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To:

Mr Virginijus Sinkevičius
EU Commissioner for Environment, Oceans and Fisheries
European Commission
Rue de la Loi 200 (Berlaymont)
1049 Bruxelles

cc:

Ms Ursula von der Leyen
President of the European Commission

Mr Phil Hogan
EU Commissioner for Trade

Ms Stella Kyriakides
EU Commissioner for Health and Food Safety

Mrs Camilla Bursi
Cabinet of Commissioner Virginijus Sinkevičius

Mr Humberto DELGADO ROSA
European Commission, Director, Directorate General for Environment, Natural Capital

Subject: Regulation of wildlife trade under the EU Biodiversity Strategy to 2030

Brussels, 15 May 2020

Dear Commissioner,

The undersigned 38 animal advocacy and conservation organisations call on the European Commission to take prompt and decisive action to effectively regulate wildlife trade in the EU, in order to protect the health of EU citizens, improve the welfare of animals, and safeguard biodiversity in and beyond Europe from the risks posed by the poorly regulated trade in live wild animals.

The risks from wildlife exploitation and trade have become painfully clear in recent weeks with the worldwide outbreak of the SARS-COV-2, the virus that causes COVID-19. While research is not conclusive about the source of the virus, it is widely believed to have been transmitted from wildlife to humans as a consequence of the proximity and variety of species sold in a Chinese wildlife market¹. Much of the public discussion around COVID-19 has focused on the potential role of illegal wildlife trade in spreading pathogens, but risks also exist from legal trade².

¹ <https://www.nature.com/articles/s41586-020-2012-7>

² <https://www.nationalgeographic.com/animals/2020/05/to-prevent-next-pandemic-focus-on-legal-wildlife-trade/>

Like SARS-COV-2, many viruses can be transmitted between animals and from animals to humans; indeed, scientists estimate that 75% of emerging infectious diseases that have affected people over the past three decades originated from animals³. However, wild animals have carried viruses and bacteria for millennia. What has changed is the way humans interact with them, due to urbanisation, the encroachment of human activities on and destruction of wildlife habitats. The illegal or uncontrolled trade of wild species and the unhygienic conditions under which wild and domestic species are mixed and marketed have exponentially increased the risk of pathogens spreading between individual animals and species, and passing from animals to humans. While wildlife markets at which animals are traded live arguably present a particularly high risk, the problem is not solely limited to wildlife markets but exists in many other circumstances in which wild animals are traded. This is not a new problem, and scientists have been warning of the likely emergence of zoonotic epidemics and pandemics for decades. Recent reports suggest that the scale of wildlife trade has grown in our globalised world economy and dangerous zoonotic diseases have accumulated⁴.

At this point, it is vital that the EU takes bold action without further delays to reduce the risks to its citizens of future human pandemics, while also showing global leadership in order to reverse the devastating impacts of human activities on nature and biodiversity, as outlined in last year's Global Assessment of Biodiversity and Ecosystem Services⁵. The European Commission will soon release its Biodiversity Strategy to 2030, a crucial component of the European Green Deal, which provides an excellent opportunity for relevant actions to be delineated. The Biodiversity Strategy is integral to a green recovery plan for the COVID-19 pandemic. This will require support for global regulations to protect habitats and healthy ecosystems contributing to a One Health approach, and diplomacy focused on embedding this green approach with partner countries. As a major donor to biodiversity and development projects, the EU must also increase conservation financing to support these efforts and take steps to ensure such financing is appropriately channelled in order to maximise its impact. The Strategy should include a renewal of the EU Wildlife Trafficking Action Plan and initiate a decisive change of direction for EU wildlife trade policies.

The unregulated exotic pet trade is an example of wildlife trade associated with an impact on global biodiversity and health risks to EU citizens that cannot be ignored. In recent years, the potential for the transmission of zoonotic diseases in the EU has significantly increased, due to a growing trend for exotic pet keeping. This includes an increasing range of species on sale that are caught in the wild elsewhere around the globe, and the commercial trade in captive-bred wild animals^{6,7} with the subsequent worldwide movement of wild animals for which the health status is unknown. A recent study for the German Government identified more than 2,000 species of reptiles, amphibians and exotic mammals (excluding birds, ornamental fish and invertebrates) on sale in Germany as exotic pets via 10 online platforms within one year, with 75% of those species not being CITES listed, leaving their imports unregistered and unregulated⁸.

Most wildlife species have complex needs, which make them unsuitable as pets. The breeding, collection, transport, holding and sale of such animals inevitably results in significant stress and increased direct or indirect contact with conspecifics or other species, increasing the risk of infection

³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1088493/pdf/TB010983.pdf>

⁴ <https://www.traffic.org/site/assets/files/12764/covid-19-briefing-vfinal.pdf>

⁵ <https://ipbes.net/news/Media-Release-Global-Assessment>

⁶ <https://www.worldanimalprotection.org.au/news/brief-history-global-exotic-pet-trade>

⁷ https://media.4-paws.org/c/5/5/5/c555a6c3b7150e4bbcb672872796b28b7b2598d6/Report_Europes-second-class-tigers_EN_FP-2020.pdf

⁸ https://www.bfn.de/fileadmin/BfN/service/Dokumente/skripten/Skript_545.pdf

by, and subsequent spreading of, pathogens that may have zoonotic potential. Some of these animals are wild-caught or captive bred in third countries and may be held in unsanitary conditions, before being transported to European homes.

