



**Beastly  
Business**

# Final Report

**Examining Illegal Wildlife Trade in  
Europe**



# Wildlife Trade in Europe

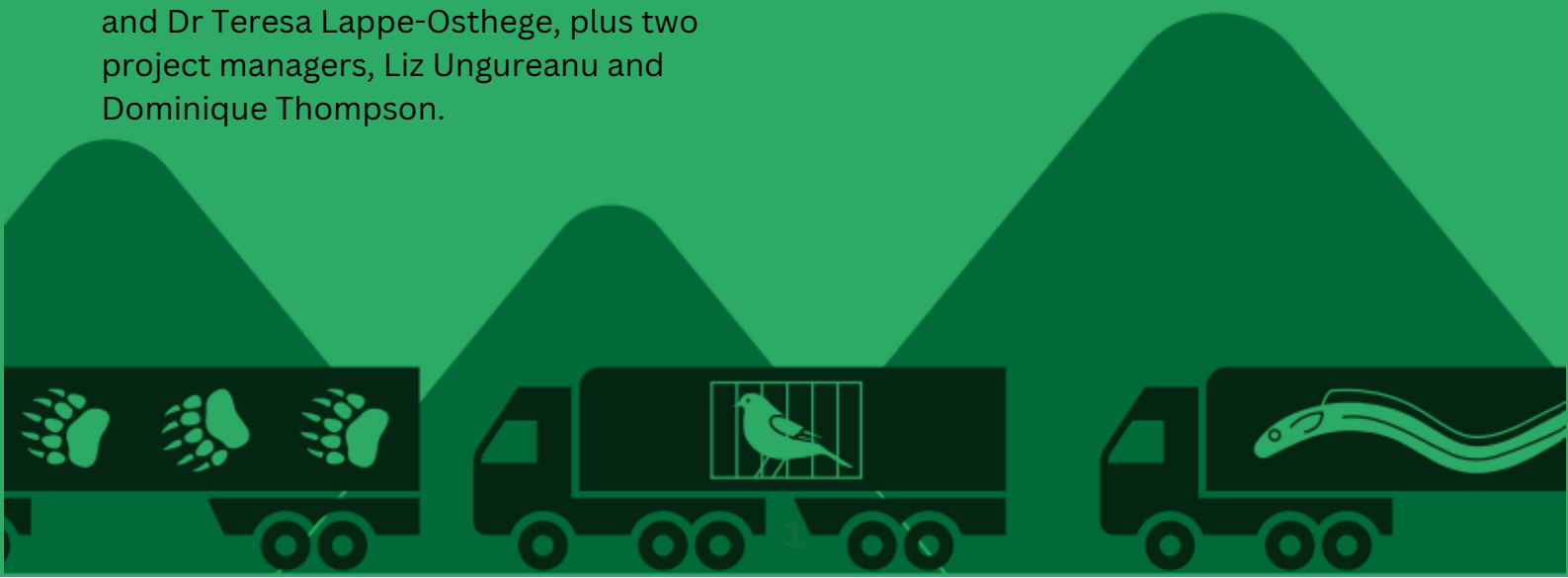
The Beastly Business Project focuses on Illegal Wildlife Trade (IWT) in European species, specifically the trade in European brown bears, European eels and songbirds. Europe is a key area for sourcing, consuming and transporting wildlife, but this is overlooked in academic and policy debates; instead IWT tends to be presented as a problem of Africa and Asia. In policies to tackle IWT Europe is often identified only as a transit route for wildlife products trafficked from source (typically assumed to be Africa) to consumer (typically assumed to be Asia). This misses the importance of IWT within Europe and in European species. Focusing on IWT in Europe is important because it is a key driver of biodiversity loss, and it has become a prominent policy issue in the EU. For example, in 2016, the EU launched the EU Action Plan Against Wildlife Trafficking, revised in 2022, as a comprehensive strategy to address the role of the EU as a destination market and transit point for illegal wildlife products. Below we summarise the key findings from our research.

