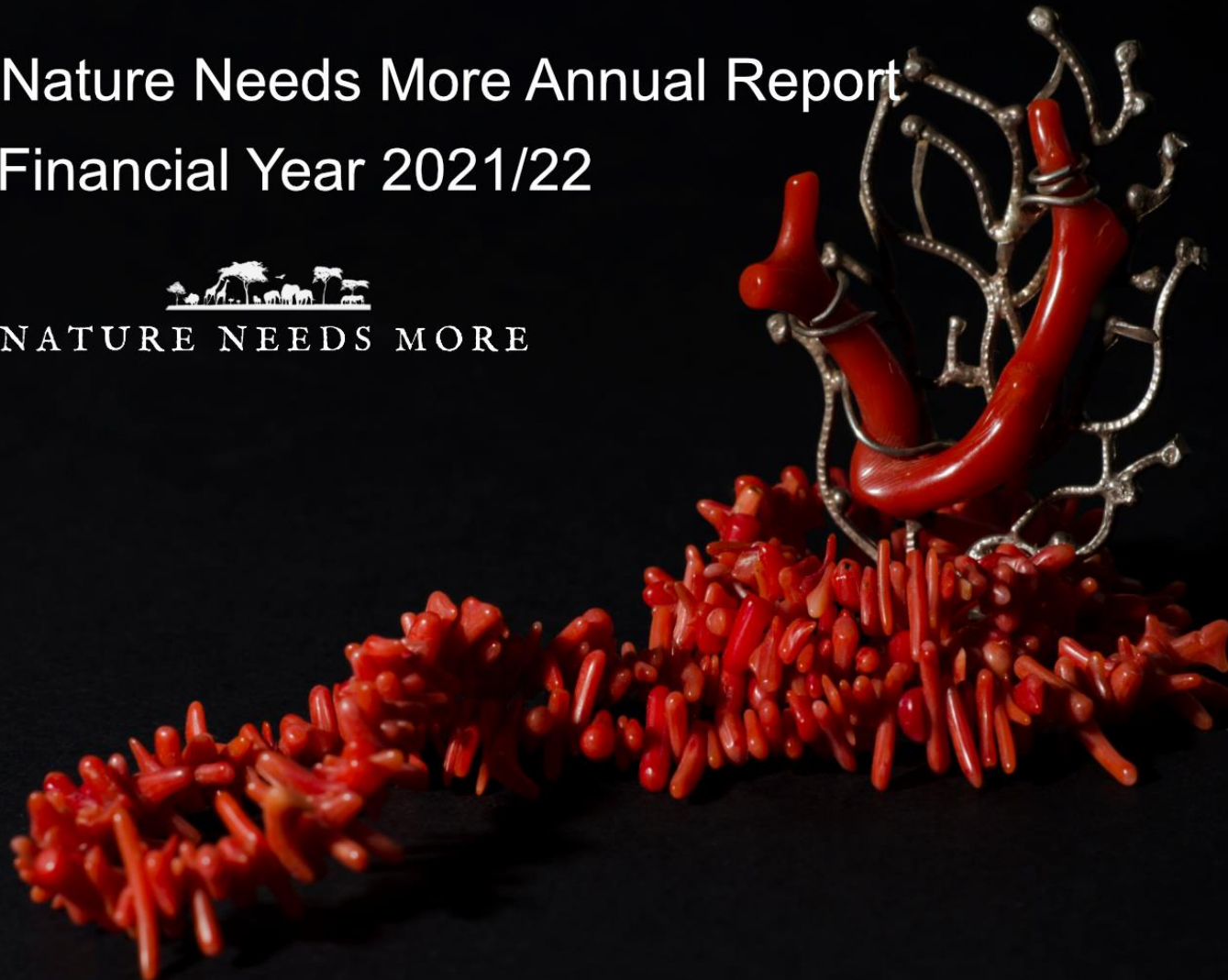


Nature Needs More Annual Report

Financial Year 2021/22




NATURE NEEDS MORE



This report is dedicated to:

To all the people in the world who are challenging mediocrity, the status quo, business-as-usual and incrementalism. These are the underlying drivers of the biodiversity loss and the extinction crisis.

We also 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 nature for personal or financial gain.



How do behaviours become entrenched? There are 3 types of feedback that mould our behaviours:

1. What is rewarded,
2. What is punished, and
3. What is tolerated

What is tolerated is the most insidious, but why?

"I used to think that top environmental problems were biodiversity loss, ecosystem collapse and climate change. I thought that thirty years of good science could address these problems. I was wrong. The top environmental problems are selfishness, greed and apathy."

Gus Speth

Until more people stop tolerating selfishness, greed and apathy in our daily lives, in our political leaders and in business, we will continue on a path to environmental collapse.

Will YOU stop tolerating the status quo?

Nature Needs More takes this opportunity to remember the words of Henry Beston, an American writer and naturalist, best known as the author of *The Outermost House*.

"The creatures with whom we share the planet and whom, in our arrogance, we wrongly patronize for being lesser forms, they are not brethren, they are not underlings, they are other nations, caught with ourselves in the net of life and time, fellow prisoners of the splendour and travail of the Earth."

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

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Executive Summary

This report covers the period July 2021 to June 2022.

The CITES Modernisation Project

Nature Needs More's report **Modernising CITES – A Blueprint for Better Trade Regulation**¹ has received a lot of attention over the year. In part this was due to being able to publish the report in all official UN languages:



Undoubtedly, this has contributed to the ongoing interest in the report, and we can't thank our donors enough for enabling this.

Certainly 2022 as seen some interesting activity in the CITES. Two key actions taken by the CITES Secretariat at the Standing Committee meeting of March 2022 was the launch of the new, CITES Wildlife TradeView website². The new website certainly makes navigating the trade data system much easier, but it is important to remember the website is simply a better window on very poor-quality data. CITES data is still incomplete and is often simply wrong. Nature Needs More's hope is that this easier way to review the poor quality of the CITES trade data will be the catalyst needed to speed up the transition to a CITES electronic permit system.

Another positive action coming from the CITES standing committee was a draft decision for CoP19 that encourages developing countries to approach donor countries for funding to implement electronic permitting. The draft decision specifically states:

19.AA Directed to the Parties

Parties are invited to:

- f) call upon donor countries and agencies to provide financial support towards the implementation of electronic CITES permit management systems in developing countries;

This critical decision didn't receive much publicity within the conservation community. Nature Needs More encourages any CITES signatory that is classed as a developing country to approach all the wealthy CITES signatory countries and ask them to cover the cost of implementing electronic permits. Over the years, Nature Needs More heard government officials, in these wealthy CITES countries, say, "We can't just offer, we need to be asked". The CITES draft decision provides the trigger to ask for donations. This draft decision will be voted on at CoP19, but we encourage countries to ask now and not wait.

A key activity throughout this financial year has been the continued lobbying of countries to fully implement a CITES electronic permit system, with the greatest focus being on EU countries and the European Commission. Now that China and the USA have both implemented CITES electronic permit system, Europe is the main consumer region that still relies on the CITES 1970s paper-based permits, which enable a huge amounts of permit fraud to occur. Within the EU only France, Belgium and the Czech Republic have implemented electronic permits; Switzerland and Norway complete the European rollout.

The during the year Nature Needs More committed an increasing amount of time lobbying for adequate resourcing for CITES, via fees and a levy on the legal trade, paid by the businesses profiting from the trade.

