

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

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IUCN response to the Roadmap on an EU Action Plan against wildlife trafficking

IUCN welcomes the opportunity to share its views on the Roadmap for an EU Action Plan against Wildlife Trafficking.

The Roadmap presents a holistic situation analysis and overview of actions at the EU level to date. In response to the three options that are given for the future EU Action Plan against Wildlife Trafficking, IUCN would like to make the following remarks in support of our preferred option(s).

Option mapping

IUCN recognizes the need for the approach and tools presented as a part of Option 2: 1) preventing wildlife trafficking, 2) strengthening enforcement and fighting organized wildlife crime more effectively as well as 3) building a global partnership against wildlife trafficking. IUCN commends and supports the EU on suggested leadership in this regard, for example through internal actions such as setting up EU strategic enforcement priorities against wildlife trafficking, ensuring full implementation and enforcement of existing EU legislation such as the EU Birds and Habitats Directives, and increasing EU efforts to tackle corruption associated with wildlife trafficking. IUCN also acknowledges the importance of the EU strengthening and developing partnerships to further this work, for example through working with the private / commercial sector, improving international cooperation on enforcement against wildlife trafficking, such as with relevant regional organizations, and stopping organized transnational criminal syndicates involved in the illicit trade of wildlife products and derivatives. Also important is the focus of the Roadmap on strengthening and better coordinating action against wildlife trafficking with relevant source, transit and market countries, raising awareness and supporting training throughout the entire enforcement chain and the judiciary as well as raising awareness of and reducing the demand for illegal wildlife products in general. Ultimately the success of the EU Action Plan will also be tied closely to cooperation with and support of range states with trafficked species, for example through the proposed support of wildlife management and anti-poaching activities and increased EU development support against wildlife trafficking.

In addition to the mechanisms presented in Option 2 which IUCN has already expressed its support for in its response to the public consultation preceding this Roadmap, completing this Action Plan with some amendments to EU legislation and other approaches such as implementing deterrent prison terms – as suggested in Option 3 – would ensure a more thorough and efficient response to the challenges presented by wildlife trafficking. However, it is of crucial importance that the launch of an EU Action Plan not be delayed by the assessment required for the tabling of new legislative proposals and related mechanisms, so we would encourage that these are dealt with on a different timeframe.

Additional considerations for implementation of the EU action plan

During IUCN's review of the Roadmap, a number of additional elements / considerations became apparent that we feel would further strengthen implementation of an EU Action Plan against Wildlife Trafficking, outlined below and organized according to the three objectives of Option 2:

1) Preventing wildlife trafficking

Increased focus and communication on the seriousness and scope of wildlife trafficking is important. In some cases demand reduction efforts (if culturally sensitive and targeted) may be a useful addition to efforts to reduce poaching.

Regarding “encourag(ing) sustainable sourcing of wildlife products by engaging with relevant business sectors”, sustainable use of wildlife is very important as it can allow communities as well as the private

sector to value and invest in wildlife, which can act to mitigate illegal wildlife trade, for example by providing the motivation to share intelligence for assisting law enforcement agencies.

Motivation for preventing illegal wildlife trafficking can be found in multi-lateral mechanisms such as CITES, focusing specifically on international trade, but also CBD. IUCN notes that according to 'Article 3: Principle' of the CBD: 'States have, in accordance with the Charter of the United Nations and the principles of international law, the sovereign right to exploit their own resources pursuant to their own environmental policies, and the responsibility to ensure that activities within their jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction'. The import and sale of illegally obtained goods is an important link in the wildlife crime supply chain so Article 3 provides a key motivation for CBD signatories to meet their obligations under the Convention in terms of 'not caus(ing) damage to the environment of other States or areas beyond the limits of national jurisdiction' in the form of illegally sourcing and trading wildlife.

2) Strengthening enforcement

In terms of working with range states experiencing poaching and wildlife trafficking of native species, experts in the IUCN Species Survival Commission (SSC) who are often nationals of these countries and / or living and working on species conservation there, emphasize that financial support and other resources will be a key need for increased law enforcement effort and other activities in many places. Similar to international drug trafficking, increased law enforcement at the level of local poachers is often not effective as these people are quickly replaced by others if caught. Instead, increased use of sophisticated intelligence and data analysis is also required to determine the structure of criminal networks and target higher levels within criminal organisations. Use of anti-money laundering provisions to seize money transfers and assets of criminals is needed as well. This will require sufficient resources and skilled analysts.

