



Re: European Green Deal / Illegal Wildlife Trade

28 October 2019

Dear Ms. Ursula von der Leyen, European Commission President-elect,

We the undersigned are a group of international conservation and animal welfare organizations.

We commend and applaud your proposed European Green Deal which you aim to implement during your first one hundred days in office starting on 01 December 2019. We are pleased to learn that the drafting of the EU Biodiversity Strategy for 2030 will be part of the Green Deal.

However, EU efforts to avert global biodiversity loss by 2020, as required by Target 6 of the current Biodiversity Strategy, have failed and we are concerned that action to combat illegal wildlife trade is currently missing from the European Green Deal. Such action is essential given the fact that exploitation of animals and plants (including for unsustainable and illegal trade) is a key driver of biodiversity decline, as identified in the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Global Assessment Report published in May 2019.

With that in mind, we would like to take this opportunity to remind you of the European Commission's own [EU Action Plan against Wildlife Trafficking](#) from 2016 *"which sets out a comprehensive blueprint for joined-up efforts to fight wildlife crime inside the EU, and for strengthening the EU's role in the global fight against these illegal activities. The plan has three main strands – better enforcement, enhanced cooperation, and more effective prevention. The Action Plan runs until 2020 and is being implemented jointly by the EU (Commission services, EEAS, Europol, Eurojust) and its Member States."*

We therefore hope that this Action Plan will be renewed and strengthened under your guidance, in order to provide a key component of the European Green Deal going forward, and can be strengthened under your and Commissioner-designate for Environment and Oceans, Virginijus

Sinkevičius' direction. We note in your 10th September mission letter to Mr. Sinkevičius that you are keen for Europe to lead global efforts to curtail biodiversity loss and that issues including protected species and habitats are examined for inclusion in a new Biodiversity Strategy for 2030. We would encourage that threatened species, including elephants in particular, are included in this global approach to protecting biodiversity. We would urge that this approach could also be included in the ambitious agreement for which the EU will aim at the 2020 Conference of the Parties to the Convention on Biological Diversity.

EU ivory trade restrictions

While the Action Plan references guidelines adopted by the EU to limit trade in raw ivory, mentions the EU ivory markets and has already banned via a set of guidelines the re-export of raw ivory from the EU, this is not sufficient. It is vital that further measures are urgently taken in order to restrict the trade in ivory and ivory products to, from and within the EU. Discussions are ongoing in this regard, based on the European Commission's proposals in its non-paper entitled "*Closing the gaps in EU rules for ivory trade*" (attached). As part of that process, our group of NGOs have devised a common position on this important issue which was submitted to DG Environment, on the 15th October (also attached). We would encourage you to give due consideration to the content of this document. Please find our letter attached

Finally, we would urge you to ensure that concrete action to combat illegal and unsustainable wildlife trade is incorporated into the European Green Deal, alongside the multitude of important environmental issues facing Europe and the wider global community.

The European Union has a key role to play in the next five years and beyond and has a responsibility to protect global biodiversity from over-exploitation for trade, which is devastating many of the world's remaining populations of wild flora and fauna.

We look forward to the European Union assuming a leadership role on this critical issue and to your favourable response.

Your sincerely,

Joep van Mierlo
Regional Director Europe International Fund for Animal Welfare (IFAW)

Mary Rice
Executive Director, Environmental Investigation Agency UK

Vera Weber
President and CEO, Fondation Franz Weber

Andrea Hoepfner
Chair of the Board, Pro Wildlife

Ruud Tombrock
Executive Director, Humane Society International/Europe (HSI)

Mark Jones
Head of Policy, Born Free Foundation (BFF)

Reineke Hameleers
Director, Eurogroup for Animals

Charlotte Nithart
Director, Robin Des Bois

Karen Botha
Chief Executive, David Shepherd Wildlife Foundation (DSWF)

Andrew Wetzler
Managing Director, Nature Program, Natural Resources Defense Council (NRDC)

Peter Knights
CEO, WildAid

Tanya Sanerib
International Legal Director & Senior Attorney, Center for Biological Diversity (CBD)

cc: Frans Timmermans, Executive Vice President-Designate, European Green Deal, European Commission

cc: Margrethe Vestager, Executive Vice President-Designate, European Commission

cc: Virginijus Sinkevičius, Commissioner-Designate, Environment and Oceans, European Commission