

Preventing the illegal trade in wildlife – Assessment of the revised EU Action Plan Against Wildlife Trafficking (WAP)

Feedback provided by the Beastly Business project team at the University of Sheffield

The ESRC-funded [Beastly Business](#) research project team welcomes the European Commission's revision of the EU Action Plan against Wildlife Trafficking. The revised policy provides strategic guidance as key international environmental agreements are renegotiated, such as CITES regulations and the Post-2020 Global Biodiversity Framework.

Since the inception of the 2016 Action Plan, wildlife trafficking has moved up on the policy agenda due to its severe implications for both people and nature. The revised Action Plan commits the European Union to address the root causes of wildlife trafficking (Priority 1), strengthen the legislative framework (Priority 2) and streamline enforcement of existing regulations (Priority 3) through global partnerships between source, consumer and transit markets (Priority 4).

The European Union remains a major player in the illegal wildlife trade. Although the revised Action Plan has made significant advancements in tackling demand, improving the quality of regulations and supporting effective implementation, critical challenges remain unaddressed.

We provide a summary of the three most pressing, interconnected challenges below which must be addressed as the revised Action Plan is implemented across the Member States.

1. Reduction of consumer demand overlooks non-CITES-listed species and importance of conservation in EU.

The revised Action Plan prioritises the reduction of EU consumer demand for illegally traded wildlife and identifies key priority species (e.g., birds and glass eels, among others). Awareness-raising campaigns are to be coupled with social science-driven behavioural change interventions (Priority 1, Objective 1) as well as activities to curb supply from source communities. Given that the [EU is the largest import market for legally traded wildlife](#) and wildlife products worldwide, such a focus on the EU consumer market is a significant advancement from the 2016 objectives.

However, the revised objectives (particularly Priority 1, Objectives 2 and 3) overlook the increasing demand for endemic non-CITES-listed species and the importance of conservation to tackle the illegal wildlife trade within the EU. Demand and supply must be addressed in synergy. The illegal trade in endemic wildlife, such as brown bears or songbirds, contributes to biodiversity loss across

Member States and requires consolidated efforts, from local to regional levels, to curb both demand and supply effectively. But the latest Action Plan continues to prioritise flagship activities targeted at communities in third countries, particularly Africa. It promotes an incomplete approach to reducing consumer demand, focusing particularly on third-country consumers and demand for exotic or threatened wildlife. Thereby, the revised policy overlooks the fundamental role of EU communities in addressing the root causes of the illegal wildlife trade in the Union and its neighbourhood, which includes the demand for and supply of endemic non-CITES-listed species.

2. Multilevel implementation requires the integration of stakeholders and systematic reporting.

Implementation (Priority 2) and enforcement (Priority 3) are closely intertwined and can have a fundamental impact on the success of the revised Action Plan. But they are separate processes that require different approaches. The separation into distinct priority areas is therefore a welcome change to the new policy and allows to address important legal disconnects. The establishment of inter-agency committees and national action plans (Objective 5) can help shift implementation authority horizontally, supporting the flexible application of the Action Plan and increased coordination across Member States.

Although provisions for multilevel implementation are matched with commitments to increased resources (e.g., through the LIFE Programme), successful implementation depends on the availability of high-quality data from Member States. The revised Action Plan envisages the creation of a ‘light reporting mechanism’ that sets out indicators against which implementation progress can be measured. However, drawing on assessments of the effectiveness of self-reporting systems in the implementation of key EU conservation policies (e.g. Birds and Habitats Directives), such a light reporting mechanism is unlikely to yield the robust results that are required to track and evaluate the effectiveness of the Action Plan. For self-reporting mechanisms to be successful, stakeholders (e.g., businesses, researchers, NGOs, etc.) must systematically be integrated into the implementation process, both with regard to data collection and scrutiny over national authorities. This is not sufficiently reflected in the relevant objectives of the Action Plan (Objectives 5-8). Moreover, there are no apparent plans to integrate neighbouring countries into the reporting process; however, given the cross-jurisdictional nature of the illegal wildlife trade and migratory species behaviour, increased cooperation with stakeholders from the EU’s neighbourhood is critical to ensure the effectiveness of policy responses to curb illegal activities associated with wildlife trafficking.

3. Emphasis on organised crime overlooks the involvement of legally registered entities.

While the separation of implementation and enforcement into distinct priority areas streamlines the practical application of the revised Action Plan in the Member States, it also places disproportionate

emphasis on the illegal wildlife trade as a serious and organised crime (Objectives 9 and 12). This is problematic because the illegal wildlife trade is often carried out in ad hoc, less organised and everyday ways by opportunist traders; often, [legal entities](#) such as corporations, sport hunting companies and food retailers (knowingly or unknowingly) engage in wildlife trafficking. This branch of wildlife crime falls under the category of ‘green-collar crime’, i.e. the type of environmental crimes committed by legally registered companies that are involved in illegal activities or use their infrastructure to facilitate illicit trade. The revised Action Plan overlooks these groups. Although it aims to step up the detection of trafficking in the EU (Objective 9) through increased information-sharing among law enforcement and national authorities (Objective 11), and also in the digital space (Objective 13), no substantial steps have been identified to work more closely with the business sector. This is a missed opportunity to refine the EU’s response to criminal activity associated with the illegal wildlife trade that increasingly merges legal and illegal interests. Despite having only recently been introduced, the revised Action Plan already lags behind policy debates in other EU institutions (for instance, in the [European Parliament](#)).

About the Beastly Business Project

The [Beastly Business](#) project is a research project that investigates the role of green-collar crime in illegal wildlife trade in Europe, and it has received funding from the **Economic and Social Research Council**, which is part of UK Research and Innovation (grant number ES/V00929X/1). The Beastly Business project develops an in-depth analysis of the dynamics that drive and sustain the wildlife trafficking in three species native to Europe in order to shape better conservation policies: brown bears, songbirds and European eels.

We previously engaged in the [public consultation](#) process on the roadmap for the revision of the EU Action Plan Against Wildlife Trafficking and offered a comprehensive [list of recommendations](#). We would like to thank the European Commission for providing the opportunity to share our feedback. Our team is willing to offer additional advice and support on the future Action Plan against Wildlife Trafficking.

The project is located at the Department of Politics and International Relations at the University of Sheffield, United Kingdom. For further information, please get in touch with the project team via Twitter ([@BeastlyProject](#)) or contact Dr Teresa Lappe-Osthege (t.lappe-osthege@sheffield.ac.uk).