In order to tackle the scale of transnational organized poaching and trafficking by criminal syndicates, many SSC experts support wildlife trafficking being escalated, if not already, to a serious crime category, similar to drugs or human trafficking. Some countries have done this already such as South Africa, which regards rhino and elephant poaching as 'priority' crimes. Related to this, making poaching and illegal wildlife trade a part of existing enforcement officer mandates with appropriate 'in house training' can be far more effective than creating specialized units.

IUCN would encourage that if a country has enacted laws to protect a particular species or category of wildlife, and / or designates conservation zones or protected areas, and these laws are violated, that removal of wildlife in contravention of these laws becomes an illegal act in that country and no one in another country should profit from this. Related to this, it should be made evident in the Roadmap and accompanying documents which key agency in the EU will collect and administer (be the central repository) for information on illegally traded species (e.g. CITES, Interpol, etc.).

3) Building a global partnership against wildlife trafficking

Regarding a global partnership against wildlife trafficking, IUCN also offers its support and collaboration to the EU in terms of work we are doing with our own global network, with IUCN offices representing all continents and more than 130 Specialist Groups in the SSC, comprising more than 10,000 scientists and experts worldwide, alerting us of developing issues with poaching and wildlife trafficking. We are pleased to share our information in terms of species being affected, to what degree, actions on the ground and strategies / best practices for addressing trafficking activities (which can vary depending on species, trafficking mechanisms and countries involved).

Partnerships to address the root causes of wildlife trafficking will also be important, requiring action at all levels, from international to local. Lack of resources is also a serious obstacle to meaningful

achievements on the ground for wildlife conservation and IUCN believes that substantive and sustained funding will be essential to effectively combat illegal wildlife trafficking.

Cross-cutting considerations

Diversity of species

In addition to charismatic mammals that currently have the world's attention, an Action Plan on illegal wildlife trafficking should ensure inclusion of the full spectrum of taxonomic groups that are affected such as birds, reptiles, amphibians, fish, plants, invertebrates and others.

Links with other existing initiatives

It is important that linkages between this Roadmap and other EU actions and strategies such as the Larger than Elephants Wildlife Strategy are made to ensure alignment and platforms for joint action with other EU-funded efforts.

Also, it would be useful for the Roadmap and / or its sub-documents to clarify how the EU specifically plans to coordinate with other governments, agencies and NGOs within and outside Europe on illegal wildlife trafficking measures.

Communities

Across all proposed actions and activities focused on illegal wildlife trafficking, IUCN very much encourages an approach based on close collaboration with range states and local communities living alongside wildlife, with genuine partnerships and full engagement to develop and explore mutually agreed solutions and actions. Poverty, in many circumstances, is one of the drivers of illegal trade in an environment where there are little or no other alternative livelihoods (as acknowledged in the Roadmap document). For example, in some villages in Mozambique the prospect of increased income from illegal wildlife trafficking activities far outweighs the threat of arrest and imprisonment, driving some locals to become involved in illicit activities. Often just a small number of individuals are the beneficiaries of illegal trade and not communities as a whole.

If many people in the community benefit from sustainable use of wildlife, for example through tourism or sustainable hunting / trade, it is more likely that poaching and illegal trade will not be as attractive and community members benefiting from sustainable use are more likely to obtain intelligence and use it against wildlife trafficking criminals. Investment on the ground is important in these countries. A genuine effort to create real livelihoods for local people based on sustainable wildlife use and to include them in solutions for wildlife trafficking is already being shown to change attitudes and have positive impacts in places such as Mozambique and South Africa. Property rights, ownership and rights to sustainably use wildlife can encourage and incentivize local communities to value wildlife and to conserve and protect it against poachers. Ultimately for wildlife to have a future in countries that have rural-based communities affected by poverty, it needs to be viewed by locals as having a value and to be a valid form of land use. Species harvest, live sale and trade, when conducted sustainably, can benefit both communities and conservation, and actually address poaching issues threatening wild populations (e.g. for crocodiles and vicuña).

The topic of communities benefiting from wildlife and being involved in addressing illegal wildlife trade was explored in an international symposium organized and co-convened by the [IUCN CEESP/ SSC Sustainable Use and Livelihoods Specialist Group \(SULi\)](#), the International Institute for Environment and Development (IIED), the Austrian Ministry of Environment, the ARC Centre of Excellence for Environmental Decisions at the University of Queensland and TRAFFIC in February 2015. The intent

was to explore whether and under what circumstances community-based interventions are likely to achieve success in combating current patterns of illegal use and trade of wildlife. The meeting provided examples, information about lessons learnt and guidance to help governments and agencies meet relevant international commitments. The [conclusions and recommendations](#) of this Symposium should, in our view, provide for a standalone further (fourth) priority within Option 2 focusing on community involvement in addressing illegal wildlife trade.

