

To: Commissioner Jessika Roswall, EU Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Cc: env-cites@ec.europa.eu

Brussels, 13 May 2025

OPEN LETTER

Re: Civil society's recommendations to Commissioner Jessika Roswall, EU Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Dear Commissioner,

On behalf of the undersigned wildlife conservation and animal protection organisations, we are writing to share our key recommendations for a successful Commission mandate for wildlife, biodiversity and people.

Considering the strong interlinkages between your work and that of the new Commissioner for Health and Animal Welfare regarding wildlife trade and trafficking issues, a letter has also been sent to Commissioner Várhelyi, calling for close collaboration between his services and yours on these issues. We look forward to collaborating closely with your team, and would warmly welcome the opportunity to meet with you at your earliest convenience to discuss our priorities in more detail.

The global scientific community has recognised the unprecedented biodiversity crisis affecting Europe and the wider world. Yet, action to address it remains woefully inadequate. As a result, nature continues to decline, as many as two million species may be at risk of extinction globally including one-in-five native European species¹, and the risk of future zoonotic disease outbreaks escalates^{2 3}. Transformative changes are urgently needed to halt and reverse biodiversity loss, combat climate change, and prevent future epidemics and pandemics.

The EU has a vital role to play, and you have a unique opportunity to elevate this role during your mandate, and to leave a lasting legacy in Europe and beyond.

During the course of your mandate, several important negotiations will take place at European and international levels that will shape our future relationship with the natural world, and the health consequences that follow. These include the 20th Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES CoP20), which regulates international trade in wildlife and is due to meet in Uzbekistan in November 2025; the 15th Conference of the Parties to the Convention on the Conservation of Migratory Species of Wild Animals (CMS CoP15); and the 17th Conference of the Parties to the Convention on Biological Diversity (CBD CoP17), both scheduled for 2026.

In parallel, a global agreement on pandemic prevention, preparedness and response, negotiated under the auspices of the World Health Organisation, will be presented for adoption to the World Health Assembly in May 2025, and the Council of Europe will finalise its Convention to Protect the Environment through Criminal Law.

At the European level, decision-makers will negotiate the revision of the EU Regulation on the Protection of Animals during Transport and related operations. Member States will also finalise the transposition of the new EU Environmental Crime Directive and publish their national strategies on combating environmental criminal offences. In addition, the next Multiannual Financial Framework will be negotiated and adopted, setting the EU's budget dedicated to biodiversity conservation in the post-2027 period.

¹ <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0293083>

² Bedenham et al. 2022. The importance of biodiversity risks: Link to zoonotic diseases. British Actuarial Journal Volume 27 , 2022 , e10, DOI: <https://doi.org/10.1017/S1357321722000058>

³ IPBES (2020) Workshop Report on Biodiversity and Pandemics of the Intergovernmental Platform on Biodiversity and Ecosystem Services. IPBES secretariat, Bonn, Germany, [DOI:10.5281/zenodo.4147317](https://zenodo.org/record/4147317)

The appointment of a Commissioner for Health and Animal Welfare alongside your appointment as Commissioner for the Environment sends an encouraging signal about the Commission's commitment to addressing the interlinked challenges of biodiversity loss, public health, and animal welfare. It reflects a promising move toward a truly integrated *One Health–One Welfare* approach.

In this context, we urge you to work in close coordination with Commissioner Várhelyi, and prioritise actions to address the threats posed by wildlife trade and trafficking to biodiversity, animal welfare and public health. Your leadership in your respective domains will be essential to drive the urgently needed transformative changes to our relationship with nature – for the benefit of animals, ecosystems, and people alike.

We also call on you to support civil society initiatives that contribute to advancing these shared goals.

Below, we have highlighted key priorities for the coming months that could greatly benefit from your continued support and engagement.

1. Minimising the risks from wildlife trade and putting nature on the path to recovery

The global and poorly regulated wildlife trade presents serious threats to animal welfare, wildlife conservation and public health. Legal activities can provide pathways for traffickers to launder illegal wildlife products and stimulate the demand for wildlife. The Covid-19 pandemic also underscored the health risks associated with the trade in and consumption of wild animals. In this context, the **application of the precautionary principle**, which is enshrined in EU Treaties, is essential across all areas of legislation and policy relating to wildlife and biodiversity.