As a result, we are interested to follow the proposal to the Convention on Biological Diversity (CBD) CoP15 from some countries in continental Africa that a **1% biodiversity levy is applied to the retail price of all products based on genetic resources and digital sequence information (DSI), with proceeds going to biodiversity conservation around the world.** Reporting³ from the discussion stated this proposal faced significant opposition from rich countries. **This levy of trade sets a precedent that business and industry will no doubt lobby to avoid.** If such a 1% levy on all products based on genetic resources and DSI is achieved, **why not a 1% levy on the retail price of all wildlife trade, as NNM proposed in the Modernising CITES report.** A 1% levy on the on the retail price of products can't possible be seen as onerous. If it isn't supported by business and governments at the CBD CoP15, this will be an indication that their commitment to tackling biodiversity loss is an on-paper commitment only.

While reverse (white, positive) listing is still the main area of pushback on Nature Needs More's recommendations for modernising CITES, this approach is receiving more attention for subsections of trade in wildlife species, such as the exotic pet trade⁴ and other trade in live animals considered a source of future pandemics. In addition, a growing number of academics are publishing work acknowledging a reverse listing approach may be necessary to move to the precautionary principle in the trade of wild species⁵.

Communication & Campaigns

A key focus of the year has been our push for **genuine proof** of sustainability statements. Nature Needs More's **Take The SUS Out Of SUSustainability** message took a number of forms from:

Social media adverts, for CITES and beyond:



Articles under the theme of **The Sustainability Game** outlined what different industries, from the finance industry, to consulting, to advertising and publishing, are all doing to create the illusion that sustainability is a valid and measurable strategy. Examples include:



The Sustainability Game: Creatives, Keep The Blood Off Your Hands



The Long Read: Is It Time To Retire Sustainability?

The Fashion Industry Must Pull Its Head Out Of The Luxury, Exotic Skin Bag



The Sustainability Game

Sustainability, in its current form, continues to be oversold as an activity to overcome biodiversity loss (and many other problems). It could evolve from an ideology to a valid strategy but only with the correspondent radical transparency needed to provide genuine proof of sustainability claims.

Nature Needs More's three news channels have continued to gain new supporters throughout the year.



NATURE NEEDS MORE



The Fly: It's time to see clearly.



HowToSpendItEthically.Org

At the start of 2022, World Games For Wildlife was rebranded as **My Wildlife Challenge**⁶, based on feedback from event participants, who felt it was important to acknowledge that the extinction crisis will be one of the biggest 'challenges' this decade. Many also acknowledged that wildlife has been facing this crisis alone and they want more people to take biodiversity loss personally.



General fundraising activities continue to be difficult given Nature Needs More is volunteer run and time allocated to fundraising activities is limited. The aim of My Wildlife Challenge is not only to support fundraising but also the provide a platform for people who haven't previously considered donating to conservation to get involved.

As Nature Needs More monitors biodiversity loss and the extinction crisis, key observations and concerns from the year include, but are not limited to:

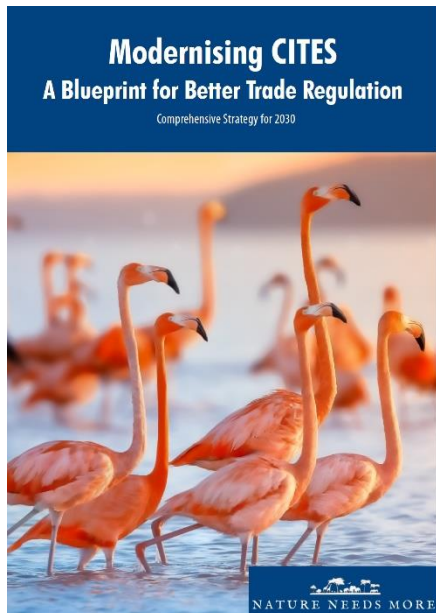
1. The accelerating risks of ignoring the loss of bioIntegrity.
2. The slow pace of talks preparing for the Convention on Biological Diversity Post-2020 Global Biodiversity Framework negotiations at CoP15, which is already 2 years late, having been postponed because of the pandemic.
3. The growing number of industries who see bioIntegrity loss as a massive business opportunity.
4. Stakeholders misunderstanding the real purpose of Environmental, Social, and Governance (ESG) tools and strategies.
5. The increasing linking of conservation and poverty alleviation.
6. The lack of mainstream media coverage of legal trade driven biodiversity loss, in particular the legal trade in endangered and exotic species.
7. The incrementalism approach to solving biodiversity loss, a strategy which has been used for 50 years and hasn't produced any results, yet it is still the accepted strategy.
8. The siloed, narrow thinking of too many in the conservation sector leading to the support of systems that can have a highly detrimental effect on the natural world. Just one of the clear examples to show this is conservations acceptance of crypto currencies for donations.

This report covers the primary project of Nature Needs More for the Financial Year 21/22, additional projects can be seen via Nature Needs More's website.

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 Project

In June 2021, Nature Needs More (NNM) published a report **Modernising CITES – A Blueprint for Better Trade Regulation**. By 2025, CITES will have been in force for 50 years. The convention 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.



While the current CITES regulatory model has failed, the convention is still (sadly) the only and best framework that the world has to deal with the risks of legal exploitation of wild species used for trade purposes. As such it is critical that it is modernised to ensure it is effective in dealing with current and future volumes of legal exploitation for trade.

After fully researching regulatory models in other industries and the history of regulatory failures, NNM outlined a new regulatory framework for CITES based on reverse (white) listing, regulating business directly and businesses paying the full cost of regulation. The model developed makes business responsible for internalising compliance yet keeps companies at arm's length from the regulator and the regulatory process.

As the lack of funding to enforce CITES provisions has long been known as a key reason for the failure of the current

CITES system – CITES currently receives annual funding of only US\$6.2 Million to regulate this global trade – the NNM report outlines a new funding mechanism providing US\$9-13.5 BILLION annually to regulate, manage, monitor and enforce the trade.

This report was forwarded to CITES management authority representatives in all signatory countries. It was sent to the relevant ministers and the civil servants we had spoken with over the previous 3 years, trade representatives and diplomats we had spoken with, conservation NGO and representatives of global IGOs.

Given the importance of the report it was recommended that we had it translated into all official UN languages. Funding was sourced to engage the necessary qualified translators who could provide the required precision in translating such a document ensuring accuracy, readability and the use of correct terminology. In September 2021, all versions of the report were available:



This could not have been achieved without the support of several donors and NNM is deeply grateful for their belief in this work.

In addition to this Nature Needs More created the first draft of a submission for review of CITES convention. The submission focuses on what is needed for CITES to achieve its stated strategic vision and also target 5 of the CBD post-2020 global biodiversity framework, to make all trade legal and sustainable by 2030. The submission calls for a review of the CITES convention and for the establishment of a Working Group to canvass proposals that would help CITES achieve its stated vision for 2030 by fixing the lack of resources both for compliance with the convention and for tackling the illegal trade. This draft submission can be found in Appendix A.

Nature Needs More sent this draft submission to a number of CITES MAs. We understood that any submission made to CITES would need to come with funding to cover the cost of a working group review; we had been advised by a representative of the CITES secretariat this funding would need to be of the order US\$500 million for a 3-year review. Nature Needs More received a pledge of US\$500 million from a US-based philanthropist to cover the cost, if we were able to secure a signatory country or countries to make the required submission for a full, in-depth review of the convention. No signatory country we approached was willing to take a lead on this. In finishing it is important to remember that the CITES convention has had only one review in its nearly 50-year history; that review was in 1994. **How many organisations would survive if they did only one strategic review every 50 years?**

Nature Needs More drafted a second submission, focused on having business pay (at least part of) the cost of regulation. This second draft submission presents three options of how this can be done under the current CITES framework. This submission can be found in Appendix B.

