



WWF

POSITION
PAPER

APRIL
2016

WWF's analysis of the EU Action Plan against Wildlife Trafficking

This analysis is based in part on information and advice from TRAFFIC.



© WWF / James Morgan

WWF strongly supports the launch of the [EU Action Plan against Wildlife Trafficking](#)¹ by the European Commission (EC). The Action Plan details a robust set of measures that will allow the EU to fight the illegal trafficking of wildlife products more effectively in the EU and globally. The timeframe for implementing this plan is very tight, as many illegally traded species are under threat from extinction. A swift response is needed.

WWF calls for:

- 1) EU Member States to demonstrate their high-level political commitment, including their endorsement of the Action Plan;
- 2) Allocation of appropriate financial and human resources for its implementation.

WWF presents below its analysis of the EU Action Plan against wildlife trafficking. It is divided into 3 parts:

1. WWF's key asks following the publication of the Action Plan
2. Strengths of the action plan
3. Gaps in the Action Plan

WWF'S MAIN ASKS ON THE EU ACTION PLAN

The plan is ambitious. WWF believes that this EU Action Plan against Wildlife Trafficking can only succeed if the 3 following points are addressed.

WWF Asks:

1. The EU Member States demonstrate a strong political commitment to its implementation. A large part of the problems faced in the EU in relation to wildlife trafficking is caused by poor implementation by EU Member States of the EU laws. WWF urges the EU Member States to embrace the EU Action Plan against Wildlife Trafficking and adopt Council Conclusions to this effect at the next Environment Council in June 2016.
2. Financial resources should be identified in the EU budget and in each Member State budget to ensure implementation of the plan. So far only DG DEVCO made a plan through its EU wildlife conservation strategy for Africa on how much will be needed and started identifying where the resources could come from. Each EC DGs and in particular each EU Member State should undertake a similar exercise of identifying resource needs and allocation. For example DG REGIO could identify resources to finance the implementation of the plan in the new EU Member States. The Action Plan is destined to fail if no financial resources support it. Human resources should also be clearly allocated.
3. Because wildlife trafficking is not just a threat to numerous species, it also threatens

¹ communication from the commission to the european parliament, the council, the european economic and social committee and the committee of the regions EU Action Plan against Wildlife Trafficking (COM/2016/087 final)

the rule of law, security and good governance, the Action Plan should not remain in the remit of the Environment departments of the EC and Member States but should involve the other relevant departments. In this respect, the other Council working groups such as Justice and Home Affairs (JAI); Organized crime (CRIMORG); external relations (RELEX); Development (DEVGEM); trade (COMER); European Judicial Cooperation (EUROJUST); Law enforcement / police (ENFOPOL) and Law enforcement / customs (ENFOCUSTOM) should be involved in the preparation of Council Conclusions. EU Member States should also ensure proper coordination within their own administrations.

STRENGTHS OF THE ACTION PLAN

WWF congratulates the European Commission for its Action Plan against wildlife trafficking. WWF welcomes the Commission's 3-pillar approach underpinning the plan: addressing prevention and root causes, strengthening implementation of existing agreements and strengthening cooperation between source, destination and transit countries. The plan demonstrates strong inter-service coordination in its development which bodes well for its implementation.

WWF is very pleased to see that the Action Plan includes:

- ✓ Measures for all EU countries to consider organised wildlife trafficking a serious crime under the United Nations' Convention against Transnational Organised Crime with sentences of at least four years imprisonment for those convicted;
- ✓ Concrete measures to boost capacity, data sharing and cooperation between the enforcement services within and between EU member states, as well as increasing checks to detect illegal activities;
- ✓ Actions to reduce the demand in wildlife products within and outside the EU, including by involving the business sector that can be complicit in wildlife trade;
- ✓ Recognition of the key role that rural communities can play in solutions to illegal wildlife trade and the EU support to their engagement in the conservation of wildlife and environmentally-friendly livelihoods activities;
- ✓ Actions addressing corruption and targeting of financial crimes;
- ✓ The pivotal role that the EU can play on the international scene by supporting third countries in fighting wildlife trafficking activities, and supporting bilateral and multilateral agreements;
- ✓ A review of the environmental crime directive in particular criminal sanctions for wildlife trafficking;
- ✓ A Monitoring and Evaluation mechanism to assess progress on the implementation of the Action Plan.

