

DGHT e. V. | Vogelsang 27 | D-31020 Salzhemmendorf

Personen

to the European Commission

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Vizepräsident: Dr. Peter Pogoda
Vizepräsidentin: Dr. Claudia Koch
Vizepräsidentin: Dipl.-Biol. Linda
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EU Action Plan against illegal wildlife trafficking

Revision 2021

Statement of the German Society of Herpetology (DGHT)

Dear Madam, dear Sir,

we welcome the opportunity to comment on the European Commission's Roadmap for preventing illegal trade in wildlife - revision of EU Action Plan.

First, DGHT expresses its undivided support for the Wildlife Action Plan (WAP) and its different actions to tackle the problem of illegal trade at the EU and the global level. The illegal trade of endangered species, resulting in non-sustainable use of natural resources and in criminal actions of global concern, has to be considered a challenge with national authorities, inter- and non-governmental organizations and the private sector acting as partners in the scope of a common understanding of responsibility to tackle this problem.

Following up, we would like to make some suggestions to focus on some specific issues that should be addressed in more detail as additions to the plan's actions, or as focal points within existing actions and priorities.

Yours sincerely,



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1. Consideration of ex-situ contributions to species conservation

Conservation of endangered species – as a main goal of the WAP and also the 2030 biodiversity strategy of the EU – must not be restricted to nomination or enlargement of protected areas, but should involve an increasing biological database of the species in question, in order to guarantee an effective management of the areas and a long-term survival of the species communities. We advocate for the consideration of the one plan approach, that includes in-situ as well as ex-situ conservation activities for an effective species conservation.

Back-up population stocks under husbandry of experienced breeders may also contribute to an increasing knowledge of reproduction rates, which in turn can help to improve in-situ-management actions, especially when natural habitats are heavily reduced and genetic variability may come to a critically low level for a long-term survival of the population or species involved. To implement the one plan approach cooperation between zoological gardens and private breeders is heavily needed, especially across member states of the EU or even at an international level.

DGHT is supporting and managing such ex-situ-/in-situ-conservation projects with several breeding groups of amphibians and reptiles. The critically endangered Annam Pond turtle (*Mauremys annamensis*) is a good example of how to establish a genetically well defined breeding stock of a species across several European countries that can serve as a starting point for a successful re-introduction once protective measures in its natural range will have improved substantially¹. Another case study can be seen in the Mallorca toad (*Alytes muletensis*)², a species restricted to a small area within the island of Mallorca and endangered by several external factors affecting its long-term survival. This amphibian species has been included in the project „Citizen Conservation“ (see <https://citizen-conservation.org>) to manage the ex-situ-part of a broader conservation project including a strictly controlled exchange of specimens between breeding groups under human husbandry, while in-situ-strategies involve improvement of habitat conditions.

¹ ZWARTEPOORTE, H., H. BECKER, E. MEIER, M. RAFFEL & T. MCCORMACK (2015): Die stark bedrohte Annam-Sumpfschildkröte (*Mauremys annamensis*) – Nachzucht in menschlicher Obhut als Beitrag für den Artenschutz. Marginata, Münster 11(3): 26–32.

² CITIZEN CONSERVATION (2021): Basis-Informationen und Haltungsempfehlungen zu *Alytes muletensis*, Mallorca-Geburtshelferkröte. <https://citizen-conservation.org/arten/mallorca-geburtshelferkroete/>.

According to the One Plan Approach (OPA), well managed ex-situ breeding programs for endangered species should be considered valuable contributions to species protection (including possible re-introduction into the wild). Exchange („trade“) of specimens among and between breeding groups, be they located in zoological gardens or under care of experienced private breeders, should be facilitated for individuals belonging to such programs, based on reliable documentation and ongoing reports and observing all hygienic standards.