Change In CITES In The Last 12 Months

CITES Wildlife TradeView Website Launched



At the CITES Standing Committee meeting of March 2022 a new website was launched, CITES Wildlife TradeView². Anyone who has tried to penetrate the CITES trade database, who doesn't use the system regularly as a part of their research or job, will know that it isn't the most transparent

trade data source to navigate around. In 2019, Nature Needs More even asked a group of trade analytics experts to navigate the CITES trade database. Their feedback was that the CITES trade database was the worst designed and most impenetrable trade data source they have ever come across.

The new CITES Wildlife TradeView website certainly makes navigating the trade data system much easier, and NNM encourages anyone worried about the trade in endangered species to use it to look at the species traded and any trading partners they are worried about.

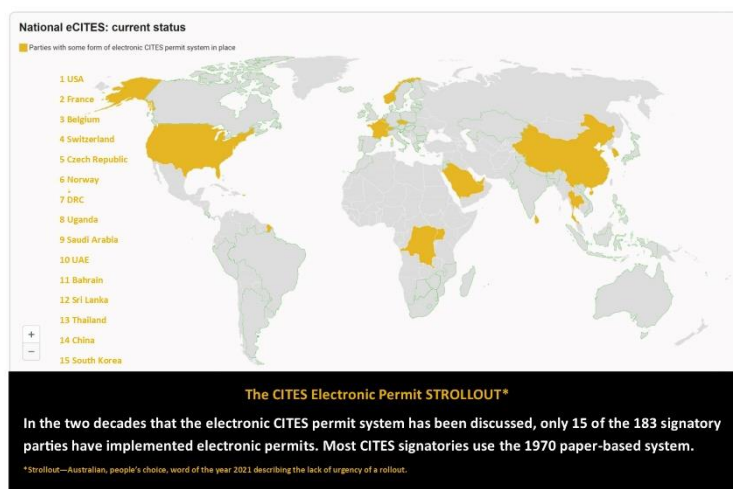
It is important to remember, the CITES Wildlife TradeView website is simply a direct link to the CITES Trade Database and, as such, the best way to define the new CITES Wildlife TradeView website is that it is a great window on very poor-quality data. **CITES data is still incomplete and is often simply wrong or missing. So, could this easier way to review the CITES poor trade data be the catalyst needed to speed up the transition to a CITES electronic permit system?** Nature Needs More first wrote about the CITES Wildlife TradeView website in March 2022 and provided a number of examples to show how the most basic reconciliations of CITES trade cannot be done.

A couple of the interesting facts about the CITES Wildlife TradeView website are that it is managed, on behalf of CITES, by the UNEP (based in Kenya) and the World Conservation Monitoring Centre (WCMC, based in the UK), and the development of the website was funded by the UK government.

Sadly, the UNEP and WCMC (two leading conservation agencies) have been unable to influence the governments of the respective countries in which they are based to give up their 1970s CITES paper permits. Neither Kenya nor the UK have modernised their CITES permit system to use electronic permits. The fact that the UK hasn't implemented electronic permits is even more odd when you look at the size of their funding to WCMC. The CITES Wildlife TradeView website states "The development of CITES Wildlife TradeView was made possible thanks to internal investment, and the financial support from the UK Research and Innovation's Global Challenges Research Fund under the Trade, Development and the Environment Hub project (project number ES/S008160/1)".

Digging into this project number, the UK government, via the Economic and Social Research Council (ESRC), has provided 4 years of funding to WCMC worth £18,239,311. **It begs the question, why would the UK government provide nearly £18,239,311 (US\$23,719,932) in a donation to help monitor the wildlife trade, but not modernise the UK CITES trade permit system to use electronic permits? A system that costs about US\$150,000 (£115,050) and takes 8-12 weeks to roll out.**

CITES ePermit Rollout Over The Last 12 Months?



Only one more CITES signatory country has been added to the list of countries to implement electronic permits; there are now a total of 15 CITES countries.

The glacial pace of the CITES ePermit '**Strollout**', must be compared with the time it has taken to implement a similar system, using the humble QR Code, for people to demonstrate their vaccine or COVID status.

First introduced by Israel, the Covid passport goes by a variety of names, including COVID Certificate, health pass and green pass. Our smart phone carries our personal QR code, providing proof we are fully vaccinated against Covid, have recovered from the virus, or have recently tested negative.

Within the EU for instance, some countries developed national Covid passes compatible with the **European digital Covid certificate**, which is designed to facilitate travel throughout the EU⁷.

As the world reopened, activities and freedoms were only available to fully vaccinated people. From entering sporting events, restaurants, workplaces and public transport, our personal QR codes were our ticket back in, for both employees and visitors. All this was possible because verification could be done in real time. The QR code provides a simple and effective system for instant, real-time verification and traceability. Invented in 1994, the QR code was designed to allow high-speed component scanning in the automotive industry. But it quickly expanded to be used in many commercial tracking applications.



But this QR code system has been conspicuous in its absence from one industry, the trade in endangered species. Moving to an electronic CITES permit system was first tabled in 2002. The tragedy of this delay in rolling out CITES ePermits permits to ensure traceability and validation of the legal trade in endangered species is made even more stark when compared to the few months it took to implement the COVID certificate system.

Nature Needs More has extensively written about the need for all 183 signatories to move to electronic permits. This would reduce the many data quality issues associated with the 1970s paper permits. It will not stop all fraud and mislabelling, but it will make it harder, given **most electronic permit systems have multiple levels of approval and an audit trail. The cost of doing so is less than US\$30million to complete the global roll out.**

A key activity through this financial year has been the continued lobbying of countries to fully implement a CITES electronic permit system, with the greatest focus being on the EU and European Commission.

Other CITES Activities

For those countries which cannot afford the US\$150,000 themselves, the recent CITES standing committee has prepared a draft decision for CoP19 that **encourages them to approach donor countries for funding**. It specifically states:

19.AA Directed to the Parties

Parties are invited to:

- f) call upon donor countries and agencies to provide financial support towards the implementation of electronic CITES permit management systems in developing countries;

Nature Needs More encourages any CITES signatory, that is classed as a developing country to approach all the wealthy CITES signatory countries and

ask them to cover the cost of implementing ePermits on your behalf. **Over the years, Nature Needs More is over listening to government officials, in these wealthy CITES countries, say, “We can’t just offer, we need to be asked”. The CITES draft decision provides the trigger to ask for donations.** This draft decision will be voted on at CoP19, but we encourage countries to ask now and not wait.

Key Observation & Concerns From The Year

Accelerating Risks Of Ignoring The Loss Of BioIntegrity

Over the course of the year there have been many actions, events, decisions and disasters that have happened. In this section of the report, Nature Needs Moors highlights just a few that will have a future impact on our relationship with the natural world. How we insist that our governments respond to such milestones can either nudge our relationship with wildlife and the environment in a healing or further destructive direction. Key to this is how we understand and mitigate risk.

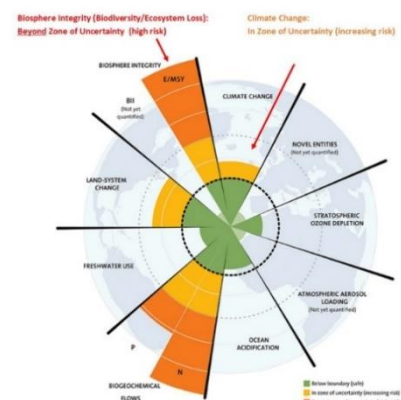
The **World Economic Forum 2022 Global Risks Report**⁸. The report summarises the results of a WEF survey of business leaders, politicians and academics who are the typical participants of the annual World Economic Forum meeting in Davos.



