



To:
Mr David Cooper
Acting Executive Secretary
Secretariat of the Convention on Biological Diversity
United Nations Environment Programme
413 Saint-Jacques Street, Suite 800
Montreal, Quebec, Canada
H2Y 1N9

January 2024

Subject: Response to CBD Notification 2023-121 requesting information on best practices for sustainable wildlife management and views on areas that require complementary guidance

Dear Acting Executive Secretary Mr David Cooper,

On behalf of the undersigned conservation and animal protection organisations, we are writing to offer our recommendations aimed at strengthening the work of the Convention on Biological Diversity relating to sustainable wildlife management.

We welcome the opportunity to submit specific views on the need for additional guidance on the sustainable management of wildlife, which would, inter alia, contribute to the effective implementation of the Kunming-Montreal Global Biodiversity Framework, advance many of the Sustainable Development Goals (1, 2, 6 to 10 and 13 to 15 in particular), and support the work of Parties as well as relevant organisations in bringing about the transformative changes required to achieve a world where people, animals and nature co-exist sustainably and in harmony.

Please find below our detailed feedback.

We thank you in advance for considering our views and recommendations. Please do not hesitate to contact us should you require any clarification or additional information.

Yours sincerely,

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On behalf of:

Born Free Foundation

World Federation for Animals

Four Paws

Animals Australia

Ethical Seafood Research

Gaia Belgium

Animal People

Rapad Maroc

Pan African Sanctuary Alliance

Our comments on best practices for sustainable wildlife management and views on areas that require complementary guidance

Wildlife populations, including species that are threatened with extinction, have experienced catastrophic declines over the past 50 years, as reaffirmed by the latest WWF Living Planet report¹. It is important to recognise that many current uses of wildlife are unsustainable, noting that the ‘direct exploitation of organisms’ was identified by the Intergovernmental Platform on Biodiversity and Ecosystem Services (IPBES) in its 2019 Global Assessment² as the second most important driver of nature’s decline.

The Global Assessment estimated that around one million species are now threatened with extinction, and more recent assessments estimate that the true figure could be double this.³ These alarming findings emphasise the need for a far more precautionary approach to any use of wildlife.

Further, in its 2022 Assessment Report on the Sustainable Use of Wild Species⁴, IPBES highlighted that:

- Overexploitation represents a major threat to many wild species, which are also negatively impacted by environmental drivers such as climate change, pollution, and invasive alien species.

¹2022 WWF Living Planet Report: <https://livingplanet.panda.org/en-GB/>

² [Global Assessment Report on Biodiversity and Ecosystem Services | IPBES secretariat](#)

³ Hochkirch A, Bilz M, Ferreira CC, Danielczak A, Allen D, Nieto A, et al. (2023) A multi-taxon analysis of European Red Lists reveals major threats to biodiversity. PLoS ONE 18(11): e0293083.

<https://doi.org/10.1371/journal.pone.0293083>

⁴ <https://doi.org/10.5281/zenodo.6448567>



- About 50,000 aquatic and terrestrial wild species are documented to be used for, inter alia, food, medicine, energy, materials, and education purposes.
- At the global level, populations of many terrestrial animals are declining as a result of unsustainable use.
- Status and trends in uses of wild species vary depending on types and scales of use, and social-ecological context.
- Global trade in wild species has grown considerably over the past 40 years, and the absence of effective regulations to address supply chains generally increases pressure and results in unsustainable use and, sometimes, in wild population collapses.

It is therefore essential that any tool, guidance or instrument designed to ensure the sustainable use and management of wild species prioritises maintaining and increasing biodiversity in order to support biological and ecological sustainability, as opposed to encouraging further wildlife use, particularly of species in decline, which would be highly detrimental to people, wildlife and the wider environment.

In addition, any policy action designed to ensure the sustainable use and management of wild species must include measures reflecting the following seven elements outlined by IPBES (and for those policy actions to be effective, they must be integrated into binding legislation and agreements):

1. inclusive and participatory decision-making;
2. the inclusion of multiple forms of knowledge and the recognition of rights;
3. the equitable distribution of costs and benefits;
4. policies tailored to local social and ecological contexts;
5. the monitoring of social and ecological conditions and practices;
6. coordinated and aligned policies;
7. and robust institutions, from customary to statutory.

For example, efforts to directly address the illegal trade in wild animals are intrinsically linked to consumer behaviour and consumption patterns, policy structures, and governance issues. Good governance, including regulatory frameworks, accountability, anti-corruption measures and behavioural norms at various scales, is key to developing effective policy.

We strongly encourage the adoption of policies that explore, encourage and better fund the use of non-animal trade first and foremost, before endorsing or allowing the use of wild animals to be used or traded for inter alia, medicine, energy, materials, or education purposes.