GAPS IN THE ACTION PLAN

WWF is pleased to see that most of its recommendations provided in the response to the EC consultation and roadmap have been taken into account in the Action Plan. WWF supports all the actions proposed in the Plan.

In addition, the Action Plan could be further strengthened if the EU addresses the following gaps.

General gaps:

- ✓ A detailed Monitoring & Evaluation plan could be developed highlighting indicators which would help measuring progress in the implementation of the Action Plan. There should be a commitment to report annually on progress with implementation, with a scorecard similar to that which was used for progress towards completion of the Natura 2000 Network;
- ✓ The role that Civil Society Organisations can play in implementing the Action Plan should be further recognised;
- ✓ The EU should act as a role model in promoting new methods and technologies such as sniffer dogs, unmanned aerial vehicles, and isotope and DNA testing. EU Member States should be supported in sharing these with the respective source and demand countries;
- ✓ Support to third countries should ensure their full buy-in and alignment to their national development priorities.
- ✓ It is to be acknowledged that legal and sustainable trade can bring positive contribution to sustainable development and to communities.

Detailed comments on some of the measures proposed in the Action Plan can be found below. It builds on the Table of Action proposed in the EC Communication.

Priority I – Preventing wildlife trafficking and addressing its root causes

Objectives	Actions	Expected results	WWF’s comments
<p>Objective 1.1 Reduce the demand for and supply of illegal wildlife products</p>	<p>1. Increase support for awareness- raising and targeted demand reduction campaigns in the EU and worldwide</p>	<p>Action taken and funding provided to raise awareness and reduce demand for illegal wildlife products in important non-EU countries and within the EU, notably for species illegally traded in large numbers within the EU</p> <hr/> <p>Existing awareness-raising tools and materials shared among the Member States</p>	<p>Social marketing and social and behavioural change communications (SBCC) should be the main vehicles through which to deliver against objective 1.1. Awareness raising is not sufficient since it does not necessarily trigger behavioural change. Demand reduction work needs to take full account of the prevailing culture in the countries targeted, and to be based on professional assessment of what has changed consumer behaviour in other domains.</p> <p>The EU should use the outreach and creativity potential from Civil Society Organisations for demand reduction campaigns using evidence- and science-based approaches in achieving real and long-term behaviour change that go beyond just awareness raising activities.</p> <p>The Green Collecting campaign in China managed by TRAFFIC under the joint WWF/TRAFFIC work programme on demand reduction is a good example of demand reduction campaign. TRAFFIC’s collaboration with master craftsmen aims to sustain the traditional Chinese culture of artwork collecting, while leading collectors towards a preference for items made from sustainably-sourced materials</p> <p>The WWF-Thailand campaign “Chor Chang Can Save Elephants” is a good example of awareness raising campaign which gathered over 1.2m participants from citizens to celebrities and decision makers. In 1 week it became the most discussed issue in Thailand. Following the campaign, the Thai government propelled the issue</p>

Objectives	Actions	Expected results	WWF's comments
			<p>of illegal ivory trading to the top of the national agenda.</p> <p>Furthermore the EU should encourage governments in key consumer countries to adopt demand reduction strategies that follow best practice and that address real consumer motivations. Ministries of Communication, Tourism and Public Health should be involved in the demand reduction strategies. Often these offer effective ways to deliver public messaging at scale, and Public Health Ministries should also have experience in delivering social marketing campaigns specifically. They will have a key role to play in tackling the use of wildlife products for medicinal purposes.</p>
	<p>2. Further limit trade in ivory within and from the EU</p>	<p>Commission guidelines issued to ensure uniform interpretation of EU rules with the aim to suspend the export of raw pre-Convention ivory and guarantee that only legal ancient ivory items are traded in the EU</p> <p>Member States do not issue export and re-export documents for raw pre-Convention ivory</p> <p>Member States only issue intra-EU trade certificates for ancient ivory items on the basis of the criteria defined in the guidelines</p>	
	<p>3. Reduce or ban unsustainable imports into the EU of endangered species by proposing their listing in CITES</p>	<p>New listing proposals submitted for consideration by Conferences of the Parties (CoPs) of CITES</p>	

