

~~END~~ **WILDLIFE** ~~CRIME~~

THE GLOBAL INITIATIVE TO END WILDLIFE CRIME RESPONSE TO THE REVISED DRAFT OF THE POST-2020 GLOBAL BIODIVERSITY FRAMEWORK FOLLOWING THE FOURTH OPEN ENDED WORKING GROUP MEETING IN NAIROBI, JUNE 2022

ABOUT THE INITIATIVE

The Global Initiative to End Wildlife Crime ([EWC](#)) is a broad alliance of environmental, policy, legal, business and public health organizations and experts coming from across every continent. EWC was 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, or the development of a [new international instrument](#), to include public and animal health in decision making.

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In its submissions on the [Zero Draft](#) and the [First Draft of the Post-2020 Global Biodiversity Framework](#), including the [Addendum](#) to its second submission, the EWC offered its comments on the Drafts and congratulated the Co-Chairs of the Open Ended Working Group, its members and the Executive Secretary on their work to date.

While EWC continues to support the 2050 Vision, the 2030 Mission, and the Goals and Milestones as outlined, we are **deeply concerned** that the [revised text](#) following the fourth Open Ended Working Group Meeting in Nairobi ('the post Nairobi 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 wildlife trade, markets and consumption, and the devastating impacts of **wildlife trafficking**.

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](#)) 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](#) or to develop a [new international instrument](#) to **include**

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human health and animal health criteria into decision-making and thereby take a “One Health” approach to wildlife trade, markets and consumption, which is not yet reflected in agreed text.

Further, the **post Nairobi text has gone backwards from earlier drafts when it comes to preventing and combating 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”, as well as the most recent [Resolution](#) of May, 2022 of the UN Commission on Crime Prevention and Criminal Justice (CCPCJ) on “Strengthening the international legal framework for international cooperation to prevent and combat illicit trafficking in wildlife”. The text of the draft working documents contain may brackets and alternative proposals, making it challenging to know what part of the existing text to refer to in some instances. However, we can see **no agreed reference to preventing and combating wildlife trafficking** anywhere in the post Nairobi draft, which is astonishing given it is addressed explicitly in the Sustainable Development Goals, five² UN General Assembly Resolutions,³ and multiple CITES, CMS, ECOSOC, UN CCPCJ and World Heritage Convention Resolutions.

OUR RECOMMENDATIONS

While EWC supports the establishment of a wildlife trade-focused action target and notes the inclusion of [Target 5](#) as a means to reduce “threats to biodiversity”, this Target as currently crafted is inadequate. EWC considers that taking measures to prevent and combat wildlife trafficking and ensuring the exploitation, trade and use of wild species is safe to human, animal and plant health is critically important.

We recommend Target 5 be as follows:

Target 5 (rev): *Take effective measures to prevent and combat illicit wildlife trafficking and ensure the exploitation, trade and use of wild species is legal and sustainable and does not pose a risk of pathogen spillover to humans, wildlife or other animals.*⁴

The EWC also notes the absence of references to the importance of appropriate legal frameworks within the Draft, which should be rectified.

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”.

⁴ Noting that ‘illicit wildlife trafficking’ is the terminology adopted by the UNGA and the UN CCPCJ

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RATIONALE

As drafted, the Target fails to:

- address the [severe threats](#) posed by 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 year⁵. 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 current draft clearly fails to recognize 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 prevent and combat wildlife trafficking and include such language in Target 5.
- reflect the need to take a holistic and precautionary approach to wildlife trade, which a fully institutionalized “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 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.⁶

FINAL COMMENTS

The adoption of an ambitious and far-sighted Post 2020 Global Biodiversity Framework is a once-in-a-decade opportunity. EWC encourages all Parties to continue negotiations in a constructive manner and in the spirit of compromise and remains ready to assist any Party in considering the issues raised in this submission, upon request.

⁵ As reported by the World Bank in its 2019 report “[Illegal Logging, Fishing, and Wildlife Trade: The Costs and How to Combat it](#)”, wildlife trafficking directly causes declines in species population, resulting in the deterioration of ecosystem functions.

⁶ Previous outbreaks, such as the Ebola virus disease, have devastated populations of non-human primates, killing an estimated 5,500 endangered western gorillas at the Lossi Sanctuary in the Republic of Congo from 2002 to 2003.