



# FOUR PAWS position on the revision of the EU Action Plan against Wildlife Trafficking

## Summary

The EU is currently revising the EU Action Plan against Wildlife Trafficking (EU WAP), key deliverable of the EU Biodiversity Strategy for 2030. The EU must be ambitious in its plan and propose a solid strategy that responds to the scourge of wildlife trafficking in the EU. Amongst other things, the EU WAP should tackle the legal commercial trade in wildlife and provide more support to European wildlife rescue centres and sanctuaries.

## Background

Wildlife crime is often underestimated; its impact on the world and society, its role in pandemic diseases, in economic losses, and in loss of biological diversity is profound. It has become the fourth largest crime sector and intersects with other transnational organised crimes such as drug smuggling, counterfeiting and human trafficking.

Europe is not spared, as it is one of the main global markets for wildlife trade. It is a source region, a transit, and a destination market for live wild animals and their parts and derivatives. While Europe plays a significant role in wildlife crime, it also became a priority for the EU and its Member States.

In 2016, the EU Commission adopted a [communication](#) with 32 actions to strengthen the fight against wildlife crime inside the EU, which was endorsed by the Council through its [conclusions](#) and by the Parliament through the adoption of a [resolution](#). The Action Plan covers a five-year period from 2016 to 2020.

In 2020, the Commission published the [Biodiversity for Strategy for 2030](#) and committed to renew the EU Action Plan against Wildlife Trafficking in 2021. FOUR PAWS welcomes this positive commitment to step up efforts to combat the illegal wildlife trade.

The Commission launched a public consultation in October 2021 to collect views from stakeholders on the previous Action Plan and is expected to publish the revised one in the second quarter of 2022. The revision of the EU WAP provides an excellent opportunity to strengthen the previous EU WAP and address the existing loopholes.

## What is missing?

- **The EU WAP did not address the legal commercial trade in wildlife**, which is detrimental to the biodiversity and animal welfare and health. It can be a gateway to wildlife crime and provides ample laundering opportunities.
- **The EU WAP did not fill the implementation gaps of the EU Wildlife Trade Regulations** and did not provide the same protection for captive-bred species such as tigers.
- **The management of confiscated wild animals still represents a major challenge** for the competent authorities due to the limited intake capacity.
- **Wildlife rescue centres and sanctuaries did not receive enough financial support** while they are playing a vital role in the fight against wildlife trafficking and care for confiscated animals.
- **Dedicated resources and staff capacity were not sufficient** to properly implement the EU WAP.
- **Lack of clear monitoring** to assess the implementation of the EU WAP in the Member States.
- **The EU WAP is not legally binding** and was not sufficiently integrated into new and existing legislation.

## Why these should be addressed?

### ... Because the legal commercial trade in wildlife is highly detrimental

While the EU WAP 2016–2020 tackled the illegal wildlife trade, it did not mention the legal commercial trade, which serves as a cover for illegal trade activities. According to the 2020 IBPES report, legal wildlife trade has become highly unsustainable and has increased 500% in value since 2005 and 2,000% since 1980s.

FOUR PAWS has undertaken extensive research on the legal commercial trade in captive bred tigers in the EU and recorded multiple cases of cruelty related to the use of tigers for entertainment and other commercial purposes (e.g. circuses, private keeping, unscrupulous zoos, photo opportunities, private hire) and tigers were even killed for the Asian market and traditional Asian medicine products.

FOUR PAWS research shows that the majority of EU Member States do not know how many tigers there are within their borders. Member States do not have the means to monitor how many tigers are sold and/or traded. However, national competent authorities still allow the commercial trade in captive-bred tigers by issuing import and export permits for trade. The lack of overview enables illicit traders to operate without much constraint.

### **... Because the international community needs to learn the lessons from the COVID-19 pandemic**

The unsustainable nature of both legal and illegal wildlife trade has multiple implications for human health. Whether legal or illegal, wildlife trade potentially leads to the introduction and transmission of zoonotic diseases that can be harmful to humans and other animals.

Scientists estimate that 75% of emerging infectious diseases that have affected people over the past three decades originated from animals. The FOUR PAWS Future Study on Pandemics stresses that wildlife trade, encroachment into wildlife habitats, and wildlife farming are some of the triggers or drivers of zoonotic diseases. The close contact between humans and different species of wild animals can facilitate the animal-to-human spill over of new viruses that are capable of infecting diverse host species.

### **... Because European wildlife sanctuaries and rescue centres need more support**

FOUR PAWS provides species-appropriate homes for rescued animals all over the world and has rescued animals from many EU Member States. Across Europe, there is a significant demand for facilities which can house seized or confiscated exotic animals. We observe that the management of confiscated wild animals represents a major challenge for the competent authorities.

On the one hand, confiscating authorities often seize or confiscate animals without a clear plan to provide proper long-term care for confiscated wildlife resulting from wildlife trafficking. Consequently, confiscated animals must be kept in the initial place where they were confiscated. In most cases, these places do not meet appropriate standards of animal care. Where no appropriate institutions for relocation can be found, euthanasia is considered as a last alternative. In some cases, the authorities do not respond and leave the animals in an inappropriate or illegal facility. In the worst case, the animal disappears from the illegal facility and the authorities do not know where the animal is, which can lead to serious public security issues.

On the other hand, it is often problematic to find facilities which can provide adequate housing and expertise for confiscated animals. Not only have rescue facilities limited capacity to house animals, but most Member States do not have appropriate facilities to house and provide lifelong care for confiscated wild animals. This poses an additional problem in terms of procedures, paperwork, and the transfer of confiscated animals.

Furthermore, it is important to note that there are significant costs (including food, staff, medicine, veterinary care) when an animal is taken into care in our sanctuaries. FOUR PAWS bear and big cat sanctuaries bear the costs when confiscated or seized animals are transferred into our sanctuaries. It includes the costs for the rescue of the animals into the sanctuary as well as the costs of the care and accommodation of the animal.

## FOUR PAWS position

The EU needs to take into account the various challenges and address them into the revised EU WAP. FOUR PAWS strongly suggests to integrate the following measures in the revised EU WAP to have a long-term impact in the fight against wildlife trafficking:

- The revised EU WAP **should jointly address the illegal and legal commercial trade in wildlife**. The legal wildlife trade has become highly unsustainable and drives wild populations towards extinction.
- Particular attention should be given to **endangered species such as tigers**. The legal commercial trade in captive bred tigers undermines international conservation efforts and serves as a cover for illegal activities. **The EU should end the commercial trade in captive-bred tigers and their parts by adopting the EU Tiger Guidance**.
- The adoption of an **EU Positive List of allowed pet species and an EU ban on the use of wild animals in circuses** will positively contribute to fighting wildlife trafficking.
- The EU WAP **should address the zoonotic risks linked to illegal and legal wildlife trade** by integrating **the One Health approach** in the revised EU WAP.
- The EU institutions and Member States **should allocate funding and resources** to properly enforce the EU WAP and should also provide **more funding to genuine rescue centres and sanctuaries in the EU**.
- The EU should develop an **EU guidance and/or encourage Member States to develop national action plans on how authorities can manage confiscated or seized wild animals** and establish an **EU list of genuine and adequate sanctuaries and rescue centres**.
- The revised EU WAP **should be consistent with other pertinent policies** such as the Environmental Crime Directive and the Digital Services Act.
- The revised EU WAP should **implement a strict monitoring** of the actions with clear indicators and timelines. The EU Commission should also dialogue with the civil society in order to identify key specific issues.

## Contact

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