

Nature Needs More Annual Report

Financial Year 2020/21



NATURE NEEDS MORE



This report is dedicated to:

The medical teams, carers, first responders and essential workers who gave selflessly to take care of all of us during the pandemic. We acknowledge their work is not yet over.



As we were able to stay home and safe, each day they have shown their humanity, compassion and commitment to all those who needed them during the COVID-19 global pandemic; a time like no other in living memory. But not only are they doing their job, they do more, much-much more.

They keep the ill and dying connected with their families, even to the point that they are there at the end, to be a hand to hold when nothing more could be done. The world is indebted to you all.

We remember those who lost their lives to this zoonotic disease. We pass our condolences to the family and friends left behind, whose lives have been forever changed.

We stand at a tipping point in our history because of a global pandemic, triggered as a result of humans' lack of consideration for non-human animals.

It is time for everyone to decide to be on the right side of history.

We must all ask ourselves **“What will my record be in helping the planet and nature for future generations?”** If we yearn for a quick return to a pre-COVID19 normal, then nothing will change. When we feel helpless and think, what can one person really do, all we need do is think of Captain Sir Tom Moore (1920 – 2021).

And finally, we dedicate this report to all those who continue to commit to protecting wildlife and the natural world in the face of danger, intimidation, threats and ridicule from the people who want to exploit and plunder them for personal or financial gain.

A special thanks to Peter, David, Tuyen, An, Nicholas, Mike, Peter E, Cameron, James & Catherine.

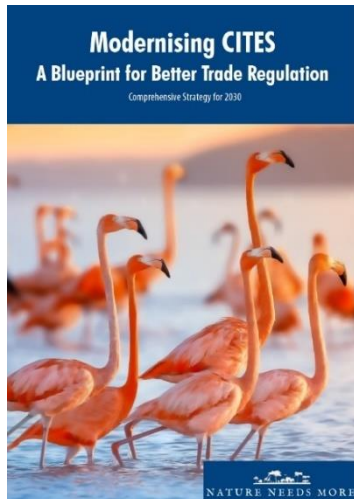
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Executive Summary

This report covers the period July 2021 to June 2022. Travel within Australia and internationally from Australia continues to be curtailed. This limited the activities planned for the Financial Year 2020/21 and will continue to do so for the Financial Year 2021/22. International travel from Australia is currently scheduled to reopen in Q1 of 2022.



During this financial year, Nature Needs More's main project has been the push to modernise the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

In discussions about the modernisation process, throughout 2019 and with over 100 stakeholders working in the conservation and CITES system, it became clear that they appeared unable to conceive a way of modernising CITES. As a result, the Nature Needs More team took the opportunity provided by the 2020 lockdown to create a detailed blueprint.

We have spent the last 12 months deep diving into a number of regulatory frameworks in other industries to see how their approach could be replicated in CITES, to make sure that all legal trade is truly ecologically sustainable and that all trade is legal.

We have drawn on existing regulatory models that use the Precautionary Principle, such as the trade in medicines. **Modernising CITES – A Blueprint for Better Trade Regulation¹** is a comprehensive blueprint for the transformation of the regulatory framework of the trade in all wild flora and fauna. **We fully understand the difficulties involved in this being enacted and explore these issues in the final section of the report.**

Our blueprint outlines **how** such a model would operate given the massive scale of the trade, the inherent inequities between countries and the vast number of species and derived products that require regulation. We provide a detailed blueprint on how to design the new listing mechanism and how to fund its operations. In our model, at least US\$6.5 BILLION will be made available to regulate, monitor and enforce the trade, 10-20 times more than the current amount.

We dedicate a whole section to providing detailed examples of how the new framework would operate in practice and take into account the reality 'on the ground', so that regulation can be both feasible and effective. We use the trade in python skins, corals and rosewood as examples. This new model also incorporates the ability to afford animals non-human rights and to enact wide-ranging protections for their benefit as well as addressing biosecurity issues.

We believe implementing such an approach provides the best opportunity to ensure that all trade is truly ecologically sustainable and that all trade is legal, which fulfills **Target 5 of the draft CBD post-2020 global biodiversity framework**, which states that "the harvesting, trade and use of wild species is sustainable, legal, and safe for human health". **There is no way to reach Target 5 with the current CITES black-listing system.**

In addition, if the current CITES system remains, not only will Target 5 of the draft CBD post-2020 global biodiversity framework be unachievable, but also:

1. The sustainable use model will remain unproven, as outlined in our **Debunking Sustainable Use Report 2020**, and
2. The UNSDGs, and specifically SDGs 14 and 15, cannot be realised.

All these issues point to the urgency needed in putting a new regulatory model in place.

In the lead up to CITES CoP19 (now postponed and expected to be hosted by Panama in November 2022) we hope this information can be used to call for a comprehensive review of CITES and to set up a working group that looks at our (and other) proposals for modernisation.

We understand that we would have a much better chance at gaining support for the first step – a comprehensive review of CITES and its effectiveness – if we can get the report translated into the 5 other official UN languages. We aim to have **Modernising CITES – A Blueprint for Better Trade Regulation report available in all 5 official UN languages by August 2021.**

While this report has been the primary project of Nature Needs More for the Financial Year 20/21, additional projects include:

1. A continued and consistent lobbying to speed up the **roll out of the CITES electronic permitting system**. This includes accepting an invitation to be a part of the CITES working group on electronic permitting. It has also included trying to source funds for developing countries to implement an electronic permit system from the governments of wealthy CITES signatory countries or philanthropists. Key to this project has been a push for transparency of the roll out status in the move from paper-based to electronic CITES permits.
2. Evolving our magazine **HowToSpendItEthically.Org** (HTSIE), which was launched in May 2020 and launching a second news channel **The Fly (It's Time to See Clearly)**. Where HTSIE is very consumer and business focused, The Fly is more political. These channels publish articles about the negative implications of the **legal** trade in endangered species. These stories are not currently covered in mainstream media, which, even after 18 months of a global pandemic, show very little interest in the negative consequences of the legal trade.
3. Building on the **Debunking Sustainable Use Report** to communicate that sustainability without the corresponding transparency remains just an ideology and not a genuine strategy or methodology. This has included investigating both industry and investors. In addition to providing commercial examples where **radical supply chain transparency is missing**, we have created campaigns, such as **No Transparency No Trade**, to highlight this critical issue.
4. Continuing to communicate the **links between the global COVID-19 pandemic and the legal trade** in endangered species. If what emerges from COVID-19 is just a global health system evolution (WHO – One Health) but ignores the global trade system (bilateral trade agreements, multilateral trade agreements, the WTO etc) then the world will only work on symptoms and not root causes of a pandemic which has brought down global societies and economies. This leaves the world unprepared for the next pandemic of zoonotic origin.
5. **Creating and evolving demand reduction and behaviour change campaigns and articles.**
6. **Investigating the role and responsibility of investors** in the legal trade in endangered species.
7. Preparing the relaunch of global, online fundraising activities as the government introduces the road map to reopening social contact and the economy. How will fundraising activities need to be adapted for new COVID normal, social distancing requirements.

Nature Needs More Ltd is registered as a non-profit Australian Public Company Limited by Guarantee. Nature Needs More continues to be a small, volunteer run organisation; the organisations three directors all act in an unpaid capacity.

CITES Modernisation – A Blueprint for Better Trade Regulation

CITES has failed in its stated objective of protecting endangered species from overexploitation through trade, with **trade being the primary extinction driver for marine species and the second most important driver for terrestrial and freshwater species**.

