

Evaluation and revision of the EU Action Plan against Wildlife Trafficking

Fields marked with * are mandatory.

Introduction

Illegal wildlife trade (IWT) – also referred to as “wildlife trafficking” – is the illegal trade in wild animals and plants, their parts and derived products which are sought for many different uses, including as food and medicinal products, for timber, textiles, leather and other luxury goods, or as pets and decorative plants. IWT severely harms biodiversity, leading to the decline and potential extinction of some species due to unsustainable extraction from the wild. It also negatively impacts sustainable development of local communities, as it limits their use of natural resources (e.g. use of timber resources, medicinal plants) or other forms of economic development, such as nature-based tourism (e.g. for big mammals and birds).

While many people think of IWT as being an issue only in Africa and Asia, Europe also has an important role to play in the fight against trafficking of certain species, as a destination market and with regard to trafficking in transit to other regions. Some species native to EU Member States (e.g. European eel) are also exported illegally to other parts of the world.

IWT is widely considered to be one of the largest black markets worldwide, comparable to and involving some of the same actors as other forms of organised criminal activity, such as arms smuggling, drug trafficking and human trafficking. The profits were estimated to be worth between EUR 8 billion and EUR 20 billion globally in 2016. Criminals often consider it as a relatively low-risk activity.

In 2016, the European Commission set out a strategy to fight illegal wildlife trade, within the EU as well as at global level, in the Communication on an EU Action Plan against Wildlife Trafficking. The Action Plan has three priorities:

- Preventing wildlife trafficking and addressing its root causes;
- Implementing and enforcing existing rules and fighting organised wildlife crime more effectively;

- and Strengthening the global partnership of source, consumer and transit countries against wildlife trafficking.

Each priority has four objectives pursued by one or more specific actions (in total 32).

Additional information can be found at:

https://ec.europa.eu/environment/cites/trafficking_en.htm

The European Commission is now evaluating the EU Action Plan against Wildlife Trafficking. This evaluation will prepare the ground for a revision of the Action Plan.

This public consultation invites citizens and organisations to provide evidence and give views on the effectiveness, efficiency, coherence, relevance and EU added value of the EU Action Plan against Wildlife Trafficking. The results of the consultation (which will be summarised and published) will inform the evaluation and revision of the Action Plan

Guidance on the questionnaire

This public consultation has three parts:

- The first part ("About you") includes some introductory questions on your profile;
- Part II targets the general public. You do not need any specialist knowledge to reply to questions in this part.
- Part III aims mainly at experts but other interested respondents are also welcome to provide their answers.

Please note that you are not obliged to respond to all questions in the questionnaire.

At the end of the questionnaire, you are invited to provide any additional comments and to upload additional information, position papers or policy briefs that express the position or views of yourself or your organisation.

The results of the questionnaire and the accompanying position papers and policy briefs will be published online. Please read the specific privacy statement informing on how the European Commission will deal with personal data and contributions.

Fields marked with * are mandatory.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen

- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Arnaud

* Surname

Goessens

* Email (this won't be published)

agoessens@wcs.org

* Organisation name

255 character(s) maximum

WCS EU

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

054662633848-40

* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Åland Islands
- Djibouti
- Dominica
- Libya
- Liechtenstein
- Saint Martin
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- | | | | |
|--|----------------------------------|---|--|
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena
Ascension and
Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

If you are responding to questions from the perspective of a country where you have lived or worked but which is not your country of origin, please indicate the country and your relationship to it here:

WCS EU is a Belgian NGO affiliated with the Wildlife Conservation Society (WCS), a global NGO working to deliver wildlife conservation programmes in over 60 countries, in Africa, Asia, the Pacific and the Americas, and works with government partners on initiatives to address wildlife trafficking around the world. WCS EU draws upon WCS's global field expertise and experience in formulating EU policy recommendations. We are thus responding to these questions mainly from an EU perspective.

If you are giving your contribution as an individual or as the representative of an organisation, please indicate the economic sector, if any, you are active in:

- A - Agriculture, forestry and fishing
- B - Mining and quarrying
- C - Manufacturing
- D - Electricity, gas, steam and air conditioning supply

- E - Water supply; sewerage, waste management and remediation activities
- F - Construction
- G - Wholesale and retail trade; repair of motor vehicles and motorcycles
- H - Transportation and storage
- I - Accommodation and food service activities
- J - Information and communication
- K - Financial and insurance activities
- L - Real estate activities
- M - Professional, scientific and technical activities
- N - Administrative and support service activities
- O - Public administration and defence; compulsory social security
- P - Education
- Q - Human health and social work activities
- R - Arts, entertainment and recreation
- S - Other service activities
- T - Activities of households as employers; undifferentiated goods- and services-producing activities of households for own use
- U - Activities of extraterritorial organisations and bodies

If you are giving your contribution as a civil society organisation or a public administration, please indicate your main area of focus or your area of competence:

Conservation of Wildlife and Wild Places

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Part II (general public)

1. Are you aware of any actions against wildlife trafficking that have been implemented in your country in the following areas? Multiple choices are possible. If 'Yes', please specify in the textbox below

	Yes	No
1.1 Awareness raising (e.g. newspaper, radio and TV campaigns, exhibits, hand-outs, social media posts)	<input checked="" type="radio"/>	<input type="radio"/>
1.2 Community engagement (e.g. involving rural communities in law enforcement efforts, generating incentives for community-based conservation; involving communities in decision-making, recognising and supporting community rights to manage and benefit from wildlife, reducing conflict between communities and wildlife in order to reduce support to poaching, responding to community concerns)	<input checked="" type="radio"/>	<input type="radio"/>
1.3 Capacity building and training of authorities and institutions for effective law enforcement and prosecution of wildlife crimes	<input checked="" type="radio"/>	<input type="radio"/>
1.4 Strengthening compliance with legislation and improving enforcement (e.g. regular checks at border-crossing points and on traders and holders such as pet shops, breeders and nurseries)	<input type="radio"/>	<input checked="" type="radio"/>

1.5 Strengthening cooperation between EU Member States (e.g. joint operations carried out by several EU Member States across borders)	<input checked="" type="radio"/>	<input type="radio"/>
1.6 Strengthening cooperation between source, transit and consumer countries	<input checked="" type="radio"/>	<input type="radio"/>
1.7 Strengthening cooperation between public authorities and business sectors	<input checked="" type="radio"/>	<input type="radio"/>
1.8 Enacting legislation (e.g. organised wildlife trafficking treated as a serious crime)	<input type="radio"/>	<input checked="" type="radio"/>
1.9 Improving knowledge and monitoring of wildlife trafficking (e.g. compilation and provision of relevant qualitative and statistical data)	<input type="radio"/>	<input checked="" type="radio"/>
1.10 Raising the profile and political importance of fighting wildlife trafficking (e.g. national authorities discuss wildlife trafficking in bilateral meetings with other international – e.g., United Nations agencies – and national authorities)	<input checked="" type="radio"/>	<input type="radio"/>
1.11 Other	<input type="radio"/>	<input type="radio"/>

1.1 Please provide further information:

WCS EU and other NGOs regularly communicated on wildlife trafficking issues on social media and published numerous news releases and op-eds. Several events and exhibits on wildlife trafficking have been organized at the European Parliament, in collaboration with NGOs and with the participation of EU officials. In May 2018, the Belgian government launched an awareness campaign on the illegal ivory trade “Get out your teeth”. In 2019, the Belgian Biodiversity Platform organized a conference “Dead or Alive: Towards a Sustainable Wildlife Trade”.

