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COMMISSION STAFF WORKING DOCUMENT

Summary of the Responses to the Stakeholder Consultation on the EU Approach against Wildlife Trafficking

1. INTRODUCTION

The trafficking in wildlife and wildlife products, including timber, has become a highly lucrative criminal activity over the last years, involving in many cases organized criminal groups. Over the last twelve months several international high level conferences have drawn attention to the serious and growing dimension of the problem globally and its negative impacts on biodiversity, sustainable development, good governance and, in some parts of the world, on regional stability.

The EU remains - despite a comprehensive regulatory framework on wildlife trade – an important transit and destination region for illegal wildlife products. Europol has pointed out in its Serious and Organized Crime Threat Assessment on Environmental Crime 2013¹ that organized wildlife crime also plays a role within the EU.

In light of the scale of the problem, the European Parliament adopted in January 2014 a resolution, calling a.o. for a dedicated EU Action Plan². In light of this call and the high level of attention given internationally to the problem, the European Commission launched a stakeholder consultation on the EU approach against wildlife trafficking in the form of a Communication³.

The consultation was open for contributions between 7 February and 10 April 2014, and 86 contributions were received⁴. These contributions came from a variety of different sources, including 16 Member States⁵, the United Nations, the CITES Secretariat, Eurojust, two non-EU countries⁶, a total of 35 NGOs and five business organizations, the European Network of Prosecutors for the Environment, two research institutes and 16 individual citizens, several of which are practitioners working on wildlife trafficking in national administrations. In addition, 2156 citizens signed up to an online petition from MEP Jan-Gerben Gerbrandy⁷. The Economic and Social Committee (EESC) adopted an Opinion on the Communication⁸.

The Commission also organized an expert conference which took place on 10 April 2014 in Brussels, followed by a day of workshops. The conference aimed to identify measures and actions to be undertaken by the EU domestically and internationally to strengthen its approach against wildlife trafficking. More than 170 representatives from 27 EU Member States, the European Parliament, Eurojust, judges and prosecutors networks, key international organizations, civil society, research institutions and important non-EU source, transit and market countries participated in the conference⁹.

The following presents a summary of the replies to the questions set out in the Commission Communication of 7 February 2014.

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https://www.europol.europa.eu/sites/default/files/publications/4aenvironmental_crime_threatassessment_2013_-_public_version.pdf

² P7_TA(2014)0031.

³ COM (2014) 64.

⁴ All contributions are available at http://ec.europa.eu/environment/consultations/wildlife_trafficking_en.htm.

⁵ Austria (2 contributions), Belgium, Bulgaria, Croatia, Czech Republic, Cyprus, Finland, France (2 contributions), Germany, Hungary, Italy, Latvia, the Netherlands, Poland, Slovakia, Sweden (3 contributions).

⁶ Albania, Ethiopia.

⁷ <http://gerbrandy.eu/stop-wildlife-crime/>

⁸ Opinion CESE 1723/2014 - NAT/643 of 5 June 2014.

⁹ Further information and a summary of the outcome can be found at http://ec.europa.eu/environment/cites/traf_conf_en.htm.

2. SUMMARY OF REPLIES

1. Is the policy and legislative framework currently in place in the EU against wildlife trafficking adequate?

All contributors shared concerns about the seriousness of the problem, and many also highlighted the need to raise awareness about it at all levels.

The large majority of respondents considered that the **legal framework** in place to regulate wildlife trade in the EU (Council Regulation 338/97 and associated Commission Implementing Regulations) did not require changes. However, some Member States and several NGOs felt that the rules should be reinforced in some areas, for example concerning internal EU trade, or to restrict the import of hunting trophies or the export of ivory antiques.

There was overall agreement amongst contributors that the current **uneven level of enforcement** of the existing regulatory framework across the EU presents a major problem. In this context, a Member State and an NGO pointed to the fact that the Commission Recommendation on enforcement from 2007¹⁰ is not binding and has not been implemented in all Member States.