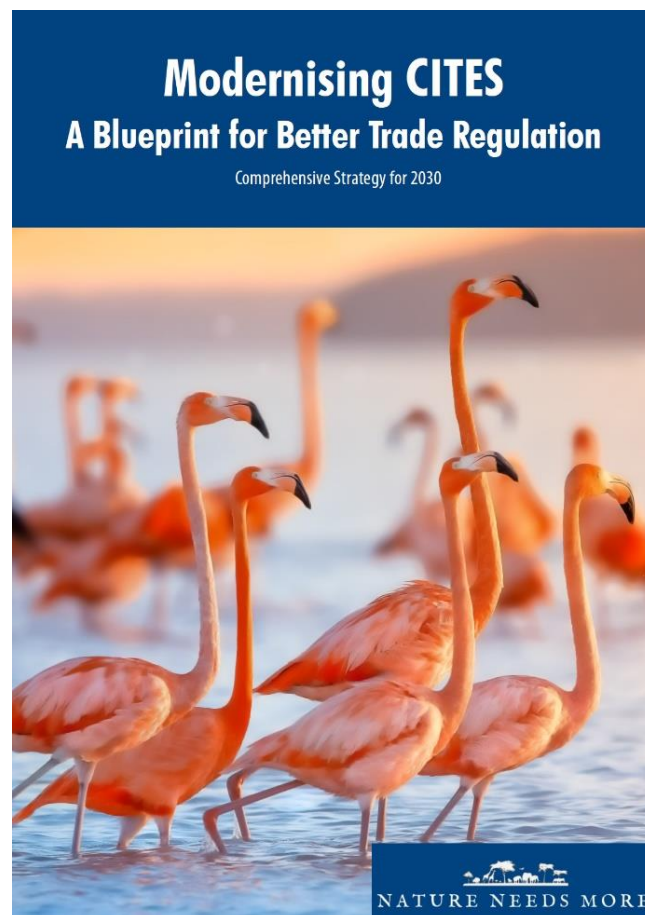
Whilst the lack of funding to enforce CITES provisions has long been known as a key reason for this, blaming the illegal trade is a convenient excuse to ignore the crucial design flaws in the current CITES model.

Building on our previous research and work:

1. **3-Steps To Modernise CITES², and**
2. **The Debunking Sustainable Use Report 2020³**

Nature Needs More used the pandemic lockdown to fully investigate the reasons why CITES is failing and why it is becoming more ineffective as the number of species in need of protection continues to rise.

We researched regulatory models from other industries and the history of regulatory failures to draw conclusions about the suitability of the basic building blocks of the current CITES framework –



blacklisting, national sovereignty and it being a non-self-executing treaty. In our **CITES Modernisation – A Blueprint for Better Trade Regulation** report, published 30th June 2021, we demonstrate that with those basic building blocks remaining in place, CITES cannot be effective and cannot arrest the decline in populations.

We outline a new regulatory framework for CITES based on whitelisting (something first proposed to CITES in 1981, at CoP3⁴), regulating business directly and businesses paying the full cost of regulation. **The model we present also makes business responsible for internalising compliance yet keeps companies at arm's length from the regulator and the regulatory process.**

We offer a detailed account of how this model would work in practice, under real life conditions. We show that it is financially viable, providing US\$6.5-13.5 BILLION annually to regulate, manage, monitor and enforce the trade. Finally, we offer a path for CITES signatory countries to make it happen,

acknowledging the difficulty involved in opening the articles for re-negotiation.

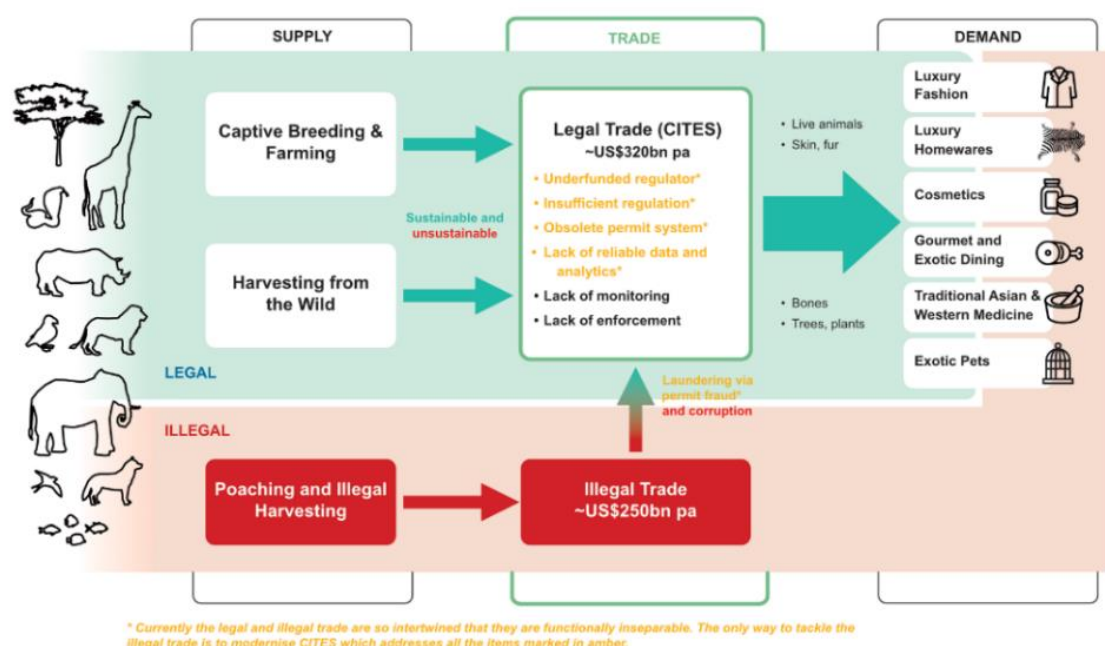
Once the report is translated into all official UN languages it will be forwarded to a database of 1,000 CITES representatives.

As a small, volunteer run organisation, based in Melbourne, Australia, we feel very strongly that the system that facilitates the legal trade in endangered species is in desperate need of modernisation.

CITES failure in its task of protecting endangered species from overexploitation through legal trade comes down to decades of underinvestment and a poorly designed regulatory system. These facts have received too little attention, with one of the reasons being that attention is diverted to the decades long No-trade/Pro-trade debate. The influence, access to governments and marketing budgets available to the pro-trade groups are a goliath compared to the tiny, mainly voluntary resources, of the no-trade collaborations. In addition, it is a sobering thought that most people find it easier to imagine the end of the world than the end of capitalism. **For this reason, Nature Needs More believes that any of the stakeholders - business, investors, government or conservation - who want the pro-trade model to remain must commit to validating it.**

Our **CITES Modernisation – A Blueprint for Better Trade Regulation** proposal will undoubtedly reduce the mindboggling profits that have been made by businesses and investors from the trade in endangered species for the last several decades. They have had plenty of time to invest in improving supply chain transparency to prove their statements of sustainable trade, yet they have done nothing. All the evidence shows voluntary self-regulation by business rarely works. It is time to modernise and invest in independent global regulators to help save the little that is left.

Only if this happens can the legal and illegal trade be decoupled. Currently the legal and illegal trade in endangered species are so intertwined that they are functionally inseparable.



While this remains the case:

1. **The sustainable use model cannot be validated** and has not been to-date. The reason for this is outlined in our Debunking Sustainable Use Report, 2020.
2. The **UNSDGs, and specifically SDGs 14 and 15, cannot be realised.**
3. Likewise, **Target 5 of the draft CBD post-2020 global biodiversity framework, which states that “the harvesting, trade and use of wild species is sustainable, legal, and safe for human health” will not be successful** without modernising CITES and fixing the lack of funding that goes into monitoring and enforcement.

Given this, the question that must be answered is **“Will we continue to let corporation and investors stand in the way of modernising international governance, including modernising CITES?”**

