



THE GLOBAL INITIATIVE TO END WILDLIFE CRIME RESPONSE TO THE FIRST 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 First Draft of the Post-2020 Global Biodiversity Framework (CBD/WG2020/3/3) (“the First Draft”) and congratulates the Co-Chairs of the Open Ended Working Group, its members and the Executive Secretary on their work to date.

While EWC supports the 2050 Vision, the 2030 Mission, and the Goals and Milestones outlined in the First Draft, we are concerned that the revised text still **fails to reflect the urgency of some key wildlife-related issues**, and in particular the threat to biodiversity and human and animal health posed by the wildlife trade, markets and consumption.

Although EWC notes that the content of the original Zero Draft was crafted before the outbreak of the COVID-19 pandemic (as it did in its [submission on the Zero Draft](#)), we are disappointed that **the newly released First Draft of the post-2020 framework continues to largely reflect the pre-COVID situation**.

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 animal-related trade, markets and consumption. 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.

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Most recently, the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services ([IPBES](#)) 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 human 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.

Further, the **First Draft appears to have gone backwards from the Zero Draft when it comes to combating and preventing illicit wildlife trafficking**. This is surprising given the content of Sustainable Development Goal 15 (Life on Land)¹ and the strong [resolution 75/311](#) adopted by consensus by the UN General Assembly on 23 July 2021 on “Tackling illicit trafficking in wildlife”. In fact, we can see no reference to wildlife trafficking at all in the First Draft, which is astonishing given the fact that it is addressed explicitly in the Sustainable Development Goals and five² UN General Assembly Resolutions³.

OUR RECOMMENDATIONS

While EWC supports the establishment of a wildlife trade-focused action target and notes the inclusion of [Target 5](#) (formerly Target 4), as a means to reduce “threats to biodiversity”, this Target still does not:

- address the risks to [animal health](#) that are posed by the trade in wildlife, which provides opportunities for disease transmission that not only cause human disease outbreaks but also threaten livestock and native wildlife populations. It is worth remembering that previous outbreaks, such as the Ebola virus disease, have devastated populations of non-human primates, killing an estimated 5,500

¹ Target 15.7 and 15.C urge to “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” and “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”.

² Resolutions [69/314](#) of 30 July 2015, [70/301](#) of 9 September 2016, [71/326](#) of 11 September 2017, [73/343](#) of 16 September 2019 and, most recently, resolution [75/311](#) of 23 July 2021.

³ As well as in recently adopted resolution [75/271](#), entitled “Nature knows no borders: transboundary cooperation – a key factor for biodiversity conservation, restoration and sustainable use”.

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endangered western gorillas at the Lossi Sanctuary in the Republic of Congo from 2002 to 2003.

- reflect the need to take a holistic and precautionary approach to wildlife trade, which a fully institutionalised “One Health” approach would enable. Wildlife trade is a complex, heterogeneous phenomenon, which includes the legal and illegal offtake, transportation, selling and end use of wildlife and wildlife products; opportunities for disease transmission exist across the entire supply chain and it is imperative that a precautionary, rather than crisis-driven, approach is adopted to prevent the future risk of animal-to-human spillovers. A precautionary approach was also encouraged by the WHO, FAO, OIE and UNEP, in their [guidance](#) on actions that national governments should consider adopting urgently with the aim of making traditional markets safer, which recommends the suspension of trade in live caught wild animals of mammalian species for food or breeding purposes, and the closure of sections of food markets selling live caught wild animals of mammalian species as an emergency measure unless demonstrable effective regulations and adequate risk assessment are in place.
- address the [severe threats](#) posed by illicit wildlife trafficking to biodiversity, climate change, human and animal health, safety and security, which has an estimated impact of \$1-2 trillion or more per year⁴. According to the 2050 Goals and 2030 Milestones, one of the main long-term goals of the framework is to significantly reduce “the rate of extinctions” and the “risk of species extinctions across all taxonomic and functional groups”. Yet, the First Draft clearly fails to recognise wildlife trafficking as a key driver of wildlife [population decline and local extinction](#). EWC believes the post-2020 Global Biodiversity Framework needs to urgently and explicitly incorporate objectives and actions to curb illicit wildlife trafficking and include such language in a stand-alone target.

We recommend changing the language of Target 5 as follows:

Target 5 (rev): “Ensure that the exploitation, trade and use of wild species is ecologically sustainable, legal, and safe for human health **and animal health, and take measures to combat and prevent illicit wildlife trafficking**”.

Proposed indicators for measuring Target 5:

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 5⁵ focus on legality, which is not in itself a direct measure of sustainability or safety.

⁴ As reported by the World Bank in its 2019 report “[Illegal Logging, Fishing, and Wildlife Trade: The Costs and How to Combat it](#)”, illicit wildlife trafficking directly causes declines in species population, resulting in the deterioration of ecosystem functions.

⁵ See [CBD/WG2020/3/INF/2](#) on proposed indicators and monitoring approach for the post-2020 global biodiversity framework.

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The Target suggests that if it is not illegal or unsustainable, it is therefore safe, which isn't necessarily the case⁶.

The indicators proposed for elements of Goal A and Targets 1-4 of the Framework, and specifically those associated with healthy and resilient populations, connectivity and ecological integrity⁷, are also relevant to Target 5 and should be referenced.

Further, monitoring measures to ensure “safe” wildlife offtake and trade operations will inevitably fall short of keeping people safe. Clear indicators are needed to measure reductions in the commercial exploitation of wildlife that poses a risk to human or animal health.

Proposed changes to glossary

The [glossary](#) accompanying the First Draft of the post-2020 Global Biodiversity Framework defines the term “sustainable” in Target 5 as “the harvesting, trade and use of organisms at a rate within the bounds of its capacity for renewal”. However, this suggests an economically driven, rather than ecologically driven, definition. We strongly urge for changes to the definition to reflect the need for sustainability to incorporate not just capacity for renewal, but capacity for recovery to levels which enable species to fulfil their ecological niche and function within healthy, functioning ecosystems.

We also strongly recommend the addition of a new separate target to directly address the illicit trafficking in wildlife:

Target XX (new): “Ensure that illicit wildlife trafficking⁸ is reduced by at least X per cent, and that adequate legal frameworks for strictly regulating wildlife trade and preventing and combating illicit wildlife trafficking are in place and effectively implemented”.

In addition, the monitoring framework needs to assess the effectiveness of efforts to prevent and combat illicit wildlife trafficking and consider both supply and demand of illegally sourced wildlife products. Efforts to directly address 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 (such as [ICWC](#)) for all types of wildlife, terrestrial and marine, and not just those species listed under CITES. Support for the adoption of a protocol on illicit wildlife trafficking under the

⁶ See for instance: Marin, C., Lorenzo-Rebenaque, L., Laso, O., Villora-Gonzalez, J. & Vega, S. Pet Reptiles: A potential source of transmission of multidrug-resistant Salmonella. *Frontiers in Veterinary Science* 7, 613718 (2020).

⁷ The “need to maintain connectivity across ecosystems” and “avoid the fragmentation of transboundary habitats” has also been recently stressed by the UN General Assembly in resolution [75/271](#).

⁸ 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.

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United Nations Convention on Transnational Organised Crime (as [proposed](#) by EWC and [called for](#) by the Presidents of Costa Rica and Gabon), and its implementation at national level, could represent one such indicator.