

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

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## **Related document: Action Plan against Wildlife Trafficking**

### **Feedback:**

*WWF notes the three options presented in the roadmap as a way to address the current shortcomings of the EU policy on wildlife trade. In light of the challenges stated above, WWF believes that option 2 would be the favoured one.*

*If the EU can ensure that under this option 2 not only the efficiency of the enforcement chain against wildlife trafficking would be increased, but also the global efforts to address the seriousness of wildlife crime, then WWF would endorse this option, subject to the suggestion in the roadmap that it includes a reference to the new EU Agenda for Security and acknowledges the need for harmonised and higher penalties in EU Member States. As the Roadmap highlights, this reference would recognise the need to assess if and how the EU policy and legislation against environmental crime should be strengthened, and that it foresees a review in 2016.*

*The issues of discrepancies among Member States' penalties for wildlife trafficking offences, and associated uneven and incomplete implementation and enforcement of the legislative framework at EU level, emerged as the biggest problems in the 2014 consultation on wildlife trafficking.*

*Other issues to consider*

#### *1. Financial support*

*Despite the fact that Option 2 discussed above does not envisage significant additional resources for combatting wildlife trafficking, WWF believes that any credible action plan must confront the issue resource shortfalls both at the EU and, more particularly, at the member State level. If the EU and its member States are to deliver on their commitment of treating wildlife crime as a serious crime then greater resources will have to be devoted to the fight against it.*

#### *2. Scope of the Action Plan*

*WWF would like to clarify and reiterate that the scope of the action plan should include trafficking in fisheries and forest products, and not merely terrestrial fauna. This was already*

*signalled in the 2014 consultation, and was endorsed both in our response and in the letter we co-signed to Vice-President Timmermans.*

### *3. Raising the Political Profile of Wildlife Crime*

*Much as WWF welcomes the EU's role in the London and Kasane conferences, and in the adoption of the UNGA Resolution on Wildlife Trafficking, we believe that more could be done to reinforce the commitment to combatting wildlife crime in the EU and its member States*

*One concrete expression of such commitment which WWF has already advocated is to have the EU Action Plan included in the conclusions of a forthcoming European Council. The Council could, for example, welcome the decision to undertake the Action Plan, and commit to providing sufficient resources to make it effective.*

*WWF also believes that the EU will need to continue and even expand its current work with those third countries, especially in Africa and Asia, where wildlife poaching and trafficking are most prevalent. Relevant activities include development aid and provision of expert advice, but also diplomatic, political and economic pressure.*

*Finally, the plan should not exclude the possibility that the EU itself could be a source of trafficked products, now or in the future.*

### *4. Diplomatic Sanctions*

*Already the UN has sanctioned some individuals in Central Africa for their involvement in wildlife trafficking while, of course, CITES has recommended suspension of trade with a range of countries due to their complicity in such trafficking, or other issues of non-compliance with CITES.*

*WWF would like to see the EU explore ways to make sanctions imposed by different bodies more mutually supportive, and to back them up with unilateral actions at EU and Member State level. So, for example, countries that are subject to CITES suspensions could be considered for the imposition of wider trade sanctions, while the EU could also actively explore avenues and existing instruments whereby individuals from such countries who implicated in wildlife trafficking on the basis of credible evidence, and who have assets in the EU, could have such assets frozen.*

### *5. Wider Awareness Raising*

*Allied to the preceding point is the fact that much more needs to be done to raise awareness of the high profitability of wildlife crime, in order to demonstrate the likelihood of organised crime, and its capacity to engender corruption which in turn facilitate other criminal activities, including even terrorism. This would be a powerful means of convincing judiciary of the seriousness of such crime. Furthermore, such awareness raising could also encourage relevant authorities in the member States to follow up cases with a view to recovering unpaid tax, or to seizing assets which are gained through illegal activity.*

*It is WWF's experience that the low penalties that are often imposed for trafficking offences are the result of prosecution services themselves not appreciating the gravity of such crimes, and therefore failing to convince the relevant judiciary accordingly. In some cases the even the initial investigation is not pursued with sufficient rigour because the offence is not seen as a serious one. More could be done to improve awareness and technical capacity in investigation and prosecution services. One option would be to set up an institute or to fund a university faculty that would keep abreast of relevant technical developments in enforcement and forensics.*

*Finally, in relation to awareness raising in consumer countries with a view to reducing demand, WWF repeats its view that such demand reduction work needs to take full account of the prevailing culture in those countries, and to be based on professional assessment of what has changed consumer behaviour in other domains. Otherwise financial resources can be wasted in activities that often prove counter-productive.*

**Feedback file:**

[RoadmapResponsefinalfinal.pdf](#)