



EAZA contribution to the Consultation on the EU approach against Wildlife Trafficking

EAZA, the European Association of Zoos and Aquaria, represents and links 345 member institutions in 41 countries. Formed in 1992, EAZA's mission is to facilitate cooperation within the European zoo and aquarium community towards the goals of education, research and conservation.

By ensuring that its member zoos and aquariums achieve and maintain the highest standards of care and breeding for the species they keep, EAZA empowers European citizens to learn about and contribute to global biodiversity conservation goals. It is estimated that more than 140 million people visit EAZA members each year, equivalent to approximately one in five European citizens.

1. Is the policy and legislative framework currently in place in the EU against wildlife trafficking adequate?

The European Association of Zoos and Aquaria (EAZA) is extremely concerned about the scale of illegal wildlife trafficking and agrees that the European Union should step up the mark to combat illegal trade.

EAZA believes in the importance of legal and controlled trade in wildlife for example for ex situ conservation initiatives and zoo based population management programmes.

EAZA is of the opinion that the policy and legislative framework against wildlife trafficking is adequate as far as licensed zoos and aquaria are concerned (e.g. CITES). CITES permitting for animals held in licenced zoos in general works well, but could be implemented more harmonised among EU member states (for example via a one market approach for animals managed in European Endangered species Programmes –EEPs-). This could increase efficiency around permitting and potentially free resources to combat illegal wildlife trafficking. Non CITES countries, and especially if candidates for EU membership, should be urged to sign the convention.

EAZA would like to take this opportunity to inform policy makers that animals kept in European zoos are increasingly subject to organized theft and mutilation (eg. rhino horns) and therefore a formal liasion between the zoo community and Europol/national law enforcement is desired.

EAZA cannot fully judge whether the framework is adequate beyond the licensed zoo and aquarium community. However, our impression is that the framework is OK whilst enforcement is under-resourced. In conclusion, we do not need more legislation but better enforcement.

2. Should the EU enhance its approach to wildlife trafficking by developing a new EU Action Plan, as called for by the European Parliament?

EAZA considers this to be a sensible approach as without an action plan, nothing will move forward. There needs to be considerable resource devoted to implementing the action plan, in tackling both the supply and demand sides of the supply chain.

3. How could the EU increase political commitment at all levels against wildlife trafficking? What diplomatic tools would be best suited to ensure coherence between different international initiatives?

Information dissemination and engagement are needed to enhance political commitment against illegal wildlife trafficking. A wider understanding of all the implications and consequences should help to raise the profile of this issue on the political agenda from parliament to communities. For instance illegal traded bushmeat has been shown to present a risk to human health through pathogen transmission. In our perception too many politicians view the loss of biodiversity and wildlife trafficking as a low priority on the political agenda. Greater understanding of the magnitude of the implications should help increase its political importance. How politicians are engaged in the issue is an entirely separate subject. It is certain that greater concordance between international initiatives would increase effectiveness.

4. What tools at international level should the EU focus on to enhance enforcement against wildlife trafficking and strengthen governance?

More effective enforcement of existing legislation seems to be key. Genuine enforcement in a timely fashion, with strict penalties for illegal activities right through the entire supply chain. Penalties must be better balanced against the financial gain of illegal wildlife trade.

EAZA feels that better intelligence-gathering structures are important. Detection of material followed by recognition and identification of the material needs to be improved. Greater coordination is probably needed along the entire supply chain, rather than focusing on the EU part of it. EU Member State authorities should perform due diligence when claims are made by range countries that animals are captive bred.

EAZA feels that centralised data gathering is of crucial importance. Working together with partners such as TRAFFIC and IUCN (for example the IUCN rhino specialist groups) is important in this regard.

Border controls at harbors but also at airports in Europe are a priority. Staff at customs should be fully equipped to detect and identify material. EAZA believes that people working at the base need better training. Furthermore customs should reach out to taxon experts whenever needed. European zoos and aquariums as well as professional private experts can play an important role in this regard.

More investment should be considered for organisations such as LAGA that has been successful in raising the profile of wildlife crime in central/west Africa with cases of ape and ivory poachers being successfully prosecuted in Cameroon.

Develop best practice guidelines/procedures for animal dealers/brokers.

As regards the animals seized in the framework of law enforcement, zoos can play a role in housing them. Unfortunately legal issues sometimes prevent them from being integrated in captive breeding programmes. The EU should take this into account and adapt the enforcement tools.

5. What tools are most suitable for EU action to address international and EU demand for illegal wildlife products? What role could civil society and the private sector play in this regard?

Professional zoos can play a role in this regard as they educate millions of visitors coming to zoos worldwide every day. Zoos have the chance to educate children from kindergartens, schools, universities, young and old people. Zoos have the chance to initiate a change in behaviour of human beings towards their attitude to nature. Especially in our modern world, when more and more people receive information from the web and less from nature itself, zoos play an important role in education and raising awareness.

Zoos can run awareness-raising campaigns on the lack of evidence for traditional medicinal products

such as rhino horn, tiger bone and bear bile. And awareness-raising in both supply and demand countries on the unsustainable and inhumane side of the trafficking.

Zoos are organised on national, international (European and World wide level). These global organisation have a huge potential to influence human behaviour.

Focus on reducing demand is a very important method of tackling the illegal wildlife trade. A combined approach of awareness-raising and strict penalties for purchasing and selling illegal products may help. In various EU Member States government campaigns have led to certain activities being viewed as being completely socially unacceptable. Drink-driving is one of them, smoking in bars and restaurants another. Such campaigns only work when they are long-running and relatively intense, and whilst they cannot reach everyone, they can be effective in tackling certain issues.

6. How can the EU best add value to address the peace and security implications of wildlife trafficking?

No comment.

7. How could the EU cooperation instruments better support the reinforcement of the capacities of developing countries for wildlife conservation and action against wildlife trafficking?

Link aid to effective and increased implementation of wildlife legislation. While rhino horn, tiger and ivory poaching continues to feed specific markets, most illegal wildlife trafficking is based on a large in-country trade in wildlife for food or pets, particularly SE Asia and West/Central Africa.

8. What measures could be taken to improve data on wildlife crime in the EU so as to ensure that policy-making can be more effectively targeted?

A European centralised database, or even better a global database system, can play an important role.

9. What measures could be taken to strengthen enforcement against wildlife trafficking by environmental authorities, police, customs and prosecution services in the Member States and to reinforce cooperation between those authorities? How could awareness of the judiciary be raised?

Most likely the only way to strengthen the enforcement in the Member States is by using economic deprivations as a tool to push MS Authorities to act.

10. How could existing tools against organised crime at EU and Member States level be better used to address wildlife trafficking? What additional measures should be envisaged, e.g. regarding sanctions? What contribution could Europol and Eurojust make in that regard?

No comment.

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