

Nature Needs More Annual Report

Financial Year 2022/23



NATURE NEEDS MORE



This report is dedicated to all the activists worldwide and to the lawyers representing them. The world's reliance on them to drive the necessary change is a clear indication of how broken global systems are. 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 nature for personal or financial gain.



Thank you.

Executive Summary

This annual report covers the period from 1 July 2022 to the end of October 2023, to include meetings in Washington DC, which was the culmination of a 5-month project undertaken with USA based NGO, **Active for Animals Inc**[1].

This project involved lobbying US Ambassadors throughout continental Africa (and their counterparts, based in Washington DC), the State Department, the US Office of the Trade Representative, USAID, the Bureau of African Affairs, the Bureau of Oceans and International Environmental and Scientific Affairs and US Fish & Wildlife Service. It culminated in meetings with these agencies and together with congresspeople, senators, and their staff, from both sides of the aisle. This project was to request that the US Government donate US\$12 million to modernise the CITES trade permit system, by rolling out eCITES ASYCUDA electronic permits, throughout continental Africa.

Lobbying for CITES modernisation and the global adoption of electronic permitting remained our primary focus during this period annual reporting period.

CITES CoP19 took place in Panama in November 2022. The 2-year delay in the Convention on Biological Diversity, Conference of the Parties (CoP15), meant that decisions which could have provided the leverage to push for CITES modernisation were not made prior to CITES CoP19. As CBD Target 5 was still being negotiated, CITES could not be held accountable to its Strategic Vision (21-30), which incorporates **“the post-2020 Biodiversity Framework being developed by Parties to the Convention on Biological Diversity”**. Because of this CBD limbo, and the resulting lack of leverage for parties to table proposals for modernisation at CoP19, Nature Needs More chose not to attend.

CITES CoP19 **did pass decisions to speed up the adoption of electronic permitting and to enable developing countries to ask donor countries for funding for this purpose**. Nature Needs More lobbied hard for these changes with the Australian and other governments and also as part of the CITES Working Group on Electronic Systems. Our lobbying continued with a push for signatory countries to test CITES decisions 19.150f in the lead up to the Standing Committee meeting, SC77.

In addition to lobbying for electronic permitting and broader modernisation of CITES, Nature Needs More published a new report to reframe the conversation around trade in wild species. This new report, **The BU\$INE\$\$ of Nature**, was published in September 2023. It contains an in-depth look at the scale of the legal trade in wild species and the role of big business in conducting the trade. It also dissects the phantom solutions dreamt up and pushed by big business to avoid what is needed to reverse biodiversity loss, namely mandatory government regulation to ensure the any and all trade in wild species is ecologically sustainable.

In September 2023 the website called **LynnJohnson.News** was launched. A growing number of people are waking up to the scale of greenwashing around climate change, we need to same to happen for biodiversity loss. The mainstream media have consistently refused to engage with this topic beyond a very narrow focus on the illegal trade in some ‘relatable’, iconic species.

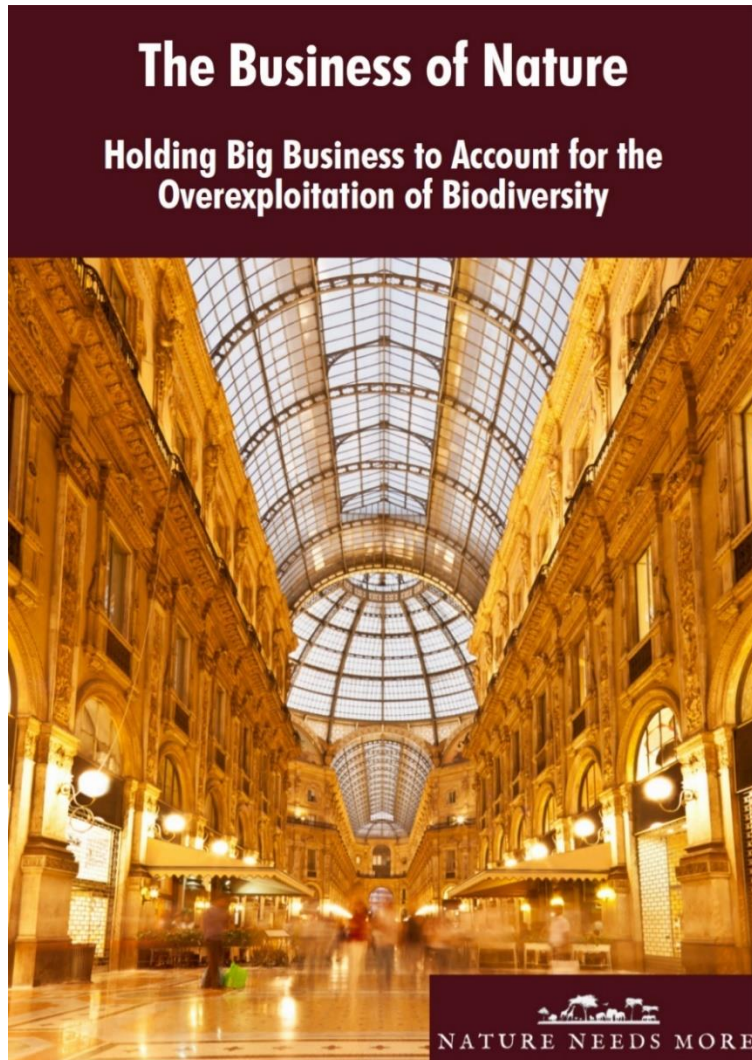
While Nature Needs More has not published any rhino horn demand reduction campaigns since the start of the COVID19 pandemic, **we monitor and investigate the ongoing no-trade/pro-trade debate**. The sale of John Hume’s 2,000 rhino herd was a key issue for rhino conservation over the last year and will have implications for the ongoing debate. While there is much talk about reducing the demand to consume wild species, there is ample evidence that the desire to supply wild species to the consumer is driving biodiversity loss. Nature Needs More’s work included the continued awareness-raising about the desire to supply is driving biodiversity loss.

In 2023, Nature Needs More was delighted Dr Cameron Murray joined the leadership team. While Cameron is involved in all Nature Needs More’s activities, he is leading the organisations investigations into and work on the exotic pet trade.

For the next year Nature Needs More will continue its push for CITES modernisation, including the adoption of electronic permitting by more signatory countries and donations from wealthy donor and demand-side countries to cover the costs of this global implementation. In early 2024, Nature Needs More will publish a report on how to fix the CITES funding crisis, under the current convention model, this will be distributed to all CITES MAs and conservation NGOs. Finally, we will continue to push for better coverage of the problems associated the legal wildlife trade in wild species, including improving the awareness in the public of the biodiversity crisis and the role legal trade plays, through the use of wild species as the raw materials used for domestic and international, industrial scale production and consumption.