## Beastly Business Project

The Beastly Business project (2021-2023) brings together political ecology and green criminology to develop new, transformative approaches to understanding green-collar crimes and IWT in European species. Funded by the UKRI Economic and Social Research Council grant of £859,000 (ES/V00929X/1), the project is based at the Department of Politics and International Relations, University of Sheffield. The team is comprised of Professor Rosaleen Duffy, Professor Charlotte Burns, Dr George Iordachescu, Dr Laura Gutierrez, Dr Alison Hutchinson, and Dr Teresa Lappe-Osthege, plus two project managers, Liz Ungureanu and Dominique Thompson.

## Four goals of Beastly Business

1. To develop a novel theoretical framework that fuses political ecology with green criminology.
2. To map systematically and then rethink the drivers of IWT in European species via the lens of political ecologies of green-collar crime.
3. To generate original empirical data on IWT in three specific European species: brown bears, songbirds and European eels.
4. To provide policy relevant advice to key stakeholders and to streamline policy responses.





# Cross-Cutting Themes

## Political Ecologies of Green-Collar Crime

A green-collar crime approach highlights the ways that legal businesses engage in harmful and/or illegal practices that facilitate IWT (van Uhm 2016). There is often an emphasis on the role of organised crime networks as the key perpetrators of IWT. However, drawing on green criminology, it is critically important to challenge simplistic definitions of 'criminal', 'organised crime', 'poacher' and 'trafficker' in order to understand the complexity of the trade. To do this, the Beastly Business project focuses on the often overlooked role of legal actors in the IWT. It brings a political ecology lens to understand the field of European environmental policy making. To do this we integrate political ecology and green criminology to develop the idea of political ecologies of green-collar crime; this allows us to engage more fully with power dynamics, and to address how class and social inequalities shape the production of crimes related to IWT.

## Scientific Uncertainty

Scientific uncertainty enables green-collar crimes and obscures significant harms against wildlife. Our research demonstrates that lack of clear data on wildlife populations and on the scale and dimensions of IWT hinders the

development of effective management and enforcement regimes. Such uncertainties open up opportunities for illegal exploitation of wildlife. Inaccurate data and controversies over monitoring techniques, as well as overestimates of wildlife populations (as it is sometimes the case of wildlife managed as game species) can lead to overexploitation and hinder international cooperation on conservation, policy-making, courts adjudication and law enforcement. Moreover, our research shows that uncertain scientific knowledge impacts public trust by creating and maintaining a crises of authority. Contested data about the species ecology and population dynamics often lead to long legal disputes which further undermines effective species management and creates opportunities which green-collar crime offenders can exploit.

## Consumption

It is essential to address patterns of consumption as a driver of IWT. However, initiatives to address European consumers of wildlife have been lacking, despite the fact that Europe is the largest import market for CITES-regulated wildlife and wildlife products worldwide. A common motivation for consuming European wildlife, either for food or leisure, is the sense of luxury, exclusivity, and social status that the consumption or



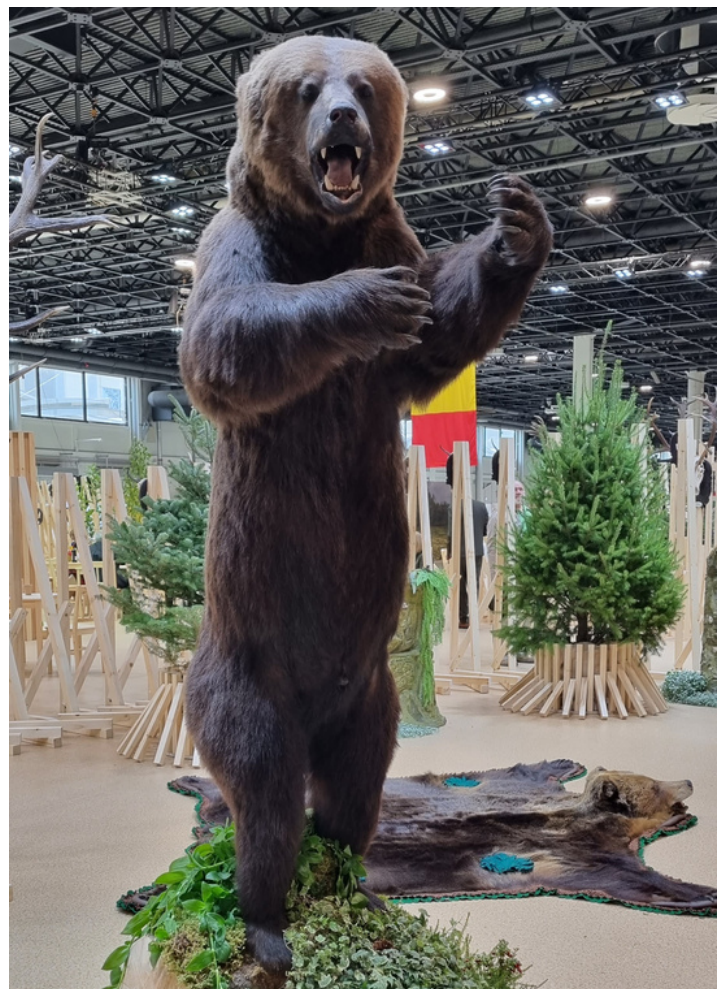
possession of illegal wildlife products conveys. An estimated 11-36 million wild birds are killed in the Mediterranean each year for human consumption or leisure. Similar dynamics drive the illegal killing and trade of brown bears as trophies in Romania and Slovakia. Parallels are also seen with juvenile glass eels and adult (smoked) eels that are often caught and traded as delicacies within Europe. Consumption of wildlife in Europe is often underpinned by deeply held cultural traditions, cross-cut by socio-economic inequalities. Opportunities for green-collar crimes can emerge at different stages of the consumption process, enabled by legislative disconnects.