1.2 Please provide further information:

WCS EU is a Belgian NGO affiliated with the Wildlife Conservation Society (WCS), a global NGO working to deliver wildlife conservation programmes in over 60 countries, in Africa, Asia, the Pacific and the Americas. WCS works closely with government partners on initiatives to combat wildlife trafficking around the world and is implementing, among others, flagship EU-funded projects aiming to tackle the illegal wildlife trade in Mozambique, Latin America, and the Mekong region in Asia. The examples below are only a subset of all of the work of WCS on countering wildlife trafficking and highlight three specific programmes (outside of the EU) with EU funding and support.

The project "Disrupting Illicit Supply Chains of Wildlife in the Niassa Special Reserve through Law Enforcement and Community Engagement" implemented in Mozambique by WCS and FFI and funded by the EU, aims to reduce community-based threats to wildlife and other natural resources, enhance conservation of elephants, lions, leopards, African wild dogs, pangolin and Miombo woodlands, and improve governance of wildlife and other products. (<https://clubofmozambique.com/news/the-eu-signs-a-project-with-wcs-to-prevent-illicit-supply-chains-of-wildlife-in-niassa-special-reserve-178021>)

The Alliance for Wildlife and Forests is a regional action funded by the EU and implemented by WCS (and WWF on illegal timber trade aspects), aiming at enhancing civil society engagement to strengthen law enforcement and cooperation with and among authorities in Bolivia, Ecuador, Colombia, Peru and the two tri-border areas with Brazil, to combat wildlife and timber trafficking. (<https://brussels.wcs.org/Our-Work/Wildlife-Trafficking/Alliance-for-Wildlife-and-Forests>)

The Partners Against Wildlife Crime is an EU-funded action implemented through a consortium of 12 international and national partner organizations led by WCS, aiming at disrupting illicit supply chains from source to market for tiger, Asian elephant, Siamese rosewood, and freshwater turtles in the Greater Mekong region, Malaysia and China by leveraging civil society partnerships to increase the effectiveness of Government action. (<https://brussels.wcs.org/Our-Work/Wildlife-Trafficking/Partners-against-Wildlife-Crime>)

1.3 Please provide further information:

WCS EU is a Belgian NGO affiliated with the Wildlife Conservation Society (WCS), a global NGO working to deliver wildlife conservation programmes in over 60 countries, in Africa, Asia, the Pacific and the Americas. WCS works closely with government partners on initiatives to combat wildlife trafficking around the world and is implementing, among others, flagship EU-funded projects aiming to tackle the illegal wildlife trade in Mozambique, Latin America, and the Mekong region in Asia. The examples below are only a subset of all of the work of WCS on countering wildlife trafficking and highlight three specific programmes (outside of the EU) with EU funding and support.

The project "Disrupting Illicit Supply Chains of Wildlife in the Niassa Special Reserve through Law Enforcement and Community Engagement" implemented in Mozambique by WCS and FFI and funded by the EU, aims to reduce community-based threats to wildlife and other natural resources, enhance conservation of elephants, lions, leopards, African wild dogs, pangolin and Miombo woodlands, and improve governance of wildlife and other products. (<https://clubofmozambique.com/news/the-eu-signs-a-project-with-wcs-to-prevent-illicit-supply-chains-of-wildlife-in-niassa-special-reserve-178021>)

The Alliance for Wildlife and Forests is a regional action funded by the EU and implemented by WCS (and WWF on illegal timber trade aspects), aiming at enhancing civil society engagement to strengthen law enforcement and cooperation with and among authorities in Bolivia, Ecuador, Colombia, Peru and the two tri-border areas with Brazil, to combat wildlife and timber trafficking. (<https://brussels.wcs.org/Our-Work/Wildlife-Trafficking/Alliance-for-Wildlife-and-Forests>)

The Partners Against Wildlife Crime is an EU-funded action implemented through a consortium of 12 international and national partner organizations led by WCS, aiming at disrupting illicit supply chains from source to market for tiger, Asian elephant, Siamese rosewood, and freshwater turtles in the Greater Mekong region, Malaysia and China by leveraging civil society partnerships to increase the effectiveness of Government action. (<https://brussels.wcs.org/Our-Work/Wildlife-Trafficking/Partners-against-Wildlife-Crime>)

1.5 Please provide further information:

An international operation "Operation Thunderstorm " against the illegal trade in wildlife and timber led to hundreds of seizures in the EU and worldwide.

1.6 Please provide further information:

Overall, the EU and its Member States increased efforts to cooperate with third countries (including source, transit and consumer countries) on countering wildlife trafficking.

1.7 Please provide further information:

The Partners Against Wildlife Crime is an EU-funded action implemented through a consortium of 12 international and national partner organizations led by WCS, aiming at disrupting illicit supply chains from source to market for tiger, Asian elephant, Siamese rosewood, and freshwater turtles in the Greater Mekong region, Malaysia and China by leveraging civil society partnerships to increase the effectiveness of Government action. The Partners Against Wildlife Crime project develops partnerships with private businesses that provide information for the transport, e-commerce and banking sector to prevent known wildlife criminals from using their services. It strengthens the capacity and engagement of online companies to regulate their platforms (i.e. social media, second-hand trading platforms and online auction houses) and enhance exchange of intelligence and information with enforcement agencies to detect, interdict and prevent wildlife cybercrimes. The project also supports the management of a mechanism to enable the transport sector to receive timely information about the transport of suspected illegal wildlife and their products, including methods of transportation, key routes, ports and other locations. The mechanism structures incoming information and generates intelligence and alerts on emerging threats, crime trends and priorities.

1.10 Please provide further information:

The 2016 Hanoi Conference was the third international Conference on Illegal Wildlife Trade, following the London Conference in 2014 and the Kasane Conference in 2015. In 2018, the UK Government hosted the 4th Illegal Wildlife Trade Conference in London. WCS and partners helped organize the First High-Level Conference on Illegal Wildlife Trade in the Americas, which was hosted by the Government of Peru on Oct. 3 and 4, 2019, and led to the “Lima Declaration” – a uniting call to fight against illegal wildlife trade as a serious crime. In addition, building on two earlier United Nation’s General Assembly (UNGA) resolutions adopted in 2015 and 2016 and with the support from the EU and its Member States, the UNGA adopted its third resolution on illegal wildlife trade in September 2017, the most comprehensive on the issue so far. Tackling wildlife trafficking also received high visibility and political attention at the European Development Days held in Brussels in June 2021.

