

## **WCS EU comments on the Interim Findings – EU Study on Positive List of Pets (24 July 2025)**

WCS EU appreciates the opportunity to provide feedback to inform the development of the EU Study on Positive List of Pets. WCS EU is a Belgian NGO supporting the conservation of landscapes and seascapes globally. Our response is also submitted on behalf of the Wildlife Conservation Society (WCS), the world's largest field-based conservation organization, with which we are affiliated. WCS has over 120 years of experience in conserving wildlife, landscapes, and natural resources. WCS's mission is to save wildlife and wild places worldwide through science, conservation action, education, and inspiring people to value nature. WCS works closely with government and civil society partners to counter wildlife trafficking in more than half of the 50+ countries where we operate, including major source, transit, and consumer countries across Asia, Africa, and Latin America.

We welcome the study, which presents a useful and thorough overview of the issues at hand, and would like to thank the authors. We fully support the idea of harmonized legislation on the pet trade across the EU, and of that including a positive listing of species for which trade is permitted.

We do have a number of concerns regarding several assumptions underlying the study, which we present here:

- (1) The impression given by the presentation in different places is that captive breeding alleviates pressure on wild populations. While this may be true in some specific contexts, it is not universally applicable or supported by scientific research, as captive breeding can also stimulate market demand, in some cases incentivize continued wildlife take from the wild, and can readily facilitate laundering of wild-caught animals as captive-bred.
- (2) The statement that "*over 50% of recorded trade in birds, amphibians, and ornamental fish are now from farmed sources (IPBES report, 2022, data not disaggregated, not exclusively for the trade in pets)*" can be misleading. While the study does acknowledge that the data is not disaggregated, it nevertheless explicitly references ornamental fish, a category that remains predominantly sourced from the wild. This could lead to a misunderstanding among policymakers—namely, the incorrect assumption that the majority of ornamental fish in trade are farmed (bred in captivity). In fact, a Systematic Review of the Ornamental Fish Trade (2020) found that 99% of marine ornamental fishes are wild-caught, primarily from coral reefs, with only 1% being captive-bred. Given the significant implications for policy and conservation, it is important that this point be clarified to avoid misinformed decision-making. Furthermore, there is a fundamental difference between claims that animals in trade are bred in captivity, and whether or not they are indeed captive-bred (and not from the wild and falsely claimed to be captive-bred, as is often the case).

- (3) The presentation refers on several occasions to the importance of "distinguishing ethical traders from illegal traders." This framing is problematic, as it conflates legality with ethical conduct. In reality, there is a clear distinction between legal and illegal trade; however, legality does not inherently equate to ethical practices. We recommend that the study avoid associating legal trade with *ethical* trade, as this could obscure legitimate concerns about the welfare, sustainability, and broader impacts of certain legal activities.
- (4) The presentation suggests that illegal trade inherently carries a higher risk of pathogen spillover. This is not necessarily supported by the available evidence, and the potential health risks associated with legal trade should not be underestimated. Even if the majority of live animals in trade, for example, are legally obtained, they may still pose a risk of pathogen spillover; the risk is related to handling and use practices in the trade, and not the legal status of a shipment or specimen.
- (5) Finally, it is commendable that the study distinguishes between biodiversity concerns and animal welfare. However, it groups health risks under welfare, whereas health—particularly pathogen spillover, zoonotic diseases, and biosecurity concerns—should be considered a distinct category.

In conclusion, we believe that addressing the issues outlined above would enhance the study's objectivity and ensure that its findings are interpreted within a more accurate and nuanced understanding of the pet trade landscape. The study presents several thoughtful and well-founded conclusions, and we commend the effort to engage with complex and often contentious issues. Once the final version of the study is published, we strongly encourage the European Commission to translate these findings into concrete policy action (i.e., developing a positive list)—guided by evidence, transparency, and precaution—to ensure effective pet trade regulation and meaningful progress on biodiversity conservation, public and animal health, and animal welfare.

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