Environmental risks, both short term and long term, dominate the report. More than 84% of people surveyed are worried or concerned about the outlook for the world. Just 12% have a positive view, and only 4% reported feeling optimistic. **"Most respondents ... expect the next three years to be characterized by either consistent volatility and multiple surprises or fractured trajectories"** WEF said.

Why are these figures so interesting? Because this group is filled with the business leaders and politicians who have been some of the main perpetrators and enablers of the unsustainable destruction of land and natural resources. **These are the same global elites, who, naively, thought they had the capability, resources, political influence to turn this problem around when 'they' felt it was needed.** Given only 4% of this group reported feeling optimistic it seems like they are beginning to realise this is not an easy ship to turn, even when you have resources, power and influence.

Just one of the models which make the risks we are facing very clear is the **Planetary Boundaries Model**⁹. From a biointegrity perspective, the planetary boundaries model shows that we are well **beyond the Zone of Uncertainty and in the High-Risk Zone**; biodiversity loss and failing ecosystems have huge implications for food security, yet we haven't even reached the 'denial stage' that obstructed 30 years of trying to



These risks are not new, as with global warming they have evolved over decades. Given they were not addressed sooner, when a more incremental approach could have been taken to transition how we consume, bold, decisive action is now required. Is this likely to happen?

A key check point on how the world collectively responds to the loss of biointegrity will be the results of the **Convention on Biological Diversity Post-2020 Global Biodiversity Framework**; the conference (CBD CoP15) has been postponed from 2020 as a result of the global pandemic and is due to finally happen in Canada (still hosted by China) in December 2022¹⁰.

The UN Convention on Biological Diversity is a multilateral treaty that has three main goals:

1. The conservation of biological diversity
2. The sustainable use of its components
3. The fair and equitable sharing of benefits arising from genetic resources.

Its objective is to develop national strategies for the conservation and sustainable use of biological diversity, and it is often seen as the key document regarding sustainable development.

The signatories to the convention were supposed to meet, in China, during 2020 to agree on a new plan, known as the post-2020 Global Biodiversity Framework (GBF). The aim of the GBF is to guide action in the lead up to 2030 by providing a number of ambitious goals, including a commitment to designate at least 30 percent of global land and sea as protected areas (known as the **30 by 30 initiative**).

Given the global pandemic, zoonotic in origin, this meeting was postponed a number of times and is now planned to happen in Montréal, Canada in December 2022; the event will still be chaired by China.

So there has been extra two years to negotiate and prepare the **ambitious goals** (called **Targets**) for the post-2020 Global Biodiversity Framework.

To clarify the progress made, I will use one target, Target 5. Target 5 is about ensuring that overexploitation of wild species doesn't occur, and all trade is legal. Early in the discussion Target 5 was proposed to take the form that all trade in wild species would be sustainable and legal by 2030. Then the pandemic hit, and Target 5 was expanded to be all trade in wild species would be sustainable, legal and safe for human health by 2030.

So where is target 5 now, after the extra meetings to negotiate the post-2020 Global Biodiversity Framework (GBF) ambitious goals? Below is the text from the latest draft, as published on the CBD website:
<https://www.cbd.int/doc/recommendations/rwg2020-03-wg2020-03-ec-oj-en.pdf>

Anything in brackets [[]] means that this part of the text **has not been agreed**.

TARGET 5 [Prevent overexploitation by ensuring][Ensure] that [any][the] [harvesting][exploitation], [capture] breeding[farming], trade and use of terrestrial, [and aquatic][freshwater][inland water] and marine and CBD[WC2020/3/L2 Page 8 coastal], wild [animal and plant] species, including eggs, fry, larvae and derivatives), is sustainable [and legal] [and safe for target and non-target species] [effectively regulated] [traceable], [minimizing impacts on non-target species and ecosystems] [without adverse effects on the populations of species], [and safe for {human}, {animal and plant} health] [and poses no risks of pathogen spillover to humans, wildlife or other animals] [and for all living beings on mother Earth]. [and prevent and eliminate bioprosy and other forms of illegal access to and transfer of genetic resources and associated traditional knowledge], while [respecting][protecting] customary rights and sustainable use [of IP Cs] [and preventing pathogen spillover], applies [ecosystem-based approaches]/the ecosystem approach to management] [and creating the conditions for the use and provision of benefits for IP Cs] [and take urgent action to address both demand and supply of illegal wildlife products]. A1.1 [Eliminate all harvesting, trade and use of wild terrestrial freshwater and marine species that is illegal, unsustainable or unsafe, while safeguarding the customary sustainable use by IP Cs].

To clarify what HAS been agreed, I have removed all the text in the brackets. This leaves:

TARGET 5 that trade and use of terrestrial, wild species, is sustainable, while customary sustainable use,...

For example, it's **hasn't even been agreed that all trade is legal!** Unless more good people are willing to stand up their governments, who are signatories to the Convention on Biological Diversity and say, "no more", we want you to deal with this ridiculous and tragic situation by taking one small step in solving the extinction crisis, then frankly wildlife and the natural world are buggered.

TARGET 5 [Prevent overexploitation by ensuring]/[Ensure] that [any]/[the] [harvesting]/[exploitation], [[captive] breeding]/[farming], trade and use of terrestrial, [and aquatic]/[[freshwater]/[inland water] and marine and CBD/WG2020/3/L.2 Page 8 coastal], wild [animal and plant] species[, including eggs, fries, parts and derivatives], is sustainable [and legal] [and safe for target and non-target species] [effectively regulated] [and traceable], [minimizing impacts on non-target species and ecosystems] [without adverse effects on the [animal and plant]] health]/[and poses no risks of [loss]s] [and for all living beings on mother Earth]],

[and prevent and eliminate biopiracy and other forms of illegal access to and transfer of genetic resources and associated traditional knowledge], while [respecting]/[protecting] customary [rights and] sustainable use [of IPLCs] [and preventing pathogen spillover], [applies [ecosystem-based approaches]/[the ecosystem approach] to management] [and creating the conditions for the use and provision of benefits for IPLCs] [and take urgent action to address both demand and supply of illegal wildlife products]. Alt.1 [Eliminate all harvesting, trade and use of wild terrestrial freshwater and marine species that is illegal, unsustainable or unsafe, while safeguarding the customary sustainable use by IPLCs.]

To clarify what HAS been agreed, when removing all the text in the brackets:

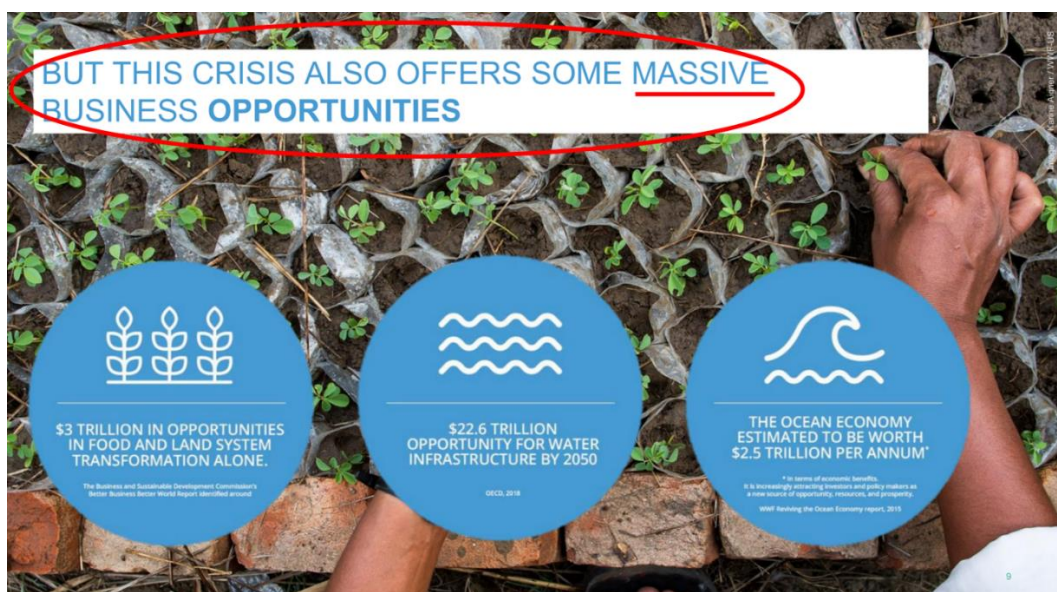
TARGET 5 that trade and use of terrestrial, wild species, is sustainable, while customary sustainable use,.. For example, it hasn't even been agreed that all trade is legal.