The BU\$INE\$\$ of Nature Report

The Business of Nature Report[2] is our third report in a series investigating the unchecked exploitation of wild species for profit. In this new report we discuss the **many phantom solutions** that are being promoted with the aim of delaying what will be needed to slow and reverse biodiversity loss, **namely mandatory regulation of all trade in wild species**.



Businesses and their investors have had 40 years to prove they could curb their excess with voluntary governance systems. They have decisively failed. Even now, in the face of natural and health disasters, the success of new iterations of voluntary self-governance is being exaggerated. **It is time to call them what they are: Phantom Solutions. We need to get real.**

Now, many of the same institutions that have profited from this overexploitation want to profit from the 'fix' and in many cases the fixes they propose are simply an illusion to maintain a business-as-usual approach.

The days of business and investors taking all profit and no responsibility must come to an end. Business, industries and investors know this is on the cards, as evidenced by the plethora of phantom solutions they have proposed in recent years. **These phantom solutions, which we explore in the report, cannot be allowed to divert attention away from tackling the biodiversity crisis in the same way as with the last thirty years in responding to climate change.**

While the fossil fuels industry has perpetrated a multi-decade, multibillion dollar disinformation, propaganda and lobbying campaign to delay climate action by "repositioning global warming as theory, not a fact", with advertorials using broken record messaging of "weak" evidence, "non-existent" proof, inaccurate climate models etc, this same type of message is not possible for biodiversity loss.

Conservation organisations and academia have been monitoring the decline of species for decades. In the case of biodiversity loss, businesses and industries can't "reposition biodiversity loss as a theory, not a fact". Instead for the last two decades or more business have focused on producing glossy sustainability reports, paying for sustainability advertorials and supported the rise of sustainability editors, managers, directors etc. **But while much has been written, little has provided any proof that there is any real understanding of what constitutes a sustainable offtake.**

This third report was initially planned for publication in 2022. Given the delays in finalising the Kunming-Montreal global biodiversity framework and the uncertainty in how the world would respond to the global pandemic, we decided to wait and watch.

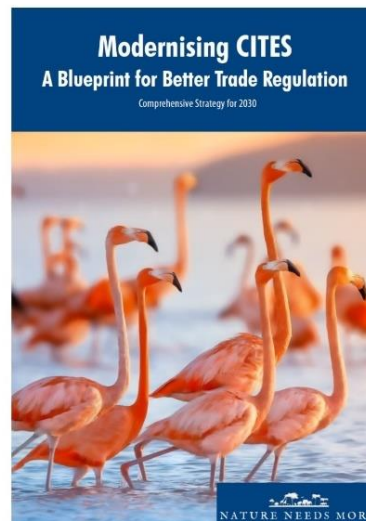
Sadly, what crystallised was possibly the worst-case scenario, namely business and investors working out that they can continue to profit from the extinction crisis by proposing a new range of phantom solutions (offsets, credits, ESGs etc) to avoid their main fear of significant regulation by governments.

Even worse, governments, IGOs and even conservation NGOs have bought into these phantom solutions, which will do nothing to address the biodiversity crisis. State and non-state actors are still afraid of the power wielded by large corporations and reluctant to enlist the public to challenge this power, despite ever-growing public concern over both climate change and biodiversity loss.

Whilst addressing climate change is not possible under capitalism, as we show in the report, we can reverse course on biodiversity loss with stringent and mandatory government regulation of all businesses involved in biomass extraction. Of course, the scale of the required regulation is only possible by breaking the stranglehold that large corporations and their wealthy investors have on our politicians, media and institutions.

Will more people demand a managed transition, requiring industry regulation, closing tax loopholes and a commitment to degrowth? Or will we follow a more chaotic route to the end of the cycle, as discussed by Peter Turchin and Ray Dalio? The BU\$IN€\$\$ of Nature Report outlines some of the real solutions needed.

Interestingly, these solutions aren't new, we simply have to remember that we have had periods, in recent history, where certain industries were subjected to drastic regulation as the result of a crisis.



Nature Needs More's first report, **Debunking Sustainable Use**[3], was published in 2020 and outlined that any discussion of sustainability without the corresponding transparency is simply a neoliberal ideology. **In the report we highlighted the SUS in the current SUSTainability strategy.** The tragedy is that the sustainable use model is the foundation used by too many NGOs and IGOs, while they clinically sidestep the

lack of supply chain transparency and lack of evidence that 'sustainable use' – as practiced today – is saving wild species from overexploitation.

Our second report, published in 2021, **Modernising CITES – A Blueprint for Better Trade Regulation**[4], outlined a new regulatory framework for CITES based on whitelisting (reverse-listing), regulating business directly and businesses paying the full cost of regulation. This report has been downloaded nearly 15,000 times since its publication, showing that there is growing appetite for dealing with the unsustainable trade in wild species.

Moving CITES to a reverse-listing model, which was first suggested in 1981 at CITES CoP3, would mean that the convention is responsible for regulating ALL trade in wild species. Such a move is critical given that the landmark May 2019 IPBES report[5] into the global extinction crisis confirmed that direct exploitation for 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.

Following on from these first three reports, in the next financial year Nature Needs More will publish a **fourth report on how to implement an immediate fix for the funding crisis of the CITES regulator.** CITES is so impoverished it is unable to achieve its objective of protecting endangered species from overexploitation through trade.

The Trade In Wild Species - UN Convention on Biological Diversity CoP15 (December 2022)

Nature Needs More was hoping that the new global biodiversity framework under the UN Convention on Biological Diversity (CBD) would provide impetus to CITES to improve its regulatory framework. 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.

As is the case with CITES, it relies on signatory countries to develop national strategies for the conservation and sustainable use of biological diversity. In contrast to CITES, the CBD has no enforcement mechanism, but it does have a funding mechanism – the Global Environment Facility (GEF).

The signatories to the convention were supposed to meet in China during 2020 to agree on a new plan, 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. Given the global pandemic, ironically zoonotic in origin, this meeting was postponed a number of times and instead happened in Montréal, Canada in December 2022.

This gave the parties two extra years to negotiate and prepare the ambitious goals for the post-2020 Global Biodiversity Framework. Given Nature Needs More's focus, we monitored the evolution of Target 5, which refers to the trade in wild species. **Early in the discussions 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.**

In the months leading up to CBD CoP15, with extra meetings to negotiate the GBF's ambitious goals, signatory conflicts were observed in the 'state' of the draft goals. For example, in the Target 5 draft became (anything in brackets ([]) means that this part of the text still has not been agreed).