## Charisma

Levels of charisma in different species can shape policy responses to IWT. We specifically focused on brown bears, songbirds and European eels because of their differing levels of charisma. We understand charisma as perceptions of each species' attractiveness or charm, which can generate emotional responses and translate into increased support for their conservation, or exploitation. Brown bears are emblematic in this way, however, their charismatic status also fuels their exploitation for hunting and ecotourism. There is also the potential for *hidden charisma*: when a close connection, affection, or intimate knowledge of the species' can increase personal perceptions of charisma that differs from social norms. Despite their hidden charisma, species broadly considered less charismatic (songbirds and eels) are often neglected in conservation interventions. Their exploitation may be highly localised, large scale, and considered normal. Recognising such animals as victims of wildlife harm, and calling for this harm to be recognised as criminal, is one way of addressing the overlooked harms against such hidden-charisma species.

## Legislative Frameworks and Legal Loopholes

Diverging regional legislation and differentiated policy implementation across the EU's 27 Member States can create legal loopholes that are exploited by green-collar offenders. We analyse gaps in legislation and how the framing of IWT as 'organised crime' impacts policy and enforcement strategies and provides cover for legal enterprises engaging in IWT. For example the illegal trade in bears is conducted by using legal covers such as the yearly culling quotas (to be carried out by trophy hunters) which have been approved by the government as an exceptional derogation from Article 16 of the EU Habitats Directive. Culling of problematic bears (that attack people or destroy property) tends not to target individuals that are prized by trophy hunters, so new culling quotas have to be issued to tackle the unresolved issue.



## Harms

Our research shows the need to use a harms-based approach for understanding and responding to IWT. Current approaches focus on wildlife trafficking as a matter of organised crime. However, this framing excludes the significant harms that can be produced by a range of legal practices that threaten wildlife, but are not criminalised. Using a harms-based approach allowed us to place centre stage the wildlife victims of both legal and criminalised wildlife exploitation, and to view their exploitation as harmful irrespective of legal definitions. This standpoint provides for a greater scrutiny of wildlife trade, particularly how legal enterprises can act as drivers of 'normalised' wildlife harms (such as with the consumption of eels, which are often described as fishery commodities, rather than wildlife). Further, our focus on green-collar crimes demonstrates how legal wildlife enterprises may themselves also be co-opted by illegal actors, to mask and legitimise illegal trade and obscure the scale of harms from wildlife exploitation.