Objectives	Actions	Expected results	WWF's comments
	Appendices (e.g. rare reptile species)		
Objective 1.2 Ensure that rural communities in source countries are engaged in and benefit from wildlife conservation	4. Strengthen engagement of rural communities in the management and conservation of wildlife	The need for proper engagement of rural communities in the design and implementation of measures against wildlife trafficking is made a priority in relevant EU and Member States policies and funding	The EU could build on the expertise and experience of Civil Society Organisations working with rural communities on sustainable livelihoods and wildlife trafficking prevention. Many interesting and successful programmes exist and could be scaled up. WWF's programme in Namibia on communal conservancies could be taken as an example of successful Community Based Natural Resources Management (CBNRM). With WWF's help, the government has empowered its communities with rights to manage and benefit from the country's wildlife through communal conservancies. In conservancies, wildlife is now a valued livelihood asset, with the result that poaching is no longer socially acceptable and populations of lions, cheetahs, black rhinos, zebras and other native species have been restored. Human welfare is also improving, thanks to \$5.5 million in annual income and benefits the conservancies generate for communities.
	5. Support the development of sustainable and alternative livelihoods for communities living in and adjacent to wildlife habitats	Support to sustainable economic activities benefiting rural communities living in and adjacent to wildlife habitats is prioritised in EU and Member States' policies on funding support for rural areas in source countries	It is important to note that communities within Europe should also be targeted. Illegal wildlife trafficking also affects European protected species such as the Danube sturgeon. The EU Strategy for the Danube Region should identify ways of supporting poor communities in areas where poaching and trafficking are concentrated in order to provide alternative incomes.
Objective 1.3 Increase business sector engagement in efforts to combat	6. Raise awareness of business sectors trading in wildlife products within/from the EU or facilitating such trade	Main players in wildlife trade related business sectors identified at EU level and regular communication channels on wildlife trade issues set up between them and the Commission	The private sector should be encouraged to act as role model, both within and outside EU territory, through a Code of Conduct condemning the consumption of illegal wildlife products

Objectives	Actions	Expected results	WWF's comments
wildlife trafficking and encourage sustainable sourcing of wildlife products		Sessions of the EU Wildlife Trade Enforcement Group organised with business players to discuss specific issues (e.g. Traditional Chinese Medicine, exotic pets, luxury industry, hunting tourism, transport, courier companies, online trade)	For example the Buckingham Palace Declaration commits signatories to eleven commitments that will raise standards across the transportation industry to prevent traffickers from exploiting weaknesses as they seek to covertly move their products from killing field to marketplace. The commitments focus on information sharing, staff training, technological improvements, and resource sharing across companies and organisations worldwide. They will also see the world's leading transportation firms assisting those in poorer nations who are in need of expertise and new systems.
	7. Support private-sector initiatives to curb the illegal wildlife trade and encourage sustainable sourcing of wildlife products in/from the EU	Existing private-led initiatives and private-public partnerships supported and best practice shared to encourage new initiatives	
Objective 1.4 Tackle corruption associated with wildlife trafficking	8. Support initiatives to fight the corruption associated with wildlife trafficking at national, regional and international levels	Wildlife trafficking included in EU policy and tools against corruption (notably as part of dialogues with key third countries receiving budgetary support)	There should be increased capacity to investigate credible allegations of complicity at Government level, which could, as a last resort, lead to sanctions at the EU and wider international level.
		Issue addressed in bilateral meetings with key partner countries and in relevant multilateral fora, including G7, G20, UN Convention against Corruption	Anti-corruption strategies should be evidence-based, where possible, or contribute to building the evidence base. Such strategies should also be within realistic long-term timeframes. The UK Anti-corruption summit in May 2016, may help inform strategies.
		Relevant resolution proposal submitted for consideration by CITES 17th Conference of the Parties	The commission and member states should involve civil society when devising strategies and interventions to address corruption.