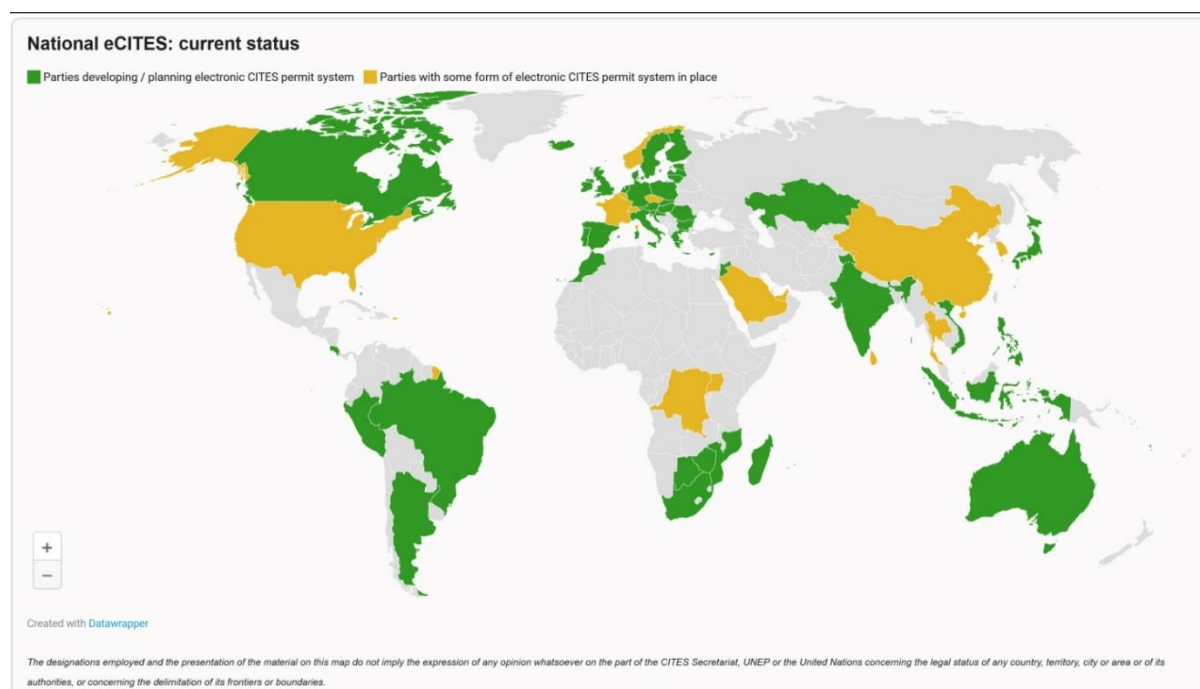
Update on CITES ePermit Rollout

We have continued to lobby for the adoption of electronic permits by CITES signatory countries, through our participation in the electronic permits working group, the Australian CITES Advisory group, direct communication with CITES and signatory country representatives and through regularly publishing updates and articles.

We achieved three significant breakthroughs in relation to electronic permitting:

1. The Secretariat sent out a Notification to Parties 2021/010 in February 2021 asking all parties to submit their status and plans in relation to adopting electronic permitting
2. The Secretariat published the responses in the form of a map on the eCITES web page at <https://cites.org/eng/prog/eCITES>
3. Australia put forward amendments to Resolution Conf 12.3 on permits that explicitly call for the adoption of electronic permitting by parties and those amendments were agreed to by the Working Group on electronic systems, which means they will go to SC74 (Standing Committee 74) for consideration.

Points 1 and 2 were the direct result of Nature Needs More repeatedly asking which countries had ePermit systems in place and which were in the process of rolling out systems. Neither the CITES Secretariat nor the Working Group knew the answer, so Notification to Parties 2021/010 was a great step towards transparency, which was further enhanced by the Working Group recommending to the Secretariat to publish the current status on the eCITES web page. Whilst the publication of the responses represents a vital step forward, the result is very disappointing:



The 14 countries shaded in amber have some form of ePermit systems in place and the 30 countries in green are either developing or planning ePermit systems: that's 44 out of 183 parties to the convention. **The map makes this clear for everyone to see and only 7.6% of CITES signatory parties have implemented some form of electronic permitting in the 20 years it has been discussed.**

Key regions, like Africa, Russia, Central Asia and the Middle East, Oceania and Latin America have low adoption to date and no plans to change that.



Despite the disappointing level of plans to adopt electronic permits by signatory countries, at least **now we have a central point to know the current status** of the roll-out and which regions our future lobbying needs to focus on. **A small step towards transparency.**

In relation to point 3, we have had numerous email communications and discussions with the Australian CITES Management Authority about putting forward new language to amend Resolution Conf. 12.3 to recommend the implementation of electronic permits and we are very pleased that Australia put forward such amendments to the Working Group (WG) on electronic permits and that the Working Group adopted those amendments with only minor changes and additions. As the Secretariat participates in the WG, we can expect these amendments to be put to SC74 in March 2022. If SC74 adopts the changes they have a very good chance of passing at CoP19.

Whilst these three breakthroughs are significant, the lack of funding for all parties to be able to adopt ePermits remains a major concern. So far only bilateral deals have been made, such as USAID paying for Viet Nam's ePermit system, or countries have sought funding from the GEF as part of bigger project proposals. Certainly, getting the GEF or World Bank to commit the less than US\$30million required to complete the global roll out would much improve the adoption rate.

Several issues remain, including:

1. **Timing and Cost of Global Roll Out:** Nature Needs More believes a commitment to a global roll out at CITES CoP19, Panama in November 2022, is still achievable.
2. **Bespoke System vs. eCITES Base Solution:** Where a party wants to build their own, customised system, and not use the UNCTAD eCITES Base Solution⁵, the party should agree to pay all ongoing interoperability cost and the cost to ensure that their system is kept up to date at all times.
3. **Blockchain vs. QR Code Systems:** There needs to be an acceptance that a blockchain system is not viable because of sustainability issues. The debate between a blockchain vs QR system is unnecessarily slowing the CITES permit system modernisation process.

Interrogating Sustainable Use – The Dogma Of Free Trade.

In May 2019 the IPBES (Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services) Global Assessment Report⁶, confirmed that:

1. **Direct exploitation for trade is the most important driver of decline and extinction risk for marine species, and,**
2. **Direct exploitation for trade is the second most important driver of decline and extinction risk for terrestrial and freshwater species.**

In addition, the world has been in the grip of a global pandemic, zoonotic in origin, **where humans are vulnerable because the line between us and exotic animals have long been breached for trade purposes.** Despite all of this only the global health response to the pandemic is being investigated and not its root cause, the global **legal** trade of endangered and exotic.

Helen Clark, who has been appointed to lead the investigation into the World Health Organization response to the coronavirus pandemic, said in a July 2020 interview⁷, **“The brief we’ve been given is, what do we need to stop the world being blindsided again by a crisis like this?”**. But the scope of this review is far too narrow because it is not investigating the:

1. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the international agreement between governments that facilitates the legal trade in endangered species.
2. World Trade Organisation (WTO) the intergovernmental organization that is concerned with the regulation of international trade between nations, including environmental ‘goods’.

A constant push for economic growth, at all costs, is the driver for deforestation, legal harvesting of wild species and mass-captive-breeding of wildlife.

To deal with the conclusions of the IPBES report regarding the extinction crisis and mitigate the risks of



future pandemics, we need to examine the free-trade dogma, including the role of corporate and white-collar (including ‘green’) crime and corruption. In addition, there must be a genuine desire to understand the effects of the limited liability model⁸ and the resulting lack of prosecutions of company executives and directors implicated in green crime. In combination with the profit motive built

into capitalism, via corporate laws, these have overwritten all environmental concerns, including concerns over biosecurity risks⁹.

The dogma of free trade goes hand-in-hand with the dogma of self-regulation at the expense of true, legally enforceable regulations and well-resourced enforcement. The lack of regulation of trade, resulting in the unchecked exploitation of the natural world means the whole discussion about sustainability is undermined from the start. This was the premise behind Nature Needs More’s Debunking Sustainable Use Report, published in June 2020. This lack of validation is critical given:

1. The global acceptance of the UN Sustainable Development Goals (UNSDGs)
2. The ongoing number of bi-lateral and multi-lateral free trade agreements and
3. The push to further liberalise trade to support post pandemic economic recovery.

The current ideology of self-regulation and setting aspirational goals instead of hard targets is embodied by the UN Sustainable Development Goals¹⁰ (and all the other similar schemes, e.g. UN Global Compact¹¹ and the Global Reporting Initiative¹²). This so-called “governance through goals” approach is a perfect complement to the free-trade mantra. Let’s pretend we care about the environment and social justice, but let’s not get in the way of the ‘magic of the free market’ by actually setting hard targets and rules and enforcing them.

A May 2020 paper, *The Sustainable Development Goals Prioritize Economic Growth Over Sustainable Resource Use*¹³ makes clear the problem of this approach in its title. It goes on to confirm a number of issues including:

1. Ever growing number of free trade agreements,
2. The combination of neoliberal ideology, corporate lobbying, business-friendly fiscal policies, tax avoidance and evasion has led to the massive weakening of the public sector [read monitoring, regulation and prosecutions],
3. Too much focus is put on efficiency improvements, rather than absolute reductions in resource use, even though such gains cannot compensate for growing populations and economies,
4. That achieving the UNSDGs mainly relies on the same institutions currently responsible for unsustainable resource use,
5. Measures proposed for achieving the UNSDGs in part counteract the possibility of transformative change.



Businesses and other organisations continue to pat themselves on the back for announcing their commitment to the UNSDGs, highlighting on the organisation’s website and in marketing material which specific SDGs are most applicable to them and on which they are focused.