A number of points were highlighted:

- The varying and often insufficient level of **penalties** for wildlife offences was stressed by six Member States, by some NGOs and intergovernmental organizations, as well as by the EESC (see also question 9 below). In this regard, two Member States called for an evaluation of the effectiveness of the Environmental Crime Directive.
- It was underlined in most contributions that the issue of **organized wildlife crime** is not sufficiently addressed by the existing framework in the EU (see below question 10).
- In view of the **cross-cutting nature** of the problem, the need to ensure good cooperation between different Directorate-Generals in the Commission was highlighted by several contributors. Three Member States underlined also the need for involvement of different Council formations to raise political awareness, and one referred to the European Council. One Member State and some NGOs argued for the creation of a high-level EU working group on wildlife trafficking involving representatives of the European Commission, Member States, EUROPOL, Eurojust and NGO stakeholders to provide strategic recommendations and advice to the EU policy-makers.
- Several contributions pointed to the different approaches taken in the EU regimes aiming at the control of illegal trade for protected species under the EU Wildlife Trade Regulation¹¹, for fisheries resources dealt with in the IUU Regulation¹², and for

¹⁰ Commission Recommendation 2007/425/EC of 13 June 2007 identifying a set of actions for the enforcement of Council Regulation (EC) No 338/97 on the protection of species of wild fauna and flora by regulating trade therein, OJ L 159 of 20 June 2007.

¹¹ Regulation 338/97 on the protection of species of wild fauna and flora by regulating trade therein.

timber products covered by the EU Timber Regulation¹³. They stressed the potential for developing a **common vision for all trade in living resources** and the need to enhance synergies between these various instruments.

Two Member States responded that the existing legal and policy framework was sufficient. One highlighted that the real problem was a lack of resources, and one underlined that it was more useful to focus on the implementation of existing instruments, the exchange of knowledge and better coordination.

2. Should the EU enhance its approach to wildlife trafficking by developing a new EU Action Plan, as called for by the European Parliament?

Amongst the contributors, there was a **very high level of support for an Action Plan** as called for by the European Parliament, similar to existing Action Plans developed at EU level to tackle other forms of organized crime. Nine out of 13 Member States replying to that question, several international organizations, all NGOs and the EESC expressed support. Building on, updating and expanding the 2007 Commission Recommendation on Enforcement binding was considered a good approach by several contributors. One Member State was not convinced of the added value of an EU Action Plan and suggested to rather focus on the sharing of best practices.

The main added value seen by most contributors in a new EU Action Plan was showing political commitment and reflecting the significance of the problem which has all the hallmarks of organized and sophisticated crime and shares many of the characteristics of other transnational criminal activities where such Action Plans exist, such as human trafficking and trafficking in fire arms. Contributors emphasized that an Action Plan would ensure coherence in the EU approach and show an overarching vision which would address the multi-layered problem in the necessary comprehensive manner.

Amongst those supporting an action plan several underlined that a mechanism for **monitoring the commitments** in the Action Plan was crucial to ensure added value. They suggested that an action plan should clearly distribute **responsibilities** and include **timelines** and **reporting requirements**.

Some NGOs called for an **EU coordinator** on the topic who would monitor the implementation of the Action Plan.

3. How could the EU increase political commitment at all levels against wildlife trafficking? What diplomatic tools would be best suited to ensure coherence between different international initiatives?

Most respondents indicated that the first step to increase political commitment was to expose the full scale and impact of wildlife trafficking (i.e. its environmental consequences, but also its socio-economic dimension, its links with transnational organised crime, corruption and

¹² Regulation 1005/2008 establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing.

¹³ Regulation 995/2010 laying down the obligations of operators who place timber and timber products on the market.

political stability in some regions). In that vein, some contributions invited the EU to support the elaboration of a yearly report on the global dimension of wildlife trafficking, on the model of what is being done by the UN Office on Drugs and Crime (UNODC) for drugs or weapons trafficking. The global economic costs of wildlife trafficking for legitimate business and for public authorities were also stressed, especially in developing countries.