Priority 2 – Making implementation and enforcement of existing rules and the fight against organised wildlife crime more effective

	Actions	Expected results	WWF's comments
Objective 2.1: Ensure more even implementation of EU rules on the wildlife trade and develop a more strategic approach to checks and the enforcement of rules against wildlife trafficking at EU level	9. Develop strategies to improve compliance with EU wildlife legislation at national level	Shortcomings in implementing EU wildlife trade regulations in each Member State assessed by the Commission and recommendations put forward on how to improve these shortcomings	<p>Member States should be required to report regularly on progress of Action Plan implementation and recommendations.</p> <p>Shortcomings and recommendations in the implementation of EU Timber Regulation, the Illegal, Unreported, Unregulated regulation, the Birds and Habitat Directives should also be pursued in Member States.</p> <p>NGOs can play an important role in monitoring enforcement and reporting on wildlife crime. Given the limited capacity of public authorities, NGOs could be further supported in their watchdog role.</p> <p>Particular attention should be paid in the new EU Member States (e.g. Romania, Bulgaria) to further support their enforcement efforts e.g. through training and financing (using EU funds). DG REGIO can play a role in implementing the action plan in new MS. In the Danube Region this can happen by using the EU Strategy for the Danube Region as a platform to promote the action plan. Also, in non-EU countries (Moldova, Ukraine, Serbia...), the association/accession process can be used to build up better enforcement structures.</p>
		Recommendations implemented in the Member States	
		Implementation of EU rules on importing hunting trophies in the EU proactively monitored, to ensure that such trophies are of legal and sustainable origin	
	10. Improve rate of detection of illegal activities	In addition to the checks at border-crossing points required under Regulation (EC) No 338/97, in-country compliance monitoring and enforcement ensured, in particular through regular checks on traders and holders such as	An Environmental Compliance Assurance package which will include compliance promotion, inspections & surveillance, and enforcement is currently being discussed under the lead of DG Environment. WWF has not seen the content of this package. Yet, it sounds like an interesting initiative to pursue if it supports the increase in the

	Actions	Expected results	WWF's comments
		pet shops, breeders and nurseries	inspection levels and therefore improve the rate of detection of illegal activities. Minimum criteria for inspection and monitoring efforts should be developed at EU level to support better and harmonised enforcement. It is crucial that Member States allocate sufficient resources to monitoring and inspection with the aim of detecting wildlife crime.
	11. Step up efforts to ensure implementation of the EU roadmap towards eliminating the illegal killing, trapping and trade of birds (also relevant under Priority 1)	Funding provided for the Intergovernmental Task Force on the illegal killing of birds in the Mediterranean established under the Convention on Migratory Species and first meeting held Action taken to improve national monitoring and enforcement of compliance	
	12. Define and assess priority risks regularly	Enforcement priorities as regards target species and products (such as eels, ivory, rhino horns, live reptiles and birds), trade routes and smuggling methods defined at national level Based on common risk-based assessment of EU-wide priorities agreed at the EU Wildlife Trade Enforcement Group, in cooperation with Europol	
	13. Improve cooperation among Member States on cases of cross-border wildlife trafficking	Sufficient resources earmarked in Europol and Eurojust for work on wildlife trafficking	Europol needs to operationalise its commitment to wildlife and other environmental crime by instituting a coordination unit, similar to that which exists in Interpol. At EU Level, the EU Enforcement Group needs to be strengthened and