Several European countries also regularly host markets and fairs to sell exotic animals. The wide range of species for sale and the stress caused by the conditions in which animals are transported and displayed, is likely to compromise the animals' immune systems, further facilitating disease transmission. Since within the EU Wildlife Trade Regulations there is no focus in preventing disease transmission, and animal health laws are not focused on wildlife trade, legal trade systems present a significant and ongoing risk to public health⁹.

Exotic animal diseases can also be transmitted to native wild animals, with potentially dire consequences for their conservation. One of the most notable examples of introduced disease which has spread among local wildlife populations is the amphibian pathogen *Batrachochytrium salamandrivorans* (B.sal). This pathogen is native to Asia, it was obviously introduced to Europe with amphibians imported for the exotic pet trade and is presently extirpating European salamander and newt populations¹⁰. Another deadly pathogen introduced via the trade that has caused at least 90 extinctions and that is believed to have caused declines in another 500 species, is the chytrid fungus *Batrachochytrium dendrobatidis*¹¹.

Furthermore, as well as being potential vectors for infectious diseases, exotic species can threaten native biodiversity if they escape or are released into the wild. The exotic pet trade has been identified as one of the main pathways for the introduction of invasive alien species in the EU by the Bern Convention¹² and the Convention on Biological Diversity (CBD)¹³. The trade is also highly unique in that it is subject to none of the precautionary safety provisions required for many other products that are marketed to the public.

The new EU Biodiversity Strategy to 2030 offers a real opportunity to respond to citizens' concerns through the inclusion of specific measures to better regulate and limit the trade in wild animals in the EU. The adoption of an EU-wide 'Positive List' for exotic pets, specifying which animal species are suitable and safe to be kept as pets subject to strict criteria (including but not limited to health risk, welfare, sustainability, invasive risk), would be an important component of such measures - an instrument that would offer a much needed precautionary approach given the continuous shifts in species and numbers of animals in trade. Such a list has already been successfully introduced (for some taxa) in Belgium and Luxembourg and is being developed in the Netherlands.

New measures to regulate the wildlife trade also provide an opportunity to address the fact that current EU wildlife trade regulations do not cover the majority of species in trade and that many threatened species are legally protected from exploitation in their native countries, but are not protected from being traded once they are in the EU. To address this, it is imperative that the EU prohibits the importation, transshipment, purchase, and sale of wildlife taken illegally from the country of origin.

⁹ <https://www.traffic.org/site/assets/files/12764/covid-19-briefing-vfinal.pdf>

¹⁰ G. Stegen *et al.* (2017). Drivers of salamander extirpation mediated by *Batrachochytrium salamandrivorans* e. *Nature* 544: 353-356.

¹¹ B. C. Scheele *et al.*, Amphibian fungal panzootic causes catastrophic and ongoing loss of biodiversity. *Science* 363, 1459–1463 (2019).

¹² P. Genovesi & C. Shine (2004): European strategy on invasive alien species. Convention on the Conservation of European Wildlife and Habitat (Bern Convention), *Nature and Environment*, No. 161, 95 pp.

¹³ <https://www.cbd.int/doc/publications/cbd-ts-48-en.pdf>

We remain at your disposal for any additional information, and we thank you in advance for your consideration.

Yours sincerely,

For and behalf of the following organisations:

AAP Animal Advocacy and Protection

ACTAsia

ANDA

Animal Defenders International

Animal Right Protection Organisation Lithuania

Animal Protection Agency (APA)

Animalia

Born Free Foundation

Caring Vets

Catholic Concern for Animals

C'est Assez!

Code Animal

Defenders of Wildlife

Deutscher Tierschutzbund

Dyrenes Beskyttelses/ Animal Protection Denmark

Estonian Society for the Protection of Animals (ESPA)

Eurogroup for Animals

FAADA

Four Paws International

GAIA

Greek Animal Welfare Fund

Humane Society International

International Fund for Animal Welfare (IFAW)

Ippohesis

ISPCA

La Fondation Droit Animal, Ethique et Sciences (LFDA)

Loomus

Luonto-Liiton susiryhmä - The Wolf Action Group

Oceanic Preservation Society (OPS)

OneKind

Pan African Sanctuary Alliance (PASA)

Panhellenic Animal Welfare Federation

ProWildlife

Robin des Bois

SEY Animal Welfare Finland

Sloboda zvierat

Spolecnost pro zvirata/Society for Animals

Svenska Djurskyddsföreningen