2. Please select five initiatives (by ticking the relevant boxes) from the list below that you would consider particularly effective.

at most 5 choice(s)

- 2.1 Awareness raising in high-demand countries
- 2.2 Awareness raising in source countries
- 2.3 Community engagement in source countries
- 2.4 Financial support to local communities in source countries
- 2.5 Capacity building and training for EU Member States authorities and institutions
- 2.6 Capacity building and training for non-EU countries authorities and institutions
- 2.7 Improving compliance with legislation and enforcement in the EU
- 2.8 Improving cooperation and information sharing between EU Member States
- 2.9 Improving cooperation and information sharing between EU and non-EU countries
- 2.10 Strengthening international agreements on wildlife trade
- 2.11 Strengthening EU legislation on wildlife trade
- 2.12 Strengthening national legislation on wildlife trade in EU Member States

- 2.13 Strengthening national legislation on wildlife trade in non-EU countries
- 2.14 Improving knowledge and monitoring of illegal wildlife trade in the EU and elsewhere
- 2.15 Raising the profile and political importance of fighting wildlife trafficking
- 2.16 Other

2.17 If other, please specify:

Initiatives focusing on science-based behavior change are needed in source and consumer countries (rather than awareness-raising).

Also, action 2.6 (capacity building and training for non-EU countries authorities and institutions) is important.

3. The Action Plan addresses a range of different actors who have a role to play in the fight against wildlife trafficking. In your opinion, are the following actors currently doing too much, enough, or not enough to tackle wildlife trafficking?

	Doing too much	Doing enough	Not doing enough	I don't know
3.1 Intergovernmental organisations (e.g. the United Nations, INTERPOL)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.2 European Union authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.3 National governments of EU Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.4 Local or regional authorities of EU Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
3.5 Judiciaries of EU Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.6 National customs authorities of EU Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.7 Other enforcement authorities of EU Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.8 National governments of non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.9 Judiciaries of non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.10 National customs authorities of non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3.11 Other enforcement authorities of non-EU countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.12 Hunting associations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.13 Business associations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.14 Banks and investors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.15 Traditional Chinese medicine practitioners	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.16 Wildlife traders including pet shops, breeders and nurseries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.17 Luxury industry companies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.18 Musical instruments manufacturers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.19 Hunting tourism providers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.20 Transport providers (e.g. airlines)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.21 Courier companies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.22 Online marketplaces	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.23 Other businesses	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.24 Non-governmental organisations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.25 Research and academia	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
3.26 Consumer organisations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
3.27 Individual consumers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3.28 If other businesses, please specify:

4. Please use the box below to provide ideas on additional actions, to point to other issues relevant to wildlife trafficking or to provide any other relevant information.

WCS EU welcomes the opportunity to provide ideas on additional actions and to point to other issues relevant to wildlife trafficking. We strongly support the evaluation and revision of the EU Action Plan against Wildlife Trafficking and commends the European Commission and the Member States for their leadership and for their achievements in implementing the Action Plan. However, much more needs and should be done.

The EU must treat wildlife (and forest) crimes as a form of serious transnational organized crime and advocate for more than political commitments, but rather more tangible demonstration of increased commitment such as (i) increased resources and legal powers allocated to the agencies mandated to reduce wildlife trafficking, or enhanced integrity measures to prevent corruption and more performance-based incentives to frontline officers. The EU needs to treat wildlife and forest crimes as serious crimes both within the EU, by revising existing legislation, as well as externally through its diplomatic and assistance programmes.

We also encourage the EU to work with other Parties to UNTOC to develop a fourth protocol on wildlife and forest crime to define specific actions Parties should take to counter wildlife trafficking and ensure it receives specific attention under the UNTOC Review Mechanism. The EU should also support and further efforts by the Financial Action Task Force (FATF) to recognize wildlife trafficking as a high-risk area for money laundering and integrate responses to FATF mutual evaluations of member states and non-EU Member States.

While we welcome the recent EU steps on further restricting its domestic ivory market, we note that most restrictions are embedded in a guidance document that isn't legally binding. We therefore urge EU Member States to thoroughly fulfill these recommendations and to amend their national legislation accordingly to ensure the guidance is fully and effectively implemented. We also call on the European Commission to closely and regularly monitor their implementation in the months and years to come, and implement additional and stricter rules (including the adoption of de minimis provisions), as deemed necessary.

Despite the recognition in the EU Biodiversity Strategy to 2030 of the need "to reduce wildlife trade and consumption", recent communications from the European Commission appear to have shifted in focus and only mention the need to combat the illegal wildlife trade to prevent outbreaks of diseases of zoonotic origin. Whilst we very much welcome the commitment to renewing the EU Action Plan against Wildlife Trafficking, which is critically needed to address the illegal wildlife trade - this should not be developed and implemented in lieu of meaningful, evidence-based efforts, aligned with a One Health approach to prevent the next zoonotic spillover, epidemic, or pandemic. See attached the WCS Policy on Preventing Epidemics and Pandemics of Zoonotic Origin: The role of Wild Meat Markets and Wildlife Trade.

We call on the EU and its Member States to step up data collection efforts on illegal imports of wild meat into the EU (as requested in the Council of the EU's Conclusions on Biodiversity - the need for urgent action / <https://data.consilium.europa.eu/doc/document/ST-11829-2020-INIT/en/pdf>) in order to support a coordinated EU response to this biodiversity and public health risk.

There is a need to take regulatory measures to ensure that non-CITES-listed wildlife unlawfully taken from the wild in non-EU countries cannot be traded in the EU.

We welcome the current leadership shown by DG INTPA and its interest to support initiatives to tackle wildlife trafficking issues. However, to be fully effective this needs significantly increased long-term EU financial support (e.g. by being integrated within EU development assistance to improve security in third countries as wildlife crime is often linked to other crimes and security issues). EU funding needs to be allocated to implement the recommendations of the 'Larger than' studies and the findings of the study on security and wildlife trafficking.

We commend the EU and its Member States for their leadership and efforts to implement CITES decisions and resolutions. In particular, WCS welcomes the fact that, for the first time in its more than 40 year history and thanks to the EU, CITES is finally starting to grapple with the scourge of corruption. We urge the EU to continue increasing its leadership in these international fora, especially at the next CITES CoP (CoP19) to be held in Panama in November 2022, at upcoming meetings of the UN Convention Against Corruption, and

at upcoming High-Level Conferences on Illegal Wildlife Trade.