The EU was called upon to include wildlife trafficking on the agenda of **high level political dialogues between the EU and key third countries**, such as EU-China, EU-African Union or EU-ASEAN Summits, or as part of Free Trade Agreements negotiations. According to several respondents, the issue should also be brought on the agenda of international organisations in charge of global affairs (such as G7, G20 or under the UN umbrella).

Many respondents indicated that the EU should consider whether there would be an added-value to launch **new initiatives at the UN**. Some respondents pleaded in favour of the adoption of a Resolution by the UN General Assembly on wildlife trafficking, as well as the appointment of a special UN Envoy on this issue. In their opinion, such initiatives would recognise the seriousness and universality of the problem and could also serve to coordinate the activities of the different UN agencies which are directly or indirectly addressing wildlife trafficking.

Some contributions also underlined the importance of considering the topic in the context of the discussions on Sustainable Development Goals as part of the **post-2015 framework on sustainable development**.

A number of respondents called for a **better inclusion of wildlife trafficking as part of the EU diplomatic action**. This could be done through a better use of the EU Green diplomacy Network. In addition, some respondents believed that staff posted in EU Delegations or in the embassies of EU Member States in charge of customs affairs, organised crime or security should have wildlife trafficking as part of their portfolio. They could assist in carrying out joint investigations involving controlled deliveries. The positive role of some EU Delegations in supporting enforcement actions and strengthening governance on the ground (through cooperation development or political support to civil society) was also highlighted as best practice to be generalised. Some respondents stressed the added value of developing further the coordination between EU Delegations, embassies from EU Member States and third countries, civil society and international organisations on specific issues.

The EU was also encouraged to use the World Wildlife Day on 3rd March to raise the awareness of the international community on the challenges associated with wildlife conservation and the need for global solutions to address them.

<p><i>4. What tools at international level should the EU focus on to enhance enforcement against wildlife trafficking and strengthen governance?</i></p>

Many respondents stressed that priority should be given to the **implementation of the commitments** agreed by the EU and its Member States in multilateral organisations (in particular CITES and, for marine species, Regional Fisheries Management Organisations)

and those taken at the recent high level conferences against wildlife trafficking in London¹⁴, Paris¹⁵ and Gaborone.¹⁶ A number of them advocated for the EU to support a strong stance towards those countries which do not comply with their international obligations, such as proposing trade sanctions as foreseen in the CITES framework. Some NGOs pleaded for the development of minimum enforcement standards within CITES, as well as the creation of a global database on wildlife seizures.

Many respondents emphasised that increased **international coordination in the field of enforcement** was key to successfully address wildlife trafficking.

The EU was invited by a large number of respondents to increase its support to the International Consortium for Combatting Wildlife Crime (ICCWC), which was seen as a key player in fostering international enforcement cooperation.

The EU and its Member States were also called upon to:

- support improved collation, analysis and sharing of intelligence through Interpol, the World Customs Organisation (WCO) and the UNODC on the individuals and organisations engaged in wildlife trafficking;
- develop further their relationships with regional Wildlife Enforcement Networks (WEN), possibly through the EU Wildlife Enforcement Group;
- second wildlife enforcement officers to international organisations (Interpol, WCO, CITES) and third countries;
- actively take part in joint international enforcement actions (such as Operations Cobra).

The development of forensic technologies and common forensic standards was also advocated by some contributions.

Some respondents emphasized that a number of countries had recently engaged in bilateral cooperation agreements or **Memoranda of Understanding** on wildlife trade enforcement and invited the EU and its Member States to follow that example with countries where operational cooperation was needed.

The inclusion of commitments to address wildlife trafficking into **Free Trade Agreements** between the EU and third countries was also seen by a large number of contributors as an interesting way for the EU to promote better enforcement of wildlife trade rules. The EU was encouraged to have an ambitious stance in that regard, when negotiating such FTAs but also when following up with the third countries concerned on the implementation of those provisions.

