



**Beastly
Business**

Green-Collar Crime and the illegal wildlife trade



Using a **Green-Collar Crime** approach will produce more effective policies to tackle illegal wildlife trade (IWT).

Green-collar crimes are those that are committed knowingly or unknowingly by legal entities.

Tackling these crimes should include:

1. Addressing the role of legal entities in IWT including private businesses and governments
2. Highlighting the harms to wildlife in IWT
3. Focusing on meeting high welfare standards in legal wildlife trade, including during capture, transportation and housing.

Value of the wildlife trade

The wildlife trade, globally, has an estimated worth of US\$220 billion per year ([CITES, 2022](#)), while the value of the illegal wildlife trade is harder to establish: it is estimated to be worth US\$ 7-23 billion per year.

Wildlife crime is commonly called a form of serious, organised crime. The lucrative illegal trade in wildlife is attractive to criminal networks – it offers potentially high profits with lower penalties and risks of being caught.

However, in tackling the illegal wildlife trade, the focus on those easily identified as operating outside the law (poachers, traffickers, organised crime networks) misses the important role of legal businesses that are involved (intentionally or not). It also means current policy responses rely too heavily on law enforcement as a solution, including increased penalties, fines and imprisonment.

As a result, current policies to tackle wildlife crime often fail to address the role of legal entities involved in the illegal wildlife trade.

This is a key policy gap which can be filled by designing policies that explicitly address Green-Collar Crime.

What is Green-Collar Crime?

Green criminologists use the idea of Green-Collar Crime to highlight the ways that legal businesses engage in harmful and/or illegal practices that facilitate illegal wildlife trade ([Wolf, 2011](#); [van Uhm 2016](#)). This is important because it resists clear cut and simple definitions of criminal, organised crime, poacher, and trafficker. Instead, the Green-Collar Crime approach highlights the complexity of the players and processes involved in producing harms towards wildlife ([Iordăchescu et al, 2022](#)).

By using the framework of Green-Collar Crime, we can draw attention to the environmental harms produced by both legal and illegal activities ([van Uhm, 2016](#)) by, for example, transport and shipping companies, restaurants or government failure to manage/control fishing and hunting.

It also opens an opportunity to address animal welfare in the legal and illegal wildlife trades. There is ignorance and denial of the routine and serious harms experienced by animals in the wildlife trade ([Wyatt et al 2022](#)). Harm is brought about by companies and practices that abide by the law, by actors and practices that violate the law, and those that straddle the line between legality and illegality.

Trapping, hunting, shipping, storage and the sale of wildlife (legal or illegal) can all entail significant harms to the animals themselves. There is a need to develop and enforce high welfare standards for traded wildlife.



Concrete examples

Green-Collar Crime and Bears:

Address the role of private zoos, hunting companies, taxidermists, bear observatories and restaurants in bear trafficking. The harms experienced by 'habituated' bears include becoming conditioned to associate humans with food sources- either because people feed them or leave trash that attracts bears. As a result they can become labelled as a 'problem bear' to be managed through culling, and this opens grey markets for trophies, or can lead to illegal killing as a form of retaliation.

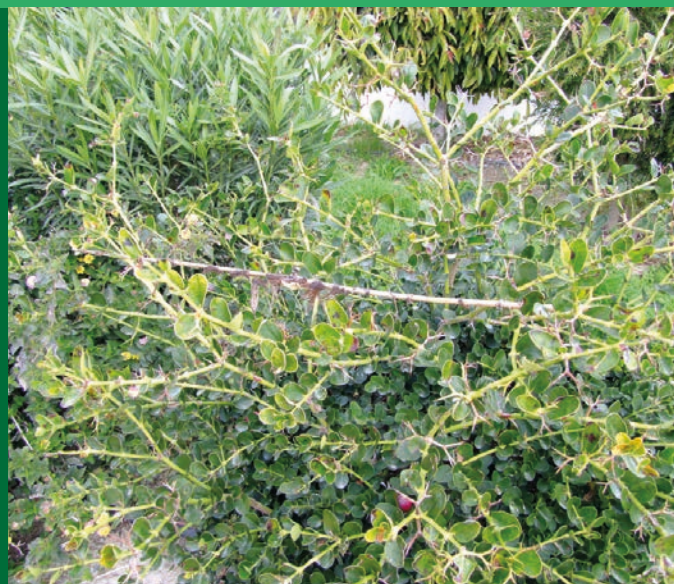


Green-Collar Crime and Eels:

Green-Collar Crime is made possible through fishing activities and restocking operators who may fish beyond the allowable quota. Additional harms also arise during the packing and transport of live glass eels for restocking or aquaculture, and poor welfare conditions at aquaculture facilities. Beyond fishing activities, harms from water abstraction and the lack of eel passes at hydropower plants should also be viewed as a form of wildlife crime.