Key conclusions arising from the Symposium include the following:

- A diversity of factors drives poaching by local people including poverty, unemployment, absence of alternatives, lack of social cohesion, poor 'people and parks' relations (inequality re: benefit sharing), corruption, inadequate law enforcement, weak legal frameworks and readily available markets for wildlife products. Incentives for engaging in illegal activity frequently far outweigh the incentives for stewardship.
- Enforcement alone will not be effective for combatting illegal wildlife trafficking without sustainable alternatives that are chosen by communities and reflect their priorities. For example, illegal trade in abalone in South Africa fills an economic void and supports livelihoods but also carries costs. Combatting the problem requires development of a legitimate fisheries governance framework and significant economic investment in the area - actions far beyond simply stopping illegal fishing.
- Communities no longer want to be only stakeholders in conservation, but shareholders. For example, revenue sharing schemes for communities living around protected areas currently tend to distribute only around 5-10 per cent to communities. More participatory and equitable governance arrangements for protected areas and biodiversity conservation are needed – examples of this are in the Philippines, Iran, Brazil, Kenya and others.
- Communities need to be involved in wildlife management, be accountable and receive benefits and income from it. Communities also need to play a role in law enforcement – they are the first line of defence against poachers.

Key recommendations for involving communities in strategies to tackle illegal wildlife trade include:

- Encouraging relevant government departments to consider community involvement in the beginning of the trade chain to complement focus at the end, on the demand and transit side.
- Contributing to and strengthening linkages with the CITES and Livelihoods Working Group – [Resolution Conf. 16.6 on CITES and livelihoods](#), CITES Decisions 16.17 to 16.25 and toolkit including a planned thematic study on 'Wildlife crime and livelihoods of rural communities'.
- Encouraging development of partnerships between communities, NGOs and law enforcement agencies in tackling illegal wildlife trade.
- Promoting policies and approaches for private sector benefits from wildlife (e.g. tourism) that support community engagement in conservation.

At the Symposium, the United Nations Development Programme (UNDP) showed for example that it has adopted a three-pronged approach to dealing with illegal wildlife trade which aims to:

- Expand economic opportunities and livelihoods options for communities in areas experiencing illegal wildlife trade.
- Strengthen governance and law enforcement.
- Raise awareness of the problem among stakeholders.

Regarding expanding economic activities for communities, this could include generating co-benefits from sustainable use (e.g. hunting), addressing human-wildlife conflict, promoting alternatives to bushmeat, and providing support for ecotourism and other 'alternative' livelihoods. It also includes training communities as eco-guards and intelligence providers. An example of alternative livelihoods

can be found in South Africa where SANParks is promoting planting trees outside the park that has resulted in reducing illegal timber extraction inside the park.

A key example from the Symposium of communities deriving benefits directly from wildlife as well as being involved in addressing wildlife trafficking is Namibia where the government amended the law in 1996 for communities to have rights of ownership over wildlife, through community conservancies. The government sets quotas for consumptive wildlife use (e.g. hunting) and one hundred per cent of the revenues from this and from other forms of tourism goes to communities. As a result, wildlife numbers have increased and many jobs have been generated - including 500 community game guards - with large amounts of income being generated, the majority from tourism (e.g. 13 million Namibian dollars, approximately a million USD, which helps fund schools, healthcare, roads, training and other community needs). Implementation has required time and a sustained period of donor investment but the model can and is being used elsewhere, for example Zimbabwe's CAMPFIRE programme. Another example of communities benefiting from wildlife and being involved in its management (including tackling illegal wildlife trade) is South Africa's 'biodiversity economy' strategy which it is developing with the objective of bringing previously disadvantaged groups into game ranching and wildlife management.

Observations regarding other parts of the text in the Roadmap

Under the heading "Issue", first paragraph, page 4 of the Roadmap, "(rhino) populations are once more in decline" - this is the case for Kruger National Park in South Africa but overall for African rhinos, while a tipping point in terms of overall continental population decline is closer to being reached, data do not exist yet to confirm that this has taken place. Also Greater One Horned rhino and Javan rhino numbers have increased recently. However, it is clear that if poaching continues to escalate, it may well become unsustainable and numbers of African rhino could then be expected to start declining again at a continental level sooner rather than later.

Also in the "Issue" section of the Roadmap, noting that "wildlife tourism represents an important share of the GDP", it would be useful to acknowledge here that returns from wildlife may also come from sustainable use including hunting and live sales.

Thank you again for the opportunity to comment on this important document.

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