A number of respondents felt that the development of **international standards for criminalizing and sanctioning wildlife crime and related offences** could assist in making sure that all countries have adequate legislation in place. This would also help overcome legal

¹⁴ www.gov.uk/government/uploads/system/uploads/attachment_data/file/281289/london-wildlife-conference-declaration-140213.pdf.

¹⁵ www.developpement-durable.gouv.fr/IMG/pdf/2013_12_05_table_ronde_braconnage_-_dossier_de_presse_FR.pdf;

¹⁶ https://cmsdata.iucn.org/downloads/african_elephant_summit_final_urgent_measures_3_dec_2013_2.pdf.

obstacles to international cooperation (related for example to exchange of data or mutual legal assistance). To this end, some respondents (including two Member States) considered that wildlife trafficking associated with organised crime should be addressed through a new Protocol on wildlife trafficking under the auspices of the UN Convention on Transnational Organised Crime (UNTOC). Others supported that wildlife trafficking should be tackled through UNTOC but considered an additional Protocol not necessary.

The importance of tackling money laundering linked to wildlife trafficking was also stressed in several contributions (see also question 10 below).

5. What tools are most suitable for EU action to address international and EU demand for illegal wildlife products? What role could civil society and the private sector play in this regard?

All respondents considered that it was of **paramount importance** to address the **demand** for wildlife products of illegal origin, given its prominent role as one of the main drivers for the current wildlife trafficking crisis. The need to understand the dynamics, structure and drivers for the demand for wildlife products in the different countries was emphasised by many respondents. In view of the cultural dimension associated with the consumption of wildlife products, the EU was advised to work in partnership with the governments, civil society and local communities to seek for solutions to curb the demand for illegal products.

There was wide support for the launch of **awareness-raising campaigns and demand reduction programmes**, which would stress the disastrous impacts of wildlife trafficking and be addressed to a large public. Some respondents stressed however that, in some situations (for example consumption of highly prized illegal wildlife products by the upper class in some countries), targeted actions towards a specific audience would have more impact than general communication campaigns. Some respondents encouraged the EU to destroy its stocks of high value wildlife products of illegal origin (such as ivory and rhino horns) as an unambiguous sign towards the public opinion that such products should be put off the market. With the same objective, some NGOs called upon the EU to ban intra and extra EU trade in pre-(CITES) convention and antique ivory.

The EU was invited to support the adoption of demand reduction measures at the international level (in particular through the CITES Convention) and follow-up on their implementation with all countries concerned.

The EU was also requested to raise the question as part of its overall **diplomacy** with the main market countries and express its concern that demand has a direct impact on poaching. Some contributions considered that the EU should use its diplomatic clout to facilitate cooperation between range and consumer countries in order to address the whole wildlife trafficking supply chain.

Finally, a number of respondents also highlighted the **role of the EU as a considerable market** for wildlife products and the need to look at this issue domestically. The importance of reaching out to the **private sector** active in wildlife harvesting, trading and processing was also stressed.

6. How can the EU best add value to address the peace and security implications of wildlife trafficking?

Several contributors suggested that the EU should invite the competent international organisations (UN Security Council, UNODC, Interpol) to continue investigating how and to which extent wildlife trafficking can contribute in some regions to threatening peace and security. The alleged links between wildlife trafficking and terrorism should also be further explored.

In cases where it is established that wildlife trafficking is a factor that threatens peace and stability in fragile regions, respondents supported the adoption of **targeted sanctions** towards individuals involved in such trafficking by the UN Security Council following the model used in relation to the Central African Republic and the Democratic Republic of Congo.¹⁷ It was also suggested that the mandate of **UN peacekeeping missions** should, where relevant, be extended to include the fight against wildlife trafficking offenders.

The EU was also invited to consider how the **EU Instrument Contributing to Stability and Peace**¹⁸ could be used to assist countries addressing wildlife trafficking where such trafficking poses a threat to national/regional political stability.

7. How could the EU cooperation instruments better support the reinforcement of the capacities of developing countries for wildlife conservation and action against wildlife trafficking?

