



THE GLOBAL INITIATIVE TO END WILDLIFE CRIME RESPONSE TO THE UPDATED ZERO DRAFT OF THE POST-2020 GLOBAL BIODIVERSITY FRAMEWORK

ABOUT THE INITIATIVE

The Global Initiative to End Wildlife Crime ([EWC](#)) is a broad alliance of environmental, policy, legal, business and public health organisations and experts coming from across every continent; created to address serious gaps in the existing international legal framework for combating wildlife crime and regulating wildlife trade. EWC advocates for, and offers technical support towards, the creation of a [new global agreement](#) on wildlife crime, and the [amendment](#) of existing international wildlife trade laws to include public and animal health in decision making.

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EWC welcomes the publication of the Updated Zero Draft of the Post-2020 Global Biodiversity Framework (CBD/POST2020/PREP/2/1) ('the updated Zero Draft') and congratulates the Co-Chairs of the Open Ended Working Group, its members and the Executive Secretary on their work to date.

EWC supports the 2050 Vision and Goals, and the 2030 Mission and Milestones, outlined in the updated Zero Draft, and welcomes the inclusion of important 2030 Action Targets in the draft framework, such as the effective protection and restoration of key habitats for biodiversity conservation, the significant reduction of pollution, and an increased contribution to climate change mitigation and adaptation.

The EWC notes that the content of the original Zero Draft was crafted before the outbreak of the COVID-19 pandemic. This devastating pandemic has fundamentally altered the way the world perceives a number of key wildlife-related issues, and in particular the threat to human health posed by certain wildlife trade, markets and consumption, be it legal, illegal or unregulated.

Although the precise source of the COVID-19 pandemic is yet to be confirmed, the most likely explanation is that the virus spilled over from a wild animal into humans, possibly via an intermediary species. We do know that previous epidemics and pandemics had their origins in wildlife, such as HIV-AIDS, Ebola, MERS and SARS.

Scientists and public health officials have long advised of the risk posed by wildlife-related zoonotic diseases, and recognised the conditions that make spillover from animals to humans more likely, including through certain high-risk animal-related trade, markets and consumption. Most recently, the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services ([IPBES](#))

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estimated that another “**1.7 million currently undiscovered viruses** are thought to exist in mammal and avian hosts”, of which “631,000–827,000 could have the ability to infect humans”.

For this reason, EWC believes it is imperative to strengthen and [amend existing international wildlife trade laws](#) to **include public health and animal health criteria into decision-making** and thereby take a ‘One Health’ approach to wildlife trade. The institutionalisation of a ‘One Health’ approach would help national governments build pandemic preparedness and resilience, offer strategic opportunities to address the common drivers of biodiversity loss (with one of the main drivers being the direct exploitation of wild species), and prevent future wildlife-related pandemics.

While the COVID-19 pandemic has had devastating consequences for people, our response provides a unique opportunity to attain optimal health for people and nature.

OUR RECOMMENDATIONS

E. 2030 Action Targets:

EWC supports the establishment of a wildlife trade-focused action target and notes the inclusion of Target 4, as a means to reduce “threats to biodiversity”. However, as drafted, this Target does not:

- make clear what is meant by the words “and safe”. Some have read this to imply that if trade is legal and sustainable it is safe. Legality, sustainability and safety are separate but related issues. The current drafting is open to different interpretations. The risks posed to human and animal health should be specifically referred to.
- reflect the need to take a holistic and a precautionary approach to wildlife trade, which a fully institutionalised ‘**One Health**’ approach would enable.
- address the [severe threats](#) posed to biodiversity, climate change, human and animal health, and security posed by **illicit wildlife trafficking**¹. Enabling condition 14 (j)² assumes such a Target exists. While there are challenges in measuring the illegal offtake and trade of wildlife, especially for developing countries, both legal use and illegal use need to be addressed in order to fully consider biological and ecological sustainability. Collating data not only on legal trade but on illicit wildlife trafficking at a country level is essential to understanding the scale and nature of the trade, the responses³, and the inter-relationship between legal and illegal wildlife trade. This has been acknowledged and addressed, at least in part, through the UN World Wildlife Crimes Reports of [2016](#) and [2020](#), the work of the [ICCWC](#) (International Consortium on Combating Wildlife Crime) and the [CITES Annual Illegal](#)

¹ As reported by the World Bank, illicit wildlife trafficking directly causes declines in species population, resulting in the deterioration of ecosystem functions. World Bank. 2019. [Illegal Logging, Fishing, and Wildlife Trade : The Costs and How to Combat it](#). World Bank, Washington, DC. © World Bank.