One interesting development to come out of recent CDB CoP15 discussions is that countries in continental Africa **proposed a 1% biodiversity levy on the retail price of all products based on genetic resources and digital sequence information (DSI), with proceeds going to biodiversity conservation around the world.** Reporting from the discussion stated this proposal faced significant opposition from rich countries¹³. The basis for this proposal was that these African countries warned that DSI has become a loophole for pharmaceutical companies and others to avoid sharing profits deriving from their flora, fauna and other forms of life – **what has become known as biopiracy.**

This levy on trade would set a precedent that business and industry will no doubt lobby to avoid. If a 1% levy on the retail price of all products based on genetic resources and DSI, with proceeds going to biodiversity conservation around the world is achieved **why not a 1% levy on the retail price of all trade, as NNM proposed in the Modernising CITES report?**

Industries See BioIntegrity Loss As A Massive Business Opportunity

While this situation is not new, as highlighted in a slide from 2019 presentation¹⁴ by Peter White, World Business Council for Sustainable Development's Ambassador for Biodiversity. The presentation talks about 'needing a strong business voice', 'developing policy recommendation to governments', 'attend international events to amplify the business voice' and 'furthering the coalition's objectives at industry events'. The heading of slide 9 is very interesting: **But This Crisis Also Offers Some MASSIVE Business Opportunities.**



In the last 12 months seeing biointegrity loss as a massive opportunity has accelerated significantly, with the push for ESG governance and investing.

Misunderstanding Of ESG Concept

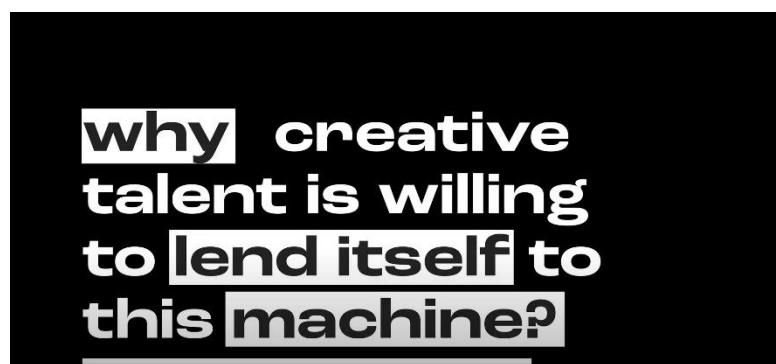
Thankfully a small but growing number of voices are challenging the perceptions around ESG investing. Two prominent voices are Andrew King, Questrom Professor in Management, Strategy and Innovation at Boston University and Kenneth P. Pucker, Senior lecturer at the Fletcher School and formerly the chief operating officer of Timberland. In a 2021 article by Pucker, for Institutional Investor titled, The Trillion-Dollar Fantasy, ***“Investors are finally taking ESG investment seriously. But as currently practiced, most ESG investing delivers little to no social or environmental impact”***. King and Pucker go in to clarify in another article, ESG and Alpha: Sales or Substance? that ***“most ESG investing is a ruse to launder reputations, maximize fees, and assuage guilt..It also creates false hope, oversells its capacity to outperform the market, and likely contributes to the delay of long-past-due regulatory action.”***¹⁵

The seriousness of this lack of understanding of ESGs cannot be understated. These financial institutions and companies cannot create this misunderstanding of ESGs alone. They are reliant on a number of service industries, including the PR, Marketing & Advertising agencies they use and the global consulting industry. In addition, conservation organisations are also driving the misunderstanding of the benefits of ESG investing¹⁶.

An Example: PR, Marketing & Advertising

So many misconceptions are due to PR, marketing and advertising driven campaigns and trends. This is finally being acknowledged with research¹⁷ confirming how PR and advertising firms have helped to create the oil industry’s greenwashing strategies for decades. One of the report’s authors, environmental sociologist Dr Robert Brulle at Brown University said, ***“PR firms and advertising agencies that have created campaigns around the oil firms’ net-zero claims are now on notice”***¹⁸. He went on to say that any PR or advertising agency could not use a plausible deniability strategy if they were challenged about material they created, which was used to help greenwash an oil company’s brand. As a result of this research, Christine Arena, a former Edelman vice-president who now runs her own social impact production company Generous Films, who said ***“climate fraud can’t happen without the help of the PR and advertising industry”***, continuing that these greenwashing initiatives help the fossil fuel industry push their message of, “We don’t need regulation. We’re on it.”.

What is interesting about this research is that it has led to the Clean Creatives initiative¹⁹, in which climate and communications industry leaders are urging PR and advertising firms to end their relationships with fossil fuel clients. Clean Creatives’ campaigns²⁰ acknowledge that the ‘well-oiled’ propaganda machine relies on creative talent for the snappy catch phrases and images it needs to drive public opinion. It states, ***“If money is the oxygen on which the fires of global warming burn, the PR and advertising agencies are the kindling.”***; not the reputation young creative talent wants!



If it is true that PR firms and advertising agencies have helped big oil greenwash their business practices, then the same can be said about the PR firms and advertising agencies helping luxury brands greenwash their use of endangered and exotic species, which is driving biodiversity loss and the extinction crisis. **This fact was used in Nature Needs More's The Sustainability Game campaign²¹.**



Conservation And Poverty Alleviation

Recent years have seen an increasing focus on Sustainable Use and Livelihoods (SULi) on the CITES standing committee and CoP agendas. This was driven home at the CITES Standing Committee meeting of March 2022, where the Secretariat presented a report, it had prepared, titled **Strategic matters: Livelihoods²²**.

While indigenous peoples and local communities have a right to be at the table, poverty alleviation is not the role of CITES. Given the lack of proof of the sustainable use model and the fact that industries and businesses have provided no evidence that they understand what constitutes sustainable offtake levels in their supply chains, poverty alleviation and conservation must be decoupled. **CITES must not be captured by this issue.**

The proposals to CITES CoP19 to give indigenous communities a greater status in CITES decision making than other stakeholder groups point to a concerted agenda. This can be interpreted as covering up the fact that CITES has failed its objective of effectively regulating the international trade to ensure the trade is legal and it is looking to demonstrate success in other ways, such as poverty alleviation. It can also be interpreted as an attempt to undermine scientific decision making to give business interests a greater say via local community proxies.

There are a great number of NGOs, IGOs and government bodies already working on poverty alleviation and development aid. The World Bank and UNCTAD were created for this very purpose, not CITES. Similarly, impoverished communities living close to wild species should not be used in the political agendas and power plays of those who simply want to maintain the status quo trade in endangered species.