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, frys, 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 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 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 HAD been agreed at that stage of the negotiations, we removed all the text in the brackets. That left: ***“that trade and use of terrestrial, wild species, is sustainable, while customary sustainable use,”*** **Just prior to the convention, it couldn't even be agreed that all trade needed proof of legality!**

In the final text of the Kunming-Montreal Global Biodiversity Framework[6], the agreed Target 5 goal for urgent action over the remaining decade to 2030 became:

TARGET 5: Ensure that the use, harvesting and trade of wild species is sustainable, safe and legal, preventing overexploitation, minimizing impacts on non-target species and ecosystems, and reducing the risk of pathogen spill-over, applying the ecosystem approach, while respecting and protecting customary sustainable use by indigenous peoples and local communities.

Currently CITES is the only global mechanism in place to regulate the international trade in wild species. It would hence fall to CITES to play a key role in achieving Target 5. **CITES has the same objective as Target 5 in its Vision for 2030[7], but no viable strategy to achieve it. As currently implemented CITES is no longer fit-for-purpose and it simply lacks the funding to make trade “sustainable, safe and legal”.** Its signatory parties also lack the political will to implement the necessary changes, the first of which is the rollout of electronic permitting across all 183 member countries (as discussed further below).

While much can be discussed about the effectiveness or not of the UN Convention on Biological Diversity, we highlight just 3 issues.

1. The CBD push for consensus. The CBD Rules of Procedure[8], states, [**1. The Parties shall make every effort to reach agreement on all matters of substance by consensus. If all efforts to reach consensus have been exhausted and no agreement reached, the decision** [, except a decision under paragraph 1 or 2 of article 21 of the Convention] **shall, as a last resort, be taken by a two-thirds majority vote of the Parties present and voting, unless otherwise provided by the Convention, the financial rules referred to in paragraph 3 of article 23 of the Convention, or the present rules of procedure. [Decisions of the Parties under paragraphs 1 and 2 of article 21 of the Convention shall be taken by consensus.]]**. The CBD push for consensus decision making means the goals/targets that are set represent the lowest common denominator that all signatory countries will accept. This incrementalist approach is insufficient to drive transformation needed.
2. While not accepted by the signatories in the final agreement, it is important to note negotiators representing the countries of continental Africa **proposed a 1% biodiversity levy on the retail price of all products based on genetic resources[9], with proceeds going to biodiversity conservation around the world.** There is a growing acceptance of the fact that business can't take an all profit, no responsibility approach for the exploitation of wild species for commercial purposes. **A 1% biodiversity levy is not onerous, and it is shameful that rich countries, who are the main profiteers, would not accept this 1% levy proposal.**
3. The 30 by 30 headline target, alluding to 30 per cent of terrestrial, freshwater and marine areas being protected by 2030. **That sounds really positive unless you dive into HOW protected areas are defined in this context and WHAT ‘effectively managed’ means.** Following the 1992 IUCN World Parks Congress, a new system of categorising protected areas was developed. Key was that new categories were introduced that allowed resource extraction, categories V and VI. With **commercial scale extraction now allowed in the definition of a protected area**, there was a rapid expansion of areas deemed ‘protected’. As far back as 2005, a publication, **Rethinking Protected Area Categories And The New Paradigm** questioned if almost half (47.9%) of these new protected areas were real or if the kind of progress celebrated at the 2003 World Parks congress was illusory. The expanded definition of what constitutes a protected area has allowed governments worldwide to include massive forest areas, which are heavily logged, in their protected area commitments. **For example, Australia claims to have 22% of its giant landmass as protected areas already, but over 62% of that is through the use of category V and VI. Without these not-really protected areas, only 8% of Australia’s landmass would count as protected[10].**

Despite setting what looks like ambitious goals, the CBD has an incredibly poor record of getting its member countries to follow through. None of the targets in the previous global biodiversity framework for 2010-2020 were achieved.

Nature Needs More will therefore continue to focus on modernising CITES and only reference the CBD and its targets when useful to do so.

CITES CoP 19 (November 2022)

The 2-year delay in the Convention on Biological Diversity, Convention of the Parties (CoP15), meant that decisions which could have provided the leverage to push for CITES modernisation were not made prior to CITES CoP19. As CBD Target 5 was still being negotiated, CITES could not be held accountable to its Strategic Vision (21-30), which incorporates “*the post-2020 Biodiversity Framework being developed by Parties to the Convention on Biological Diversity*”. Because of this CBD limbo, and the lack of positive response from parties to table proposals for modernisation at CoP19, Nature Needs More chose not to attend.

Instead, in the lead up to CITES CoP 19 we published a report: **Immediate Steps For Discussion At CITES CoP19 To Ensure CITES Is Effective**[11]. This document outlines urgent measures that could have been adopted by the Conference of the Parties to **vastly improve the effectiveness of CITES without the need to renegotiate the articles of the convention**. We recommended that the short-term priorities highlighted should all be implemented by CITES 50th year of enforcement in 2025. Only with this, as a very minimum, can CITES retain any form of relevance and credibility in line with its stated objective and primary vision for 2030.

Summary Of Recommendations

Number 1: Fix The Funding Crisis

Short-Term Priorities:

- Apply A 1% Levy To Imports To Major Import Markets
- Create A Register Of Businesses Trading Under CITES
- Reverse The Burden Of Proof

Number 2: Improve Monitoring, Traceability And Analytics

Short-Term Priorities:

- Global Rollout Of Electronic Permitting
- Trade Analytics Reporting
- Source To Destination Tracking
- Increase Reviews Of Significant Trade

Number 3: Enable Effective Enforcement In All Countries

Short-Term Priorities:

- Dedicated Enforcement Authority
- Enforcement And Prosecution Funds
- Targeted Trade Sanctions

Number 4: SULi Is NOT Part Of The Convention

Short-Term Priorities: Decouple Conservation Objectives From Poverty Alleviation

Number 5: Positive Lists For The Live Animal Trade

Short-Term Priorities: Adopt A Protocol To Use Positive Lists For The Trade In Live Animals

It should be stressed that only a move to a reverse listing model can provide the systemic change needed to match the scale of the problems we collectively face.

In relation to CITES CoP19, we make just three points:

1. The publication of the **first CITES World Wildlife Trade Report is that it isn't a trade report**[12]. It is an overview of the current CITES export data, with an attempt to put a price on some of the trade, based on using proxy data from the US and a number of retail/wholesale websites.
2. New species added for trade regulation during CoP19 included nearly 100 species of sharks and rays[13], more than 150 tree species, 160 amphibian species and several species of songbirds. **There was no corresponding funding increase to the CITES regulator.**
3. It is worrying that CITES CoP19 received less media attention that has been the case in past years.