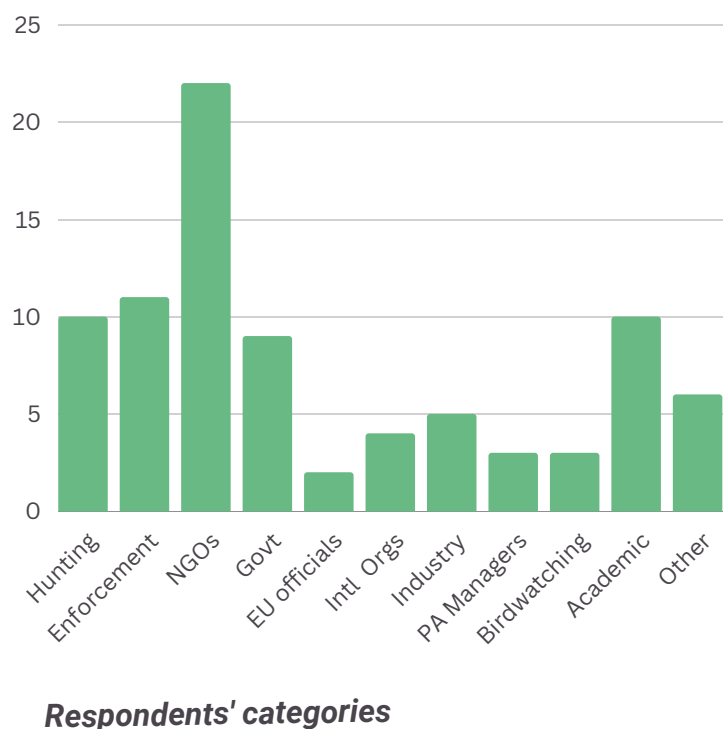
## Research Methods

The team conducted 78 interviews with 87 respondents, undertook participant observation, archival research and attended several meetings on wildlife trade. Fieldwork was carried out in Romania, Slovakia, Hungary, Cyprus, Italy, Belgium, UK, Bermuda and Germany. The team also drew on methods from environmental humanities to develop animal biographies and storytelling to enrich the research. The first 8 months of the project were affected by COVID restrictions across Europe which delayed the start of face-to-face interviewing and fieldwork.

This focus on harm to the individual, rather than a high-level focus on population status, ties into our focus on how perceptions of charisma influence the visibility of harm.

## Animal Cultures

It is essential to centre the animals themselves in research on IWT. Animal cultures are key to understanding how and why green-collar crimes occur and are sustained. Hunters have a highly developed understanding of the behaviours and animal cultures of their target species in order to make their hunting practices more effective (for example understanding feeding, breeding and migration patterns). In our research, we use animal biographies to trace how brown bears become victims of green-collar crime. Furthermore, we develop understandings of governance of migratory species, to explore how animals on the move are stopped or diverted by wildlife crime, and how attention to animal cultures could contribute to more effective conservation.





## **Work Package 1 – Dr George Iordăchescu – Brown bear trafficking in Europe: examining the political ecologies of green-collar crime**

WP1 analysed the wildlife crimes that affect brown bear (*Ursus arctos*) populations in Europe. The project included over four months of field research in Romania, Slovakia and Hungary, as well as interviews with key stakeholders in Brussels. The research design combined historical and archival methods with ethnographic fieldwork and follow-the-policy methods to understand which are the actors involved in perpetuating harms against bears and how their *modi operandi* adapt to policy changes related to brown bear conservation and management in the region. The project followed a broad definition of wildlife crime and considered multiple interconnected harms against brown bears, such as trafficking, illegal killing, habitat destruction and habituation as a source of human-bear conflict.

### **Key findings with direct policy implications from this research include:**

1) Enforcing blanket bans on trophy hunting without adequate funding for strict protection and robust mechanisms to mitigate human-wildlife conflict decreases

tolerance towards the species and prompts illegal killing as a retaliatory conflict resolution alternative. Moreover, since bear trophy hunting is an elite sport, it generates essential income for other species and habitat conservation. Failing to implement alternative funding disrupts the conservation work of game managers (hunters) in the studied countries.

2) Food conditioning and habituation lead to increased human-bear conflicts, including depredation of livestock and attacks on humans. Heightened conflict can lead to appeals for legal culling or can result in illegal killing where official intervention measures are deficient. Current practices part of game management – such as supplemental feeding, or common in ecotourism – such as using food as an attractant, contribute to bears' habituation, along with improper waste management around settlements and tourist areas.

3) Scientific uncertainty hinders effective bear management and conservation. Uncertainty about species status and population dynamics enables green-collar crime and obscures harms against brown bears. Unreliable population data offers occasions for green-collar crime offenders to exploit legal discontents and trade bears illegally or value them in illicit ways.



