



Dear MEP and Rapporteur César LUENA (S&D)

*Copy to:*

Shadow rapporteurs: Alexander Bernhuber (EPP), MEP Rodriguez Ramos (Renew), Vile Niinistö (Greens/EFA), Marco Dreosto (ID), Alexandr Vondra (ECR) & Nikolaj Villumsen (GUE),  
All ENVI Members

**Re: Resolution on the Biodiversity Strategy for 2030 Paragraph no. 28 (wildlife trade)**

I am writing you as Chair of the International Union for Conservation of Nature (IUCN) Sustainable Use and Livelihoods Specialist Group (SULi). IUCN is the global authority on the status of the natural world and the measures needed to safeguard it – you may be aware of the Red List of Threatened Species (<https://www.iucnredlist.org/>) that provides data on the conservation status of species and is widely used as a key indicator in international biodiversity policy. SULi is a global network of 300+ experts on sustainable wildlife utilisation from the intergovernmental, government, academic, private and NGO sectors. It brings together a diverse array of relevant expertise from technical management of forestry, fisheries, medicinal plants and wildlife, to traditional knowledge, community based natural resource management, and rural development (see [www.iucnsuli.org](http://www.iucnsuli.org) for more information).

I am aware of the European Parliament's Environment (ENVI) Committee's draft report ([link](#)) on the EU Biodiversity Strategy for 2030. It may not be immediately apparent, but the wording of paragraph no.28 (wildlife trade) is likely to create a context for wide-ranging problems for sustainable use and wildlife trade.

I am referring in particular to Paragraph 28 which states:

*“Reiterates its call for a full ban on the trade in both raw and worked ivory to, from and within the EU, including ‘pre-convention’ ivory and rhino horns, and asks for similar restrictions for other endangered species, such as tigers”.*

The text of paragraph 28, especially the reference to “*similar restrictions for other endangered species*”, is problematic for because it fails to recognise that ‘*trade*’ includes both commercial and not commercial aspects. It is of paramount importance to highlight that the term “trade” (as defined by Article 2u [EU CITES Regulation](#)) also includes the importation into the EU and exportation therefrom of endangered species for all the purposes listed in Article 8(3)(e), (f) and (g) in the [EU CITES Regulation](#) – i.e. for the “*advancement of science*” or “*for essential biomedical purposes*” or “*breeding or propagation purposes from which conservation benefits will accrue to the species concerned*” or “*research or education aimed at the preservation or conservation of the species*”. Thus, this amendment and any similar wording would effectively close the door for all scientific importation and exportation of endangered species, including for the purposes of saving species from extinction, which is the major concern of IUCN.

Let me give you some examples of such trade:

Conservation purposes: Beyond economic benefits and counter-intuitive as it seems, wildlife use and trade can contribute to the restoration of populations of endangered

species. It does this by creating conservation incentives for private individuals and local communities - on whose land the majority of the world's wildlife lives. Saltwater crocodiles (*Crocodylus porosus*) in Australia's Northern Territory are a case in point having experienced massive population declines due to persecution as a dangerous pest, but equivalent population recoveries once a scheme was introduced to allow local people to collect eggs for sale to crocodile farms where the crocodiles are reared for luxury leather production. Vicuna (*Vicugna vicugna*) populations in the Andes similarly recovered with the introduction of live shearing by local communities for the luxury fibre trade. As did Pirarucu (*Arapaima gigus*) (a giant Amazonian freshwater fish) when utilised for the luxury leather trade. Wildlife trade also generates broader livelihood and development outcomes, including building community networks, skills and capacities, and strengthening land tenure, resource access, natural-resource management and local enterprise development<sup>ii iii iv</sup>. Trade in wildlife is often attractive to poor communities due to the low entry requirements (no need for high levels of education or skills or for expensive harvesting technology), the year-round availability of some products, and ease of combining with other income-generating activities<sup>v</sup>. The CITES website provides a range of case examples where trade in wildlife - including of products that are imported into the EU - has generated both conservation and local development outcomes (<https://cites.org/eng/prog/livelihoods>).

Scientific and educational purposes: It is important to note that private collections or specimens found at schools, local museums, and the visitor centres of national parks tend to possess specimens of endangered species with social interest, such as hunting trophies or those with aesthetic value. For example, in the Iberian Peninsula, a classic example is the Iberian lynx (*Lynx pardinus*). As part of the overall conservation effort for the species, systematic surveys during the past decades<sup>vi</sup> uncovered a considerable number of specimens in private and other small collections, which highlights the important role played by non-professional institutions and individuals in the preservation of this material. This may well be the case for many other species and countries; in the Iberian Peninsula alone, for example, these would include the imperial eagle (*Aquila adalberti*), the bearded vulture (*Gypaetus barbatus*), the Cantabrian bear (*Ursus arctos arctos*), and the capercaillie (*Tetrao urogallus*)<sup>vii</sup>. Zoos and aquariums are also often reliant on live animal trade without which their educational and scientific activities would be undermined. Tens of thousands of the transactions in the CITES wildlife trade database involve zoos and aquariums, meaning that such institutions play a significant role in the context of the Convention. Finally, and perhaps most obviously, the ability to import and export species is essential for biomedical research including drug development

The current EU CITES Regulation provides a balanced approach. While it prohibits the purchase, acquisition for commercial purposes, display to the public for commercial purposes, use for commercial gain and sale, keeping for sale, offering for sale or transporting for sale of specimens of the species listed in Annex A, it still allows for exemption in specific cases such as “*advancement of science*” or “*for essential biomedical purposes*”<sup>viii</sup> or “*breeding or propagation purposes from which conservation benefits will accrue to the species concerned*” or “*research or education aimed at the preservation or conservation of the species*”.