CITES Electronic Permitting

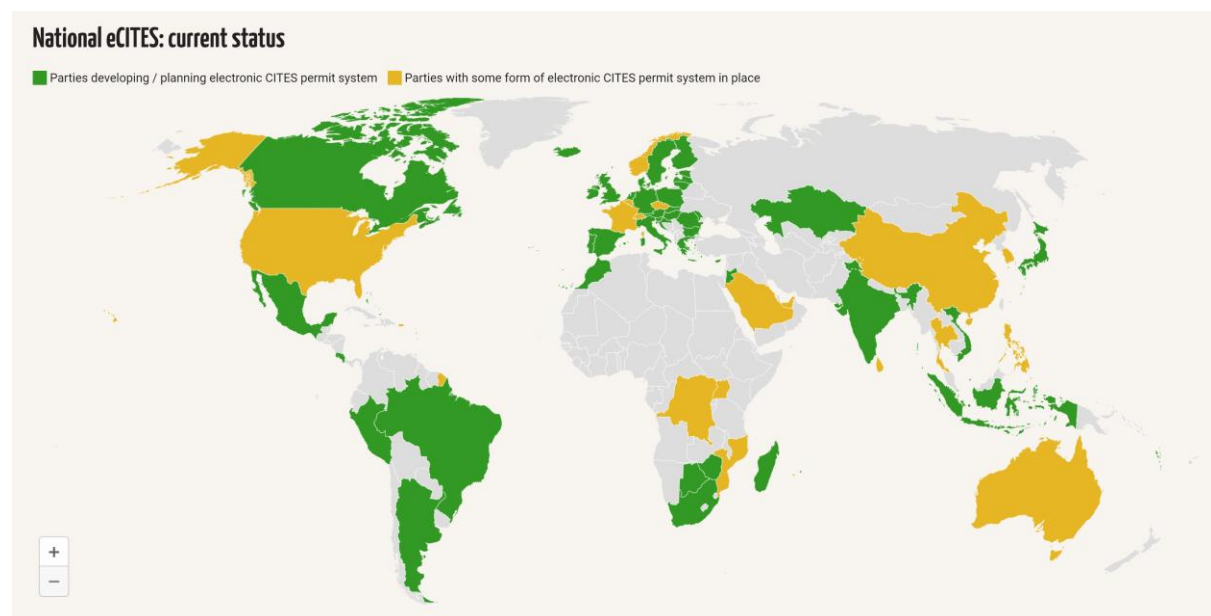
After a 4-year push by Nature Needs More, CITES electronic permitting finally received a greater focus at CITES Cop19, with the CITES leadership acknowledging the process to regulate the export or import requires both transparency and rigour at the borders to allow legal trade to proceed while preventing illicit trade to flourish. It was again acknowledged that ***“many countries currently rely on traditional paper-based means to process permits, allowing the fraudulent trade in endangered species”***, continuing, ***“Digital systems can also facilitate the exchange of electronic permits and information across borders increasing transparency and preventing the use of fraudulent permits[14].***

A global rollout of the CITES ePermit system could help ensure that:

1. All trade is legal (by decoupling the legal and illegal trade).
2. All trade is sustainable, by creating more transparent supply chains.

The urgency of implementing electronic permits was also highlighted by a previous CITES Secretary-General, John Scanlon, who commented on Boston's News Station, WBUR, ***“We have a paper permitting system which is a 50-year-old permitting system that's open to fraudulent use and corruption, whereas in 2023 we should have a fully automated system”[15].***

In recent months a new website has been launched outlining the cost effective eCITES ASYCUDA electronic permit system[16]; an off the shelf system which has been available for some years now. Also, in the last few months CITES has launched an advertisement promoting the need for electronic permitting[17]. Yet only 4 more countries have been added to the eCITES Map[18], as having **implemented an electronic permit system (Amber)** during 2023. This **CITES Map of Shame** continues to show the glacial pace of the **CITES ePermit ‘Strollout’**



No region is more shameful than Europe, whose countries collectively profit the most from the international trade in wild species. In particular the EU27 has become a laggard not a leader in modernising the block's CITES trade permit system[19]. At a side event at CITES Cop19, the representatives of the European Commission introduced the new EU ePermit system, saying it would be available in 2023. Yet no new countries from the EU have been added, to-date to the eCITES map in 2023, as having implemented a CITES electronic permit system.

The EU27 remains stubbornly at 3 countries; France, Belgium and the Czech Republic.

It is particularly disappointing that The Netherlands still uses a 1970s CITES paper permit system, since 40% of trade enters Europe through the Port of Rotterdam. Even if the EU chooses not to push for eCITES to be a

binding 'regulation' throughout the block, there is no reason why CITES electronic permitting cannot become an EU wide 'directive' setting out goals that EU countries **must** achieve, even if the individual EU countries are able to devise their own ways on how to reach these goals.

CITES Decision 19.150f

Nature Needs More has been having meetings with CITES signatory country representatives since 2018 about the move to electronic permits. A key theme of these meetings was that:

1. The biodiversity rich (developing) nations of the global South have said they were interested in electronic permits but given the country's challenges, an investment in modernising their CITES system was way down their list of priorities, while at the same time,
2. The donor countries, mainly of the global North stated, *'they couldn't just offer this donation they would need to be asked'*.

As part of Nature Needs More's participation on the CITES ePermit working group throughout 2020/21 we lobbied for a solution to this this impasse.

One of the best decisions to emerge from CITES CoP19 was the electronic systems working group's push for formalising the ability for 'developing' nations request funds from wealthy donor nations cover the cost of rolling out CITES electronic permits on their behalf. This suggestion was adopted by the CoP as decision 19.150f, which states, **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**[20].


As this was agreed at CITES CoP19, there is certainly a growing expectation from interested developing countries that donor countries will have a budget for this, given they have agreed to be **'called upon'** to provide financial support towards the implementation of electronic CITES permit management systems.

While countries are now requesting such donations, it is imperative that this is done at speed and at scale. This is why Nature Needs More has:

1. Continued to lobby donor countries to make donations to the global South to aid the roll out of CITES electronic permits,
2. Encouraged countries to test CITES decision 19.150f by requesting donations from the wealthy, donor and demand-side, CITES signatory countries.

Throughout the discussions with representatives of wealthy donor countries, there has always been someone who has asked if the slow progress in rolling out eCITES in developing nations is about funding or political will? Implying that this is about corruption and governments in these export countries desire to maintain plausible deniability on the scale of the trade.

Nature Needs More encourages countries throughout continental Africa, Latin America, Oceania, Western, Central and SE Asia to request funds from donor countries to challenge any belief that this is about hiding



**Test CITES decision 19.150f.
Ask for funds to implement eCITES.**

The vast majority of illegally harvested wild species is laundered into legal markets with the help of fraudulent CITES permits (obtained using fraudulent information, faked, reused, altered, etc.). This laundering is often far too easy because of outdated permit systems, with most countries still using stand-alone solutions or even paper permits.