In our submission, we consider the mandate of the Convention on Biological Diversity and the goals and targets of the Kunming-Montreal Global Biodiversity Framework, adopted in December 2022.



The Framework specifically refers to ensuring the sustainable, safe, and legal use of wild species in Target 5, while addressing in situ and ex situ conservation, sustainable management practices and human-wildlife interactions in Target 4, and highlighting the sustainable management and use of wild species in Target 9.

With this in mind, we highlight areas that are currently not adequately covered by existing guidance developed under relevant multilateral environmental agreements and by competent intergovernmental organisations, with a focus on certain uses of wildlife – other than wild meat – that lack policy tools and guidance, including the unsustainable hunting of wild animals for the pet trade, and trophy and recreational hunting.

Further, we identify animal welfare as an issue addressed in the IPBES Assessment Report on the Sustainable Use of Wild Species that was not included in document CBD/SBSTTA/25/11 of 16 August 2023 on Sustainable Wildlife Management.

Guidance to adequately define the sustainable use and management of wild animals

Importantly, there should be a common understanding of what the ‘sustainable use of wild species’ means among Parties, stakeholders, practitioners, and across all institutions, Multilateral Environmental Agreements, organisations and agencies that address the sustainable management of wildlife and related issues.

Under the CBD, sustainable use is defined in Article 2 as “the use of components of biological diversity in a way and at a rate that does not lead to the long-term decline of biological diversity, thereby maintaining its potential to meet the needs and aspirations of present and future generations”. Sustainable wildlife management is defined as “the sound management of wildlife species to sustain their populations and habitat over time, taking into account the socioeconomic needs of human populations”.

As currently defined, sustainable use fails to value biodiversity and ecosystem services in their own right, despite the Addis Ababa Principles and Guidelines⁵ requiring consideration for the intrinsic and other non-economic values of biological diversity. We strongly encourage the CBD to reflect the progressive conceptualisations of sustainable use that are evolving over time, including by moving away from its anthropocentric approach and adopting a more systemic and transformative view, in recognition of the fact that humanity is part of nature.

Evidence derived from the IPBES Sustainable Use of Wild Species Assessment suggests that the growth of non-destructive and non-extractive uses, focused around service industries (e.g., tourism) and on improving mental health and welfare, can contribute significantly to the broader appreciation of the value of nature and the promotion of ecologically sustainable forms of use.

⁵ [Addis Ababa Principles and Guidelines \(cbd.int\)](https://www.cbd.int/doc/2002/02/2002-02-01-Addis-Ababa-Principles-and-Guidelines-English.pdf)



We encourage a clearer focus on prioritising the protection of biodiversity and viable ecosystems as opposed to a simplistic promotion of utilisation without adequate consideration of the associated

complexity and risks. We strongly recommend the adoption of a holistic view of sustainability, which considers health risks from the exploitation and use of wild species as well as ecological, biological and socio-economic considerations. Clear and objective measures of biological sustainability must take into account all uses of and pressures on species, including legal and illegal uses, and impacts on non-target species, and incorporate the potential impacts of wildlife exploitation on, for example, human health, with all the societal and economic consequences.

In order for any use to be considered sustainable, the assessment of its potential impacts on human, wildlife and ecosystem health and well-being is critical. If COVID-19 has proved anything, it has demonstrated that the use of wildlife is currently unsafe and increases the potential for zoonotic pathogen spillover and disease emergence. There are clear and serious gaps in the international legal and policy frameworks for regulating the taking, holding, trade, marketing, use and consumption of wild animals that pose a risk to public health. Without a significant shift in how we utilise wildlife, and the integration of primary prevention measures through addressing high-risk activities including wildlife trade and trafficking, the future safety of people from emerging zoonotic diseases cannot be ensured.

Guidance to protect animal health and welfare

Further, safety from an animal health and welfare perspective should be considered, using the One Health and One Welfare frameworks. The welfare of individual wild animals must be taken into consideration as part of efforts to sustainably conserve entire species, recognising the intimate relationship between animal welfare, human well-being, and the broader health of the environment. Consideration of wild animal welfare is important on ethical grounds because of the suffering inflicted on wild animals, but also has considerable implications for the success of any sustainable use and management programme.

Applying the One Health and One Welfare frameworks would facilitate a holistic approach to both halting biodiversity loss and mitigating human health risks from human-wildlife interactions. The CBD should consider developing tools to facilitate the application and operationalisation of One Health and the precautionary principle to sustainable wildlife management, including through the provision of guidance on ensuring the welfare of live animals in trade, and focussing on higher risk taxa, in order to ensure sustainability of use in the broadest sense. Such guidance would provide cost-effective solutions to addressing both the risk of future pandemics and the key drivers of biodiversity loss.

