions do not affect the parties' right to adopt stricter measures to regulate trade in species covered by CITES’. The article highlights ‘the importance of collaboration between parties and relevant international institutions to ensure the effectiveness of CITES’.

(Source: Reorganize from the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES))

Implementation of CITES in Malaysia

Malaysia, one of the parties to the convention, has thoughtfully implemented the CITES provisions via the International Trade in Endangered Species Act 2008 (Act 686). The act outlines several offences related to the international trade of endangered species, including engaging in the illegal import, export, and re-export of endangered species, failure to comply with the provisions of the CITES, possession of endangered species without the required permits, failing to obtain the necessary permits for activities involving the international trade of endangered species, and participation in wildlife trafficking activities, including the sale and purchase of endangered species or their products

Furthermore, Malaysia has also enacted a few legislations to protect endangered species. In West Malaysia, Parliament passed the Wildlife Conservation Act 2010 to replace the previous Protection of Wildlife Act 1972, which was later amended into the Wildlife Conservation (Amendment) Act 2022. In Sarawak, the state enacted the Wildlife Protection Ordinance 1998, and the Wildlife Conservation (Amendment) Enactment 2016 was passed in Sabah.

By enacting these legislations, Malaysia demonstrates its commitment to fulfilling its obligations under CITES, contributing to global efforts to protect endangered species and curb the illicit wildlife trade. To combat the issue of wildlife trade, heavier punishment was imposed.

Table 7: Penalty of Fine for Offences Related to the Trade of Wildlife

Offences	International Trade in Endangered Species Act 2008	Wildlife Conservation (Amendment) Act 2022	Wildlife Protection Ordinance 1998 of Sarawak	Wildlife Conservation (Amendment) Enactment 2016 of Sabah
Import and export	<p>Section 10 Body corporate: A fine not exceeding two hundred thousand ringgit.</p> <p>Person: A fine not exceeding one hundred thousand ringgit.</p>	<p>Section 65 Protected wildlife or controlled wildlife: A fine not less than fifty thousand ringgit.</p> <p>Section 71 Totally protected wildlife: A fine of twenty thousand ringgit for each animal, and shall not exceed the aggregate of one million ringgit.</p>	<p>Section 31 A fine of two thousand ringgit or five times the sum value of the animals, whichever is greater.</p>	<p>Section 53 Species in Appendix I: a fine not less than fifty thousand ringgit.</p> <p>Species in Appendix II: a fine not less than thirty thousand ringgit.</p> <p>Species in Appendix III: a fine of not less than thirty thousand ringgit and not more than fifty thousand ringgit.</p>
Trading	<p>Section 12 Body corporate: A fine not exceeding two hundred thousand ringgit.</p> <p>Person: A fine not exceeding one hundred thousand ringgit.</p>	<p>Section 63 Body corporate: A fine not less than fifty thousand ringgit and not exceeding one hundred thousand ringgit.</p> <p>Person: A fine not less than thirty thousand ringgit and not more than one hundred</p>	<p>Section 33 Selling a protected animal: A fine of five thousand ringgit.</p> <p>Section 34 Purchasing of a protected animal: A fine of two thousand</p>	<p>Section 48 Trading: A fine of not less than five thousand ringgit and not more than fifty thousand ringgit.</p>

Possession	Section 12 Body corporate: A fine not exceeding two hundred thousand ringgit. Person: A fine not exceeding one hundred thousand ringgit.	thousand ringgit. Section 29 A fine of not less than fifty thousand ringgit and not more than one hundred thousand ringgit.	Section 37 Totally protected animals: A fine of twenty-five thousand ringgit per individual animal or part was found. Protected species: A fine of ten thousand ringgit per individual animal or part found. Other species: A fine of two thousand ringgit per individual animal or part found.	Section 41 Species in Appendix I: A fine not less than fifty thousand ringgit and not more than two hundred and fifty thousand ringgit. Species in Appendix II: A fine of not less than thirty thousand ringgit and not more than one hundred thousand ringgit. Species in Appendix III: A fine of not less than thirty thousand ringgit and not more than fifty thousand ringgit.
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(Source: Reorganize from International Trade in Endangered Species Act 2008, Wildlife Conservation (Amendment) Act 2022, Wildlife Protection Ordinance 1998 of Sarawak, Wildlife Conservation (Amendment) Enactment 2016 of Sabah)