2. Increasing the use of Appendix III of CITES / consideration of conservation units beyond the species level

International trade of endangered species is regulated by CITES. While species listed in Appendix I of the convention are excluded from any trade, the trade of species listed in Appendix II is subject to regular proofs of its sustainability based on non-detriment-findings (NDFs). While conservationists use to focus on these two appendices, Appendix III is far less considered despite being a powerful tool for documentation of trade quantities to the European Union³. Since an Appendix III listing can be set in action by any party of CITES and independent of the 3-year-cycle of the CoPs, it may also be used to address local populations representing endangered forms of species not (yet) threatened as a whole, to gain valuable trade data of such „conservation units“ or „management units“

We advocate for considering an inclusion of (genetically) well defined populations into CITES Appendix III listing procedures to establish a broader view on conservation priorities beyond the species level if necessary and based on scientific evidence.

³ HEINRICH, S., SHEPHERD, C.R & EMERSON, Y. Sy (2022): Using CITES Appendix III to Protect Native Species Found in International Trade: the Case of the Philippines.- Philippine Journal of Science 151 (1): 127-137.

3. Improving control of wildlife trade within EU

While all 28 EU member states as well as the EU itself have become parties of CITES, and Council Regulation (EC) No 338/97 on the protection of species of wild fauna and flora by regulating trade therein is the legal basis for species conservation at the EU level, trade regulations and documentation are restricted to trade activities at the EU border. On the other hand there are substantial gaps in knowledge about the inner-European trade, so that robust data on imports of non-CITES species – that may already qualify as candidates for an Appendix III listing – do not exist or are at least not easily accessible for conservation experts to address specific problems related to inner-European trade flows. As national regulations of transport of living animals do differ among EU member states, as well as those for registering specimens, individual pathways of imported species can hardly be tracked, thus making it difficult to detect illegal activities along the trade flow within the European Union. An EU-wide platform providing all different regulations on wildlife trade from outside the EU into one member state as well as any national regulation could improve knowledge transfer and support activities towards a harmonization of trade regulations within the EU.

We advocate for the establishment of an effective and uniform information system containing all information of EU member states' trade regulations and requests for legal acquisition (and submission) of living animals. The respective database should lead to track wildlife trade of endangered (or those of special interest as conservation units) inside EU across boundaries thus facilitating plausibility checks of documents and source codes in order to discern illegal pathways of trade. This approach could help to address the goal outlined in chapter A of the roadmap document, i.e. that *the Wildlife Action Plan was designed to complement and support the effective implementation and uniform enforcement of these Regulations and of other rules which impact on wildlife trade, but also to allow for checks for sustainability aspects along the wildlife trade chain.*

4. Qualifying enforcement authorities

While it is of crucial importance that the enforcement authorities of the countries involved in wildlife trade act on the basis of scientific evidence, there are no uniform requirements for primary qualification or knowledge transfer for decision makers across the EU. The Action Plan should also address this aspect and support the development of EU wide quality standards for the advanced training of the enforcement authorities staff, thus preventing misinterpretation of existing legislation.

We advocate for developing and providing uniform training programs of specific expertise (including certificates) for all groups of stakeholders involved in law enforcement activities referring to the trade of live animals.

5. Addressing the submission of seized animals

Seized specimens involved in illegal trade activities have to be kept in appropriate and acceptable destinations (see also the corresponding resolution of CITES Res.Conf. 11.20 (Rev CoP18)). Besides the need to provide a sufficient quantity of specialised and well managed rescue centres for such individuals, there should also be a refined legal basis for a transfer of some of these specimens (according to the quality of tracing back their origin) to well managed and certified ex-situ-breeding programs.

DGHT

The German Society of Herpetology and Herpetoculture has been founded in 1918 and is the largest herpetological association worldwide with more than 5000 personal and institutional members, connecting professional herpetologists and experienced breeders of amphibian and reptile species. DGHT is certified as a national NGO for species conservation under German law. Its main activities include funding and managing projects for amphibian and reptile species conservation, publication of scientific journals and books on herpetology as well as guidelines for conservation breeding of endangered species and environmental education. DGHT is largely involved in projects with the German enforcement authority (BfN), Species360, CITES and IUCN. / www.dght.de

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