A large number of contributions advocated for the EU to **increase its efforts** for wildlife conservation and against wildlife trafficking **as part of its development cooperation policy**. It was stressed that the first step would be to carry out a **comprehensive mapping** of the needs of range, transit and consumer countries and of the funds available to match those needs. This should be done in coordination with the beneficiary countries and other donors, at national, regional and (if relevant) continental levels.

Some respondents encouraged the EU to include wildlife conservation and the fight against wildlife trafficking in the **programming of the various EU financial instruments for development cooperation**, in particular in the national, regional and continental envelopes under the European Development Fund (EDF), the Global Public Good and Challenges programme under the Development Cooperation Instrument (see also question 6 above for the EU Instrument contributing to Stability and Peace). Respondents stressed that combating wildlife trafficking was relevant not only for the protection of biodiversity but also in the pursuit of other EU objectives such as the promotion of good governance, securing income to rural communities and ensuring national/regional stability. Support for efforts against wildlife trafficking could therefore also come from EU development cooperation in those areas.

¹⁷ See Security Council Resolutions 2134 (2014) and 2136 (2014).

¹⁸ See Regulation 230/2014 establishing an instrument contributing to stability and peace.

Some contributions insisted on the need to **coordinate better** the use of the various funding mechanisms from the EU and EU Member States to address wildlife trafficking. Many contributions also called for making EU financial assistance conditional upon guarantees that wildlife trafficking (and in particular corruption associated with it) is properly addressed in the beneficiary countries.

A large number of respondents insisted that poverty is an important driver of poaching and wildlife trafficking and that this should be fully considered when devising development cooperation strategies on this issue. Wildlife trafficking driven by poverty would not stop if no alternative sources of income were available for the “front-line” poachers on the ground. It was underlined that the **involvement of local communities** in devising and implementing anti-poaching measures is key to their success.

The **links with Voluntary Partnership Agreements (VPAs)** under the FLEGT process were highlighted in several contributions with some respondents pointing to the benefits expected for wildlife conservation from the implementation of the VPAs and others advocating for an explicit inclusion of commitments against wildlife trafficking as part of the agreements (similar to what some forest certification schemes foresee).

Regarding **possible focus areas**, financial support to the **creation and functioning of protected areas** was highlighted as critical by a number of contributors.

Regarding **enforcement**, the EU was invited to promote the implementation of the "Forest and Wildlife Crime Toolkit" developed by ICCWC as part of its cooperation strategy with developing countries, as it provides a comprehensive guidance on measures that need to be in place to address wildlife trafficking.

The need for **capacity-building, training and equipment** for enforcement officers and the judiciary was stressed by many contributors. The EU was also called to support regional (notably through Wildlife Enforcement Networks, WEN) and international cooperation. **Addressing corruption** was also seen as a major challenge that could be addressed partly through support to local civil society organisations and increased scrutiny on the conditions under which wildlife products are harvested and traded in some countries.

The possibility to provide for **emergency financial support** to address sudden crisis situations was also stressed, based on the model of what is planned for interventions by ICCWC or under the new MIKES¹⁹ programme.

<p><i>8. What measures could be taken to improve data on wildlife crime in the EU so as to ensure that policy-making can be more effectively targeted?</i></p>

The lack of comprehensive data on illegal wildlife trade was generally recognized as an **obstacle** to more effective enforcement and more targeted policy making.

¹⁹ Monitoring the Illegal Killing of Endangered Species.

Several contributions, including from research institutes, Member States and NGOs underlined a need to **improve the data collection systems at national level** where often there is no central collection of data in place and where the different agencies do not always share data, e.g. on seizures. Once such comprehensive data collection at national level were in place, ideally in a unified format for all Member States, it was highlighted that other Member States should have access to this data and that Europol could play a role in this. A **common EU wide database** was another option proposed by several contributors while others felt that better use of existing systems would be preferable. The need to ensure the effectiveness and long-term funding of EU-Twix, the current platform for information exchange regarding non-nominal data was underlined by many Member States and organizations.