Even before the pandemic, Nature Needs More pointed to the World Trade Organisation not including UNSDG 15 **Life On Land**¹⁴ in its list of priorities; eighteen months in to a global pandemic UNSDG 15 is still not listed as a priority for the WTO¹⁵. In addition to the future global pandemic risks of this not being included in the WTO commitments, a further three examples provide an insight into the lack of proof of genuine sustainability for ‘environmental goods’ (as the trade in endangered, exotic and all species are labelled) being traded:

1. In an April 2021 paper titled, *Impacts Of Wildlife Trade On Terrestrial Biodiversity*¹⁶ the authors state, “A global understanding of carrying capacity and offtake levels is missing” **[This information shouldn’t be missing for CITES listed endangered species, as this was what CITES was put in place to do in 1975]**, goes on to say “We reveal that where the exploitation for trade occurs, populations decline significantly in abundance.” [Again, if the CITES regulator there should be no significant decline in abundance of the species it lists for trade restrictions and monitoring].
2. **The Regional Comprehensive Economic Partnership (RCEP)**¹⁷ was signed on 15 November 2020. It is a free trade agreement among the Asia-Pacific nations of Australia, Brunei, Cambodia, China, Indonesia, Japan, Laos, Malaysia, Myanmar, New Zealand, the Philippines, Singapore, South Korea, Thailand, and Vietnam. The 15 member countries account for about 30% of the world's population (2.2 billion people) and 30% of global GDP (\$26.2 trillion) as of 2020, making it the biggest trade bloc in history. This trade agreement has no binding environmental protections,

3. The widespread use of the **Investor-State Dispute Settlement (ISDS) system**, which allows companies to sue countries who strengthen domestic regulations to protect the environment. Investment arbitration firms bring claims against countries for loss of profits for investments in those countries, if regulatory standards are strengthened and could impact future profits. An example of this is playing out in Europe right now, with German energy giant RWE using the Energy Charter Treaty to claim compensation from the Netherlands over its planned phase-out of coal from the country's electricity mix by 2030. This sets a precedent, which can be used against countries who try to strengthen regulations in the legal of endangered and exotic species.

In these investigations, we have found:

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- A collage of 10 fashion-related images. Top left: A man in a plaid shirt with a white bird on his shoulder. Top right: A woman with voluminous dark hair. Middle left: A collection of shoes and handbags. Middle right: An interior scene with a red lamp and ornate furniture. Bottom left: A woman in a fur hood. Bottom center: A still life with champagne and a mortar and pestle. Bottom right: A close-up of a lace shoe.

The real question is, will we continue to let corporations and investors stand in the way of modernising international governance?

Nature Needs More Media

We are nearly 18 months into the COVID19 pandemic, and yet there is still very little coverage of the **legal** trade in endangered and exotic species in the mainstream media (MSM). In spite of the global pandemic being the top news story for over a year, the zoonotic origin is rarely linked to the legal wildlife trade.

As with climate change, businesses, industries and governments need to be held to account, and exposed, for the lack of progress in tackling legal trade induced biodiversity loss. This trade is decimating the world's remaining wildlife and putting human lives at risk.

Nature Needs More has covered the link between the legal wildlife trade and COVID 19 in our three news channels:



NATURE NEEDS MORE



The Fly: It's time to see clearly.



HowToSpendItEthically.Org



18 Months Into A Pandemic –
Have We Learnt Anything?



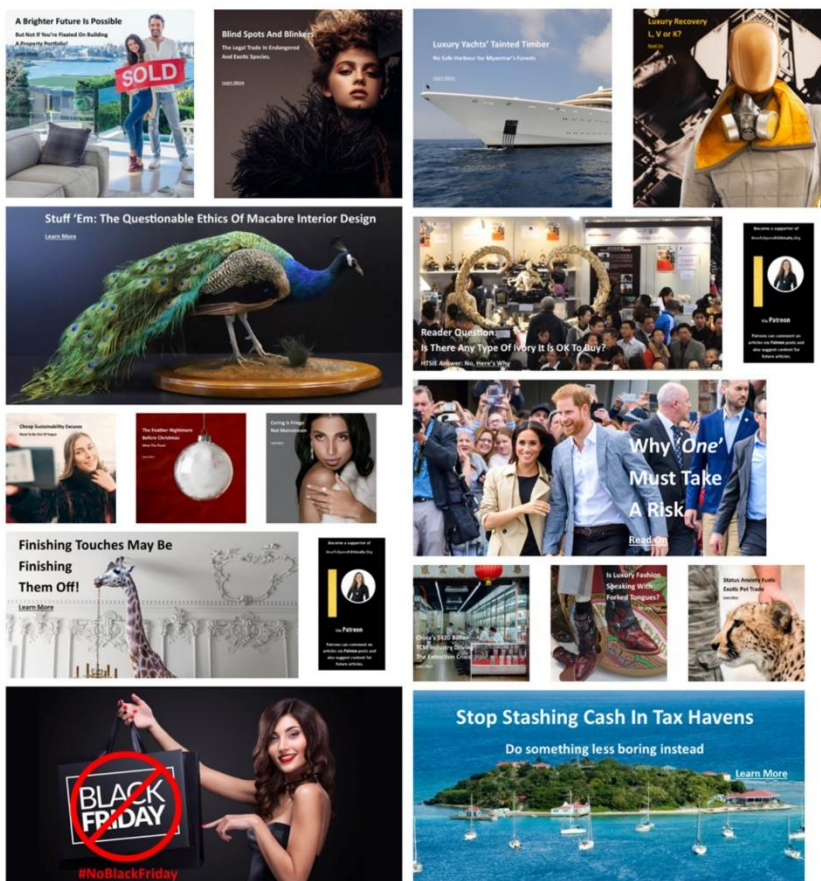
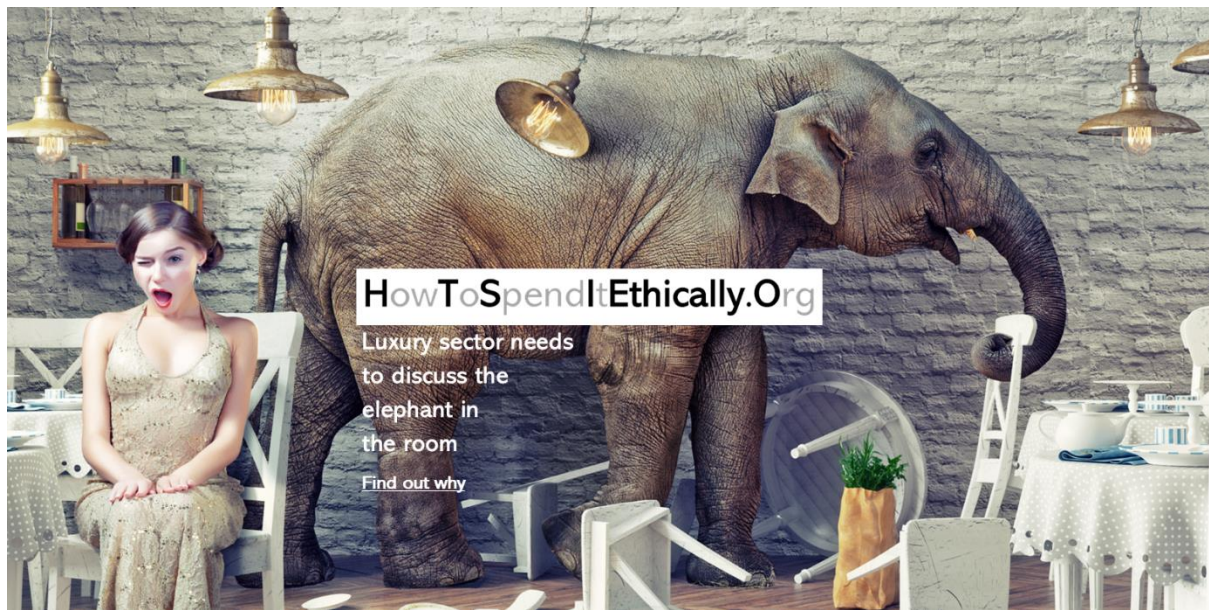
We continue to engage with journalists and the MSM, with the aim of influencing them to not only write about the illegal wildlife trade but to provide a more balanced view, by exposing the issues created by the legal trade. We are also trying to get a greater understanding of the obstacles faced by the MSM in printing articles about the legal trade in endangered and exotic species.