"We have a paper permitting system which is a 50-year-old permitting system that's open to fraudulent use and corruption, whereas in 2023 we should have a fully automated system".
John Scanlon, CITES SG, 2010 - 2018
<https://www.cites.org/>

If the delays in implementing a modern electronic permitting systems are about funding, then it is time to ask for assistance because the funds are available. With the passing of CITES decision 19.150 in Panama last year, donor countries have agreed to be 'called upon' to provide financial support towards the implementation of electronic CITES permit management systems. Decision 19.150 states:

"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."

We encourage all parties still using paper permits or stand-alone systems to approach donor countries on the sidelines of the 77th meeting of the Standing Committee meeting in Geneva Nov 6-10 for funding to implement ASYCUDA eCITES or an equivalent electronic permitting system that achieves the CITES minimum standard. It is encouraging to hear a growing number of stakeholders calling for CITES electronic permits to become mandatory.

Maintaining outdated permit systems or paper permits allows large scale fraud and makes it difficult to fight the illegal trade. The lack of reliable information on the trade in CITES listed species allows for plausible deniability of the true scale of the trade and robs countries of legitimate export revenue.

"Rolling out an electronic permit system within CITES would have an immediate benefit in driving down the illegal trade."
Transnational Crime Investigator

Who to ask for funding? Donor and demand-side countries that are CITES signatories, including but not limited to:
Australia, Austria, Bahamas, Bahrain, Belgium, Canada, China, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Iceland, India, Ireland, Italy, Japan, Kuwait, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, The Netherlands, New Zealand, Norway, Oman, Poland, Portugal, Qatar, Republic of Korea, Russian Federation, Spain, Sweden, Switzerland, UAE, UK, USA and the European Commission.

For more information please visit: <https://natureneedsmore.org/e-permits>

corrupt practices. Countries to approach for donations include: **Australia, Austria, Bahamas, Bahrain, Belgium, Canada, China, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Iceland, India, Ireland, Italy, Japan, Kuwait, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, The Netherlands, New Zealand, Norway, Oman, Poland, Portugal, Qatar, Republic of Korea, Russian Federation, Spain, Sweden, Switzerland, UAE, UK, USA and the European Commission.**

Congruence, Not Hypocrisy

Globally, environmental protections are not sufficiently robust to address current or future environmental challenges. Nowhere is this more apparent than in the legal trade in wild species. Governments worldwide pay lip service to ***markets only being as strong as the trust and integrity that underwrite them***[21]. In the case of CITES, trust and integrity can only be rebuilt if the convention and its signatories can transparently prove that they can conserve biodiversity while supporting legal, traceable and biologically sustainable trade in wild plants and animals.

Rolling out the off-the-shelf ASYCUDA eCITES digital permit system to countries worldwide is not the panacea; it is simply the very minimum action needed to provide CITES any ongoing credibility as robust and effective in achieving its mission. Yet, this pragmatic and cost-effective solution has been sidestepped for years.

Western governments worry about the growing influence of the Middle East, Russia and Asia in regions of continental Africa, Oceania and Latin America. Other than security, history shows that most international interest is based on the desire to exploit the natural resources of a region. With all the talk of sustainable development, including the 2023 publication, CITES as a Tool for Sustainable Development[22], **just how much longer can we wait for the lack of evidence of sustainable offtake to be proven?**

While we wait opportunities are lost. How much harder will it be now to offer Gabon the funds to roll out CITES electronic permitting, given in 2023 military officers announced that they had taken power? The country, with significant port facilities making it a key legal and illegal trade route, should have been seen as a high priority for CITES trade permit modernisation. During much of this time a British-Gabonese conservationist, Lee White, served as the Gabonese Minister of Water, Forests, the Sea and Environment; a key priority being the preservation and management of natural resources. There should have been no better time for a donor country to provide funding to implement a CITES electronic trade permit system.

Another example of a lost opportunity is Myanmar. Aung San Suu Kyi served as State Counsellor of Myanmar and Minister of Foreign Affairs from 2016 to 2021. This period covered the signing of the Regional Comprehensive Economic Partnership[23] on November 15, 2020, creating a trade region with a combined GDP of US\$26.3 trillion and a population of 2.3 billion. In 2019, this trade was worth \$532.6 billion to Australia, which is why it came as no surprise that the Australian Federal government created a \$232 million Mekong-Australia Partnership[24] in November 2020 to enhanced Australian engagement in this subregion of Southeast Asia. These funds could have been used to implement CITES electronic permits in the Mekong region, including in Myanmar, something Nature Needs More discussed with the Australian Department of Foreign Affairs and Trade at the time.

In February 2021, the Myanmar military handed power to military chief Min Aung Hlaing. Martial law, protests, Rohingya genocide and civil war ensued. Timber and wildlife crime has exploded in the country since, with reports showing the harvesting of the luxury wood, including so-called 'blood teak', to wealthy nations of the world to continue despite sanctions[25].

These two examples, and there are many more, show the importance of using the opportunities of relatively stable political periods to invest in the modernisation of country's systems. While the sustainable use model is the basis for much of the world's trade in wild species, it is hypocritical of wealthy countries to capitalise on so called sustainable development while ignoring the corresponding investment in supply chain transparency and regulation to prove their assertion that any offtake is sustainable.

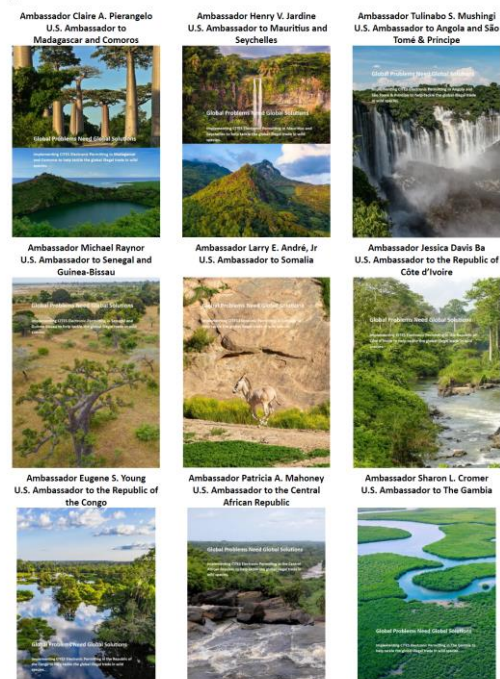
This is why Nature Needs More believes that it is imperative that wealthy donor and demand-side countries, including Australia, the USA, the UK, the countries of the EU, China, Saudi Arabia etc must show more urgency in donating to Latin America, the countries of continental African, SE Asia, the Pacific Island nations and the Mekong region, to aid the modernisation of management and regulation of the global trade in wild species.