Several contributors further suggested the need for **regular reports** on the scope of wildlife crime, both at national and EU level, possibly through Europol. This could e.g. assist joint risk assessments at EU level. Some contributors suggested a worldwide database on wildlife trafficking.

Some felt that **linking the data** received with data on timber and fisheries trade and with data on species protected under the Birds and Habitat directives would be very useful to get an integrated and comprehensive picture. The need to address the current **lack of information about court cases and sentences imposed** was highlighted by several contributors.

In the context of this question, several contributions also emphasized the existing problems with **data sharing** amongst enforcement agencies at national level, between Member States and relevant agencies, such as Interpol or Europol, notably with regard to nominal data.

For trafficking relating to timber and fish, it was suggested that the existing CITES trade database could serve as a model.

9. What measures could be taken to strengthen enforcement against wildlife trafficking by environmental authorities, police, customs and prosecution services in the Member States and to reinforce cooperation between those authorities? How could awareness of the judiciary be raised?

Overall, to ensure a more even level of enforcement, an **Enforcement Strategy or guidelines** for uniform enforcement of EU legislation were considered important by several Member States, organizations and the European Network of Prosecutors for the Environment practitioners. This could include developing enforcement indicators and/or binding requirements for inspections. Several contributors also suggested for the EU to prepare **guidance documents** on a variety of relevant issues. The need for close monitoring of the relevant EU directives in the Member States (Habitats Directive, Birds Directive, Environmental Crime Directive) was also highlighted.

A majority of contributions considered it essential to ensure **stricter and deterrent penalties** for wildlife offences in all Member States. Amongst many others, the contributions from seven Member States highlighted this point and supported achieving this goal through approximating sanction levels throughout the EU whereas one Member State spoke out against. Several replies underlined in this context that sanction levels play an important role when enforcement priorities are set as they reflect that a society takes certain offences

serious. Too short statutes of limitation were also mentioned as an obstacle to effective enforcement.

Increasing training and awareness raising activities for officers of all parts of the enforcement chain was highlighted as a priority by many Member States, international organizations, NGOs and a business organization. Including the topic in the curricula of law enforcement and judicial training programmes was seen as an important step in this regard.

A number of specific suggestions were made for strengthening enforcement:

Firstly, addressing **transit** of illegal wildlife products, including transit from neighbouring countries, e.g. through twinning projects. Secondly, several Member States and organizations saw a need for more attention to be paid to the wildlife trade through the **internet and mail services**. EU guidelines to the private sector active in this area were suggested. One Member State suggested a revision of directive 2000/31 concerning the responsibility of internet service providers. Improving the **traceability** of CITES listed species, at least the most endangered ones, through a common system of tracking and registration was also suggested as important in several contributions.

For **improving cooperation** between all parts of the enforcement chain, both at Member States level and throughout the EU, cross-agency task forces or at least regular meetings of the different enforcement agencies were considered important by the large majority. The examples of such cross-agency bodies in other countries, e.g. the US and China, were cited. Several contributors, including from international and non-governmental organizations and different Member States, considered specialized wildlife crime units in national enforcement agencies (police, customs, prosecution) and possibly in the judiciary as very useful tools for improving coordination.

There was a high level of support for **increased involvement of Europol and Eurojust** and closer cooperation amongst these bodies and between them and national authorities, with a number of possible focus areas highlighted, such as the facilitation of Joint Investigation Teams, data gathering, analysing and sharing of intelligence, the preparation of an annual report on wildlife trafficking and the development of enforcement indicators. In order to give wildlife trafficking a higher profile with the agencies, a dedicated taskforce or focal point within Europol (and by some also for Eurojust) was considered an important step by five Member States, by Eurojust and by several NGOs. Several organizations felt also that Impel, the EU Network for Implementation and Enforcement of Environmental law, could play a useful role for strengthening enforcement throughout the Union.

As for international cooperation, participation in targeted **intelligence-driven operations** was seen useful.