We appreciate advertising revenue is increasingly harder to find and media outlets, particularly those who consider themselves progressive, will struggle to manage the conflicts of interest between investigative work and advertising. Telling captivating stories that open people's eyes to the damage being done by global luxury brands through their unthinking and unchecked exploitation of nature, greenwashing and lack of commitment to supply chain transparency is obviously a difficult decision for MSM outlets to make.

The global legal trade in endangered species which supplies the fashion, home furnishings beauty, food, medical and pet industry appears to be continuously clinically side stepped. Articles about the legal trade in endangered and exotic species need to cover luxury business, luxury lifestyles and luxury consumption. They also need to interrogate supply chain transparency, legislation enabling businesses to hide their activities under the guise of 'commercial in confidence', the greenwashing which hides the lack of any real progress in companies' glossy sustainability reports. In depth investigations are needed of domestic and international regulation of this legal trade. It is time for the truth to come out about the overexploitation of endangered species for the **legal** trade.

While we wait, Nature Needs More will write some of the stories that need to be told. We thank our small but constantly growing subscribers.

HowToSpendItEthically.Org



After launching **HowToSpendItEthically.Org** (HTSIE)¹⁸ in May 2020, the support for the publication has built during the financial year 2020/21.

The information covered in HTSIE is of growing importance during the pandemic, because all the talk from business and politicians is about getting 'back to normal' as quickly as possible. There is little acceptance that the old 'normal' scale of consumption, is driving the extinction crisis and putting human lives at risk.

In the push to get people to spend more, marketing, PR and advertising are being used to make consumers feel good about their

'sustainable' purchasing behaviour, when in reality they are doing very little to curb their spending addiction. For example, an article in Vogue magazine describes a consumer as a 'sustainability-conscious'¹⁹ if they rent or buy second-hand outfits, every so often. **Labelling consumers 'sustainability-conscious' for doing effectively nothing, makes it too easy for people to compromise, between caring about sustainability while doing little to change their purchasing behaviour.**

This behaviour has even got its own psychological name, moral self-licensing. This is the process of using one, easy, ethical decision, for example, I won't use takeaway coffee cups, to help you maintain a high moral self-image about your ethical consumption credentials. This, in turn, provides an excuse to ignore other, harder, ethical purchasing choices. This research was published in an interesting 2020 study titled, **A little good is good enough: Ethical consumption, cheap excuses, and moral self-licensing**²⁰, which explores how consumers justify their purchasing decisions. **HowToSpendItEthically.Org** explores consumers purchasing decisions and justifications which have implications for wildlife and the environment.

Currently, it is too easy for companies and industries to promote their sustainable credentials with no real proof backing up their statements. This year HTSIE created new segments to investigate what fashion industry policies in relation to the legal trade in endangered species:

Fashion Week For Wildlife



XX Fashion Week 2021

1. Does XX Fashion Week have a statement and/or policy about the sustainable use of endangered and exotic species in the collections you profile?
 - If Yes, can you provide this statement and/or policy?
 - If No, given the landmark 2019 intergovernmental report into the global extinction crisis confirmed that direct exploitation for legal trade is the most important driver of decline and extinction risk for marine species and the second most important driver for terrestrial and freshwater species, would XX Fashion Week consider putting in place such a statement or policy by 2023?
2. Can you confirm if XX Fashion Week requires all the designers/brands you profile to provide you with their policy on how they manage their supply chain when it comes to using endangered and exotic species for their collections?
3. If XX Fashion Week does not yet require the designers/brands you profile to provide you with such a policy, would XX Fashion Week consider requesting such a policy from the designers/brand you profile by 2023?
4. How would XX Fashion Week describe the progress on the management and monitoring of the sustainable use of endangered and exotic species used in the global, luxury fashion industry and how do you back up the statement made?

Radical Transparency For Wildlife



The fashion industry is one of the largest users of endangered and exotic species, in the form of its raw materials.

1. What specific initiatives does the XX currently have in place to ensure the sustainability of CITES listed species used in the fashion industry?
2. Given CITES uses a 1970s paper-based permit system and its trade data doesn't match customs records, what does the XX recommend to use to demonstrate transparency and sustainability within supply chains?
3. To what specific initiatives have the XX's partners committed, to improve the quality of CITES related reporting and the supply chain traceability for the CITES listed species they use?
4. What funds does the industry currently commit to improve transparency and sustainability in the use of CITES listed endangered species in [country]?
5. What specific future plans does the XX have to tackle the laundering of illegal items into the legal supply chain?

Sustainability Wise For Wildlife



1. What does sustainability mean to you?
2. Given its resources, where do you think the luxury fashion industry is at in embracing the concept of sustainability? Can and should it be leading the way?
3. How do you feel about the use of endangered and exotic species in the luxury fashion industry?
4. Transparency is required to prove sustainability; what is your understanding of how the luxury fashion industry is doing in relation to supply chain transparency when it comes to the use of endangered and exotic species?
5. Given many would say that we are a long way from achieving sustainability, what do you think is needed next as a priority?
6. What is your personal focus in relation to sustainability in the next 12 months?

Over time, similar initiatives will be created to investigate policies and actions in other industries using endangered species in their product and service lines.

The mission of **HowToSpendItEthically.Org** continues to be to help educate and inform consumers about the legal trade in endangered and exotic species; **no one really wants to be a Blind Shopper!**

Even in the first year of operation HTSIE has been regularly approached to accept paid content. **We won't accept paid articles or advertisements, so donations via a subscriber base will be needed.**

We estimate it will take at least 3 years to build a large enough subscriber base and social media following for make **HowToSpendItEthically.Org** self-supporting via Patreon.

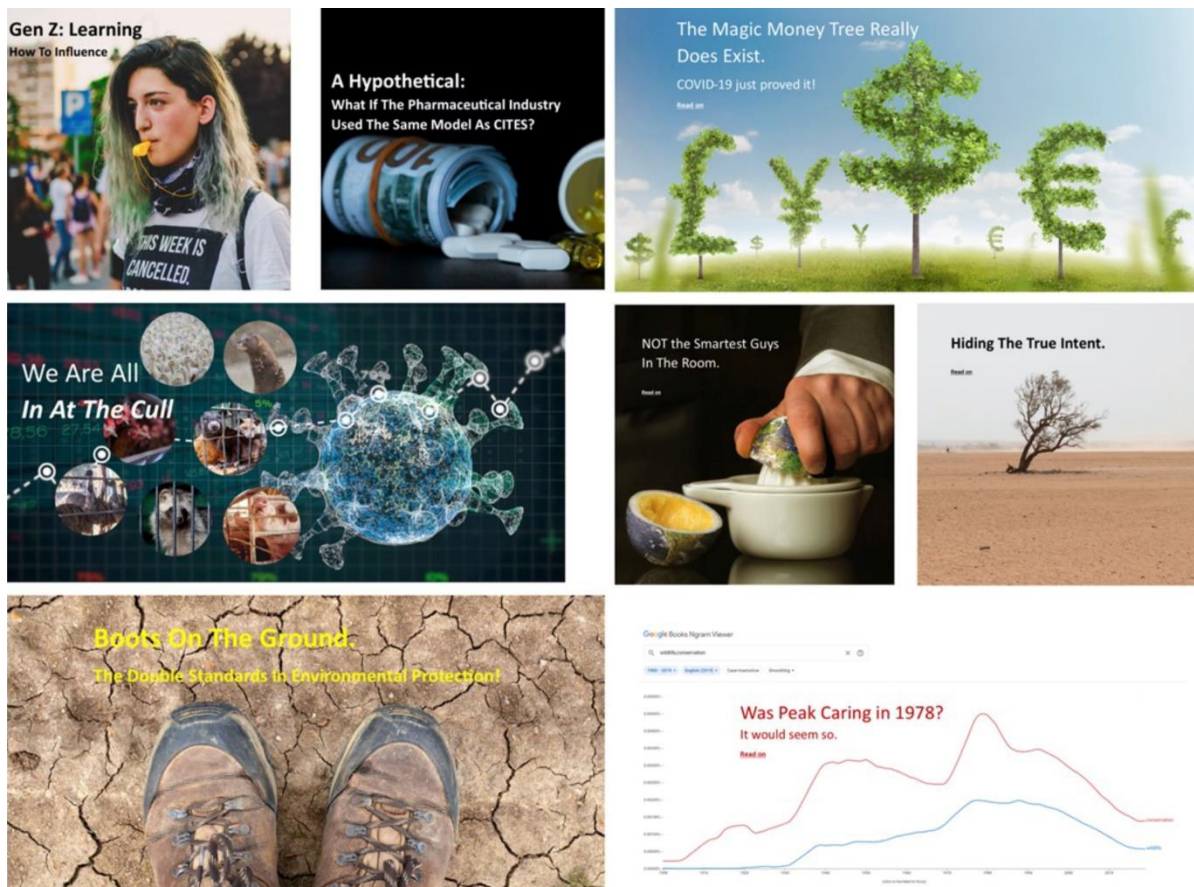
MSM's lack of coverage of the legal trade in wildlife during the 18 months of the pandemic highlights the need for a publication such as **HowToSpendItEthically.Org**



The Fly (It's Time to See Clearly).



