

## SWiPE feedback on the Roadmap for the revision of the EU Action Plan against Wildlife Trafficking

The Successful Wildlife Crime Prosecution in Europe (SWiPE) LIFE project that intends to discourage and ultimately reduce wildlife crime by improving compliance with Environmental Laws in the EU, increasing the number of successfully prosecuted offences, welcomes the commitment of the European Commission to revise and improve the EU Action Plan Against Wildlife Trafficking and contribute to the implementation of the goals of the European Green Deal and the EU 2030 Biodiversity Strategy. This is a pivotal moment for all stakeholders to get engaged and make sure that the EU will play an even greater role in addressing wildlife crime both in Europe and globally.

We are already building on important steps like the Council conclusions setting the EU's priorities against serious and organised crime for EMPACT 2022–2025 where environmental crime remains a priority, and within that trafficking of endangered species. Furthermore, the *Environmental Crime Directive* is also in a revision process to clarify the scope of environmental crime offences, provide more precision with regard to sanctioning and facilitate the use of effective investigative tools and promote cross-border cooperation and information sharing. It is important to have them reinforce one another, to have interservice coordination.

2022 will be an important year for biodiversity both at global level (with the Convention on Biological Diversity negotiations and the CITES COP19) and in Europe with many wildlife trade-relevant policy files on the table of the European Parliament and EU Council such as the revised Environmental Crime Directive, the Deforestation Law and the Corporate Due Diligence and Corporate Accountability Directive.

Wildlife crime – which encompasses wildlife trafficking is one of the elements that is putting global biodiversity under pressure and negatively impacts the sustainable development of local communities.<sup>1</sup> The EU is a market and a critical transit point for both the legal and illegal trade in wildlife and their commodities, and millions of plant and animal specimens worth billions of euros are internationally traded every year.<sup>2</sup> This provides opportunities for laundering into the legal trade and is generally considered a relatively low-risk illegal activity.

<sup>1</sup> LIFE & wildlife crime publication of the European Commission, Published: 2018-07-18

<sup>2</sup> The [Report on the Role of France on Wildlife Trade](#) by WWF France and TRAFFIC, pg.12, pg.18 March 2021

In addition to the EU's role in trade-related aspects of wildlife crime, Europe's wildlife is also directly threatened by illegal taking from the wild - including poaching, trapping or illegal fishing of threatened wildlife within and across EU boundaries. Whereas the EU Birds and Habitats Directives are the main legislative pieces regarding conservation of European wildlife - many aspects specifically related to capacity building, development of specific risk-based strategies and cooperation across Member States for better enforcement against illegal taking from the wild need to be substantiated by concerted efforts under the Action Plan against Wildlife Trafficking.

In conclusion, wildlife crime is a transnational problem in which Europe plays a role as a source, transit and destination country. It devastates the security of global communities, while destroying ecosystems and wildlife. It is linked to other forms of criminal activity, such as money laundering, cybercrime and often fueled by corruption which represents one of the largest conservation and development challenges within natural resources sectors.<sup>3</sup> An increased recognition of wildlife crime as a serious crime could lead to efficient allocation of human and financial resources doubled by crime prevention approaches (e.g situational crime prevention, restorative justice, consumer behaviour change).

The success of the EU Action Plan Against Wildlife Trafficking will depend on the financial and human resources allocated to its implementation and the EU institutions and the EU Member States should identify dedicated budgets both at EU and Member States levels for its implementation. SWiPE is particularly concerned that two Seconded National Expert posts in the European Commission CITES team remain unfilled at time of writing. This needs to be rectified as a matter of urgency. Furthermore, much more needs to be done by Member States if the action plan is to be transformational, namely they must allocate more resources to combating wildlife crime.

Furthermore, the future Action Plan should be supported by a comprehensive Monitoring and Evaluation (M&E) system, in order to measure progress and ensure accountability towards its implementation. EU Member States should commit to translate/implement the EU plan at national level. National law enforcement agencies need to be fully mobilised, trained and specialised to tackle this type of crime and consider it as a serious crime.

While progress has been made thanks to the former plan, the need for further and better coordination between law enforcement authorities at national, EU and international levels remains a priority, as well as the coordination between wildlife/ CITES and organised crime experts.

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<sup>3</sup> For more information check the following reports: [Addressing corruption in CITES documentation processes](#) and '[Corruption and wildlife crime: A focus on caviar trade](#)'.

Regarding the evidence based and data collection component, we consider that the SWiPE National Reports on wildlife crime in 11 focal countries (available by the end of 2021) and the SWiPE European summary Report on WLC covering 11 countries (available in March 2022) can bring added value to the analysis conducted by the external contractor. Both the national and the European reports will be available on the [SWiPE portal](#). In addition, valuable information can be found in the [\*Report on the evidence for trafficking of critically endangered sturgeon in the lower Danube region\*](#).

SWiPE offers its assistance to the EC to support their efforts to address wildlife trafficking and we are asking the Commission to conduct a thorough and comprehensive consultation process where the public and the NGOs could bring in all the relevant know-how and expertise.