

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 Species Survival Network provides the following comments on the Roadmap for the EU Action Plan against Wildlife Trafficking:

1. SSN urges the Commission to pursue Option 3. We believe that there is a great need for new legislation to address the import of wildlife taken and/or exported in violation of the laws of range State(s). Such legislation should seek to ensure that fauna or flora taken from the wild illegally in source countries (and its progeny) is considered illegally acquired in the EU. Demand for exotic species not listed in the CITES Appendices is significant in the EU and current legislation is inadequate to address the significant levels of illegal trade/sales occurring.

2. SSN encourages the Commission to take effective action to enhance enforcement within the EU including increased inspections at border points, higher civil and criminal penalties for wildlife crime, and improved coordination and prioritization of wildlife trafficking across enforcement, regulatory, and intelligence agencies within the EU. We also note that if enforcement or penalties differ significantly among Member States, traffickers will exploit these differences to facilitate trade.

3. The EU Plan should specifically seek stricter measures regarding the sale, import and export of elephant ivory and rhino horn within the EU, including the destruction of stockpiles.

4. SSN strongly opposes the proposed action “(to) encourage sustainable sourcing of wildlife products”. Promoting or supporting the legal trade in wildlife is not a workable solution as the legal trade does not in any way offset illegal trade and, on the contrary, often provides a laundering opportunity for trade in illegal products. Such actions would provide mixed messages to consumers.



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