Table 8: Penalty of Imprisonment for Offences Related to the Trade of Wildlife

Offences	International Trade in Endangered Species Act 2008	Wildlife Conservation (Amendment) Act 2022	Wildlife Protection Ordinance 1998 of Sarawak	Wildlife Conservation (Amendment) Enactment 2016 of Sabah
Import and export	Section 10 A person will be imprisoned for not exceeding seven years.	Section 65 Imprisonment not exceeding fifteen years for importing	Section 31 Imprisonment for one year.	Section 53 Species in Appendix I: Imprisonment

		protected wildlife or controlled wildlife.		between one to five years.
		Section 71 Imprisonment for a term not exceeding fifteen years for importing totally protected wildlife.		Species in Appendix II: Imprisonment between six months to five years.
				Species in Appendix III: Imprisonment up to three years.
Trading	Section 12 A person will be imprisoned for not exceeding seven years.	Section 63 A person shall be imprisoned not exceeding three years.	Section 33 Selling a protected animal shall be fine only.	Section 48 Any person who trades shall be imprisoned not exceeding three years.
			Section 34 Purchasing of a protected animal shall be fine only.	
Possession	Section 12 A person will be imprisoned for not exceeding seven years.	Section 29 imprisonment not exceeding ten years.	Section 37 For other totally protected animals, imprisonment is for two years.	Section 41 Species in Appendix I: Imprisonment not less than one year and not more than five years.
			For protected species: Imprisonment for one year.	Species in Appendix II: Imprisonment not less than six months and not more than five years.
			Other species: Imprisonment for one year.	Species in Appendix III: Imprisonment not more than three years.

(Source: Reorganize from International Trade in Endangered Species Act 2008, Wildlife Conservation (Amendment) Act 2022, Wildlife Protection Ordinance 1998 of Sarawak, Wildlife Conservation (Amendment) Enactment 2016 of Sabah)

The Court's Analysis of Wildlife-Related Cases

In legal adjudication, the examination and interpretation of cases related to wildlife are of the utmost importance. With our ecosystems confronting various challenges, the judiciary's role becomes crucial in addressing issues that impact the delicate balance of wildlife. Through its decisions, the court plays a significant role in environmental conservation.

Parties	The Facts of the Case	Decision by Court	Sources
<i>PP v. Nguyen Thi Huong</i> [2015] 2 CLJ 102	An accused person faced four charges of smuggling trophies of wild animals protected by the Wildlife Conservation Act 2010.	The High Court, on appeal, punished the first charge with 12 months imprisonment, the second with six months imprisonment and RM40,000 fine or four months imprisonment in default, the third with 18 months imprisonment, and the fourth with 18 months imprisonment and a fine of RM50,000 or five months imprisonment in default. All sentences are to run concurrently.	Current Law Journal (CLJ)
<i>Azmi Bin Ismail & Anor v. PP</i> [2019] 7 MLJ 45	The two appellants were charged with possession of the head and 19 parts of mountain goats under section 68(2)(c) of the Wildlife Conservation Act 2010 and found guilty by the court.	On appeal, the High Court reduced the fine to RM100,000 and, in failure, six months imprisonment but maintained the two-year imprisonment.	Malayan Law Journal (MLJ)
<i>PP v. Tran Van San</i> [2019] 10 CLJ 869	The accused was charged under the Wildlife Conservation Act 2010 for unlawful possession of various body parts of protected wild animals and was found to possess 273 wildlife parts illegally.	The accused was found guilty of all ten charges and sentenced to 19 years in prison and an RM850,000 fine.	Current Law Journal (CLJ)
<i>Tijelo Jacquinn Kuin v. PP</i>	The appellant was charged with possessing sun bear body parts under section 41(1) of the Wildlife	On appeal, the High Court dismissed the appellant's appeal and varied the sentence to 4 years	Current Law Journal (CLJ)