- **An EU-wide positive list system:** In response to strong support expressed by the Agriculture and Fisheries Council and European Parliament in 2022⁴ ⁵, the Commission undertook a study to examine the feasibility of an **EU-wide positive list system. The findings of this study will be presented in July 2025.** We urge you to consider these findings carefully, and to instigate the development of a legislative proposal that will help reduce the animal welfare harms, while addressing risks to health, safety and conservation associated with the trade in and keeping of wild animals as pets, and facilitating enforcement of EU law by the relevant authorities.
- **A pandemics agreement that prioritises prevention:** An international agreement, which aims to improve global pandemic prevention, preparedness and response, has been negotiated under the auspices of the World Health Organisation and is due to be adopted at the World Health Assembly in May 2025. We urge the Commission to encourage all EU Member States to sign and ratify the agreement without delay, and to prioritise its full implementation, in particular of Articles 4 and 5 which relate to the prevention of pathogen emergence at source and the adoption and operationalisation of a One Health approach. To this end, we urge the European Union and its Member States to prioritise the identification and elimination, or at least the strict regulation, of those activities involving wild animals that present a high risk of potentially zoonotic pathogen emergence and spillover, including the legal and illegal commercial trade in live wild animals for food and breeding purposes, particularly mammals and birds, and to consider the permanent closure of the sections of food markets that sell these animals. We also call on you to continue to work closely with the World Health Organisation (WHO), its Member States, and the quadripartite organisations of which the WHO is a part, to further develop provisions relating to the Pandemics Agreement in order to assist all Member States in their implementation of the Agreement.

⁴ 19 EU Member States supported the position paper on a new EU legislative framework for an EU Positive List for the keeping of companion animals (on behalf of Cyprus, Lithuania, Luxembourg and Malta, 16 May 2022, 9127/22), as presented at the Agriculture and Fisheries Council meeting of 24 May 2022. Available at:

<https://data.consilium.europa.eu/doc/document/ST-9127-2022-INIT/x/pdf>

⁵ European Parliament resolution of 5 October 2022 on the EU strategic objectives for the 19th meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), to be held in Panama from 14 to 25 November 2022 [2022]. Available at:

https://www.europarl.europa.eu/doceo/document/TA-9-2022-0344_EN.html

- **One Health - One Welfare principles:** Risks to human and animal health from wildlife trade should be addressed through the adoption of One Health - One Welfare principles across the EU and their incorporation into all relevant EU legislation and policy, including those related to public health and food safety, and across all relevant international agreements. We urge you to actively promote the adoption of these principles and their translation into concrete actions at both EU and global levels.

2. Strengthening the EU's efforts to tackle wildlife crime

Wildlife trafficking is one of the most profitable and rapidly growing criminal activities globally, often driven by organised criminal networks. Despite the significant risks to animal welfare, wildlife conservation, public health and security, it continues to be seen by criminals as a low-risk, high-reward activity, including in **the EU which serves as both a major destination market and transit hub for illegally traded wildlife**. This is partly due to gaps and loopholes in the EU's wildlife legislation, which significantly undermine its ability to address the issue.

We urge you to foster a close collaboration between your services and those of Commissioner Várhelyi to ensure that tackling illegal, unsustainable and unsafe wildlife trade is prioritised and addressed through coordinated and effective action.