² Enabling condition 14(j) currently reads as follows: ‘*Safety and security in use of biodiversity to prevent spillover of zoonotic diseases, spread of invasive alien species and illegal trade in wildlife*’ (section G of the updated Zero Draft - CBD/POST2020/PREP/2/1)

³ See the [CITES Guidelines](#) for the content of Annual CITES Illegal Wildlife Trade reports.

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[Trade Reports](#), which was adopted by CITES Parties at CoP17 in 2016. The post-2020 Global Biodiversity Framework needs to explicitly incorporate objectives and actions to curb illicit wildlife trafficking and include such language in Target 4.

We recommend changing the language of Target 4 as follows:

*“By 2030, ensure that the harvesting, trade and use of wild species of fauna and flora is legal, at sustainable levels, ~~and safe~~ **poses no significant risk to human or animal health, and illicit wildlife trafficking⁴ is reduced by (X %)**”.*

Proposed indicators for measuring Target 4:

More work is also required to refine the Target’s indicators, which currently lack true measures of ecological and biological sustainability. Current proposed indicators for Target 4⁵ focus on legality, which is not in itself a direct measure of sustainability or safety.

Further, monitoring measures to ensure “safe” wildlife offtake and trade operations will inevitably fall short of keeping people safe. The language of Target 4 needs to be changed, as is referred to above, and clear indicators are needed to measure reductions in the commercial exploitation of wildlife that poses a risk to human or animal health.

In addition, the monitoring framework needs to ensure effective efforts to prevent and combat illicit wildlife trafficking and consider both supply and demand of illegally sourced wildlife products (noting the strong link with Target 15⁶). Efforts to address directly the illicit trafficking in wildlife are intrinsically linked to, *inter alia*, consumer behaviour and consumption patterns, policy structures, and governance issues. There should be indicators on trends in the adoption of policies, laws and regulations, as well as measuring the degree of implementation and enforcement efforts through international instruments for all types of wildlife, terrestrial and marine, and not just those species listed under CITES.

G. Enabling Conditions

EWC supports the inclusion of a paragraph on zoonotic diseases and the ‘illegal wildlife trade’ and notes the inclusion of paragraph 14 (j) as a means of doing so. However, the drafting combines three separate issues into one paragraph that do not neatly fit together, (although zoonotic diseases and invasive alien species, including their impact on animal health, could be linked).

Given the severe threats posed to biodiversity, climate change, human and animal health, and security by illicit wildlife trafficking, it deserves a standalone sub paragraph. In this regard we draw

⁴ ‘Illicit wildlife trafficking’ is the terminology used in the UNGA Resolutions of 2015, 2016, 2017 and 2019.

⁵ See [CBD/SBSTTA/24/3/ADD1](#) on Proposed indicators and monitoring approach for the post-2020 global biodiversity framework.

⁶ Current draft Target 15 reads as follows: “By 2030, eliminate unsustainable consumption patterns, ensuring people everywhere understand and appreciate the value of biodiversity, and thus make responsible choices commensurate with 2050 biodiversity vision, taking into account individual and national cultural and socioeconomic conditions”

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attention to the three UN General Assembly Resolutions on ‘Tackling Illicit Wildlife Trafficking’ from [2015](#), [2017](#) and [2019](#)⁷ and to [UN SDG 15.7](#)⁸. In this context, we note the General Assembly use of the terminology ‘illicit trafficking in wildlife’ rather than ‘illegal trade in wildlife’, and we recommend this language be used.

As a general observation, EWC notes the absence of any reference to the importance of adequate legal frameworks as an enabling condition, which should be addressed.

We recommend that Paragraph 14 (j) be amended as follows:

“Safety and security in use of biodiversity to prevent spillover of zoonotic diseases, spread of invasive alien species and ~~illegal trade in wildlife~~ risks to animal health”.

And the insertion of a new paragraph under Paragraph 14 as follows:

“Adequate legal frameworks for strictly regulating wildlife trade and preventing and combating illicit wildlife trafficking are in place and effectively implemented”.

⁷ Together with a shorter Resolution related to UN World Wildlife Day in [2016](#).

⁸ Among its 17 Goals and 169 Targets, the SDGs specifically address tackling illegal trade in wildlife through specific Targets under Goal 15, which state:

“15.7 Take urgent action to end poaching and trafficking of protected species of flora and fauna and address both demand and supply of illegal wildlife products.

15.c Enhance global support for efforts to combat poaching and trafficking of protected species, including by increasing the capacity of local communities to pursue sustainable livelihood opportunities.”