USA – Australia Collaboration

During 2023, Nature Needs More, together with our USA-based collaborative partner, **Active for Animals**[26], wrote to U.S. Ambassadors based throughout continental Africa, their African counterparts, based in Washington DC and also to President Biden[27].



Appendix 1: U.S. Ambassadors to Continental Africa Contacted To-Date

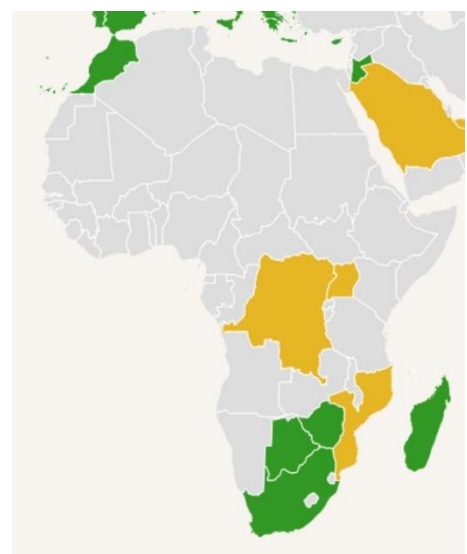


Our letters have requested that they support a rollout of the eCITES ASYCUDA electronic permit system throughout continental Africa; including a US donation of \$12 million to modernise the CITES trade permit system across the whole of the continent.

Of the African nations who are signatories to the CITES only 3 have implemented an electronic permit system (Amber), Uganda, the Democratic Republic of Congo and Mozambique. Another 5 African countries have electronic permit system in the planning or development stage (Green).

On the CITES ePermit map, the remaining African nations are shown as not confirming they will move beyond the CITES 1970s paper-based permit system (Grey). Some of these countries, like Namibia and Botswana, are relatively wealthy, but for many who are facing a range of challenges, rolling out CITES electronic permits is something they may struggle to allocate funds to currently.

The cost of rolling out the ASYCUDA eCITES digital permit system to the 49 countries in continental Africa who still use CITES paper



permits is US\$12 million. This includes the initial roll out and two additional years of maintenance and support.

The US government was approached to make this commitment to the countries of continental Africa because:

1. The USA is a key trading partner for the countries of continental Africa. Of the CITES signatory countries based in continental Africa:
 - a. **12 list the USA as their primary trading partner.**
 - b. **22 countries list the USA in their top 3 trading partners.**
 - c. **We found thousands of CITES permits for trade from the countries of continental Africa to the USA labeled as: 'unknown', 'unspecified' or simply 'specimens'.**
2. 2015 research by the University of Cape Town into the accuracy of CITES export permits from 50 African nations (to 198 importing countries/territories) **between 2003 and 2012 only 7.3% were free from discrepancies**[28].
3. The USA is currently negotiating a Strategic Trade Investment Partnership (STIP) with Kenya[29]:
 - a. While Kenya still uses CITES paper permits.
 - b. The STIP focus is : (1) agriculture, **(2) anti-corruption, (3) digital trade, (4) environment and climate action, (5) good regulatory practices,** (6) micro, small, and medium size enterprises, (7) protecting worker's rights and protections, (8) supporting the participation of women, youth, and others in trade, **(9) standards collaboration, (10) trade facilitation and customs procedures, and (11) services domestic regulation.**
 - c. Kenya may receive formal warning for not fulfilling its CITES treaty obligations[30].

Nature Needs More joined **Active for Animals** for a week of meetings in Washington DC, with political representatives and advisors from both side of the aisle. What became evident is how little they know about the international commercial legal trade in wild species. This, in turn, meant no one knew which department should be leading and driving the modernization of CITES, USTR?, FWS?, USAID?, OSE? **This isn't unique to the USA, we have found the same situation with political and trade representatives in Australia, Europe and beyond.**

The pattern of the meetings was them bringing up elephants and rhinos, hunting trophies and zoos and poverty alleviation. Together with **Active for Animals**, **in every meeting we had to reframe the issue from iconic species and poverty alleviation to a global scale, 500-billion-dollar commercial trade, and explain that after seafood, fashion and furniture are the key profitters from the trade in wild species** and that the large businesses profiting from this trade were not contributing to the costs of regulation.

But it begs the question, how have the government policy people in the global conservation organisations, who do have access to government, left political representatives so ignorant of the scale of this industrial commercial trade? They certainly have allowed big business to hide behind small scale cultural and community use of wild species. To save wild species from overexploitation this political naivety must be addressed.

Capacity building is a key strategy used by global conservation organisations and IGOs. The illusion is that this is solely about the biodiversity rich, impoverished communities of the global South, with donations made by Western governments for capacity building in the area of forensic investigation of wildlife crime scene, for example.

It is clear that capacity building regarding the implications of the commercial scale legal trade in wild species is urgently required on US Capitol Hill, in the Australian Federal Parliament, in the European Commission, the Palace of Westminster and more. On one hand, the biggest global conservation organisations have shied away from speaking this truth to power. In fairness, it must be added that governments too often selectively consult representatives friendly to their thinking.

In the end governments can't solve wildlife and timber crime while two key suspects continue to be removed from the frame, namely, the global commercial legal trade and the lack of effective regulation. While these prime suspects are removed from the investigation this enables supply chains to remain opaque and the 'raw materials', used in the global commercial legal trade, to be laundered into the legal marketplace.



Nature Needs More has discussed over many years our concerns that the mainstream media fails to investigate key enablers of biodiversity loss, namely the legal trade in wild species and the funding crisis in mandated trade regulation, making any company statements about sustainability meaningless.

We were still **Breaking The Brand (to stop the demand for rhino horn)** when we discussed, in early 2017, how mainstream media was contributing to the rhinos demise. For three years articles had been written supposedly exploring the case for a legal trade in rhino horn, with titles such as: ***Would a legal trade in rhino horn save the rhino? Of 40 articles read over one 18-month period, just one made mention of the user's preference for horn taken from a wild rhino, rather than 'farmed' horn***[31]. A fundamental question appears to be ignored. This has not changed in the intervening years. If the mainstream media don't start asking basic business questions, such as **'Does the customer want horn from a farmed rhino?'** their headline in the future could be, if international trade is legalised, 'How did we miss that a legal trade in rhino horn would drive wild rhinos to the brink of extinction?'.

The lack of transparency in the legal trade of wild species is not hidden. Neither are the failings of the CITES regulator. The landmark May 2019 IPBES report into the global extinction crisis confirmed that **direct exploitation for 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. And, after seafood fashion and furniture are the top users of wild species in their supply chains. Yet the mainstream media is silent on this**[32].