The WP developed innovative ideas to understand wildlife trafficking in data-poor contexts. In particular, it combined a focus on animal biographies from animal studies with a focus on harm inspired by green criminology to examine the hidden dynamics of wildlife trafficking, including the involvement of green-collar crime offenders and frequently overlooked spaces of commodification.

## Work Package 2 – Dr Teresa Lappe-Osthege – Green-collar crime and the illegal songbird trade in Europe

WP2 analysed the role of corporate or green-collar crime in the illegal songbird trade in Europe to understand the socio-ecological drivers of demand and supply. The research demonstrated that consumption patterns are deeply intertwined with cultural practices in key EU Member States; however, traditional consumption and supply differ fundamentally from the profit-driven methods used by green-collar offenders who conceal business interests behind appeals to tradition. The research identified that contrary to existing responses to regulate the import of (illicit) wildlife and wildlife products into the EU from third countries, the illegal songbird trade in Europe is largely overlooked due to its prevalence in the internal EU market. Regional regulatory frameworks (such as EU Birds and Habitats Directives, Bern Convention or Convention on Migratory Species) are often disconnected, creating blind spots where legal and illegal spheres overlap or focus on exotic and CITES-listed species. As trafficked songbird species are mostly endemic, non-threatened and not listed under CITES, they evade public focus and policy attention. Uncertainty surrounding the impact of the illegal trade on migratory bird populations across transboundary flyways creates additional ambiguity over the data upon



which policy responses are based. The research combined insights from political ecology, green criminology and new institutionalism with qualitative data from 25 semi-structured interviews with stakeholders in the case study countries Cyprus and Italy, and key international organisations, as well as participant observation at international hunting exhibitions and regional conservation conferences. The analysis pointed to two significant challenges in responding to the illegal songbird trade in Europe, with greater implications for environmental policymaking in the EU.

**Firstly**, current policies do not engage critically with the cultural roots of environmentally harmful activity, which raises broader questions about the role of European cultures and national identities in EU environmental policy-making and in the production and distribution of harm. As the research demonstrated, the design of EU and regional policies permits structured deviation from existing regulations to accommodate specific cultural practices but simultaneously creates an ambiguous context that can be exploited by green-collar offenders.

**Secondly**, the demand and supply of illicitly trapped, killed, and traded birds must be addressed in synergy to counteract the harm stemming from the policy design itself. As green-collar crime in the wildlife sector is



opportunistic and often loosely organised, it can adapt to tightening regulations by shifting to different locations, targets or methods. Coordinated enforcement and monitoring activities (e.g. through [IMPEL](#) and [EU-TWIX](#)) must be complementary to demand reduction campaigns that target illegal wildlife consumption by EU citizens to prevent displacement of criminal activity. These findings have broader implications for assessments of environmental policy effectiveness in a transboundary context. Through the process of transference,

environmental policies can appear effective in a specific location while invisibilising and externalising socio-ecologically harmful activity. Therefore, the research cautions that environmental policy effectiveness cannot be measured solely by legal compliance with and implementation of existing regulatory frameworks in EU Member States. Instead, it argues for a comprehensive assessment of policy effectiveness that corresponds with the ecosystemic dynamics it seeks to regulate (e.g. bird conservation along flyways).



### **Work Package 3 – Dr Alison Hutchinson & Dr Laura Gutierrez – Unpacking the illegal trade, exploitation, and harm towards European eels**

This work package was divided into two parts, with the first year of research undertaken by Dr Laura Guterrez and the second year of research carried out by Dr Alison Hutchinson. The overarching ambition of this research was to examine the drivers and sustainers of European eel (*Anguilla anguilla*) trafficking, and the porosity between legal and illegal markets.

The research established how a combined conceptual and theoretical framework of green criminology and political ecology can be adopted to shine a light on the harms impacting the European eel, and by doing so highlighted the need to focus attention beyond the IWT to broader and systemic harms arising from infrastructure, pollution, and development – to name a few.