	Actions	Expected results	WWF's comments
		Regular joint operations involving cross-border cooperation carried out by EU Member States (facilitated by Europol)	
		Joint Investigation Teams involving Europol and/or Eurojust set up	
	14. Review the EU policy and legislative framework on environmental crime in line with the European Agenda on Security	Effectiveness of Directive 2008/99 reviewed, including concerning the criminal sanctions applicable to wildlife trafficking throughout the EU	<p>The Commission should prioritise efforts to ensure that EU MS are fully compliant with Directive 2008/99 on the protection of the environment through criminal law.</p> <p>For those Member States that have not already done so, they should institute maximum penalties of four years or more for wildlife trafficking involving organized crime, as a credible deterrent and in order to be able to apply the provisions of the UN Convention on Transnational Organised Crime.</p> <p>The possibility to impose higher sanctions when the environmental crime occurs in the context of organised crime should be made explicit in the Environmental Crime Directive.</p>
Objective 2.2: Increase capacity to combat wildlife trafficking of all parts of the enforcement chain and the judiciary	15. Improve cooperation, coordination, communication and data flow between the enforcement agencies responsible in the Member States	A coordination mechanism (such as an inter-agency task force and/or Memorandum of Understanding) between the relevant agencies (customs, inspection services, police, CITES management and enforcement authorities) is put in place in each Member State, and all the authorities with responsibility in this area have access to the relevant communication	Cooperation between the different European Commission and Member State services in charge of timber trade and fisheries trade should also cooperate with the services in charge of species covered by the EU Wildlife Trade Regulations.

	Actions	Expected results	WWF's comments
		channels	
		Options for data exchange between the authorities responsible in this field under national legislation reviewed by Member States	
		Best practice for inter-agency cooperation and the effective monitoring and enforcement of compliance in the MS is collected and shared at EU level through the EU Wildlife Trade Enforcement Group	

	Actions	Expected results	WWF's comments
	16. Improve knowledge base on checks, investigations, prosecutions and judicial proceedings against wildlife trafficking	More systematic provision by Member States to the Commission of relevant qualitative and statistical data, including data on checks, investigations, seizures, prosecution cases and judgments, including the penalties imposed, and systematic information to Europol about all cases with organised crime and/or cross-border implications	Data collection and statistics on wildlife crime across the EU needs to be strengthened via a coordinated approach, possibly facilitated by a dedicated individual that provides information to Europol. Data collection should also focus on links between wildlife crime and other crimes. Ideally, the EU should be able to present an integrated picture of all aspects of wildlife trade and wildlife crime. Data on trade in species covered by the EU trade Regulations should be integrated with data from other sources, such as timber or fisheries trade, or data on species protected by the Birds and Habitats Directives.
Data collection methodology in the field of wildlife trafficking streamlined throughout the EU and awareness raised in relevant expert groups on crime statistics			
Database containing case law on wildlife trafficking from Member States established at ENPE ² to facilitate knowledge-sharing		Data on prosecutions for wildlife-related offences, including the penalties imposed should also be held and maintained centrally, and should be in the public domain. It is important to have the data on both successful and unsuccessful prosecution in order to identify where weak enforcement capabilities are. The EU TWIX tool should be promoted more widely beyond EU borders, and a long-term funding model should be provided for supporting this tool.	
	17. Step up training for all parts of the enforcement chain, including joint training activities	Training on wildlife trafficking is included in the programme of EU training institutions such as CEPOL, ERA and others	In order 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 that would keep abreast of relevant technical developments in enforcement

² European Network of Prosecutors for the Environment

	Actions	Expected results	WWF's comments
			and forensics.
		Existing training material is compiled and shared within the EU	Current efforts for training and sensitising Judiciary should be continued and up-scaled, including training Judiciary in 3 rd countries.
		Training against wildlife trafficking eligible for funding support under the various relevant EU financial instruments (LIFE, Internal Security Fund, etc.)	Relevant EU funding lines would need to include wildlife crime as a priority, in order to allow Member States to apply for sharing of best practice projects, and for developing and testing new methods such as sniffer dogs, unmanned aerial vehicles, and isotope and DNA testing).
		Training is regularly given in Member States for the entire enforcement/judiciary chain, including joint training sessions bringing together relevant enforcement agencies, prosecutors and judges	
	18. Strengthen or, where applicable, establish practitioner networks at national and regional level, and improve cooperation between them	Establishment of relevant national networks supported in each Member State	Existing and well-functioning networks, such as EU-TWIX, should also be strengthened, especially financially (see above under action 16)
		Joint meetings of relevant EU networks organised	
	19. Improve care of seized or confiscated live animals or plants	Facilities are available in all Member States for temporary care of seized or confiscated live specimens, and mechanisms are in place for long-term rehoming, where necessary. Assistance is provided to other Member States.	
Objective 2.3: Fight	20. Regularly assess the	Serious and Organised Crime Threat	