In recent years, there has been much talk about the need to crack down on 'fake news', which is undoubtedly necessary. **But we should also be asking if the 'real' news is as real as it makes out to be?** If the mainstream media continue to publish PR pieces from self-interested parties as 'news' rather than a genuine investigative piece of journalism, then we have to ask: Is mainstream media contributing to the extinction crisis? This together with the rapidly accelerating number of phantom solutions being proposed to address biodiversity loss while not impacting production/consumption- as-usual was the reason for launching LynnJohnson.News (LJN) September 2022[33].

The articles in LynnJohnson.News cover the forces shaping our world, with a focus on those driving biodiversity loss and climate collapse. Our collective success in softening the environmental breakdown will depend on our willingness to demand significant levels industry regulation, domestically and globally.

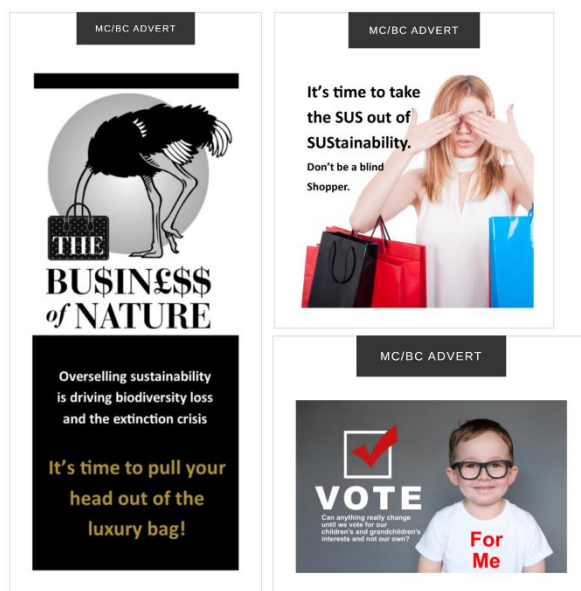
All the articles and campaigns on LynnJohnson.News are free to view, free to republish, free to use.

For those who would like to learn more LynnJohnson.News highlights some 'Great Reads', about the underlying drivers and enablers of the crisis we are collectively facing.

RECOMMENDED READING



Scattered throughout LynnJohnson.News are images titled **MC/BC Advertising** which stands For **Mindset Change And Behaviour Change Advertising**.



MC/BC advertisements on LynnJohnson.News are simply visual statements to show how the big issues we are collectively facing. The aim is to trigger reflection on what needs to change to help rebalance our relationship with nature and mitigate environmental collapse.

We hope MC/BC Advertisements[34] will help people make conscious and informed decisions about how they shop, eat, vote, invest, where you work and the entertainment you choose, including where and how they travel.

We can't promise that these messages will be always painless. Sometimes we will certainly point to greed, selfishness, or apathy. There is a belief in many circles that all messages should be positive, don't upset people, people only learn and change when they feel

positive, are having fun and are engaged. This mindset is pervasive, naïve and just plain wrong.

MC/B Advertising challenges the pervasive belief that positive messages have a greater impact (they do with 'some' people, but not with 'all' people). It is because of the pervasive belief that all messages must be positive that our societies and workplaces have barely nudged the dial on sexism, racism, bullying and much-much more. So, should those that consume too much of the world resources be given the status of influencers or seen as pariahs? Similarly, is being someone who is a 'rusted on' voter for one political party actually helping or hindering progress; is it time to tell politicians you are a floating voter? Can something really be called an investment when it is driving biodiversity loss?

The message to all of us is that ***"We not only inherit the Earth from our ancestors, we borrow it from our children"***. And, in the words of the UN Secretary General, ***"We have a collective choice. Collective action or collective suicide"***.

In the first few months of operation, we have been heartened by the message's thanking us for speaking the truth and posing difficult questions.

In finishing, Nature Needs More was delighted to see the launch, in 2023, of the Earth Journalism Network, CITES Legal Trade Journalism Fellowship[35].

Rhinos



While Nature Needs More has not published any rhino horn demand reduction campaigns since the start of the COVID19 pandemic, we monitor and investigate the ongoing no-trade/pro-trade debate.

Obviously, the sale of John Hume's 2,000 rhino herd was a key issue for rhino conservation over the last year. While it is undoubtedly better that these 2,000 rhinos are under the protection of African Parks, it must be acknowledged that the Hume family and associates still hold 10-tonnes of stockpiled rhino horns. At the time of the sale, the Hume family stated that their stockpiled horns were worth more than US\$500 million on the black market. The sale of the rhinos, while the horn stockpile remains in place, has provided the Hume family and associates a significant amount of capital to lobby for a legal trade. This is a major concern particularly the same old pro-trade spin on opening the international trade in rhino horn was being discussed over the months of the sale. Undoubtedly this sale will have implications for the ongoing pro-trade/no-trade debate.

For Hume's rhinos to be valuable from a conservation perspective, there would need to be evidence that they could be successfully rewilded. This is the work now been undertaken by African Parks. Attempts have been made to rewild rhinos, including in Chad[36] and Kenya[37], both unsuccessful. The rhinos relocated to Botswana were decimated by poachers[38].

Maybe the value of Hume's failed experiment would be if it triggered a review of the model for private ownership of wildlife in South Africa, and beyond. The South African model of private ownership has led to an obsession with the commercialisation of wild species by some owners, the clearest example being the captive breeding of lions for the lion bone trade and canned hunting.

The scale of wildlife commercialisation in South Africa certainly hasn't prevented biodiversity loss in the country. A 2020 report by Swiss Re[39], the world's second-largest re-insurer, confirmed that **of the G20 countries, South Africa is ranked in first place for failing and fragile ecosystems. Encouraging private ownership and making money from selling wildlife has not stopped South Africa from being ranked in first place for failing and fragile ecosystems.**

While there is much talk about reducing the demand to consume wild species, there is ample evidence that the desire to supply wild species to the consumer is driving biodiversity loss.

One thing of note is that in recent years those pushing for an international legal trade have acknowledge such trade won't stop rhino poaching. The response to the FAQ page question, *"Doesn't the market value 'wild' horn more than harvested?"* is, *"Possibly, yes. If there is a preference for 'wild' or whole horn, this will be reflected in the price buyers are willing to pay."*[40]. A far cry from their earlier, evidence free, assertions that the supply from the privately owned rhinos in South Africa could satisfy demand in Viet Nam and China and that consumers would be willing to substitute farmed horn for horn from wild rhinos.

Organisational Change

In 2023, Nature Needs More was delighted to have a fourth person join our leadership team, Dr Cameron Murray[41]. Cameron was raised in rural Western Australia. He graduated from Murdoch University Veterinary School in 1994 before spending time in mixed practice in Australia and the UK. Since returning to Perth in 2000 he has worked in small animal general practice with more than two decades as a practice owner. Since 2013 he has served as a committee member of SAVE African Rhino Foundation, a Perth based rhino conservation charity, involved primarily with projects in Zimbabwe.

