

Nature Needs More Annual Report
Financial Year 2023/24



NATURE NEEDS MORE



For the second year, 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 November 2023 to the 30 June 2023. This shorter time period is the result of extending the last years Annual Report to include the October 2023 meetings in Washington DC, which was the culmination of a 5-month project undertaken with USA based NGO, **Active for Animals Inc**[1].

In meetings with US political representatives and advisors from both side of the aisle, what was evident was how little they know about the legal international trade in wild species. The pattern of meetings was them bringing up elephants and rhinos, hunting trophies, and zoos and poverty alleviation. This isn't unique to the USA, we have experienced the same with political and trade representatives from Australia to Europe, Asia to Latin America.

This begs the question, **how have the establishment conservation organisations, who do have access to government, left political representatives so ignorant of the true nature and scale of this commercial trade?**

In every meeting Nature Needs More had to **reframe the issue from iconic species and poverty alleviation to global scale commercial trade**, and explain that after seafood, fashion and furniture were 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.

Nature Needs More has continued to educate stakeholders on the true nature of the legal trade in wild species. If we want to save wild species from overexploitation this ignorance must be addressed and challenged. When there is so little understanding of the issue, is this intentional or incompetence?

Nature Needs More is working with stakeholders on actions including:

1. The need to move to a **business pays model** to ensure all trade in wild species is sustainable and legal. **Business can no longer be allowed to take an all profit, no responsibility approach.**
2. Ensuring that industrial scale, **commercial trade is not allowed to hide behind small-scale cultural and community use** of wild species.
3. Making transparent the scale of the profits big brand, listed companies make compared to the **lack of willingness to invest anything in supply chain transparency**. Any statements on sustainability without the corresponding proof are meaningless and should no longer be blindly accepted by customers, NGOs etc.
4. Challenging conservation NGOs and academics to **validate the sustainable use model**.
5. Highlighting **industry, company, and government reliance on phantom solutions**, versus the real solutions needed to address biodiversity loss.
6. Demonstrating that without a **strategic review and significant, ongoing investment**, the CITES regulator is not able to cope with current(and future) trade conditions, which is driving biodiversity loss.
7. The **need for a reverse-listing (precautionary principle) model** for the trade in all wild species, which is vital to save what is left. The reverse listing model was first proposed in 1981, at CITES CoP3, only 6 years after CITES came into force. It was already recognised then that the existing model would fail to protect wild species from overexploitation, a prediction which has come to fruition.
8. Ensuring any policies on trade regulation and environmental protection (e.g. protected areas) are scrutinised in relation to their true details and real-world impact.
9. **Continuing to lobby for the most basic, first step of CITES modernisation, namely the global implementation of an electronic permitting system.**

Nature Needs More's work has resulted in a growing recognition and acceptance that the problems with the legal trade can no longer be ignored and must be addressed.

At the same time, Nature Needs More is aware that at the time of writing this report, **half of the world will be involved in elections by the end of 2024**. There is ample evidence that many countries are lurching to the right of the political spectrum and, as a result, this has significant implications for backsliding on environmental commitments, both by governments and by businesses.

How these global elections unfold will no doubt impact commitments at the three globally significant conferences happening in the second half of 2024; 1. The Biodiversity Conference (CBD CoP16), 2. The Climate Conference (UNFCCC CoP29) and 3. The Land Conference (UNCCD CoP16).

By the end of 2024 we will have a clearer understanding of the willingness (or not) to live within planetary boundaries and protect wildlife and ecosystems.

Why Is The CITES Regulator So Impoverished?

A 2012 UK Parliamentary Report [2] estimated the value of the legal trade in flora and fauna to be worth US\$320 billion annually. Similarly, a 2016 European Parliament Report [3] states, **“The wildlife trade is one of the most lucrative trades in the world. The LEGAL trade into the EU alone is worth EUR 100 billion annually.”**