Finally, with regard to the question how **awareness of the judiciary** could be raised, training was considered the key success factor, including through joint trainings with other parts of the enforcement chain as highlighted by a Member State. Several contributors also mentioned improved access to relevant case law from other Member States as a tool for increasing awareness, similar for the publication of convictions and successful operations. The need to inform the judiciary better about the **adverse impact of illegal wildlife trade on businesses engaged in legal trade** was highlighted.

10. How could existing tools against organised crime at EU and Member States level be better used to address wildlife trafficking? What additional measures should be envisaged, e.g. regarding sanctions? What contribution could Europol and Eurojust make in that regard?

The large majority of contributors, including five Member States and several organizations, considered that **more focus on organized criminal activities in the context of wildlife trafficking** was important as the current EU legislative and policy framework did not address that aspect. The need to increase capacity of national enforcement agencies to target organized wildlife crime was underlined. One Member State considered on the other hand that within the EU there was no strong link with organized crime.

The need for awareness-raising about the organized crime implications was highlighted by many. Several contributions suggested that considering **environmental crime as a priority in the EU policy cycle on organized crime** would enable a better strategic approach and raise the importance of the topic in national enforcement strategies.

While most felt that the existing EU instruments against organized crime could provide some important tools and that instruments like controlled deliveries and asset recovery, as well as other investigative tools used against other forms of organized crime, should be applied more, it was also underlined by several that more explicit references in the EU instruments to organized environmental crime would be important.

As to concrete measures, a key point highlighted by several international organizations, NGOs and Member States was the suggestion to ensure – in line with the commitment taken in the London Declaration²⁰ and as called for under UN Ecosoc Resolution 2013/40 – that **organized wildlife trafficking should be treated as a "serious crime"** in the understanding of the UN Convention against Transnational Organized Crime (see above question 4) which means that it should be sanctioned in national criminal law with maximum sanctions of not less than four years. For that purpose, several contributors, including two Member States, suggested a revision to the Environmental Crime Directive 2008 /99.

In view of the international organizations, Eurojust and several NGOs, increased focus and training on the links with **money laundering** would be important. Some of the contributions highlighted in this context the funding of militia activities in Africa through profits of wildlife trafficking. This should include the better use of existing instruments or e.g. dedicated guidelines on "due diligence" in the context of wildlife trafficking.

3. CONCLUSION

In the period since the end of the stakeholder consultation, wildlife trafficking has continued to figure prominently on the international agenda. The first UN Environment Assembly in June 2014 adopted, based on a joint proposal from the EU and the African Group, a resolution on the issue, highlighting the cross-cutting nature of the problem with its serious adverse impacts on sustainable development, livelihoods, the rule of law, security and good

²⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281289/london-wildlife-conference-declaration-140213.pdf.

governance. A UN General Assembly Resolution is expected for end 2014, and a large number of regional activities in all parts of the world continue work towards strengthening the capacity to react to the threats posed by wildlife trafficking.

The contributions received during the stakeholder consultation on the EU approach against wildlife trafficking show that the topic is an important concern for many Member States, NGOs, citizens and businesses involved in legal wildlife trade.

There is a strong perception amongst a large majority of stakeholders from different groups (Member States, international organizations, non-governmental organizations, business associations, citizens) that the current EU approach against wildlife trafficking requires strengthening in certain aspects, and that the EU has a leading role to play in the fight against wildlife trafficking globally.

Regarding the situation within the EU, the need for a stronger focus on organized wildlife crime, a more consistent approach across Member States to implementation and enforcement, notably with regard to sanction levels, and the need for increased political commitment and awareness-raising are key areas highlighted in the contributions.

With regard to international action, the contributions invited the EU to raise the profile of wildlife trafficking at the highest level as part of its diplomatic, development cooperation and trade agenda, to reinforce its engagement in favour of concrete progress in the implementation of international commitments on wildlife trade and address the demand side of the problem.

The Commission Services have carefully analysed all replies received during the stakeholder consultation process and will consider all appropriate steps for possible follow-up in close cooperation with Member States, the European External Action Service and other relevant stakeholders.