The Belief In Incrementalism

The incrementalism approach to solving biodiversity loss is a strategy has been used for 50 years and hasn't produced the needed results. The World Wildlife Fund Living Planet study says that in the past 50 years, the abundance of global wildlife has collapsed 69%; in Latin America the World Wildlife Fund study says the abundance of wildlife has fallen 94% since 1970²³. **Yet incrementalism is still the accepted strategy. So why does this ineffective approach continue to be used?** What are the advantages of this strategy?

Key is that it avoids difficult decisions being made. Incrementalism is easily accepted and helps to avoiding conflict. This approach has a number of disadvantages, time is wasted in dealing with the root cause of the problem. Incremental changes to policies and policy applications lead to failure to

account for change, enable an ad-hoc, tactical approach keeping thinking very siloed. This is very apparent in CITES and the global conservation sector who have not responded to the evolution of global trade conditions and scale, for example. Critical is that there is no incentive to confront vested interests and to come up with new ideas or policies since everything is limited to the current system. This is very apparent, as Nature Needs More has lost count of the number of times we have heard a stakeholder say, “we know CITES isn’t great, but it is all we have”²⁴.

Conservation’s Support For Cryptocurrency

This incrementalism approach leads to other detrimental actions by the sector, just one example being conservation’s support for cryptocurrency and blockchain²⁵. It is disappointing to see conservation charities legitimise strategies used by wildlife traffickers, by accepting cryptocurrency donations. Wildlife charities explain, “that donating cryptocurrency is a non-taxable action, meaning you do not owe capital gains tax on the appreciated amount and can deduct it on your taxes”, they continue by saying, “This makes Bitcoin and other cryptocurrency donations one of the most tax-efficient ways to support your favourite cause.”.

Cryptocurrencies not only lack transparency and regulation, they are also highly energy intensive. This begs the question **how can a conservation charity push its credentials in tackling the climate crisis when also accepting cryptocurrency donations?**

Also, anyone can ‘issue’ a new cryptocurrency, opening the door to plenty of scams, pyramid schemes and fraud. This is one of the reasons they are of such interest to wildlife traffickers, and it is critical that the conservation sector doesn’t legitimise them simply to get donations. Instead conservation needs to highlight potential disaster of, for example, El Salvador’s decision of making Bitcoin legal tender. El Salvador is the world’s largest exporter of live animals into the legal trade and the country still uses the CITES paper-based permit system that already makes it laughably easy to launder illegal wildlife into the legal marketplace. So, when the world’s largest exporter of endangered and exotic live animals adopts Bitcoin as legal tender, it will make it even easier to corrupt the legal trade system and will enable the illegal trade to flourish in the country and through its borders.

It is hard for conservation organisations to criticise this development when they are accepting cryptocurrencies themselves.

In completing this section, over the financial year Nature Needs More also conducted research into the consulting, media, legal, financial industries and further research into global conservation organisations, investigating the broader systemic problems that are driving biodiversity loss and the extinction crisis. The results of this broader research will be used to evolve NNM’s strategic program of work.

Main Campaigns

Critical to slowing biodiversity loss is to challenge the overselling of sustainability. Research over recent years into sustainability confirmed that in almost all cases there is no information to back up the claims of sustainability being made. In this financial year campaigns and communications were built around the message **Take The SUS Out Of SUSTainability**.

It is important that more people call for a proof of sustainability claims as both the CITES and the CBD are both conventions, set up to protect biodiversity from overexploitation, based on using a strategy of 'sustainable use'.

Without this proof, sustainability must be called out for what it is, nothing more than a meaningless marketing/advertising/PR lead activity. Nature Needs More's **Take The SUS Out Of SUSTainability** message took a number of forms from:

Simple social media adverts, for CITES and beyond:



Articles under the theme of **The Sustainability Game**:

These outlined what different industries, from the finance industry, to consulting, to advertising and publishing, are all doing to create the illusion that sustainability is a valid and measurable strategy. Examples include:



The Sustainability Game: Creatives, Keep The Blood Off Your Hands



The Long Read: Is It Time To Retire Sustainability?

The Sustainability Game

The Fashion Industry Must Pull Its Head Out Of The Luxury, Exotic Skin Bag



The Sustainability Game

As Nature Needs More stated in our 2020 report Debunking Sustainable Use²⁶, we believe that any of the stakeholders – business, industry groups, investors, government, IGOs or conservation NGOs – who want the sustainable use model to remain must commit to validating it. Radical transparency is the first step, until trade is transparent there is no proof of sustainability; it remains an ideology based on magical thinking.

Fundraising

At the start of 2022, World Games For Wildlife was rebranded as **My Wildlife Challenge**, based on feedback from event participants, who felt it was important to acknowledge that the extinction crisis will be one of the biggest ‘challenges’ this decade. Many also acknowledged that wildlife has been facing this crisis alone and they want more people to take biodiversity loss personally.



My Wildlife Challenge acknowledges that life is better if you decide to challenge yourself to be a visible force for change in the real world.



It also acknowledges that it is a challenge to live a balanced lifestyle; **and now we all need to add to this the challenge of living in balance with wildlife and the natural world.**

The message of My Wildlife Challenge is to ask people to set their own challenge and be part of the solution. Whether it's a marathon, an open water swim, scaling a mountain or riding your bike across America. ***Your Challenge, Your Choice!***

We hope the flexibility of **My Wildlife Challenge** provides a platform for a growing number of to create their own fundraising event based on their personal interests and fitness goals.

Financial Report

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

Supporters And Subscribers

Without the support of our donors, we couldn't keep driving these changes without your support; key donors being Mike & Eva Palmer, SAVE African Rhino Foundation, the Tanglewood Foundation and the Trawalla Foundation.

Thank you also to all those who subscribe to Nature Needs More's online publications and the growing number of subscribers who donate and send feedback as a result of reading about what we do and what we are trying to achieve.

Plans for The Financial Year 2022-23

Activities covering the next financial year, 1 July 2022 to 30 June 2023, will again be split into two timeframes:

1. Actions leading up to CITES CoP19, in November 2022 and CBD CoP15, in December 2022
2. Actions, as a result of the decisions made at these two conferences.

The main activities for period 1 are expected to be:

1. Continue to socialise **the failure of CITES to ensure the sustainability in the legal trade** in endangered and exotic species, with a focus on:
 - a. **The need for transparency**, better reporting and rolling out electronic permits.
 - b. **The need for adequate funding** for regulation, a business pays model and how the funds can be used.
 - c. **The need for modern systems and processes**, moving to a reverse-listing approach to implement the precautionary principle to the trade in wild species.
 - d. Continuing to raise the profile of the **legal** trade in (endangered and exotic) wild species to challenge the:
 - i. Lack of proof of sustainability statements by business and the overselling of the benefits of sustainability.
 - ii. Misunderstanding of the benefits of ESG investing and how this misunderstanding can drive biodiversity loss.
 - iii. Outsized focus on the illegal trade in developing nations driving biodiversity loss, while ignoring the legal trade in wealthy countries which is driving biodiversity loss.
 - iv. Lack of coverage of the legal trade in the mainstream media.
2. We will continue to investigate key leverage points to drive meaningful change to the trade in endangered species.
3. We will build our fundraising strategy around existing donors and the **My Wildlife Challenge** partnership with SAVE African Rhino Foundation and Active for Animals.

Activities for period 2 of this reporting period will, to a large degree, be based on the outcomes of CITES CoP19, the CBD CoP15 and what is observed of the business sector and investor groups actions in the leadup and during these two conferences.