Last but not least, there is a need to increase the resources and staff capacity of the EU Wildlife Trade team at DG Environment to ensure the proper implementation of the EU Wildlife Trade Regulations.

Part III Expert section

Part III is mainly for experts and specialised public, but all types of respondents are welcome to respond to any question in this part. It includes questions on the effectiveness, efficiency, coherence, relevance and value added of the EU Action Plan against Wildlife Trafficking and questions on what could be done in the future to further fight illegal wildlife trade.

5. As a first priority, the EU Action Plan against Wildlife Trafficking aims at **preventing wildlife causes**. In this regard, to what extent do you agree with the following statements?

	Completely agree	Somewhat agree	Neither agree nor disagree
5.1 The authorities of my country have taken adequate actions and provided adequate financial support to reduce demand for illegal wildlife products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.2 The authorities of the EU have taken adequate actions and provided adequate financial support to reduce demand for illegal wildlife products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.3 Existing awareness-raising tools and materials have been shared among the EU Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.4 The EU has proposed the listing of additional endangered species in the three Appendices to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (which grant different levels of protection to species)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.5 The authorities of my country have provided adequate financial support to sustainable economic activities benefiting rural communities living in or near wildlife habitats (EU or non-EU)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.6 The authorities of my country have supported existing private-led initiatives and private-public partnerships to curb the illegal wildlife trade and encourage sustainable sourcing of wildlife products in /from the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5.7 The authorities of my country have systematically discussed how to better fight the corruption associated with wildlife trafficking with key source countries, including those receiving financial support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
--	-----------------------	-----------------------	-----------------------	-----------------------	-----------------------	----------------------------------

6. As a second priority, the EU Action Plan against Wildlife Trafficking aims at **making implementation and enforcement of existing rules and the fight against organised wildlife crime more effective**. In this regard, to what extent do you agree with the following statements?

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know / not applicable
6.1 The authorities of my country (applicable only for EU countries) have received and implemented European Commission recommendations on how to address the shortcomings in implementing the EU wildlife trade regulations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6.2 The authorities of my country have ensured the monitoring and enforcement of compliance not only at the borders but also within the country, in particular through regular checks on traders and holders such as pet shops, breeders and nurseries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
6.3 The authorities of my country have improved national monitoring and enforcement of the rules to eliminate the illegal killing, trapping and trade of birds	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

6.4 The authorities of my country have defined national enforcement priorities for target species and products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
6.5 The authorities of my country have set up Joint Investigation Teams with Europol and/or Eurojust	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6.6 The authorities of my country have put in place a coordination mechanism (such as an inter-agency task force and/or Memorandum of Understanding) between the relevant agencies (customs, inspection services, police, CITES management and enforcement authorities) and all the authorities with responsibility in this area have access to the relevant communication channels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
6.7 The authorities of my country have established and supported national and/or regional practitioner networks (e.g. of environmental agencies, public prosecutors or judges) to improve cooperation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
6.8 In my country there are adequate facilities for temporary care of seized or confiscated live specimens, and mechanisms are in place for long-term rehoming, where necessary	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

6.9 The authorities of my country have organised training for investigators on illicit financial flows related to wildlife trafficking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
6.10 The authorities of my country have reviewed and, where necessary, amended, relevant national legislation to ensure that organised wildlife trafficking constitutes a serious crime	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
6.11 The authorities of my country have reviewed and, where necessary, amended, relevant national legislation on money laundering to ensure that offences connected to wildlife trafficking are covered	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

7. As a third and final priority, the EU Action Plan against Wildlife Trafficking aims at **strengthening the global partnership of source, transit and consumer countries against wildlife trafficking**. In this regard, to what extent do you agree with the following statements?

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know / not applicable
7.1 The authorities of my country have received EU financial support against wildlife trafficking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
7.2 The authorities of my country publish regular reports and/or indicators on how EU financial support to the fight against wildlife trafficking has been used	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
7.3 The authorities of my country have set up focal points in delegations and embassies in key source, transit and/or consumer countries to strengthen partnerships with those countries against wildlife trafficking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

8. Please complete the following sentences by ticking the relevant boxes:

"As a result of the EU Action Plan against Wildlife Trafficking, **in my country...**"

	Significantly increased	Increased	Stayed the same	Decreased	Significantly decreased	I don't know / not applicable
8.1 ... the demand for illegal wildlife products has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
8.2 ...the supply of illegal wildlife products has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
8.3 ...the engagement of rural communities and the benefits they get from wildlife conservation have...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
8.4 ...the engagement of the business sector in fighting wildlife trafficking and encouraging sustainable sourcing of wildlife products has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
8.5 ...corruption associated with wildlife trafficking has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
8.6 ...the capacity of all parts of the enforcement chain and the judiciary to fight wildlife trafficking has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

8.7 ...the effectiveness of the fight against organised wildlife crime has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
8.8 ...the support to developing countries has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
8.9 ...the coordination of the actions against wildlife trafficking and its root causes with other (source, transit or consumer) countries has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
8.10 ...the effectiveness of the initiatives addressing the security dimension of wildlife trafficking (e.g. links between wildlife trafficking and other forms of organised crime and financing for militias or terrorist groups) has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

9. Please complete the following sentences by ticking the relevant boxes:

"Since the adoption of the EU Action Plan against Wildlife Trafficking, in **the European Union...**"

	Significantly increased	Increased	Stayed the same	Decreased	Significantly decreased	I don't know / not applicable
9.1 ...the demand for illegal wildlife products has...	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9.2 ...the supply of illegal wildlife products has...	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9.3 ...the engagement of the business sector in efforts to fight wildlife trafficking and encourage sustainable sourcing of wildlife products has...	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9.4 ...corruption associated with wildlife trafficking has...	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9.5 ...the EU Member State implementation of EU rules on the wildlife trade has...	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9.6 ...the capacity to fight wildlife trafficking of all parts of the enforcement chain and the judiciary has...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9.7 ...the effectiveness of the fight against organised wildlife crime has...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9.8 ...international cooperation specifically on enforcement against wildlife trafficking has...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9.9 ...the support from the EU and its Member States to developing countries has...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
9.10 ...the effectiveness of initiatives addressing the security dimension of wildlife trafficking has...	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. Please complete the following sentences by ticking the relevant boxes:

'Since the adoption of the EU Action Plan against Wildlife Trafficking, **non-EU countries and globally...**'

	Significantly increased	Increased	Stayed the same	Decreased	Significantly decreased	I don't know / not applicable
10.1 ...the demand for illegal wildlife products has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
10.2 ...the supply of illegal wildlife products has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
10.3 ...the engagement of rural communities in source countries and the benefits they get from wildlife conservation have...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
10.4 ...the engagement of the business sector in efforts to fight wildlife trafficking and encourage sustainable sourcing of wildlife products has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
10.5 ...corruption associated with wildlife trafficking has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
10.6 ...the capacity to fight wildlife trafficking of all parts of the enforcement chain and the judiciary has...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10.7 ...the effectiveness of the fight against organised wildlife crime has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
10.8 ...international cooperation specifically on enforcement against wildlife trafficking has...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10.9 ...the coordination of EU and Member State actions against wildlife trafficking and its root causes with relevant source, transit and market countries has...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
10.10 ...the effectiveness of initiatives addressing the security dimension of wildlife trafficking has...	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
10.11 ...the effectiveness of multilateral efforts to fight wildlife trafficking has...	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11. To what extent do you agree with the following statements?

