

Your Voice In Europe: ROADMAP feedback for Action Plan against Wildlife Trafficking

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Related document: Action Plan against Wildlife Trafficking

Feedback:

The Born Free Foundation would like to make the following comments on the Roadmap for the EU Action Plan against Wildlife Trafficking:

Context:

In relation to the links between wildlife trafficking and the funding of militia groups, we suggest referencing United Nations General Assembly Resolution 69/314 on tackling illicit trafficking in wildlife http://www.un.org/en/ga/search/view_doc.asp?symbol=A/RES/69/314; and the film 'Warlords of Ivory' which documents the results of a year-long investigation by National Geographic reporter Bryan Christy, and demonstrates that ivory trafficking funds the activities of terrorist groups in Africa. <http://channel.nationalgeographic.com/explorer/episodes/warlords-of-ivory/>

Issue:

We urge the Commission to recognise the widespread and highly significant impacts of wildlife trafficking on animal welfare, which is of great concern to many EU citizens, in addition to other identified impacts.

The increase in wildlife trafficking is also driven by increasing disposable income and the associated increase in demand for high-value products in many developed and developing countries.

Who is affected and how:

Please include animal welfare NGOs among the list of stakeholders.

Subsidiarity check:

Regulation 1143/2014 on Invasive Alien Species might be relevant, as well as Article 13 of the Treaty on the Functioning of the European Union which, inter alia, requires Member States to pay full regard to the welfare requirements of animals.

Option mapping:

Given the serious nature of wildlife trafficking, as recognised by the EU through its endorsement of the Declaration from the London Conference on the Illegal Wildlife Trade in February 2014; and given United Nations General Assembly Resolution 69/314 on tackling illicit trafficking in wildlife in which Member States are urged to make illicit trafficking in protected species of wild fauna and flora involving organized criminal groups a serious crime; the Born Free Foundation favours the introduction of a full and robust suite of measures in the EU Action Plan. In this regard, the need for the EU to ensure a level playing field among member States concerning sanctions for wildlife trafficking and to qualify wildlife trafficking involving organised criminal groups as a serious crime, punishable with a maximum sanction of at least four years' imprisonment, represent vital components. Therefore the Born Free Foundation urges the Commission to pursue Option 3.

However, recognising the need for decisive and urgent action (as also agreed in the Declaration from the London Conference on the Illegal Wildlife Trade), we urge the Commission to ensure that the development of legislative proposals included in Option 3 are not allowed to delay the implementation of other aspects of the Action Plan.

Should the Commission pursue its clear preference for Option 2, the Born Free Foundation recommends that the Action Plan includes a reference to the new EU Agenda for Security, with a strong recommendation that the legislative proposals contained within Option 3 be promoted in the anticipated review of EU policy and legislation against environmental crime in 2016.

Please find attached the Born Free Foundation's Recommendations for a European Commission Action Plan on Illegal Wildlife Trade.

Feedback file:

[EU Trade Report Recommendations 0415 v2.pdf](#)