- **The EU Action Plan Against Wildlife Trafficking (WAP):** We broadly support the measures outlined in the revised WAP published in 2022. Nevertheless, the previous version was poorly implemented and, thus far, progress towards effectively implementing its successor is unclear. We urge you to support and promote the robust implementation and monitoring of the new WAP by EU institutions and Member States, the allocation of sufficient resources at both EU and Member State levels, and effective cross-border cooperation.
- **EU trade in species sourced illegally in their country of origin:** Many threatened species that are legally protected in their native countries are not protected against international trade, either by domestic legislation in destination countries, or by CITES. As a result, traffickers can freely trade them within the EU once they are smuggled out of their native countries, leading to population declines as well as animal welfare, public health and security risks intrinsic to the illegal wildlife trade. We welcome the Commission's initiation of a study to explore new tools to address this issue and urge you to ensure that this is promptly translated into effective legislative and policy action to criminalise the trade in illegally sourced wildlife.
- **A Global Agreement to tackle Wildlife Trafficking:** Strong common tools are urgently needed to address the scale and growing pace of international wildlife trafficking. The Resolution on Enhancing Measures to Prevent and Combat Crimes that Affect the Environment, adopted at the 12th Conference of the Parties to the UN Convention against Transnational Organised Crime (UNTOC) in October 2024, provides momentum for the adoption of a Global Agreement on tackling environmental crime in the form of an additional protocol or protocols to the UNTOC. We call on you to encourage the implementation of the Resolution and the development, adoption and implementation of such an agreement with a strong focus on tackling wildlife trafficking. The need for a global agreement on environmental crime already enjoys the support of both the European Parliament and the European Commission - the former in its Resolution of 5 October 2022 on the EU's strategic objectives for the 19th meeting of the Conference of the Parties to CITES, and the latter through the revised EU Action Plan against Wildlife Trafficking, which backs the development of a specific protocol on wildlife trafficking. Equally importantly, several biodiversity-rich countries outside the EU have also expressed strong support.⁶
- **Protecting the Environment through Criminal Law:** Combating environmental crimes effectively requires deterrent sanctions, harmonised rules, and better intra- and inter-state cooperation. These principles are central to the revised EU Environmental Crime Directive adopted last year, and the Council of Europe's Convention on the Protection of the Environment through Criminal Law, expected to be finalised this year. We urge you to support the comprehensive and ambitious transposition and implementation of the Directive by Member States, and the ratification and application of the Convention by as many Countries as possible.

⁶ Report of the UNODC Secretariat to the 33rd session of the CCPCJ (May 2024) '*Strengthening the international legal framework for international cooperation to prevent and combat illicit trafficking in wildlife*': <https://docs.un.org/en/E/CN.15/2024/14>

3. Dedicating adequate funding to global nature protection

Addressing these global and regional challenges effectively requires bold and strategic action. The EU must significantly increase its investment in external action to protect biodiversity under the next Multiannual Financial Framework. Demonstrating genuine global ambition means recognising nature's essential role in sustaining communities, economies, and climate resilience, and committing at least 50% of external funding to climate and biodiversity-related issues, with 15% dedicated exclusively to biodiversity objectives.

We thank you in advance for considering our concerns and recommendations. We would appreciate the opportunity to meet with you to discuss these issues, and look forward to your response.

Please do not hesitate to contact us should you require any clarification or additional information.

Yours sincerely,

Devrol Dupigny – Head of Public Policy, **Animal Advocacy and Protection (AAP)**

Sophie Evers – Co-Founder, **Biodiversity Action Europe**

Dr Mark Jones – Head of Policy, **Born Free Foundation**

Georgina Lamb – CEO, **David Shepherd Wildlife Foundation**

Debbie Banks – Campaign Leader (Tigers and Wildlife Crime), **Environmental Investigation Agency (EIA)**

Nicholas Clark – Wild Animals Programme Leader, **Eurogroup for Animals**

Lindsey Harris – Head of Wildlife Trade, **Fauna & Flora**

Vera Weber – President, **Fondation Franz Weber**

Ana Motamayor – Policy Advisor, **Global Initiative to End Wildlife Crime**

Dr Joanna Swabe – Senior Director of Public Affairs, **Humane World for Animals**

Ilaria Di Silvestre – Director of Policy and Advocacy-Europe, **International Fund for Animal Welfare (IFAW)**

Dr. Robbert Boudewijns – Institute Coordinator, **Leuven One Health**

Dr Jamie McCallum – Director UK and EU, **Peace Parks Foundation**

Daniela Freyer – Head of Policy, **Pro Wildlife**

Katie Hunter – Intergovernmental Advisor, **Whale and Dolphin Conservation**

Dr Janice Weatherley-Singh – Director, **Wildlife Conservation Society EU Office (WCS EU)**

Correspondent: Elodie Cantaloube, EU Policy Officer, Born Free Foundation: elodie@bornfree.org.uk