In February 2017, the Commission published a [table](#) on the state of play in the implementation of the Action Plan. In October 2018, the Commission adopted a [progress report](#) on the implementation of the Action Plan. The report is accompanied by a [document](#) containing an overview of measures taken to achieve the objectives of the Action Plan. Individual EU countries provided [contributions](#) to the report. The monitoring and reporting practices to document the progress in implementing the EU Action Plan against Wildlife Trafficking were...

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know / not applicable
11.1 ...useful to detect, in a timely manner, the uneven implementation of the Action Plan across the EU Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
11.2 ...useful to detect problems in the implementation and enforcement of specific actions, and therefore to adopt follow-up actions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
11.3 ...useful to track the contribution of the specific actions of the EU Action Plan to achieving its overall objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
11.4 ...burdensome for the competent authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

12. How could the monitoring and reporting of progress towards the implementation of the actions of a future EU Action Plan against Wildlife Trafficking be improved? Multiple choices are possible.

- 12.1 Use common reporting standards and templates
- 12.2 Automate check of data quality and completeness
- 12.3 Provide guidance on how to collect data, in order to save resources and increase coherence of results
- 12.4 Set measurable targets and indicators on implementation (e.g. number of measures adopted by priority area), impacts (changes observed in the achievement of the plan's objectives) and compliance with existing rules and their enforcement (i.e. extent of compliance by businesses, measurements taken, inspections carried out, court cases pursued)
- 12.5 Collect and provide contextual information (e.g. main aggregates such as surface of protected areas, surface of non-protected wilderness, size of the legal wildlife trade, and behavioural patterns such as e-commerce share of total retail sales)
- 12.6 Set reporting requirements for all entities named responsible (*see below*) in the EU Action Plan against Wildlife Trafficking
- 12.7 No improvement is needed
- 12.8 Other

** Entities named responsible include:*

- The European Commission*
- The High Representative of the Union for Foreign Affairs & Security Policy / Vice president of the European Commission*
- Member State competent authorities*
- Europol*
- Eurojust*
- European Network of Prosecutors for the Environment*

12.9 If other, please specify:

13. Were the objectives of the 2016 EU Action Plan against Wildlife Trafficking appropriate to the need of tackling wildlife trafficking?

	Fully appropriate	Somewhat appropriate	Neither appropriate nor inappropriate	Somewhat inappropriate	Fully inappropriate	I don't know / not applicable
13.1 Priority 1 - Preventing wildlife trafficking and addressing its root causes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.2 Reduce the demand for illegal wildlife products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.3 Reduce the supply of illegal wildlife products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.4 Ensure that rural communities in source countries are engaged in and benefit from wildlife conservation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.5 Increase business sector engagement in efforts to fight wildlife trafficking and encourage sustainable sourcing of wildlife products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.6 Tackle corruption associated with wildlife trafficking	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13.7 Priority 2 - Making implementation and enforcement of existing rules and the fight against organised wildlife crime more effective	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.8 Ensure more even implementation of EU rules on the wildlife trade and develop a more strategic approach to checks and the enforcement of rules against wildlife trafficking at EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.9 Increase capacity to fight wildlife trafficking of all parts of the enforcement chain and the judiciary	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.10 Fight organised wildlife crime more effectively	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.11 Improve international cooperation on enforcement against wildlife trafficking	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.12 Priority 3 - Strengthening the global partnership of source, consumer and transit countries against wildlife trafficking	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13.13 Provide increased, more effective and more strategically focused support to developing countries	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.14 Strengthen and coordinate better action against wildlife trafficking and its root causes with relevant source, transit and market countries	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.15 Address the security dimension of wildlife trafficking	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
13.16 Strengthen multilateral efforts to fight wildlife trafficking	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

14. Was there any particular issue that should have been but was not considered at the time of developing the EU Action Plan against Wildlife Trafficking and for which no objective was set? Please explain.

While we welcome the latest EU moves to further restrict its domestic ivory market, the majority of the new restrictions are rooted in a guidance document that isn't legally binding. We therefore urge EU Member States to thoroughly fulfill these recommendations, and to amend their national legislation accordingly to ensure the guidance is fully and effectively implemented. We also call on the European Commission to thoroughly and periodically review the guidance's implementation and adopt additional and stricter rules, including de minimis provisions, as necessary.

We call on the EU and its Member States to step up data collection efforts on illegal imports of wild meat into the EU (as requested in the Council of the EU's Conclusions on Biodiversity - the need for urgent action in October 2020 / <https://data.consilium.europa.eu/doc/document/ST-11829-2020-INIT/en/pdf>) in order to support a coordinated EU response to this biodiversity and public health risk.

There is a need to take regulatory measures to ensure that non-CITES-listed wildlife unlawfully taken from the wild in non-EU countries cannot be traded in the EU.

Despite the recognition in the EU Biodiversity Strategy to 2030 of the need "to reduce wildlife trade and consumption", recent communications from the European Commission appear to have shifted in focus and only mention the need to combat the illegal wildlife trade to prevent outbreaks of diseases of zoonotic origin. Whilst we very much welcome the commitment to renewing the EU Action Plan against Wildlife Trafficking, which is critically needed to address the illegal wildlife trade - this should not be developed and implemented in lieu of meaningful, evidence-based efforts, aligned with a One Health approach to prevent the next zoonotic spillover, epidemic, or pandemic. Not all is known of the time, place and mechanism of the COVID-19 spill-over but decision-making must be based on the best available science and the precautionary principle. There is clearly no evidence that the risk of pathogen spillover is exclusively related to illegally obtained animals; a virus is indifferent to whether an animal in a market was obtained legally or not. To have a meaningful impact on significant reduction of the risk of future pandemics of zoonotic origin, all efforts must be made to prevent the pathogen spillover in the first place. The EU must promote and assist the global community in ending the commercial trade and sale in markets of wildlife for human consumption, particularly birds and mammals. Merely improving the regulation of this trade or closing a few markets, will not prevent a future pandemic of zoonotic origin. Only the closure of commercial markets in live and freshly slaughtered animals for human consumption, and the trade (domestic and international) that provides animals to these markets, will significantly help achieve this goal (whilst recognizing that controls on wildlife farms/captive breeding facilities, for all purposes, is also critical). On 1st December 2021, the World Health Assembly agreed to initiate a process to form an international pandemic treaty, an idea initially launched by EU Council President Charles Michel. Such a new treaty must focus on pandemic prevention at source, not solely on preparedness.