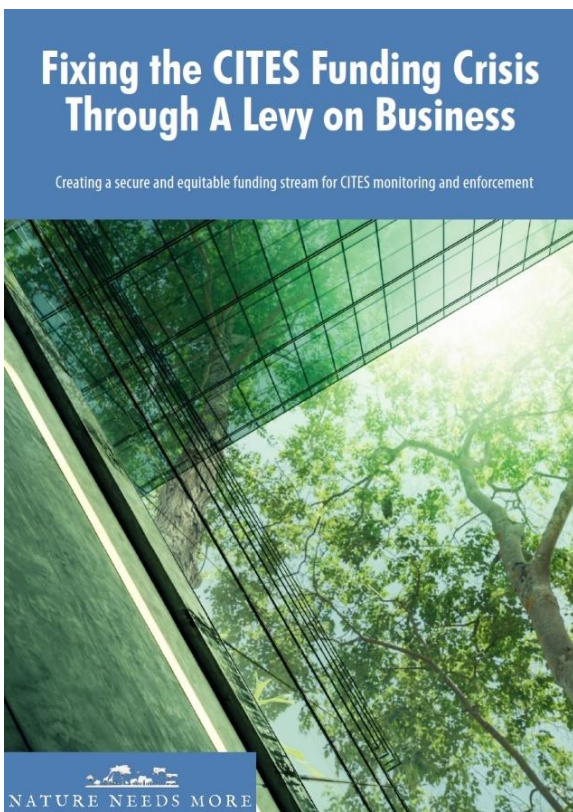
Given the wildlife trade is **“one of the most lucrative trades in the world”**, then why aren't more conservation organisations questioning why the regulator of this trade, CITES, is impoverished to the point of being useless? The CITES regulator receives a yearly budget of \$6.2 million to manage a global trade valued at hundreds of billions of dollars annually. All data collection, monitoring and enforcement related costs are up to individual signatory countries, no matter how impoverished they are.

Even the largest conservation organisations use data that is 30 years old. For example, WWF's statement on the size of the legal wildlife trade is, **“This is a difficult estimate to make. As a guideline, TRAFFIC has calculated that wildlife products worth about 160 US billion dollars were imported around the globe each year in the early 1990s”** [4]. WWF, like all the other large conservation organisations has participated in CITES CoPs for decades. **Why have establishment conservation organisations accepted that the value of the legal wildlife trade, under CITES, “is difficult to estimate”?**

Keeping a check on this trade - offtake, volume - is precisely what CITES was created for and, as a result, the value of trade should be able to be accounted for with some precision. Yet, this is not the case. As a result, the legal and illegal trade are so intertwined that they are functionally inseparable.

A significant investment is needed to fix and modernise the CITES, to ensure that the regulator is properly resourced to be able to adequately cope with the current and future trade environments, ensuring that the trade in all wild species is sustainable. This would also make it easier to decouple the legal and illicit trade, making it harder to launder illegal specimens into the legal marketplace, helping to ensure all trade is legal.

The scale of investment needed to fix the CITES must also be considered in the context of a world where aid budgets are getting tighter and tighter, and climate change is increasingly consuming massive resources. The October 2023 meetings in Washington DC were only able to proceed because of a 45-day continuing resolution to keep the US government operating, as budget negotiations were taking place.



Needless to say, budgets and funding were front-of mind in all the meetings.

So maybe it should come as no surprise that people from both sides of the political spectrum saw the benefits of business paying the cost of monitoring the legal wildlife trade.

They expressed that an upfront investment of less than \$30 million, for a global roll out of CITES electronic permits, could be a worthwhile if **this leads to value chains being transparent and auditable**, which in turn would provide the evidence needed for business to pay for monitoring.

Several people voiced that maybe CITES electronic permits should become mandatory in the future to capture the countries who are resistant to this needed change.

While it went unspoken, certainly what was being alluded to was just how little aid funding will be available for protecting non-human species.

An outcome of these meeting was a request for a report expanding on our proposal to put a 1% levy on the value of commercial imports of Appendix I and II listed species into the major import markets. In early 2024, Nature Needs More published, **Fixing the CITES Funding Crisis Through A Levy on Business Report** [5].

The model outlined in the report would create a secure and equitable funding stream for CITES monitoring and enforcement, which could be distributed to national authorities via the CITES External Trust Fund. **Given the urgency to fix the CITES funding crisis, this proposed model is designed to work under the current articles of the convention and can be implemented quickly and efficiently.**

CITES is currently unable to achieve its stated objective - to keep the trade in endangered species legal and ecologically sustainable [6]. The illegal trade is rampant, **and monitoring and enforcement of the legal trade suffer from major problems starting with a broken NDF process, lack of Significant Trade reviews, poor quality and irreconcilable trade data**, and an ancient permit system not fit for the scale and value of the commercial, legal trade.

The lack of resources made available to implement and enforce CITES provisions are the most important factor leading to this failure and also enable the illegal trade to flourish. With most of the paltry 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 an increase in resources to better implement and enforce CITES.

