

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

## **User's data:**

- Domain: Non governmental organisation
- Name: Federation of Associations for Hunting and Conservation of the EU (FACE)
- Email: [johan.svalby@face.eu](mailto:johan.svalby@face.eu)
- Country: Belgium
- Organisation: Federation of Associations for Hunting and Conservation of the EU (FACE)
- Headquarter: select
- Register: 75899541198-85
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## **Related document: Action Plan against Wildlife Trafficking**

## **Feedback:**

*FACE, representing 7 million European hunters, welcomes the Commission's initiative to adopt a more holistic and multidimensional approach against wildlife trafficking. For too long this issue has been thought of as the sole responsibility of law enforcement authorities, when in fact it should be a top priority for a greater number of actors in various fields who must act under a coordinated strategic guidance to effectively address this great threat to biodiversity and socio-economic development. Wildlife trafficking negatively affects hunting in mainly two ways: The demand and supply of illegal wildlife products drives unsustainable practices that result in the loss of wildlife. Second, the reputation of law-abiding hunters is often badly affected by the failure of media and policy makers to uphold a clear distinction between legal hunting, on the one hand, and illegal killing and trade in wildlife, on the other. Ultimately, such blurring – often deliberately facilitated by ideological anti-hunting groups – risks resulting in ill-advised decisions where lawful, instead of unlawful, nature users are being targeted and punished.*

*FACE therefore welcomes that the Commission highlights in its Roadmap that the legal sector operators are victims of illegal activities. The Commission also recognises the problem that the reputation of legal wildlife trade "is more and more in the public opinion equated to wildlife trafficking."*

*Further restrictions or complete bans on legal hunting do not offer a solution to the current wildlife trafficking crisis. Its causes are more complex, rooted in organised crime networks exploiting weakened socio-economic conditions, and insufficient protection of wildlife at local level. The Declaration from the London Conference on Illegal Wildlife Trade, states that the way forward should be achieved through concerted political leadership, community engagement and international cooperation over a sustained period, and urges greater research into understanding the problem, and how to the effectively combat it.*

*These insights are important to spell out and address. FACE consequently encourages the Commission, not only to ward off ill-advised proposals where lawful, instead of*

*unlawful, nature users are being unjustifiably targeted (e.g. by unnecessary and unproductive bureaucratic burdens risking to discourage their activities), but to actively ensure science-based and balanced awareness-raising activities that take duly account of the importance of sustainable wildlife use, including trophy hunting, as a well-documented tool for wildlife conservation. For example as recognised in the UN Convention on Biological Diversity, various resolution adopted by the Parties to CITES, Policy Statements and Guiding Principles of IUCN, etc.*

*Correct and unambiguous communications may also help avoiding inconsiderate policies by business operators, such as airlines, to introduce bans on trophy shipping, based on unscientific misconceptions about its conservation value. Such bans may otherwise have detrimental effects on conservation-based use programmes in range states.*

*Hunters originating from EU countries play a significant role in raising money to fund wildlife conservation programs worldwide. Their expenditure for licenses, services and special governmental fees provide much of the revenue used by wildlife management authorities in developing countries for conservation and anti-poaching programmes. Moreover, hunting is often the only incentive for local communities in remote and poor areas to correctly manage revenue generating wildlife.*

*It is important to engage with local communities as active partners in conservation, permitting them rights to manage and benefit from the wildlife with which they live, as highlighted by the International Symposium “Beyond enforcement: engaging communities in tackling wildlife crime”, 26-29 February 2015 in South Africa, led by IUCN’s Sustainable Use and Livelihoods (SULi) Specialist Group, along with IIED and other partners.*

*A pressing point in the Action Plan concerns the need for strengthening enforcement and fighting organised wildlife crime more effectively, for example through improving international cooperation on enforcement, setting up EU enforcement priorities, raising awareness and supporting training throughout the enforcement chain, and ensuring full implementation of related EU legislation, such as the Nature Directives. FACE supports these actions, and hunters are already active partners in such initiatives at European level, such as the Bern Convention’s Tunis Action Plan for the eradication of illegal killing, trapping and trade of wild birds.*

*The Commission proposes to strengthen and coordinate better action with relevant source, transit and market countries and regional organisations via more strategic use of diplomatic tools, the EU Delegations under the European External Action Service and using trade agreements.*

*While welcoming more coordination and the use of diplomatic tools, FACE thinks it is important to ensure that bilateral or any unilateral efforts respect the international mechanisms that are already available for wildlife trade, such as CITES, and especially not to fall back on stricter parallel competing structures, which would move away from the needed holistic and coordinated global response, and once more lead to the fragmentation that the Roadmap sets out to avoid. The guidance provided in the future EU Action Plan should focus on coordination and awareness-raising to maximise the impact of existing structures.*

*Finally, FACE welcomes the increase in EU development support against wildlife trafficking and the ambition to better coordinate with other donors. The recent funding initiative by DG DEVCO of the European Commission was already one important step in this direction.*

*FACE is looking forward to continue being a partner of the European institutions in the fight against wildlife crime and trafficking.*