Drawing from this combined conceptual approach, the research investigated the recognition of and responses to threats facing the European eel across their migratory route, from the Sargasso Sea to the shores of the River Severn in the UK. The study involved a combination of semi-structured and photo-voice interviews to examine the implications of management



interventions and the recognition of harm amongst key involved groups (government agencies, law enforcement, relevant NGOs, fishery/trade representatives, and interested parties). The research demonstrates that despite numerous and compounding threats towards the European eel, a predominant focus within policy making towards regulating fishing activities and preventing the illegal trade of glass eels means that other significant threats, with a greater potential to harm and threaten the European eel, are overlooked. Although the European eel has become a higher-profile species as a result of lucrative and illegal trade, uncertainties in scientific understanding, and a lack of interest or regard for the species (possibly born from their unappealing or uncharismatic status) mean that management, enforcement, and conservation interventions can fall short of meaningful and impactful change for the species.

In the UK, the allocation of fishing rights is interwoven with land-ownership (securing tumps) and controlled by trade interests. This creates a system of financial control that influences and motivates fishery activities. Following Brexit, the UK eel fishing industry is under constant pressure to remain operational. The prevention and active closing of the fishery has led to an atmosphere of distrust and disconnect between fishers, traders, management, and enforcement authorities. Additionally, an overlap between trade and conservation interests, through the process of re-stocking and translocating juvenile eels, may provide a temporary solution in the absence of more fundamental conservation action. However, the merit of this approach is highly uncertain and potentially exploited as a means to perpetuate the fishery and navigate illegal trade through legal channels.



The overwhelming focus toward illegal fishing shapes narratives surrounding management responses. Our findings indicate that a focus on illegal fishing and overexploitation within the fishing industry needs to be expanded beyond individual problems within the fishing community. Overall, fisheries pose but one of a myriad of risks contributing to greater harms toward the eel. Concurrent industries (infrastructure, energy generation, global shipping) combined with extensive (historic and present) habitat alteration and degradation continue to contribute to individual harms and the wide scale decline of the species. These problems should be considered in tandem, rather than a means to deflect attention, with additional focus on the unequal power and wealth dynamics that both sustain the fishery itself and enable other significant threats towards the eel to be minimised and masked from view.





# Knowledge Exchange

Knowledge exchange is central to the project. We contributed to the [consultation on the Revised EU Action Plan Against Wildlife Trafficking](#) and the [EU Environmental Crime Directive](#). Team members attended [CITES COP19](#) and [CBD COP15](#) and continue to engage with a range of organisations including TRAFFIC International, United Nations Office on Drugs and Crime (UNODC), the European Commission, the European Parliament, Convention on Migratory Species (CMS), Convention on the International Trade in Endangered Species (CITES), BirdLife International and national partners, Sustainable Eel Group (SEG), European Federation for hunting and Conservation (FACE), WWF Romania, WWF Slovakia, Flora & Fauna International (FFI) Romania.

**More information is available on our website <https://beastlybusiness.org/>**





# Beastly Business Resources

## Short Films

We have a series of short films available on our website, which provide an overview of our main research findings:

- [Green-Collar Crime and the Illegal Wildlife Trade](#)
- [Uncertain Scientific Knowledge](#)
- [Placing a Spotlight on European Consumers: Drivers of Demand for Illegal Wildlife Trade in Europe](#)
- [Wildlife We Love To Harm](#)
- [Combined films](#)

## Policy Briefs

We produced a series of briefs aimed at policy makers in governments, international organisations and conservation NGOs. These provide short jargon free summaries and can be [downloaded from our website](#).

The policy briefs cover the key themes of [green collar crime](#), [scientific uncertainty](#), [consumption](#) and [harms](#).

## Recorded Talks

Our team has a series of recorded conference papers and talks available to watch - they can be accessed from our [website](#).

## Digital Art Exhibition

Entitled '[A Marvellous Creature in Perilous Waters](#)' our digital art exhibition is a collaboration between Dr Laura Gutierrez and Sergio Gonzalez Rosas. It explains the lifecycle of the European Eel and the threats faced by eels during their long migration from the Sargasso Sea to Europe.

## Papers

You can read an overview of our theoretical developments, published in [Environmental Politics](#).

Further articles and short essays can be accessed on our [website](#)

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#### **About the Beastly Business Project**

The Beastly Business Project was funded by UKRI Economic and Social Research Council grant of £859,000 (ES/V00929X/1), and based at the Department of Politics and International Relations, University of Sheffield

#### **For more information:**

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