	Actions	Expected results	WWF's comments
organised wildlife crime more effectively	threat posed by organised wildlife trafficking in the EU	Assessments (SOCTAs) include assessment of wildlife trafficking threat, based on data and, where possible, national threat assessments provided by Member States	
	21. Boost capacity of relevant experts to tackle the links of wildlife trafficking with organised crime, including cybercrime and related illicit financial flows	Awareness-raising activities conducted in relevant fora (REFCO Network of Prosecutors specialised on organised crime, national organised crime, cybercrime and financial investigation units)	
		Capacity built to tackle online wildlife trafficking within competent units and ensured that channels exist to trigger assistance from units specialised in cybercrime in specific cases (e.g. darkweb investigations, abuse of virtual currencies).	
		Issue put on the agenda of the FATF ³ , of CARIN ⁴ and of the Egmont Group of Financial Intelligence Units	
		FATF requested to prepare guidance on links between money laundering and wildlife trafficking	
		Training on investigations into illicit financial flows related to wildlife trafficking organised	

³ Financial Action Task Force

⁴ **Camden Assets Recovery Interagency Network**

	Actions	Expected results	WWF's comments
	22. Member States ensure, in line with international commitments made, that organised wildlife trafficking constitutes throughout the EU a serious crime under the UN Convention against Transnational Organized Crime, i.e. that it is punishable by imprisonment of a maximum of at least four years	Relevant national legislation reviewed, and where necessary amended	
	23. Member States review, in line with UNGA Resolution, national legislation on money laundering to ensure that offences connected to wildlife trafficking can be treated as predicate offences and are actionable under domestic proceeds of crime legislation	Relevant national legislation reviewed, and where necessary amended	
Objective 2.4: Improve international cooperation on	24. Step up cooperation on enforcement between the Member States and EU enforcement actors	Joint meetings held involving Europol, the EU Wildlife Trade Enforcement Group and relevant regional enforcement networks (e.g. ASEAN-	Initiate a review of the effectiveness of WENs, identifying criteria for what makes a WEN effective, and measuring against such criteria.

	Actions	Expected results	WWF's comments
enforcement against wildlife trafficking	and key non-EU countries and other regional Wildlife Enforcement Networks, relevant global networks (International Consortium for Combating Wildlife Trafficking, ICCWC ⁵ , and the International Network for Environmental Compliance and Enforcement, INECE)	WEN and Lusaka Agreement Task Force) and the INECE.	
		Best practice in enforcement cooperation shared	
		Member States, assisted by Europol, participate in joint international law enforcement operations	
	25. Support capacity building for law enforcement in key source and market countries, including enforcement within protected sites	Continued funding support provided for ICCWC activities, including evaluations of enforcement systems based on the ICCWC wildlife and forest crime Toolkit	There is a need to promote further the ICCWC Wildlife and Forest Crime toolkit and to ensure its roll-out in key countries.
		Results of ICCWC Toolkit recommendations taken into account in targeted support to third countries	

⁵ Comprising Interpol, the CITES Secretariat, the World Customs Organisation, UNODC and the World Bank.

Priority 3 - Strengthening the global partnership of source, consumer and transit countries against wildlife trafficking

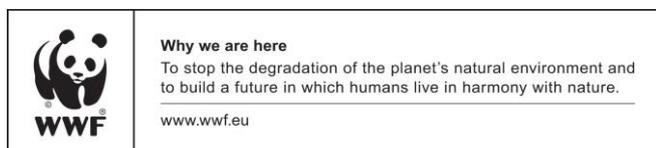
	Actions	Expected results	WWF's comments
	26. Ensure that wildlife trafficking is considered for EU funding under relevant programmes in the areas of natural resources management, environment, organised crime, security and governance	<p>"Strategic Approach for Wildlife Conservation in Africa"⁶ serves as a basis for programming relevant development support</p> <p>Further regional or thematic strategic approaches are developed</p> <p>Development cooperation funding streams, including the European Development Fund (EDF), the Development Cooperation Instrument (DCI), the Instrument contributing to Stability and Peace, and other financial instruments such as the Partnership Instrument, are mobilised against wildlife trafficking, within the agreed financial envelopes of the contributing programs, and other possible funding sources are explored</p>	
	27. Increase effectiveness of funding support against wildlife trafficking	<p>Regular meetings held in key countries to coordinate donor activities</p> <p>Beneficiary countries asked to report on how the measures against wildlife trafficking funded by the EU have been</p>	