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CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



Nineteenth meeting of the Conference of the Parties
Panama City (Republic of Panama), 14 to 25 November 2022

Strategic matters

REVIEW OF THE CONVENTION

1. This document has been submitted by

Background

2. In May 2022 the 196 signatory countries of the Convention on Biological Diversity will adopt the post-2020 Global Biodiversity Framework which sets out an ambitious agenda for protecting both terrestrial and marine biodiversity. The draft text includes Target 5 of the 2030 Action Targets which reads:

“Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health.”

3. This target cannot be achieved without the active participation of CITES and its signatories. The post-2020 framework in its accompanying draft decision makes a call for contributions to implementing the targets:

10. Urges relevant agreements, processes and organizations to consider the development or updating of relevant strategies and frameworks, as appropriate, as a means of complementing and supporting national actions and of contributing to the implementation of the post-2020 global biodiversity framework;

11. Invites Parties and other Governments at the forthcoming meetings of the decision-making bodies of the other biodiversity-related conventions and other relevant agreements to consider appropriate contributions to the collaborative implementation of the post-2020 global biodiversity framework;

4. CITES already echoes this goal in its Strategic Vision 2021-2030 in the primary Vision Statement.
5. CITES Decisions 17.56 (Rev CoP18) and 18.47 – 18.48 call for ways to strengthen cooperation, collaboration and synergies with the post-2020 global biodiversity framework and are calling for “measures to enhance the implementation of the Convention in this regard”.
6. With CITES being the primary agreement tasked with providing appropriate contributions to achieving Target 5, this submission calls for a review of CITES, its processes and funding mechanisms to evaluate its effectiveness in delivering on this target and to propose how CITES would need to be modernised to make the required contribution to achieve Target 5.
7. Such a review should be based around the practical achievability of Goal 1 and Goal 3 of the CITES Strategic Vision 2021-2030, namely that “trade is conducted in full compliance with the Convention” and that “Parties (individually and collectively) have the tools, resources and capacity to effectively implement and enforce the Convention”, within the current CITES framework.

Can CITES in its Current Form Achieve Legal and Sustainable Trade by 2030?

8. When CITES was conceived in the late 1960s the international trade in wild flora and fauna was small and governments were the primary powers in international trade. Total global exports, for all trade, were worth \$318billion in 1970 compared to \$2trillion in 2020. Today the trade in wild species is worth over \$350billion, more than the total global trade value when CITES was conceived¹.
9. The primary power in international trade today lies with multinational corporations, not governments. Governments have shifted their role to largely act as enablers of free trade, not regulators. This creates a conflict of interest within governments when it comes to funding the enforcement of treaties restricting free trade, such as CITES.
10. The illegal trade in wild species is estimated at between \$100-250bn, far larger compared to the value of the legal trade than in comparable industries that are highly regulated.
11. With all funding to regulate and monitor the legal trade coming from signatory governments and with government budgets under severe pressure everywhere, there is little prospect of a 5-20 times increase in total funding to better enforce CITES. Yet this is the level of funding increase that would be needed to make a meaningful contribution to achieving Target 5.
12. It is therefore inconceivable that CITES in its current form can achieve Target 5 without getting businesses to contribute to or fully cover the cost of regulation.

¹ Total value of global exports from statista.com. Value of trade in wild species from Andersson et. Al., *CITES and beyond: Illuminating 20 years of global, legal wildlife trade*, Global Ecology and Conservation, Volume 26, April 2021

13. CITES needs to develop an adequate response to the CBD post-2020 framework, which can only be done through a review of its effectiveness in relation to Target 5 and through studying proposals that would help achieve Target 5.

The Need for Review and Modernisation

14. CITES has not been modernised since its inception to address the changed realities in both international trade and the massive scale of the legal and illegal trade in endangered species.
15. CITES has had only one review in 1994. This review did not lead to any changes in the articles of the convention or any acknowledgment of the limits of the current listing model as the number of listed species continues to increase dramatically.
16. CITES suffers from a number of problems that are the result of the design choices made when it was originally conceived, namely:
- a) CITES is a non-self-executing treaty, meaning that the responsibility for implementing and enforcing the convention falls entirely onto the signatory parties. This means a tiny signatory like Samoa has the exact same responsibilities as the United States.
 - b) CITES lacks a funding mechanism to support developing and poor countries, which tend to be the main countries where extraction of biomass happens today. This lack of funding makes it impossible to achieve the desired proof of sustainability of extraction and adequate enforcement outcomes.
 - c) Based on the assumption of national sovereignty, CITES pits governments against each other in their dual role as trade enablers and regulators instead of distinguishing between public interest (to protect endangered species) and business interest (to profit from trade in endangered species).
 - d) CITES processes can no longer cope with over 38,500 listed species. The lack of funding means that in its current form CITES is bound to fail the vast majority of listed species. Listing more species does not lead to better conservation outcomes if funding does not increase in proportion to the number of species listed.
17. These problems cannot be overcome within the current CITES framework. The amount of funding available to combat the illegal trade is miniscule compared to other transnational crimes. The World Bank Group estimated that just US\$260million was made available annually to fight an illegal trade worth at least US\$100billion pa². In contrast, at least US\$100 BILLION pa is spent on fighting the illegal drug trade (which is only 2-4 times larger than the illegal wildlife trade).
18. Without a major change in its regulatory framework and funding CITES cannot possibly contribute in any meaningful way to achieving Target 5 of the post-2020

² World Bank Group *Analysis of International Funding to Tackle the Illegal Wildlife Trade* (2016)

biodiversity framework and will not be able to achieve its Strategic Vision 2021-2030.

Recommendations

19. Taking all of the above into account, it is recommended to the Conference of the Parties to:

Regarding the review of the Convention

- a) review the effectiveness of CITES in relation to protecting endangered species currently listed on the appendices and in obtaining timely listings for all species threatened by trade.
- b) address the findings in the 2019 IPBES Global Assessment report which highlighted that direct exploitation for trade is the main driver of extinction risk for marine species and the second most important driver for terrestrial and freshwater species.
- c) review the effectiveness of CITES in enforcing its provisions and in combatting the illegal trade, including the use of 'loopholes' and the role of corruption to designate non-compliant extraction as legal.
- d) study to what extent trade designated as non-commercial undermines the upholding of quota and other mechanisms to keep trade sustainable.
- e) establish the true level of funding made available by and to selected major exporting and importing countries and examine the effectiveness of this funding in keeping the trade legal and sustainable (using a select number of species).

Regarding the establishment of a working group

- f) establish an intersessional working group to study proposals that will help address the shortcomings listed and which are designed to significantly improve the contribution that CITES can make to achieving Target 5 of the post-2020 global biodiversity framework.
- g) task the working group to include the study of proposals that address the lack of funding for monitoring and enforcement to combat the rampant illegal trade, including proposals to mandate an enforcement agency in all signatory countries.
- h) task the working group to consider proposals where business pays the cost of regulation, to bring the trade in endangered species in line with how other high value – high risk trades (such as pharmaceuticals) are currently regulated.
- i) task to working group to examine proposals that will make the regulation, monitoring and enforcement of the legal trade more equitable, so that biodiversity rich exporting countries are not unduly disadvantaged by bearing a larger proportion of the costs without receiving a proportionate share of the funding.

- j) call for proposals to be examined by the working group which address the biosecurity risks to human health as a result of the trade in life animal species.
- k) incorporate the examination of proposals that would require a change to the articles of the convention in the mandate of the working group, as long as such proposals specifically address the stated objective of keeping all harvesting, trade and use of wild species legal, sustainable and safe for human health.