As with Nature Needs More's other directors Cameron came to the same conclusions that the legal trade in wild species and its lack of effective regulation is driving biodiversity loss. While Cameron is involved in all Nature Needs More's activities, he is leading the organisations investigations into and work on the exotic pet trade.

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.

Even with this re-branding it was difficult for Nature Needs More to create the necessary momentum to drive this type of fundraising activity. As a volunteer organisation, we don't have the 'time' to give this the attraction it needs. As a result, in 2023 we closed **My Wildlife Challenge**.

Financial Report

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

Supporters And Subscribers

Without the support of our donors and subscribers, we couldn't keep driving system change. Their ongoing interest and belief in our work to drive system wide, rather than incremental, change provides the fuel for us to keep working on these projects. We can't thank them enough for the commitment they have made to Nature Needs More's work.

Plans for The Financial Year 2023-24

Activities covering the next financial year, 1 July 2023 to 30 June 2024, will include:

1. Continuing to lobby for the rollout of CITES electronic permits. **Since starting to lobby for this, CITES signatories implementing electronic permitting has gone from just 2 countries to 19.**
2. **Advocate for a business pays model to fix the CITES funding crisis.** This will include writing a dedicated report, expanding on the funding section of the 2021 Modernising CITES report.
3. Continue to socialise the failure of CITES in its objective to ensure the sustainability in the legal trade in endangered and exotic species and Nature Needs More's solution to fix the inherent flaws in the convention. **Key is to continue advocate for the move to a reverse-listing model.**
4. 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 supposed benefits of ESG investing and how this misunderstanding can drive biodiversity loss.
 - iii. Phantom solutions proposed and push for clear definitions on what proposed solutions, such as a clear definition of what Nature Positive really means to avoid any and all greenwashing.
 - iv. Outsized focus on the illegal trade in developing nations, while ignoring the legal trade in wealthy countries which is the primary driver of biodiversity loss.
 - v. Lack of coverage of the legal trade in the mainstream media.
5. Continuing to investigate key leverage points to drive meaningful change to the trade in endangered species.
6. Continuing the process of awareness-raising, education and capacity building by writing blogs[42], articles[43] and reports[44].
7. Direct lobbying of receptive governments and CITES management and scientific authorities.
8. We will further work on debunking the phantom solutions peddled by business and actively lobby against government support for such phantom solutions.

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

A special thanks to Peter, David, Cameron, James, Eva and Mike.

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References

1. <https://activeforanimals.org/transparency-matters/>
2. <https://natureneedsmore.org/wp-content/uploads/2023/09/The-Business-of-Nature-Web-Version.pdf>
3. <https://natureneedsmore.org/wp-content/uploads/2020/06/Debunking-Sustainable-Use-Report.pdf>
4. <https://natureneedsmore.org/wp-content/uploads/2021/06/Modernising-CITES-Web-Version.pdf>
5. https://files.ipbes.net/ipbes-web-prod-public-files/202002/ipbes_global_assessment_report_summary_for_policymakers_en.pdf
6. <https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-04-en.pdf>
7. https://cites.org/sites/default/files/document/E-Res-18-03_0.pdf
8. <https://www.cbd.int/convention/rules.shtml>
9. <https://www.theguardian.com/environment/2022/mar/30/cop15-faces-copenhagen-moment-genetic-data-dispute-aoe#>
10. See 2
11. <https://natureneedsmore.org/wp-content/uploads/2022/11/Immediate-Steps-For-Discussion-At-CITES-CoP19-To-Ensure-CITES-Is-Effective.pdf>
12. <https://lynnjohnson.news/2022/12/14/the-trade-report-that-isnt-a-trade-report/>
13. <https://natureneedsmore.org/sharks-worth-more-than-the-sum-of-their-body-parts/>
14. <https://cites.org/eng/news/how-digitalization-will-curb-illicit-trade-in-endangered-species>
15. <https://www.wbur.org/onpoint/2023/06/08/cites-a-historic-treaty-protecting-endangered-species-turns-50-is-it-still-an-effective-tool>
16. <https://www.ecites.org/>
17. https://www.youtube.com/watch?v=KE-exGOdi24&ab_channel=CITES
18. <https://cites.org/eng/prog/eCITES>
19. <https://lynnjohnson.news/2022/08/21/eu-27-a-laggard-not-a-leader-in-tackling-trade-in-endangered-species/>
20. <https://cites.org/eng/dec/index.php/44355>
21. <https://minister.dcceew.gov.au/plibersek/speeches/speech-national-biodiversity-conference>
22. <https://www.cambridge.org/core/books/cites-as-a-tool-for-sustainable-development/22CDF8213CA9509172A6FD67AC17050C>
23. <https://www.dfat.gov.au/trade/agreements/in-force/rcep>
24. <https://www.dfat.gov.au/geo/southeast-asia/investing-our-southeast-asian-partnerships/mekong-australia-partnership#>
25. <https://eia-international.org/wp-content/uploads/EIA-Acts-of-Defiance-2-FINAL.pdf>
26. See 1
27. <https://activeforanimals.org/wp-content/uploads/2023/05/Letter-to-President-Biden-CITES-Electronic-Permitting.pdf>
28. https://science.uct.ac.za/sites/default/files/content_migration/science_uct_ac_za/841/files/Russo.%25202015.pdf
29. <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2023/october/united-states-and-kenya-hold-second-negotiating-round-under-strategic-trade-and-investment#>
30. <https://cites.org/sites/default/files/documents/E-SC77-31-R1.pdf>
31. <https://natureneedsmore.org/is-mainstream-media-contributing-to-the-rhinos-demise/>
32. <https://natureneedsmore.org/the-legal-wildlife-trade-mainstream-media-d-notice/>
33. <https://lynnjohnson.news/>
34. <https://lynnjohnson.news/mc-bc-advertising-stands-for-mindset-change-and-behaviour-change-advertising/>
35. <https://earthjournalism.net/projects/cites-legal-trade-journalism-fellowship#>
36. <https://news.mongabay.com/2018/11/four-of-six-black-rhinos-translocated-to-chad-are-now-dead/>
37. <https://www.savetherhino.org/africa/kenya/all-rhinos-translocated-to-tsavo-east-national-park-have-died/>
38. <https://us.eia.org/wp-content/uploads/2022/03/EIA-SC74-Botswana-Rhino-Briefing.pdf>
39. <https://www.swissre.com/media/press-release/nr-20200923-biodiversity-and-ecosystems-services.html>
40. <https://www.rhinoalive.com/rhino-horn-trade-faq/>
41. <https://natureneedsmore.org/who-we-are/>

42. <https://natureneedsmore.org/category/blog/>
43. See 33
44. <https://natureneedsmore.org/reports/>