⁶ Larger than elephants - Inputs for an EU strategic approach to wildlife conservation in Africa – Synthesis, Publications Office of the European Union, 2015

	Actions	Expected results	WWF's comments
		effective in addressing the problem (using indicators such as the number of seizures and successful prosecutions)	
Objective 3.2 Strengthen and coordinate better action against wildlife trafficking and its root causes with relevant source, transit and market countries	28. Step up dialogue with key source, transit and market countries, including dialogue with local communities, civil society and the private sector	<p>Priority countries identified</p> <p>Specific dialogue and technical cooperation structures established</p> <p>Topic systematically included in the agenda of political and sectorial dialogues and of high-level meetings with key non-EU countries or regions</p> <p>Network of focal points in delegations and embassies in relevant countries set up, making use, where appropriate, of existing structures such as the Green Diplomacy Network</p>	
	29. Use EU trade policies and instruments proactively to support action against wildlife trafficking	<p>Ambitious commitments to combat wildlife trafficking proposed by the EU for inclusion in future Free Trade Agreements (FTAs) e.g. with Japan and the USA (Trans-Atlantic Trade and Investment Partnership – TTIP)</p> <p>Proactive monitoring of the implementation of commitments associated with wildlife trafficking included in existing FTAs and the GSP+ regime</p> <p>Wildlife trafficking included on the</p>	The sustainable development chapter of the trade agreements should be made mandatory. Trade should not undermine sustainable development.

	Actions	Expected results	WWF's comments
		agenda of EU bilateral trade dialogues with key partners and of the WTO Committee on Trade and Environment	
	30. Strengthen cooperation against wildlife trafficking with relevant regional organisations, such as the African Union, SADC, the East African Community, ASEAN, and in relevant multilateral fora, such as ASEM	Topic included regularly on the agenda of high-level meetings	
Objective 3.3 Address security dimension of wildlife trafficking	31. Improve knowledge base and develop strategies to tackle the links between wildlife trafficking and security	Study launched to improve knowledge base on links between wildlife trafficking and other forms of organised crime and financing for militias or terrorist groups.	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 facilitates other criminal activities, including even terrorism. There is a need for more systematic investigation of the links between wildlife trafficking and regional conflict or terrorism, pending outcomes of the forthcoming UNODC report.
		Based on the results, next steps agreed in relevant EU fora	
		Security dimension of wildlife trafficking considered in overall EU situational assessments for relevant non-EU countries	
		UN-EU cooperation on the illegal wildlife trade in the context of peacekeeping and crisis management stepped up	
Objective 3.4 Strengthen multilateral	32. Support the adoption and implementation of strong decisions, resolutions and	Issue addressed under <ul style="list-style-type: none"> • CITES – including, where necessary, 	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

	Actions	Expected results	WWF's comments
efforts to combat wildlife trafficking	political declarations on wildlife trafficking in international instruments and multilateral fora	<p>through support for trade sanctions in cases of non-compliance</p> <ul style="list-style-type: none"> • Convention on Migratory Species - Tunis Action Plan 2013-2020 on the eradication of illegal killing, trapping and trade of wild birds under the Berne Convention on the Conservation of European Wildlife and Natural Habitats • Relevant multilateral initiatives at global level (UN, London and Kasane follow-up processes, G7, G20 etc.) <p>Implementation of commitments made in these fora regularly monitored by the EU and its Member States</p>	EU and Member State level. 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.



For further information:

Colman O’Criodain

Wildlife Trade Policy Analyst
WWF International

Email:

coeriocain@wwfint.org

Mobile + +41 79 204 1942

Emilie Van der Henst

EU Development Policy and
Funding Officer
WWF European Policy Office

Email:

evanderhenst@wwf.eu

Mobile +32 485 332 759