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



Nineteenth meeting of the Conference of the Parties
Panama City (Republic of Panama), 14 to 25 November 2022

Strategic matters

MAKING CITES TRADE LEGAL AND SUSTAINABLE

20. This document has been submitted by

Background

21. In May 2022 the 196 signatory countries of the Convention on Biological Diversity will adopt the post-2020 Global Biodiversity Framework which sets out an ambitious agenda for protecting both terrestrial and marine biodiversity. The draft text includes Target 5 of the 2030 Action Targets which reads:

“Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health.”

22. CITES already echoes this goal in its Strategic Vision 2021-2030 in the primary Vision Statement.

23. CITES Decisions 17.56 (Rev CoP18) and 18.47 – 18.48 call for ways to strengthen cooperation, collaboration and synergies with the post-2020 global biodiversity framework and are calling for “measures to enhance the implementation of the Convention in this regard”.

24. This submission calls for adopting specific measures that will address existing difficulties in eliminating the illegal trade, reducing the laundering of illegal items through the issuance of fraudulent permits and raising the overall level of monitoring and enforcement to be commensurate with the current scale of the legal and illegal trades.

Can CITES in its Current Form Achieve Legal and Sustainable Trade by 2030?

25. When CITES was conceived in the late 1960s the international trade in wild flora and fauna was small and governments were the primary powers in international trade. Total global exports, for all trade, were worth \$318billion in 1970 compared to \$2trillion in 2020. Today the global trade in wild species is worth over \$350billion, more than the overall value of global trade when CITES was conceived³.
26. The total illegal trade in wild species (including illegal fishing) is estimated at between \$100-250bn, far larger compared to the value of the legal trade than in comparable industries that are highly regulated.
27. With most funding to regulate and monitor the legal trade coming from signatory governments and with government budgets under severe pressure everywhere, there is little prospect of a massive increase in total funding to better enforce CITES. Without such a massive funding increase, the strategic vision is not achievable.
28. CITES lacks a funding mechanism to support developing and poor countries, which tend to be the main countries where extraction of biomass happens today. This lack of funding makes it impossible to achieve the desired proof of sustainability of extraction and adequate enforcement outcomes.
29. CITES processes can no longer adequately cope with over 38,500 listed species. The lack of funding means that in its current form CITES is bound to fail the vast majority of listed species. Listing more species does not lead to better conservation outcomes if funding does not increase in proportion to the number of species listed.
30. The amount of funding available to combat the illegal trade is miniscule compared to other transnational crimes and reliant on government and philanthropic funding. The World Bank Group estimated that just US\$260million was made available annually to fight an illegal trade worth at least US\$100billion pa⁴.
31. With government and philanthropic funding unlikely to increase significantly, it is therefore inconceivable that CITES in its current form can achieve its primary vision for 2030 without getting businesses to contribute to the cost of regulation. Such a move would bring the trade in line with other regulated industries where businesses are required to pay fees commensurate with regulatory costs.

Increased Funding Through Levying Fees on Business

32. In the absence of wholesale changes to the articles of the Convention (such as a transition to 'reverse' or positive listings), the most viable strategy to increase funding for monitoring and enforcement is via levies on businesses that profit from the trade in CITES listed species. There are three possible avenues to achieve this in an equitable manner:

³ Total value of global exports from statista.com. Value of trade in wild species from Andersson et. Al., *CITES and beyond: Illuminating 20 years of global, legal wildlife trade*, Global Ecology and Conservation, Volume 26, April 2021

⁴ World Bank Group *Analysis of International Funding to Tackle the Illegal Wildlife Trade* (2016)

- a. Establishing a recommended fee structure for CITES export and import permits and linking its introduction to the urgent adoption of electronic permitting in the major import and export markets to increase overall fee receipts and to earmark such increased fee revenue for contributions to the CITES External Trust Fund for re-distribution in line with 'return on investment' criteria for keeping all trade legal and sustainable.
 - b. Asking the major importers (US, EU, China/HK, Japan, UK) to adopt import permits for Appendix II listed species with a view of levying permit fees on imports commensurate with the value of shipments and using such increased fee revenue for contributions to the CITES External Trust Fund for re-distribution in line with 'return on investment' criteria for keeping all trade legal and sustainable.
 - c. Using the proposed Pandemic Prevention Protocol to regulate the trade in live species to establish a Business Register of companies that trade CITES listed species. Registrations for businesses trading in live species would attract higher registration fees to also enable the monitoring and enforcement of the Pandemic Prevention Protocol. Registration for all other businesses trading in CITES listed species with revenue above a minimum threshold should also attract fees commensurate with annual revenue of the entity. Signatories would be encouraged to pass national legislation to make such registration mandatory. Distribution of funds can be established in the Pandemic Prevention Protocol or utilise the CITES External Trust Fund.
33. Targeting fees in the region of 1% of value of trade could raise somewhere between US\$200-500 million pa, potentially doubling or tripling the amount available to fight the illegal trade (based on the World Bank estimate of US\$260million currently).
34. Urgent adoption of electronic permitting by all signatory countries and the establishment of a Business Register would also improve supply chain transparency, data quality and consistency, which are all crucial to keeping all trade legal and sustainable. The Business Register could ask companies to submit data on which species and derivative products they trade in. This would also help to re-establish a level of trust in CITES data collection.

Burden of Proof of Sustainability

35. Currently the burden of proof on the sustainability of trade lies with government departments, IGOs, academic institutions and NGOs which collectively lack the funding to adequately monitor populations and the trade in over 38,500 listed species. Funding further suffers from 'iconic/relatable species bias'.
36. Whilst reversing the burden of proof is not possible without a transition to reverse (positive) listing, the businesses most profiting from the trade should be asked to make a meaningful contribution to data collection and scientific studies that underpin Non-Detriment Findings and Reviews of Significant Trade.

37. Business contributions could prioritise companies engaged in the highest value trades in CITES listed species such as body parts (skin, bones, teeth, feathers), luxury seafoods/meat, the exotic pet trade and tropical hardwood. Contributions could be linked to the Business Register or import permits as discussed above.
38. Contributions made under such a scheme should be allocated to the species most considered at risk from ongoing trade or where the base data on populations and the illegal trade are absent, out of date or unreliable.
39. Businesses trading in species most considered at risk from ongoing trade or where the base data on populations and the illegal trade are absent, out of date or unreliable should also be compelled to make a contribution towards data collection and research (as long as their total revenue is above a certain threshold).

Recommendations

40. Taking the above into account, it is recommended to the Conference of the Parties to:
 - l) establish an intersessional working group to study proposals that will help address the funding shortfall and burden of proof related issues raised herein and which are designed to significantly improve the probability that CITES will make all trade legal and sustainable by 2030.
 - m) task the working group with developing proposals for adoption at CoP20 where business pays or at least contributes to the cost of regulation, to bring the trade in endangered species in line with how other high value – high risk trades (such as pharmaceuticals) are currently regulated.
 - n) prioritise the examination of proposals that will increase transparency and data quality in monitoring the trade, including proposals that would require businesses to register and pay fees, as long as such proposals specifically address the stated objective of keeping all harvesting, trade and use of wild species legal, sustainable and safe for human health.
 - o) task the working group with developing proposals that will make the regulation, monitoring and enforcement of the legal trade more equitable, so that biodiversity rich exporting countries are not unduly disadvantaged by bearing a larger proportion of the costs without receiving a proportionate share of the funding.
 - p) link the proposals to be developed by the working group to the Pandemic Prevention Protocol should work on such a protocol move ahead in the same time frame.
 - q) task the working group to include the study of proposals that would mandate an enforcement agency in all signatory countries in conjunction with increased funding being provided.