Need to increase the resources and staff capacity of the EU Wildlife Trade team at DG Environment, to ensure the proper coordination and implementation of the EU Wildlife Trade Regulations.

15. Is there still a need to...

	Yes	No
15.1 Reduce the demand for illegal wildlife products	<input checked="" type="radio"/>	<input type="radio"/>

15.2 Reduce the supply of illegal wildlife products	<input checked="" type="radio"/>	<input type="radio"/>
15.3 Ensure that rural communities in source countries are engaged in and benefit from wildlife conservation	<input checked="" type="radio"/>	<input type="radio"/>
15.4 Increase business sector engagement in efforts to fight wildlife trafficking and encourage sustainable sourcing of wildlife products	<input checked="" type="radio"/>	<input type="radio"/>
15.5 Tackle corruption associated with wildlife trafficking	<input checked="" type="radio"/>	<input type="radio"/>
15.6 Ensure more even implementation of EU rules on the wildlife trade and develop a more strategic approach to checks and the enforcement of rules against wildlife trafficking at EU level	<input checked="" type="radio"/>	<input type="radio"/>
15.7 Increase capacity to fight wildlife trafficking of all parts of the enforcement chain and the judiciary	<input checked="" type="radio"/>	<input type="radio"/>
15.8 Fight organised wildlife crime more effectively	<input checked="" type="radio"/>	<input type="radio"/>
15.9 Improve international cooperation on enforcement against wildlife trafficking	<input checked="" type="radio"/>	<input type="radio"/>
15.10 Provide increased, more effective and more strategically focused support to developing countries	<input checked="" type="radio"/>	<input type="radio"/>
15.11 Strengthen and coordinate better action against wildlife trafficking and its root causes with relevant source, transit and market countries	<input checked="" type="radio"/>	<input type="radio"/>
15.12 Address the security dimension of wildlife trafficking	<input checked="" type="radio"/>	<input type="radio"/>
15.13 Strengthen multilateral efforts to fight wildlife trafficking	<input checked="" type="radio"/>	<input type="radio"/>

16. Are there new issues or technological/scientific developments that have arisen since 2016 and that would require setting new objectives and corresponding actions in a new policy /plan?

The EU must treat wildlife (and forest) crimes as a form of serious transnational organized crime and advocate for more than political commitments, but rather more tangible demonstration of increased commitment such as (i) increased resources and legal powers allocated to the agencies mandated to reduce wildlife trafficking, or enhanced integrity measures to prevent corruption and more performance-based incentives to frontline officers. The EU needs to treat wildlife and forest crimes as serious crimes both within the EU, by revising existing legislation, as well as externally through its diplomatic and assistance programmes.

We also encourage the EU to work with other Parties to UNTOC to consider developing a fourth protocol on wildlife and forest crime to define specific actions Parties should take to counter wildlife trafficking and ensure it receives specific attention under the UNTOC Review Mechanism. The EU should also support and further efforts by the Financial Action Task Force (FATF) to recognize wildlife trafficking as a high-risk area for money laundering and integrate responses to FATF mutual evaluations of member states and non-EU Member States.

The Commission must ensure that both illegal and legal (but often unsustainable) wildlife trade are systematically dealt with as a matter of course in all EU Free Trade Agreements (FTAs) and not just some of them. We urge the Commission to include relevant provisions on transparency, anti-corruption, sharing of information on investigations into wildlife trafficking, cooperation, and enforcement measures in every future EU FTA. We also believe that non-compliance issues should be associated with consequences, whether through trade or other sanctions, as it encourages partners/States to comply more fully with Trade and Sustainable Development provisions. We expect the Commission to prioritise the discussion on Sustainable Development chapters in FTAs.

Despite the recognition in the EU Biodiversity Strategy to 2030 of the need “to reduce wildlife trade and consumption”, recent communications from the European Commission appear to have shifted in focus and only mention the need to combat the illegal wildlife trade to prevent outbreaks of diseases of zoonotic origin. Whilst we very much welcome the commitment to renewing the EU Action Plan against Wildlife Trafficking, which is critically needed to address the illegal wildlife trade - this should not be developed and implemented in lieu of meaningful, evidence-based efforts, aligned with a One Health approach, to prevent the next zoonotic spillover, epidemic, or pandemic. There is clearly no evidence that the risk of pathogen spillover is exclusively related to illegally obtained animals; a virus is indifferent to whether an animal in a market was obtained legally or not.

We call on the EU and its Member States to step up data collection efforts on illegal imports of wild meat into the EU (as requested in the Council of the EU's Conclusions on Biodiversity - the need for urgent action in October 2020 / <https://data.consilium.europa.eu/doc/document/ST-11829-2020-INIT/en/pdf>) in order to support a coordinated EU response to this biodiversity and public health risk.

We welcome the current leadership shown by DG INTPA and its interest to support initiatives to tackle wildlife trafficking issues. However, to be fully effective this needs significantly increased long-term EU financial support (e.g. by being integrated within EU development assistance to improve security in third countries as wildlife crime is often linked to other crimes and security issues). EU funding needs to be allocated to implement the recommendations of the ‘Larger than’ studies and the findings of the study on security and wildlife trafficking.

There is a need to increase the resources and staff capacity of the EU Wildlife Trade team at DG Environment to ensure the proper coordination and implementation of the EU Wildlife Trade Regulations.

17. The following statements capture some more specific views on how well the Action Plan has served its purpose or what could have been done differently. To what extent do you agree with these statements?

	Completely agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Completely disagree	I don't know / not applicable
17.1 The benefits of increased wildlife protection derived from the EU Action Plan against Wildlife Trafficking have outweighed the costs of implementation and enforcement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
17.2 The EU Action Plan against Wildlife Trafficking was fit for responding to new and emerging issues and challenges	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
17.3 The EU Action Plan against Wildlife Trafficking has brought better results than what could have been achieved by the uncoordinated action of individual EU Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
17.4 More actions of the EU Action Plan against Wildlife Trafficking should have been implemented at EU level rather than national level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>17.5 A focus on organised crime may have overlooked opportunistic traders and legally registered companies involved in trafficking</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>17.6 The EU Action Plan against Wildlife Trafficking draws disproportionate attention to the illegal trade of wildlife products that are associated with non-European species, like ivory, compared to European species which may be threatened by illegal trade</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>17.7 The different levels of implementation of the EU Action Plan against Wildlife Trafficking across EU Member States and, where applicable, non-EU countries have resulted in criminal activities shifting towards countries with lower implementation and enforcement levels</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<p>17.8 The EU Action Plan continues to provide a comprehensive means of tackling wildlife trafficking while facilitating legal trade</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

18. Do you expect the EU Action Plan against Wildlife Trafficking to have any long-lasting effects? Please explain.

We strongly support this key initiative to combat wildlife trafficking and commend the European Commission and the Member States for their leadership and for their first achievements in implementing the Action Plan. If such Action Plan is fully implemented it will have a significant positive impact on reducing wildlife trafficking globally.