Guidance to tackle the exotic pet trade

The trade in and trafficking of wildlife is one of the most lucrative trades worldwide. Specifically, the international trade in wild animals as 'exotic pets' is estimated to be worth billions of pounds



annually and involves millions of individual animals. Further, the pet trade is known to be one of the main pathways for the introduction of invasive alien species, which can cause significant damage to ecosystems, native biodiversity, and local economies, and is identified as a major cause of global biodiversity loss.

Whilst the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) provides an important mechanism to regulate and restrict the international trade in threatened wildlife, it has a limited remit and only regulates international (i.e. cross-border) trade in species listed on its appendices. Many of the species currently traded internationally to supply the exotic pet market are not protected under CITES.

In addition, CITES also arguably fails to ensure the sustainability of trade in wild species that it does regulate. In many cases, species continue to decline following their listing on the CITES appendices. Under CITES, authorities are obligated to make science-based non-detriment findings (NDFs) to ensure export will not be detrimental to the survival of that species before a permit is issued, as well as ensuring that wildlife specimens in trade have been legally acquired. The biological concept behind the establishment of an NDF is the maximum sustainable yield. However, in practice, NDFs are rarely truly evidence-based, and permits are often issued to benefit traders. In addition, NDFs rarely account for all the pressures on target populations, and are generally based on population numbers while failing to account for the population-level effects that might accrue from the removal of key individuals in socially complex species. NDFs typically do not consider the implications of selective offtake, nor do they include consideration of disease risk. A wider systemic approach to trade policy, regulation and implementation is clearly needed.

The CBD could fill this gap, build on its 2010 publication from the CBD Technical Series No. 48 on “Pets, Aquarium, and Terrarium Species: Best Practices for Addressing Risks to Biodiversity”⁶, and develop guidance that would encourage demand reduction efforts and promote the development of a robust ‘Positive List’ system to restrict the keeping of pets to those species which meet strict criteria, aimed at ensuring the welfare of individuals, the conservation of populations, and the protection of human, animal and environmental health.

Guidance to end trophy hunting

Trophy hunting has a long history as a direct driver of over-exploitation. Trophy hunting operations are often unsustainable and do not benefit biodiversity conservation, nor do they represent an effective wildlife management tool. In fact, they may be extremely damaging to the long-term viability of fragile populations of wild animals.

⁶ [cbd-ts-48-en.pdf](#)



Between 2011-2020, upwards of 300,000 trophies derived from more than 300 CITES-listed species were exported from 112 countries. These figures only reflect those trophies derived from species that are protected by international agreement, and for which cross-border trade is monitored. When adding species that do not benefit from such legal protection, and those killed by hunters in their own country, these numbers represent the tip of a very large iceberg.

As trophy hunters primarily target animals that make the best trophies, typically removing genetically, socially and reproductively important individuals, the consequences for social and genetic stability, population integrity and viability may be dramatic. This selective offtake can also weaken population resilience to other threats such as climate change, and therefore increase species' extinction risk.

Far from incentivising wildlife conservation or lifting people out of poverty, trophy hunting operations generate only a tiny proportion of wildlife tourism income. A 2017 study concluded that “the current total economic contribution of trophy hunters from their hunting-related, and non-hunting related, tourism is about 0.03% of GDP”⁷. In contrast, a study⁸ found that a live elephant may be worth as much as \$1.6m over its lifetime through income from photographic tourism – many times the fee typically paid by a trophy hunter to shoot an elephant.

Further, animals that are allowed to live their lives in healthy wildlife habitats provide enormous value to communities and economies. They contribute to ‘ecosystem services’ such as the sequestration of carbon, the value of which could be realised using carbon markets. Research suggests that the carbon sequestration value of individual forest elephants can be measured in millions of dollars. They also offer non-consumptive ecotourism opportunities, which typically generate far more income and provide many more jobs than trophy hunting can ever do.

We therefore urge the CBD to develop guidelines for Parties to adopt evidence-based and precautionary positions on trophy hunting, moving beyond this cruel and unsustainable practice and other inessential consumptive uses of wildlife, and instead support sustainable community livelihoods by promoting non-consumptive activities with a proven contribution to biodiversity enhancement. This would contribute to the effective implementation and align with targets 5 and 9 of the Kunming-Montreal Global Biodiversity Framework.

Existing CBD guidance on the wild meat sector

Finally, we would like to encourage the extension of the CBD’s guidance on the wild meat sector, as it is currently applicable to limited areas of terrestrial tropical and subtropical habitats, biomes and ecosystems. The guidance should address the blurring between subsistence and commercial use, to reflect the increasing commercial reality and commodification of the sector.

⁷ [Microsoft Word - Economists at Large Lions Share Trophy Hunting Report 2017 \(hsi.org\)](#)

⁸ <http://iworry.org/wp-content/uploads/2013/09/Dead-or-Alive-Final-LR.pdf>