It would surely be odd for the European Parliament to be calling for restrictions (on endangered species) in such a broad context, without accepting the current regulatory framework and the value of such trade? Beyond the CITES Regulation, the current text in para 28 contradicts the European Commission's (EC) initiative on the [Global Biodiversity Coalition launched in March 2020](#) and referred to in the [EC Communication on the EU Biodiversity Strategy for 2030](#). The initiative<sup>ix</sup> has brought together zoos,

aquariums, botanic gardens, natural history and science museums to help raise awareness around the world on the need to protect and nurture biodiversity – all of which engage to some extent in the import and export of specimens including from endangered species.

Because of the wide ranging importance, and often beneficial or benign impact, of trade in wild species including those classified as endangered, I would really strongly recommend amending Paragraph 28 as follows (additions in square brackets):

*“Reiterates its call for a full ban on the [commercial] trade in both raw and worked ivory to, from and within the EU, including ‘pre-convention’ ivory and rhino horns, and asks for [an assessment of] similar restrictions for other endangered species [excluding trade for conservation, scientific, educational purposes], such as tigers”.*

This would ensure respect for:

- i) the current regulatory framework, which includes the import of elephant hunting trophies into the EU, and
- ii) the text does not jeopardise sustainable wildlife trade for the sake of a very wide range of “endangered species” (including plants) which are traded for scientific, educational and conservation purposes.

I would like to thank you for your attention to this matter.

Please do not hesitate to contact me should you require further clarifications.

Yours faithfully



Dr Dilys Roe  
Chair, IUCN Sustainable Use and Livelihoods Specialist Group

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<sup>i</sup> The importance of endangered species for scientific and medical research cannot be overstated. For further information, please see IUCN “Conserving Medicinal Species” <https://portals.iucn.org/library/efiles/documents/2006-022.pdf>.

<sup>ii</sup> Dalal-Clayton, B. and B. Child (2003). Lessons from Luangwa: The story of Luangwa Integrated Resource Development Project, Zambia. London. International Institute for Environment and Development. Wildlife and Development Series No. 13. Available from <http://pubs.iied.org/pdfs/9079IIED.pdf>

<sup>iii</sup> Lichtenstein., (2010). Vicuña conservation and poverty allevation? Andean communities and international fibre markets. International Journal of the Commons 4(1), pp. 100–121. Available from <http://www.thecommonsjournal.org/index.php/ijc/article/view/139/130>

<sup>iv</sup> Lichtenstein, G. and P. Carmanchahi (2012). Guanaco management by pastoralists in the Southern Andes. Pastoralism: Research, Policy and Practice 2(1), 16

<sup>v</sup> Marshall, E., K. Schreckenber and A.C. Newton, eds. (2006). Commercialization of non-timber forest products: Factors influencing success. Lessons learned from Mexico and Bolivia and policy implications for decision makers. Cambridge: UNEP World Conservation Monitoring Centre. Available from <http://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/3769.pdf>.

<sup>vi</sup> Rodríguez and Delibes. 2002. Internal structure and patterns of contraction in the geographic range of the Iberian lynx. *Ecography* 25: 314–328.

<sup>vii</sup> Mireia Casas-Marce, Eloy Revilla, Margarida Fernandes, Alejandro Rodríguez, Miguel Delibes, José A. Godoy, The Value of Hidden Scientific Resources: Preserved Animal Specimens from Private Collections and Small Museums, *BioScience*, Volume 62, Issue 12, December 2012, Pages 1077–1082, <https://doi.org/10.1525/bio.2012.62.12.9>

<sup>viii</sup> The importance of endangered species for scientific and medical research cannot be overstated. For further information, please see IUCN “Conserving Medicinal Species” <https://portals.iucn.org/library/efiles/documents/2006-022.pdf>.

<sup>ix</sup> It may include a wide variety of topics, such as: - Use of zoo data to create demographic projections, advance metapopulation management possibilities and study the viability of captive populations; research methodologies and technology to apply in the field; research pertaining to the health of wild animals which may directly contribute to that of their wild counterparts [European

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Commission, Zoos Directive, Good Practices,  
[https://ec.europa.eu/environment/nature/pdf/EU\\_Zoos\\_Directive\\_Good\\_Practices.pdf](https://ec.europa.eu/environment/nature/pdf/EU_Zoos_Directive_Good_Practices.pdf), p.16].