Green-Collar Crime and Songbirds:

Green-Collar Crime offenders can include hunting companies, restaurants, food transporters, or taxidermists. For example, hunting tourism companies can be involved in using illegal methods, such as calling devices, hunting operators may shoot more than they are officially permitted or shoot birds that are not on the approved list, and restaurants may sell illegally killed birds as delicacies to their customers.





Further reading:

CITES (2022) [World Wildlife Trade Report](#) (CITES/ UNEP-WCMC; Geneva/Cambridge).

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About the Author

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About the Beastly Business Project

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Placing a spotlight on European consumers:

Drivers of demand for illegal wildlife trade in Europe



Key issue

Europe is a key consumer market for illegal wildlife products. Demand for both [CITES](#) and non-CITES listed species by European consumers fuels the illegal wildlife trade in EU Member States and its neighbourhood. Although policy responses have [begun to recognise the role of European consumers](#), interventions to curb consumption predominantly focus on the Global South, particularly [Asia](#). The role of Europe must be addressed as it contributes to biodiversity loss across the continent. This will require:

- a. demand reduction campaigns that recognise the cultural roots of demand by European consumers coupled with
- b. coordinated and integrated enforcement and monitoring across national jurisdictions (including in the EU's immediate neighbourhood).

The nature and extent of demand by European citizens

Europe is the [largest import market](#) for CITES-regulated wildlife and wildlife products worldwide, demonstrating the scale of demand from European consumers. The annual value of the illegal trade of CITES-listed species in the EU was estimated at [€4.7 million in 2019](#), but such estimates are based on official seizure reports by EU Member States; actual figures are likely much higher. Criminal activity within the EU and its neighbourhood has increasingly shifted towards the [trafficking of endemic non-CITES-listed species](#), such as songbirds, to evade law enforcement. This is problematic because the demand for and trafficking of European wildlife within Europe is not sufficiently captured in [current policy responses](#) that focus largely on understanding and curbing the drivers of the illegal wildlife trade of CITES-listed species in the Global South.



Demand is rooted in cultural traditions and socio-economic inequalities

Policies must target the underlying drivers of demand by European consumers to effectively tackle the illegal wildlife trade in Europe. These drivers are often rooted in cultural traditions and are enabled by socio-economic inequalities, making enforcement and monitoring alone inadequate responses. There are examples from across the Member States concerning different species which illustrate that current policies do not comprehensively tackle the underlying interlinkages of demand, traditions, and inequalities.

For instance, EU Member States like Cyprus and Italy function as important consumer countries for illegally trapped or killed non-CITES-listed birds which are eaten as culinary delicacies (e.g. *ambelopoulia* or *polenta e osei*). Every year an estimated [11-36 million wild birds](#) are killed in the Mediterranean for human consumption or leisure. Similar dynamics drive the illegal killing and trade of [other European species](#) in different European countries, such as brown bears killed for trophies in Romania and Slovakia. In 2022 alone, [Europol seized 1,255kg of glass eels](#) across the EU which are often caught and traded as delicacies. The motivation for consuming European wildlife, either for food or leisure, builds on the sense of luxury, exclusivity, and social status that the consumption or possession of illegally traded wildlife conveys.



Why must policies target demand more comprehensively?

Overlooking that demand by European consumers has its roots in cultural traditions and socio-economic inequalities is problematic for two reasons.

First, framing the consumption of European wildlife by EU citizens as an integral part of cultural and national traditions diminishes its role as an important driver of the illegal wildlife trade in Europe. While many activities associated with the illegal wildlife trade have their roots in cultural practices (such as the trapping of songbirds with limesticks in Cyprus or the hunting of brown bears by elites in Romania), contemporary practices hold little resemblance to the traditions. For instance, the use of non-selective trapping methods, such as mist nets, means that bird trapping has become a high-profit business in EU Member States. Similarly, the large-scale aquaculture of eels differs from the [traditional, localised, and demand-led](#) fishing practices common prior to industrial expansion.

Criminals often work with [legal businesses](#) or use their infrastructure to maximise profits. Framing activities associated with the illegal wildlife trade in Europe as rooted in tradition can legitimise them at national and international levels. Attempts to tighten regulations to curb such activities and demand can be considered an affront to cultural diversity in Europe. This makes the creation and implementation of policies to tackle demand by EU Member States much more difficult.