Regarding the section above (box 17.8), "facilitating legal trade" should not be part of an EU Action Plan against Wildlife Trafficking; it's a different issue that should be dealt with separately.

19. Does the EU Action Plan against Wildlife Trafficking have synergies with the following policies?

- 19.1 EU Action Plan on Forest Law Enforcement, Governance and Trade (FLEGT)
- 19.2 EU Regulation to prevent, deter and eliminate illegal, unreported and unregulated fishing (IUU)
- 19.3 EU Animal Health Law
- 19.4 EU initiatives against trafficking in waste
- 19.5 EU initiatives against trafficking in drugs
- 19.6 EU initiatives against trafficking in counterfeit goods
- 19.7 EU initiatives against trafficking in firearms
- 19.8 EU initiatives against trafficking human beings
- 19.9 EU initiatives against money laundering and illicit financial flows
- 19.10 Other

19.11 If other, please specify:

EU initiatives to prevent future pandemics of zoonotic origin, particularly focused on prevention at source

20. Does the EU Action Plan against Wildlife Trafficking have overlaps/duplications, inconsistencies, or contradictions with the following policies?

- 20.1 EU Action Plan on Forest Law Enforcement, Governance and Trade (FLEGT)
- 20.2 EU Regulation to prevent, deter and eliminate illegal, unreported and unregulated fishing (IUU)
- 20.3 EU Animal Health Law
- 20.4 EU initiatives against trafficking in waste
- 20.5 EU initiatives against trafficking in drugs
- 20.6 EU initiatives against trafficking in counterfeit goods

- 20.7 EU initiatives against trafficking in firearms
- 20.8 EU initiatives against trafficking human beings
- 20.9 EU initiatives against money laundering and illicit financial flows
- 20.10 Other

20.11 If other, please specify:

21 In your opinion, are there stakeholder groups that disproportionately bear the costs of the implementation of the EU Action Plan against Wildlife Trafficking? If any, what are these groups? Multiple choices are possible.

- 21.1 Intergovernmental organisations (e.g. the United Nations, INTERPOL)
- 21.2 European Union authorities
- 21.3 National authorities of EU Member States
- 21.4 Local or regional authorities of EU Member States
- 21.5 National authorities of non-EU countries
- 21.6 Hunting associations
- 21.7 Business associations
- 21.8 Banks and investors
- 21.9 Traditional Chinese medicine practitioners
- 21.10 Wildlife traders including pet shops, breeders and nurseries
- 21.11 Luxury industry companies
- 21.12 Musical instruments manufacturers
- 21.13 Hunting tourism providers
- 21.14 Transport providers (e.g. airlines)
- 21.15 Courier companies
- 21.16 Online marketplaces
- 21.17 Other businesses
- 21.18 Non-governmental organisations
- 21.19 Research and academia
- 21.20 Consumer organisations
- 21.21 Individual consumers
- 21.22 No groups bear costs disproportionately

21.23 If other businesses, please specify:



22. In your opinion, how effective would the following actions for tackling wildlife trafficking be?

	Very effective	Somewhat effective	Neither effective nor ineffective	Completely ineffective	Somewhat ineffective	I don't know / not applicable
22.1 Increase the focus on consumer behaviour change, both in EU and non-EU countries	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.2 Increase the human and financial resources dedicated to strengthening engagement of rural communities in the management and conservation of wildlife and support livelihoods, including in source countries within the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.3 Support non-consumptive conservation approaches as alternatives to trophy hunting, like photo tourism or payment for ecosystems services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.4 Coordinate anti-corruption efforts between the EU Member States and non-EU countries when tackling illegal wildlife trafficking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.5 Increase the focus on anti-money laundering efforts at the EU Member State level when tackling IWT	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

22.6 Take regulatory measures to ensure that non-CITES-listed wildlife unlawfully taken from the wild in non-EU countries cannot be traded in the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.7 Implement at the EU level CITES CoP Resolution Conf. 12.10 on Registration of operations that breed Appendix-I animal species in captivity for commercial purposes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.8 Promote sustainable use and trade of species listed in Appendix II of CITES	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.9 Address the keeping and sale of specific CITES-listed exotic pet species that are threatened with extinction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
22.10 Review the allocation of human and financial resources at EU level to implement a new Action Plan against Wildlife Trafficking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.11 Promote the allocation of appropriate human and financial resources by the EU Member States, according to their specific situations (e.g. whether they are source and/or transit and/or import countries)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.12 Develop EU guidance on the seizure, transport and funding for the long-term care of seized/rescued wildlife	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

22.13 Increase the focus on fighting the illegal trade of European species and associated products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
22.14 Better monitor and prosecute online wildlife trafficking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.15 Develop a risk-based system to prioritise inspection of flights to/from specific countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.16 Improve training of in detecting illegal trade of species	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.17 Improve training of maritime and sea-port enforcement agencies in detecting wildlife trafficking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.18 Develop and deploy artificial intelligence to help detect wildlife trafficking	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.19 Categorise wildlife trafficking as a serious crime (on the same level as human trafficking and drug trafficking) in national criminal law	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
22.20 Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

23. Please select the EU and non-EU countries which should be the focus of additional efforts to reduce the *demand* for illegal wildlife products. Multiple choices are possible.

Afghanistan

Åland Islands

Albania

Algeria

American Samoa

Andorra

Angola

Anguilla

Antarctica

Antigua and Barbuda

Argentina

Armenia

Aruba

Australia

Austria

Azerbaijan

Bahamas

Bahrain

Bangladesh

Barbados

Belarus

Belgium

Belize

Benin

Bermuda

Bhutan

Bolivia

Bonaire Saint Eustatius and Saba

Bosnia and Herzegovina

Botswana

Bouvet Island

Brazil

British Indian Ocean Territory
British Virgin Islands
Brunei
Bulgaria
Burkina Faso
Burundi
Cambodia
Cameroon
Canada
Cape Verde
Cayman Islands
Central African Republic
Chad
Chile
 China
Christmas Island
Clipperton
Cocos (Keeling) Islands
 Colombia
Comoros
Congo
Cook Islands
Costa Rica
Côte d'Ivoire
Croatia
Cuba
Curaçao
Cyprus
Czechia
Democratic Republic of the Congo
Denmark
Djibouti
Dominica
Dominican Republic

- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras

Hong Kong
Hungary
Iceland
India
 Indonesia
Iran
Iraq
Ireland
Isle of Man
Israel
Italy
Jamaica
Japan
Jersey
Jordan
Kazakhstan
Kenya
Kiribati
Kosovo
Kuwait
Kyrgyzstan
Laos
Latvia
Lebanon
Lesotho
Liberia
Libya
Liechtenstein
Lithuania
Luxembourg
Macau
Madagascar
Malawi
Malaysia

Maldives
Mali
Malta
Marshall Islands
Martinique
Mauritania
Mauritius
Mayotte
 Mexico
Micronesia
Moldova
Monaco
Mongolia
Montenegro
Montserrat
Morocco
 Mozambique
Myanmar /Burma
Namibia
Nauru
Nepal
Netherlands
New Caledonia
New Zealand
Nicaragua
Niger
Nigeria
Niue
Norfolk Island
Northern Mariana Islands
North Korea
North Macedonia
Norway
Oman

Pakistan
Palau
Palestine
Panama
Papua New Guinea
Paraguay
 Peru
Philippines
Pitcairn Islands
Poland
Portugal
Puerto Rico
Qatar
Réunion
Romania
Russia
Rwanda
Saint Barthélemy
Saint Helena Ascension and Tristan da Cunha
Saint Kitts and Nevis
Saint Lucia
Saint Martin
Saint Pierre and Miquelon
Saint Vincent and the Grenadines
Samoa
San Marino
São Tomé and Príncipe
Saudi Arabia
Senegal
Serbia
Seychelles
Sierra Leone
 Singapore
Sint Maarten

Slovakia
Slovenia
Solomon Islands
Somalia
South Africa
South Georgia and the South Sandwich Islands
South Korea
South Sudan
Spain
Sri Lanka
Sudan
Suriname
Svalbard and Jan Mayen
Sweden
Switzerland
Syria
Taiwan
Tajikistan
Tanzania
 Thailand
The Gambia
Timor-Leste
Togo
Tokelau
Tonga
Trinidad and Tobago
Tunisia
Turkey
Turkmenistan
Turks and Caicos Islands
Tuvalu
Uganda
Ukraine
United Arab Emirates

United Kingdom
United States
United States Minor Outlying Islands
Uruguay
US Virgin Islands
Uzbekistan
Vanuatu
Vatican City
Venezuela
 Vietnam
Wallis and Futuna
Western Sahara
Yemen
Zambia
Zimbabwe

24. Please use the box below to provide ideas on additional actions, to point to other issues relevant to the evaluation of the EU Action Plan against Wildlife Trafficking or its future revision.

The EU must treat wildlife (and forest) crimes as a form of serious transnational organized crime and advocate for more than political commitments, but rather more tangible demonstration of increased commitment such as (i) increased resources and legal powers allocated to the agencies mandated to reduce wildlife trafficking, or enhanced integrity measures to prevent corruption and more performance-based incentives to frontline officers. The EU needs to treat wildlife and forest crimes as serious crimes both within the EU, by revising existing legislation, as well as externally through its diplomatic and assistance programmes.

We also encourage the EU to work with other Parties to UNTOC to develop a fourth protocol on wildlife and forest crime to define specific actions Parties should take to counter wildlife trafficking and ensure it receives specific attention under the UNTOC Review Mechanism. The EU should also support and further efforts by the Financial Action Task Force (FATF) to recognize wildlife trafficking as a high-risk area for money laundering and integrate responses to FATF mutual evaluations of member states and non-EU Member States.

There is a need to significantly increase long-term EU financial support (e.g. by being integrated within EU development assistance to improve security in third countries as wildlife crime is often linked to other crimes and security issues). EU funding needs to be allocated to implement the recommendations of the 'Larger than' studies and the findings of the study on security and wildlife trafficking.

We call on the EU and its Member States to step up data collection efforts on illegal imports of wild meat into the EU (as requested in the Council of the EU's Conclusions on Biodiversity - the need for urgent action in October 2020 / <https://data.consilium.europa.eu/doc/document/ST-11829-2020-INIT/en/pdf>) in order to

support a coordinated EU response to this biodiversity and public health risk.

There is a need to take regulatory measures to ensure that non-CITES-listed wildlife unlawfully taken from the wild in non-EU countries cannot be traded in the EU.

Despite the recognition in the EU Biodiversity Strategy to 2030 of the need “to reduce wildlife trade and consumption”, recent communications from the European Commission appear to have shifted in focus and only mention the need to combat the illegal wildlife trade to prevent outbreaks of diseases of zoonotic origin. Whilst we very much welcome the commitment to renewing the EU Action Plan against Wildlife Trafficking, which is critically needed to address the illegal wildlife trade - this should not be developed and implemented in lieu of meaningful, evidence-based efforts, aligned with a One Health approach to prevent the next zoonotic spillover, epidemic, or pandemic. Not all is known of the time, place and mechanism of the COVID-19 spill-over but decision-making must be based on the best available science and the precautionary principle. There is clearly no evidence that the risk of pathogen spillover is exclusively related to illegally obtained animals; a virus is indifferent to whether an animal in a market was obtained legally or not. To have a meaningful impact on significant reduction of the risk of future pandemics of zoonotic origin, all efforts must be made to prevent the pathogen spillover in the first place. The EU must promote and assist the global community in ending the commercial trade and sale in markets of wildlife for human consumption, particularly birds and mammals. Merely improving the regulation of this trade or closing a few markets, will not prevent a future pandemic of zoonotic origin. Only the closure of commercial markets in live and freshly slaughtered animals for human consumption, and the trade (domestic and international) that provides animals to these markets, will significantly help achieve this goal (whilst recognizing that controls on wildlife farms/captive breeding facilities, for all purposes, is also critical). On 1st December 2021, the World Health Assembly agreed to initiate a process to form an international pandemic treaty, an idea initially launched by EU Council President Charles Michel. Such a new treaty must focus on pandemic prevention at source, not solely on preparedness.

Need to increase the resources and staff capacity of the EU Wildlife Trade team at DG Environment to ensure the proper coordination and implementation of the EU Wildlife Trade Regulations.

Please feel free to upload a relevant document, such as for example evidence supporting your replies or a position paper.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

8e0afff1-9282-44d5-b991-4eeba3985610

/Summary_of_WCS_policy_on_wild_meat_markets_wildlife_trade_and_zoonotic_2021_05_21_Final.pdf

779fc751-d719-423d-80d6-32eb37de47bf/WCS-EU_BD_Strategy.pdf

44b4b993-fe5c-45f7-abdc-b27cc94521a0/Wildlife_Conservation_Society._2019.

_WCS__the_Illegal_Wildlife_Trade.pdf

Contact

env-cites@ec.europa.eu