[2020] 4 CLJ 139	Protection Enactment 1997 and was found guilty and punished with two years imprisonment and a fine of RM50,000.	imprisonment and a fine of RM50,000 in default of 24 months imprisonment as a deterrent sentence.	
<i>Sarawak Forestry Corporation v. Rajiman</i> [2022] MLJU 2010	The accused was charged under section 37(2) of the Wildlife Protection Ordinance 1998 for possessing three Pangolins two thousand and seven hundred eighty-two pieces of Pangolin scales.	The accused was sentenced to 1 year in prison and a fine of RM27,850,000.00 following section 29(2) of the ordinance for individual animals and animal parts found in the accused's possession.	Malayan Law Journal (MLJ)
<i>PP v. Toh Tung Kit</i> [2023] 1 CLJ 633	The respondent was charged under Sarawak's Wildlife Protection Ordinance 1998 for possessing parts of wildlife and plants protected under the Ordinance.	The High Court, on appeal, sanctioned the accused with two years imprisonment and a fine of RM50,000 in default, plus six months in prison for each charge.	Current Law Journal (CLJ)
Teo Boon Ching	A Malaysian wildlife trafficker was charged in the United States for crimes related to wildlife trafficking and facilitating the movement of tonnes of animal parts.	The court sentenced the accused to 18 months of imprisonment.	Ramendran, C. (2023, September 26). <i>A blow to illegal wildlife trade</i> . The Star. https://www.thestar.com.my/news/nation/2023/09/27/a-blow-to-illegal-wildlife-trade

Concluding Remarks

Malaysia stands at a critical juncture in its efforts to conserve its rich biodiversity and combat illegal wildlife trade. The country's unique governance structure, where three distinct regions enforce wildlife legislation within their jurisdictions, presents both opportunities and challenges. While this decentralised approach allows for tailored conservation strategies at the regional level, it also highlights the need for greater coordination and harmonisation of laws and enforcement efforts on a national scale.

The court's ruling demonstrates Malaysia's commitment to enforcing wildlife protection laws. The severity of the punishments imposed by the courts varies according to the seriousness of the crimes. The cases show the range of wildlife offences punished in Malaysia, from

smuggling protected trophy animals to possessing various wildlife body parts illegally. The penalties imposed, which include fines and imprisonment terms varying from months to years, deter future violations and emphasise how crucial it is to protect the nation's biodiversity through stringent legal enforcement. Malaysia aims to convey a strong message about the seriousness of these violations and the necessity of protecting its natural variety through its judicial decisions. The legal actions show Malaysia's steadfast position against activities that jeopardise the integrity of its natural ecosystems and function as both punitive measures and deterrents. By upholding stringent conservation laws and imposing consequential penalties, Malaysia endeavours to preserve its ecological heritage for future generations, fostering a sustainable coexistence between humanity and the natural world.

Despite the complexity of Malaysia's legal framework for wildlife conservation, significant progress has been made in aligning domestic legislation with international agreements such as CITES. Malaysia's commitment to compliance with CITES is a testament to its dedication to global conservation efforts and recognition of the importance of international cooperation in addressing wildlife crime.

Moving forward, Malaysia must prioritise conservation goals, enhance inter-agency collaboration, and engage local communities as active participants in wildlife protection efforts. Strengthening enforcement capacity, promoting public awareness, and fostering sustainable livelihood alternatives are essential steps towards mitigating the threats posed by illegal wildlife trade and ensuring the long-term survival of Malaysia's natural heritage.

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