Second, overlooking the roots of demand by European citizens leads to ineffective policies that frequently rely on increased enforcement and monitoring to tackle supply networks. Such policies merely treat the symptoms and not the root cause. While enforcement and monitoring play an important role in creating seizure data and ensuring that existing legislation is implemented (such as through [EU-TWIX](#) or [IMPEL](#) networks), these policy responses only tackle one side of the illegal wildlife trade in Europe. They overlook the ways that illegal activity along the supply chain can shift from one location to another to evade enforcement. Therefore, to prevent the shift of criminal activity to other locations or species, supply and demand dynamics need to be addressed in tandem.

Recommendations

1. Policies must prioritise the reduction of demand by European citizens for illegal wildlife products, including those of non-CITES-listed species.

To be effective, policy responses must be sensitive to cultural contexts and socio-economic inequalities, for example by introducing awareness-raising campaigns that demonstrate that contemporary illegal activity is fundamentally different from traditional practices and that it can have detrimental effects on regional biodiversity. An increase in funds will be required to support Member States and third countries; the LIFE-Programme can provide crucial funding streams for conservation.

2. Enforcement and monitoring activities should be seen as complementary policy interventions to demand reduction campaigns, rather than as the prime solutions.

Tackling demand and supply simultaneously can prevent the transference of criminal activity from one location to another. Member States and key third countries must step up cooperation across national jurisdictions, as seizure and other law enforcement data can provide crucial insights into shifts in demand for illegal wildlife products. Participation in networks (e.g. IMPEL) and data-sharing initiatives (e.g. EU-TWIX) should be widened to maximise their effectiveness.



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Uncertain Scientific Knowledge and European Illegal Wildlife Trade



Uncertain scientific knowledge about the status of European species contributes to illegal wildlife trade (IWT) by obscuring or facilitating the production of environmental harm.

Missing or incomplete data about the ecology and population dynamics of European species enables green-collar crimes by legally registered companies or entities and hinders collaboration between institutions. Policymakers should adopt a precautionary principle when sound scientific knowledge is lacking in order to minimize the possibility of harm to European wildlife.

Scientific uncertainty and policymaking

Controversies over scientific assessments by authorities prompt violations of [environmental law](#), as it impairs the uniform and effective enforcement of environmental regulations.

Scientific uncertainty hinders the creation of effective management and conservation plans for protecting European species. Without reliable population data, management decisions can be taken without having the species' viability or favourable conservation status as the primary objective, making room for [commercial exploitation](#) as the main management objective.

Contention over the scientific assessment by authorities and monitoring techniques can lead to inaccurate reporting of species status, a core obligation of Member States stemming from the Habitats Directive ([92/43/EEC](#)). This can negatively impact international conservation efforts and can block transboundary cooperation in issues such as law enforcement and prosecution of wildlife crimes.

Scientific uncertainty enables environmental harm

Uncertain scientific knowledge impacts public trust by creating and maintaining a crisis of authority.

Unreliable data maintain an environment in which human-wildlife conflict is presented as a crisis (of human safety, human health, etc.) that demands that solutions are taken without democratic oversight. Often conflicts arise over numbers of large carnivore populations (wolf, brown bear, etc) which can lead to long [legal disputes](#) at the national and European Union levels which undermine or halt effective species management.

Traditional monitoring techniques are often inadequate for reaching conservation objectives.

For example, track counting of large carnivores or bird surveys during hunting seasons do not offer data on population trends and the impacts on hunting, potentially leading to inaccurate estimations. Monitoring of wildlife as game species needs to be supplemented with techniques which offer comprehensive scientific knowledge to ground actions for conservation, such as comprehensive transboundary assessments of migratory populations.

Over-estimations can have a long-term impact on species protection.

The reported abundance of wildlife managed as game species can misrepresent on the ground species abundance in the absence of reliable population data. The abundance of species which are targeted for trophies or for consumption as culinary delicacies is more often [overestimated](#) than in the case of those that cannot be hunted.





Moving forward:

1. Adopt a **precautionary principle approach** to decision making. It is important to recognise that uncertain scientific knowledge impacts decision-making in environmental matters, and aim to mitigate its impacts. By adopting precautionary measures potential environmental harms can be reduced.
2. Develop **guidelines** through a participatory process for uniform monitoring and reporting methodologies for those species about which current data is incomplete or unreliable. Such guidelines can be issued as soft law instruments.
3. Allocate **priority funding** for prompt implementation of state-of-the-art monitoring methodologies across the population range of target species.
4. Address the impacts of uncertain scientific knowledge within **practitioners' networks** working across Europe (such as the EuroLarge Carnivores platform). These platforms can unite groups with diverse **expertise and interests**. Such platforms have the potential to offer complex solutions and concrete pathways for addressing the effects of unreliable data on the species conservation and protection.
5. Acknowledge that ineffective management of European species leads to serious, but unaccounted for, **environmental harms against people and wildlife**. For example, inadequate oversight of trophy hunting can result in wildlife crime, negatively impact locals' livelihoods and undermine public trust.