In addition to [HowToSpendItEthically.Org](https://www.howtospenditethically.org), Nature Needs More launched **The Fly**²¹, in October 2020. Whereas HTSIE was created for people who are not currently thinking about conservation, **The Fly** has been created for those that are and want to know more about the underlying causes of the current extinction crisis and the solutions available given political and business will.

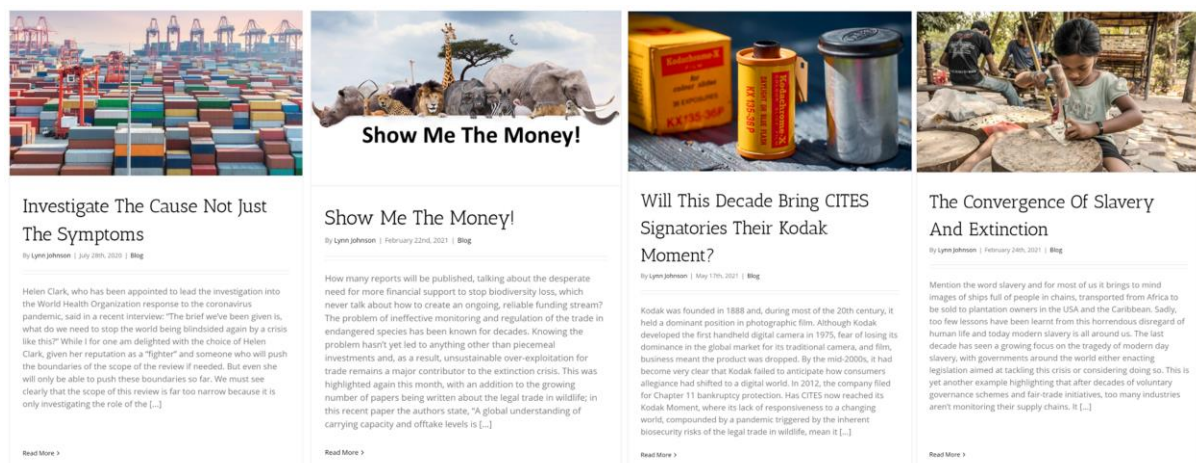


Biodiversity loss is an international governance challenge, not an issue of more evidence-based conservation science being needed. **The Fly** provides insights on governance and politics.

Nature Needs More Blogs



In addition to the Fly and HTSIE, we continue to regularly publish blogs²² on the Nature Needs More website for our several hundred subscribers. The purpose of the blogs is to examine the issues specific to the legal and illegal wildlife trade. These blogs provide background and updates on our projects, including our push to modernise CITES and to drive the adoption of electronic permits by signatory countries.



Our blogs provide more in-depth investigations of the issues and examples for those who have been actively supporting conservation, together with those who have a professional interest in the international trade in endangered species.

At the same time our blogs are not academic in nature; they are designed to also provide commercial and political understanding of the failure to regulate the wildlife trade properly.

Nature Needs More Campaigns

While some campaigns have been put on hold because of the pandemic (**Breaking The Brand**²³), other long-term campaigns have been built on (**Extinction: The Vulgarly of Desire**²⁴) and Nature Needs More has launched new campaigns.

Breaking the Brand Demand Reduction Campaign

While demand reduction campaigns remain vital, **it cannot be underestimated just how much supply-side factors and the over-generalised value of the sustainable use model can undermine the success of demand reduction strategies.** For this reason, Nature Needs More has chosen to focus its limited resources on supply-side issues, the sustainable use model and the mechanisms of trade during this financial year.

In addition, the ongoing global pandemic continues to create a level of uncertainty about how consumer desire will evolve, given the zoonotic nature of COVID-19. This is a time to monitor consumer motivations and to understand how demand reduction campaigns need to evolve in response to changes in consumer thinking and behaviour because of the pandemic.

There have been mixed messages of the effect on rhino poaching levels as result of the pandemic, with most reports indicating a downward trend.

There has been a very noticeable increase in the number of views and downloads the Breaking The Brand (to stop the demand for rhino horn) demand reduction documents get over the last 12 months. Despite this documentation being produced as long ago as 2014/15, it appears to be still relevant. This includes the Breaking The Brand project documents associated with creating, evolving and evaluating demand reduction campaigns²⁵.



The reason for this increased interest may be related to the pandemic or it may be that wildlife conservation issues are finally getting more interest from a broader range of people.

We will re-examine our demand reduction work after CITES CoP19. By that time, it should become much clearer what the 'new normal' emerging from the pandemic is going to be and how consumer behaviour has changed (or not) in relation to both luxury consumption and the wildlife trade.

At the same time, we continue to support any organisation that is working on solutions to rhino poaching, especially if they involve demand reduction initiatives.

We have gained a broader audience in the USA by working in collaboration with **Active for Animals**²⁶. Future rhino horn demand reduction campaigns in Viet Nam and will be undertaken in collaboration with Active for Animals.

Extinction: The Vulgarly of Desire

Nature Needs More's Founder, Dr Lynn Johnson, was delighted to be invited to be a part of an international collaboration exploring the implications of excessive, unchecked luxury consumption. In November 2018, a month-long exhibition was launched with a symposium. For this event, staged in Venice, Nature Needs More explored the concept – **Extinction: The Vulgarly of Desire**. For the Symposium we presented out work on **Re-Inventing Magnificence: Gaining Status from Contribution Not Consumption**. These themes have continued through a number of Nature Needs More initiatives over the years since this event.

The papers presented at the symposium have now been published in a special edition of **Luxury: History, Culture, Consumption**²⁷.



Abstract

Most luxury consumers link rarity to higher status. It may be a luxury car, yacht, haute-couture fashion and accessories, prestige holiday destinations such as Venice, or purchasing exotic wildlife products. For some, legal luxury is not enough to fulfil their status need and they take a step into a world of illegal consumption; this is the case for the buyers of rhino horn in Viet Nam. The desire for rare wildlife products, both legal and illegal is increasing rapidly. Legally, the desire to supply means species are both captive bred en masse and legally harvested from the wild to fulfil the demand. Illegally, criminal syndicates have moved beyond simply exploiting the existing demand to manufacturing new markets using the same principles luxury goods manufacturers have used for decades to trigger desire and purchasing decisions. Uncurtailed luxury consumption of exotic wildlife products is driving the illegal poaching and unsustainable harvesting of many species.

Extinction is a direct result of the vulgarity of desire for luxury goods made from endangered species. Battling this trend requires a different approach to traditional conservation methods. Nature Needs More utilises an innovative approach to wildlife conservation, that of demand reduction. But demand reduction alone is not enough, there is a need to redirect desire away from both legal and illegal consumption of exotic and endangered species. Nature Needs More combines demand reduction campaigns in SE Asia with work to revive and reinvent Magnificence, a concept steeped in history but subverted by luxury in recent centuries. This paper outlines Nature Needs More's research in the field, and the mechanisms by which we can provide elites with an alternative to fulfil their self-image and status needs based on contribution instead of consumption of our most fragile heritage.

These themes:

1. **Extinction: The Vulgarly of Desire**
2. **Inventing Magnificence: Gaining Status from Contribution Not Consumption**

Will guide Nature Needs More's work in the months and years to come.

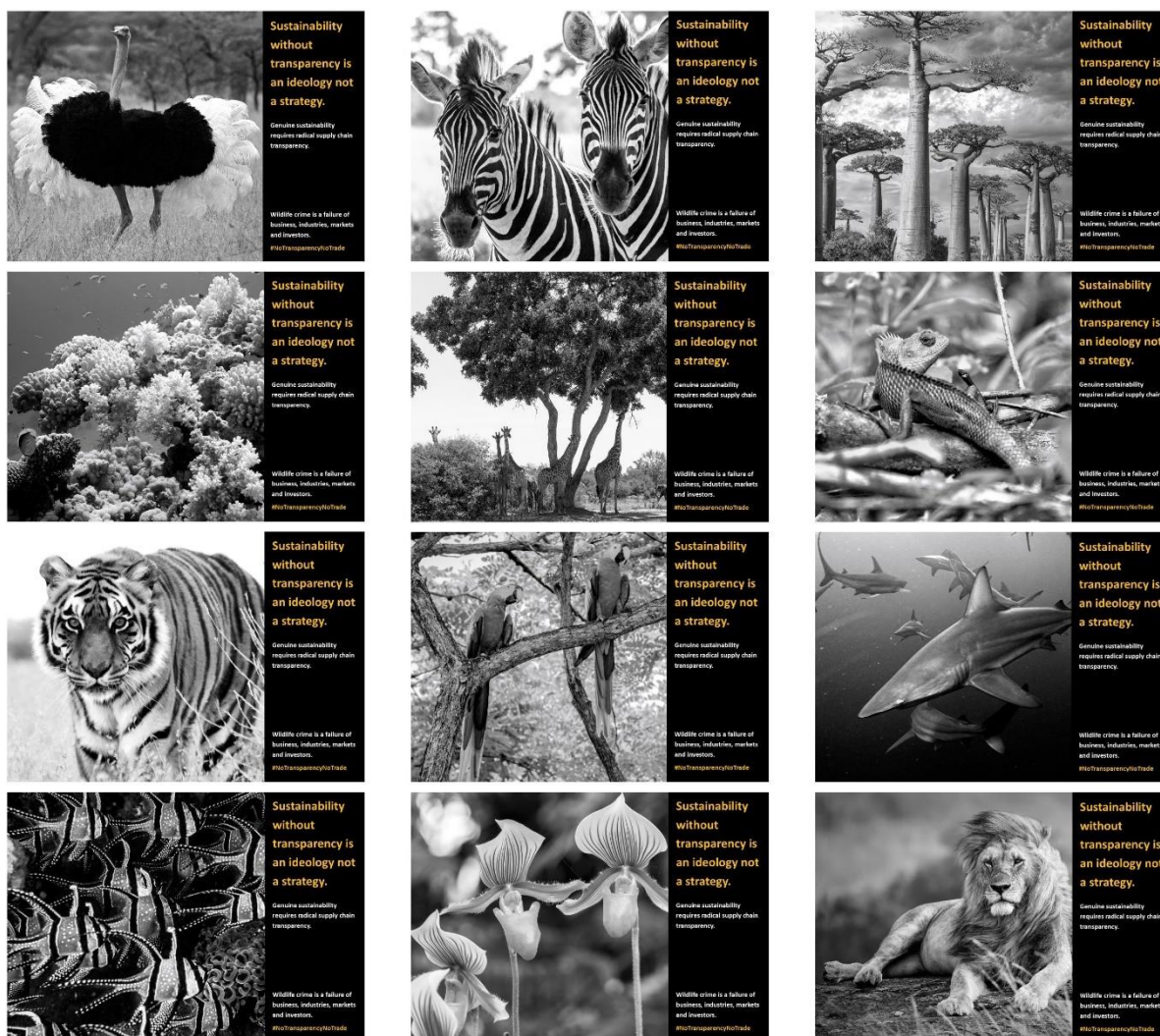
No Transparency No Trade (#NoTransparencyNoTrade)



Wildlife and timber crime is a failure of business, industry, markets and investors. They demonstrate no understanding of the tremendous impacts of the poorly regulated procurement of endangered species for the global legal trade. Over the last 30 years, talk about sustainability has increased, bringing with it a growing pile of glossy sustainability reports. But we are further from sustainability in extracting biomass from nature than ever before. After decades of legal trade in endangered and exotic species there appears little commercial understanding of sustainable offtake

levels. Begging the question, is it time for a moratorium on this trade until businesses, industries and shareholders provide the necessary investments to properly monitor and clean up supply chains?

This is the reason for the **No Transparency, No Trade (#NotTransparencyNoTrade)**²⁸ campaign.



Powerful individuals, business and commercial institutions have driven up the desire for endangered and exotic species for profit. In the main exotic and endangered species are used to manufacture non-essential products for luxury consumers, fulfilling luxury lifestyle choices.

Best Jobs For the Future



Over recent years, politicians, worldwide, have dismissed the type of youth activism best characterised by Greta Thunberg, because as children these protesters didn't yet have a vote. But what now that Greta has turned 18 and she can vote? While some young adults in this age group will want to maintain the status quo, linking personal identity and status to the stuff that they can buy, a growing number of young people are realising that they are being educated for a world that won't exist in its current form.

Understandably, they wonder if today's jobs will remain when domestic, regional and global economies are unstable due to the constant disruptions associated with climate change, degrading ecosystems and social inequality. Many already know that they will need to work to clean up the mess left by their parents and grandparents' generations.



Nature Needs More's **#BestJobsForThe Future (#ImWorkingForThePlanet)**²⁹ campaign explores the emerging types of employment and what to expect in the future. Over recent decades adults should have been fighting biodiversity loss and climate change as if their children's and grandchildren's lives depended on it. Baby Boomers, Gen X and Gen Y must be prepared to be remembered as the pathetic generations.

Wildlife and Timber Crime Is A Failure Of Business, Industry and Investors

The basis for this statement is introduced in Nature Needs More's Annual Report for the Financial Year 2019 – 2020. Additional information can be found in our articles and campaigns on our website.



In this annual report we will focus on the failures of investors and why getting investors committed to tackling biodiversity loss, associated with legal trade, maybe a key action to dealing with the extinction crisis.

Investors have started to exert influence in relation to climate change policies and carbon emissions targets in the companies in which they invest.

They have been under increasing pressure from consumers and activists to divest from fossil fuels and to not finance new projects. **The question is, can a similar approach work in relation to biodiversity protection and the trade in endangered species?**

We already know from our research, starting in 2018, that one failure of investors is that too many respond negatively to the implementation of sustainability practices in the luxury sector; they perceive sustainability is an identity mismatch with what the industry represents. Given the fact that investors have a very powerful influence over a company's decisions and actions, it is vital to educate investors about the negative consequences of the **legal** trade in endangered species.

Over this financial year, Nature Needs More spoke with representatives of the banking industry, superannuation funds, ethical investment funds and investor groups tackling climate change and more. Below outlines some of the themes that came from these discussions.

1. Investor groups influencing and lobbying companies on climate change actions. All stated that they knew of no similar groups anywhere in the world where investors were joining forces to tackle biodiversity loss associated with the trade in endangered and exotic species. **This topic is currently not on the radar for investor groups or consultants.**
2. Discussions with ethical investments funds, including superannuation funds. While they did have policies on investing in companies dealing in live animals, these were in the main policies regarding the welfare of stock animals. **All stated that they know very little about the trade in CITES listed endangered species (and captive breeding of exotic and endangered species).** Some stated their ethical investment mandate wouldn't allow them to invest in captive breeding of endangered and exotic species.
3. Speaking unofficially with representatives of the investment arm of banks, regarding the company's policy of investing in captive breeding programs of endangered and exotic animals, **most stated that this was too risky for their portfolio**, and they would expect that it would be wealthy private investors and hedge funds who would be the main investors in captive breeding and legal harvesting of endangered and exotic animals.

The main theme through all of these investor conversations was their surprise at the value and scale of the legal trade in endangered species and that they knew very little about it, though they were well informed on other issues, such as climate change.

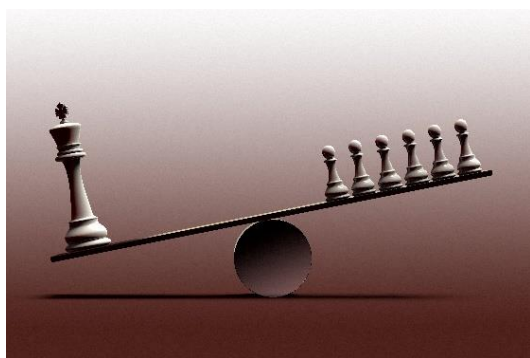
Investing in the captive breeding of endangered and exotic animals fell into 'no man's land' between those who:

1. Ethically wouldn't invest and, as a consequence, know nothing about the trade, and those who,
2. Are happy to invest and, in the main, show no interest in the negative outcomes and risks.