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Wildlife we love to harm:

How charisma impacts conservation responses to the illegal wildlife trade in Europe



Conservation action for the protection of wildlife must move from a focus on highly popular species to those who are at greatest risk of exploitation.

Over one million species are approaching extinction due to human activities, including over-exploitation and trade. To address this rising crisis, conservation action needs to be rapid and transformative.

Halting biodiversity loss is a key element of the [European Commission's Biodiversity Strategy for 2030](#). However, the European conservation agenda has often been [biased toward popularised and charismatic species](#) to the detriment of high-risk species and wildlife whose exploitation is localised, large scale, and considered normal.

Addressing this oversight will require the re-framing of conservation priorities and funding to direct efforts to highly exploited and overlooked species.

It is essential to recognise that:

- Exploitation of less charismatic and popularised wildlife (for food, as pets, and for recreation) is a major driver of wildlife harm.
- Expanding perceptions of value beyond market-based mindsets will help exploited wildlife to be recognised as victims.

Perceptions of charisma and value underpin the conservation and exploitation of wildlife.

These judgements can vary considerably depending on time, space, culture, and species. Charismatic species typically encompass large, iconic, and popularised wildlife (e.g., brown bears). The high 'donor appeal' of popularised species means that they often receive more [funding support](#) than endangered, low-charisma, or non-threatened species, but exploitation and demand for charismatic species is also often high.

Popularity also impacts the perceived value of wildlife.

Wildlife can be both instrumentally valuable (as a resource for trade and tourism), relationally valuable (culturally and spiritually), and intrinsically valuable (valuable in their own right and for themselves).






THE MULTIPLE VALUES OF WILDLIFE

- It's food   
- It's medicine 
- It's beautiful  
- It's dangerous  
- It's an investment   
- It's a trophy   
- It's my culture   

Market-based values (where wildlife are viewed as tradable commodities) dominate social norms, policy responses, and [conservation action](#). The European eel is an example of a species considered primarily for their market value. Policies focus on maximising economic value by maintaining sustainable trade, meaning wider relational or intrinsic values have little weight in public, conservation, or policy spheres.

European wildlife trade (bears, songbirds, and eels) and the diverging pathways of charisma, value, and harm.

	BROWN BEAR 	SONGBIRDS 	EUROPEAN EEL 
APPEAL & CHARISMA	High charisma. High public interest. This feeds into conservation and exploitation appeal.	Medium charisma. Highly specific market desirability with low public awareness of threats.	Low charisma. Minimal public engagement with conservation and normalised exploitation.
RECOGNISED VALUE	Social conflict between instrumental (economic) and intrinsic value.	Instrumental value tied to aesthetic preferences and cultural practices.	Economic value tied to cultural practices for food.
SPECIES AND INDIVIDUAL HARMS	Low risk to species overall, although public attention to individual harms can be high.	Medium risk to species. Exploitation is normalised and viewed as unthreatening with minimal recognition of individual harms.	High risk to species, with numerous pressures beyond exploitation and trade. The recognition of individual harms is absent.

Commodifying wildlife and valuing them on a hierarchy of [charisma and appeal](#) ignores alternate [diverse, culturally embedded, and traditional values](#) for wildlife. Under this narrow view, wildlife must ‘pay their way’, proving their economic value as tradeable or exploitable commodities to receive meaningful conservation support. This is a problem for [less-charismatic and \(non-\)threatened wildlife](#) (e.g., birds, amphibians, invertebrates) and species whose exploitation is normalised (e.g., fish, plants, fungi). Species that are not threatened with extinction also experience significant harms through legal and illegal wildlife trade and are frequently [overlooked in conservation funding](#) and policymaking.

Recommendations

- 1. Proactive and precautionary conservation responses are essential for under-prioritised, less appealing, and non-threatened species to alleviate pressures of the mounting biodiversity crisis and to move towards socially and environmentally just responses to wildlife crime and harm.**
- 2. Diverse values of nature must be embedded into conservation action and policy making, transitioning from an instrumental value mindset to one that encompasses multiple values and traditional knowledge to ensure sustainable and just futures for wildlife and people.**



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