The lack of knowledge in this second group is partly a result of them not having to cover the financial cost associated with the 'risks' of the trade. This was clearly demonstrated during the pandemic.

As insurance companies keep their distance from businesses involved in the captive breeding of animals, farmers have expected governments to compensate them for the disruption to trade associated with culling. In Denmark alone, mink farmers requested up to AUS\$4 billion compensation³⁰, after a nationwide cull was undertaken, amid coronavirus fears; that equates to nearly AUS\$700 for every man, woman and child in Denmark. The costs associated with the 'disruption to trade' in captive breeding facilities created to produce non-essential products should be covered by the business, consumers and investors who want to maintain the trade, not governments. When compensation given to producers appears to come with no conditions attached, there is no imperative for behaviour change in these industries. **It is an all profit, no responsibility approach.**

This lack of knowledge or corresponding lack of concern in investor groups is a problem, as investors



exert significant influence not only on business but also government policy. In 2014, a pair of American political scientists published a ground-breaking peer-reviewed paper analysing 30 years' worth of US policy-making that compared policy outcomes to public polling results. They found that **general public sentiment had almost no impact on US policy making** – but the political preferences of wealthy people and large corporations were hugely predictive of what laws and regulations implemented by the government³¹. Their conclusion

being ***"Economic elites and organized groups representing business interests have substantial independent impacts on U.S. government policy, while average citizens and mass-based interest groups have little or no independent influence."***

While this research was done for the USA and can't be readily generalised to other so-called advanced western democracies, because of differences in electoral systems and campaign financing, undoubtedly intensive investor and business lobbying on policy development has favoured shareholder and company interests in the last 30 years³².

The concentration of influence and power is even more apparent when you consider three giant financial companies, used by the global elite, represent the largest ownership blocks in 88% of the companies that are currently listed on the S&P500; BlackRock, Vanguard and State Street³³. These three organisations manage \$18 trillion in combined assets in January 2021, equivalent to more than three-quarters the size of the US economy.

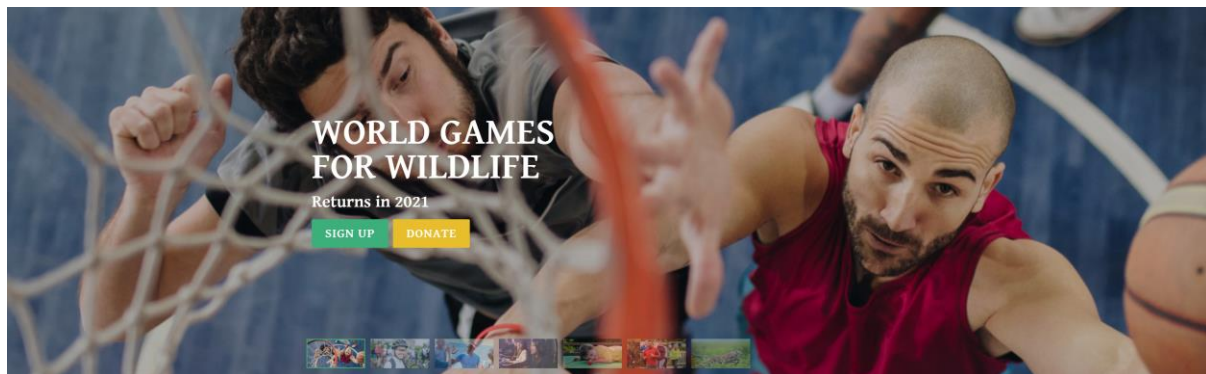
BlackRock alone has \$8.67 trillion in assets under management, as of January 2021, Vanguard is nearly as big, with \$6.2 trillion and State Street had \$3.1 trillion. **BlackRock and Vanguard are shareholders in Kering Group³⁴, LVMH³⁵, Prada³⁶, Burberry³⁷ and L'Oreal³⁸, Vanguard also has a stake in Hermès³⁹.**

Given this level of concentration of ownership it is crucial to educate investors in the risks inherent in the trade in endangered species and the lack of transparency in supply chains today. They must take more responsibility for their role in dealing with biodiversity loss associated with the legal trade in endangered and exotic species.

Fundraising

Given the ongoing pandemic and strict lockdowns in Melbourne, Victoria, Australia and worldwide, Nature Needs More's online fundraisers Style Icon Afternoon Tea⁴⁰ and World Games for Wildlife⁴¹ were cancelled in the financial year 2020/21.

Nature Needs More has joined forces with the SAVE African Rhino foundation, based in Perth and Active for Animals, based in the USA to relaunch **World Games For Wildlife** on the 1st July 2021, (the first day of the new financial year in Australia).



Nature Needs More also plans to relaunch the Style Icon Afternoon Tea. While sport and social activities continue to be prohibited or severely constrained in Australia the reopening of such fundraising events will be slow, but to use a phrase seen in the media on an almost daily basis, we have a “roadmap for reopening” for a crowdfunding activity, which will evolve over time.

General, overseas travel from Australia was prohibited for the whole of the financial year 2020/21. As such an overseas fundraising trip to the USA due to take place in May/June 2020 has still not been possible, though Nature Needs More will undertake this trip once normal travel resumes and the cost of flying is not prohibitive. As it currently stands this trip is unlikely to happen before Q2 of 2022.

Financial Report

Nature Needs More's financial report can be viewed via the ACNC website.

Plans for The Financial Year 2021-22

Activities covering the next financial year, 1 July 2021 to 30 June 2022, will again be heavily dependent on how the pandemic evolves. The inability to travel during the FY20/21, both domestically and internationally has slowed progress in driving systemic change and the modernisation of the CITES trade system. If this situation continues throughout the FY21/22, the pace of change will remain limited.

The main activities for this period are expected to cover the following areas:

1. We will continue to socialise **the failure of CITES to ensure the sustainability in the legal trade** in endangered and exotic species. This means addressing unsubstantiated claims about sustainability frequently made by governments, business and IGOs. We will expand our

pushback on such claims by incorporating related failures to hold business and governments to account, such as:

- a. Tax avoidance, lack of transparency and the use of secrecy jurisdictions to avoid business and the wealthy paying their fair share
 - b. The lack of prosecution of corporate crime, including green crime
 - c. The negative consequences for conservation that arise due to the almost religious devotion to private property rights when using a commons approach would have much better outcomes
 - d. Secret business lobbying against better regulation whilst publicly proclaiming adherence to lofty goals and ‘ambitious targets’
 - e. The negative effective of inequality on biodiversity
2. Expanding the conservation sector’s and the public’s understanding of the legal trade in endangered species and its effects on biodiversity loss.
 - a. We will publish reports, to compliment and add to the Modernising CITES Report. In the first instance that means publishing the translations of the Modernising CITES report.
 - b. HowToSpendItEthically.Org will regularly publish articles written for people not yet engaged in conservation issues.
 - c. The Fly will cover the issues the conservation sector routinely overlooks in relation to its interaction and partnership with business and governments.
 - d. Our Nature Needs More Blog for a specialist and academic audience that address the unsustainability of the trade in endangered species.
3. A continued push for systemic change in modernising the legal trade in endangered (and exotic) species and the systems that facilitate this trade, with a key focus on
 - a. Modernising CITES and especially the adoption of electronic permits by signatory countries.
 - b. Getting one or several parties to CITES to make a submission to CoP19 to call for a Working Group to study ways to modernise CITES.
 - c. Getting the funding to run a side event at CoP19 where we present the Modernising CITES Report.
 - d. Decoupling the legal and illegal trade in endangered species through increased transparency, monitoring and enforcement.
 - e. Promoting strategic fixes, such as the ‘reverse listing’ approach and industry contributions and levies to properly resource the CITES regulator.
4. We will continue to investigate key leverage points to drive meaningful change to the trade in endangered species, including a renewed focus on targeting investors groups given they may be the most important group in forcing the largest companies involved in the legal trade to start investing is the radical supply chain transparency that is long overdue.
5. We will build our fundraising strategy around exiting donors and the World Games For Wildlife partnership with SAVE African Rhino Foundation and Active for Animals. The aim is to get to 50 fundraisers in WGFW by the end of the financial year.

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