Yet without a massive funding increase, the **2030 CITES Strategic Vision** [7] of making all trade legal and sustainable, in line with the Kunming-Montreal Global Biodiversity Framework (GBF), is not achievable.

Fixing the CITES Funding Crisis Through A Levy on Business, is Nature Needs More's forth report in a series investigating the unchecked exploitation of wild species for profit.



At the heart of these proposals is the realisation that the **CITES trade is overwhelmingly a luxury trade and that the businesses ultimately profiting from this trade are large luxury companies and conglomerates** [8]. These companies are concentrated in handful of markets (US, Europe, China/HK, Japan, and UK), which are also the major import markets for wildlife products. Thus, putting a small levy on the value of imports into these markets can raise hundreds of millions of dollars every year, which can be allocated to national authorities to improve monitoring and enforcement of CITES provisions.

Such a levy can be raised in an efficient manner via **mandating import permits for Appendix II species in these jurisdictions and setting the permit fee to 1% of the value of the shipment as declared to customs**. The main import countries would further need to agree to remit the equivalent of, say, 80% of the proceeds to CITES and retain 20% of the proceeds to cover the cost of administering the collection of the levy and also to better monitor and regulate their own domestic CITES trade.

Given the value of the legal trade in flora and fauna was estimated to be worth US\$320 billion annually as long ago as 2012, **why has the CITES regulator been impoverished to the point of being meaningless?**

The idea that businesses will voluntarily adopt and pay for ensuring the legality of their supply chains ought to be confined to the dustbin of history by now. In the 2009 book, **From Predators to Icons** [9], the authors challenge the image of the entrepreneur as a visionary with a plan. Instead, they describe the entrepreneur in terms of,

“predation: ruthlessly taking advantage of imperfections, weaknesses, and vulnerabilities within the market”.

Unfortunately, the CITES trade provides a perfect example of business exploiting the imperfections, weaknesses and vulnerabilities in the market.

This can only be changed by creating a significant and secure funding stream to adequately resources CITES and its national authorities. Putting a levy on imports into the main countries benefitting from the trade is both equitable and efficient. **Any pushback by business to such a levy should negatively impact a company’s reputation, brand and value.** In the end it will be the negative effect on a company’s sales volume or share price which will drive the needed business transformation. Ideally, companies, not countries, would be sanctioned if they can provide no proof of sustainability of the products and services they are selling or helping to promote.

Why Is The First Step Of CITES Modernisation Progressing So Slowly?

CITES trade data collection was established in the pre-computer era and has not been updated to reflect new technologies, global trade conditions, and information flows. The current permit system and trade data reporting are completely obsolete. The most basic export/import quantity reconciliations of CITES shipments are impossible in the current system. **This, in turn, makes a mockery of attempts to ensure the legality of trade and also of the statements that this trade is sustainable.** There is simply no proof.

In a world where big data is seen as critical, why is “one of the most lucrative trades in the world” facilitated with a 1970s system? While many establishment conservation organisations push their commitment to an ‘evidence-based approach’ and the sustainable use of wild species, they have shown little interest in lobbying the governments of CITES signatory countries to modernise the CITES trade permit system. The history is telling:

1. **Modernising CITES from its current paper-based permit system was first discussed in 2002** [10].
2. A working group on electronic permits was first established in 2005.
3. In 2010 the group published the CITES e-permitting toolkit, which advised signatory countries what they would need to do to move to electronic permits.
4. **Only two countries had implemented electronic permits by 2018, Switzerland and France**, when Nature Needs More started researching the CITES convention in depth.
5. In 2019, the off-the-shelf, pragmatic and cost-effective ASYCUDA eCITES [11] system was launched in Sri Lanka. This system could be rolled out quickly to over 100+ CITES signatory countries who use the ASYCUDA customs system, if donors were willing to fund the implementation.
6. Since 2018, the number of CITES signatories implementing electronic permitting has increased from 2 countries to 19. **This is too slow.**

In September 2023, CITES Secretary-General Ivonne Higuero wrote, ***“Unfortunately, problems can arise with the use of paper documentation, including fraudulent use. Complications in keeping track of documents during issuance, transportation, and verification could result in forged paper documents. This may involve declaring false information, altering documents, reusing them, or even theft. There also have been cases where lost paper permits were used illegally due to delays in reporting and the extended duration of subsequent notifications among Parties”*** [12].

And in July 2023, CITES previous Secretary-General, John Scanlon, commented on Boston's News Station, WBUR, ***“We***

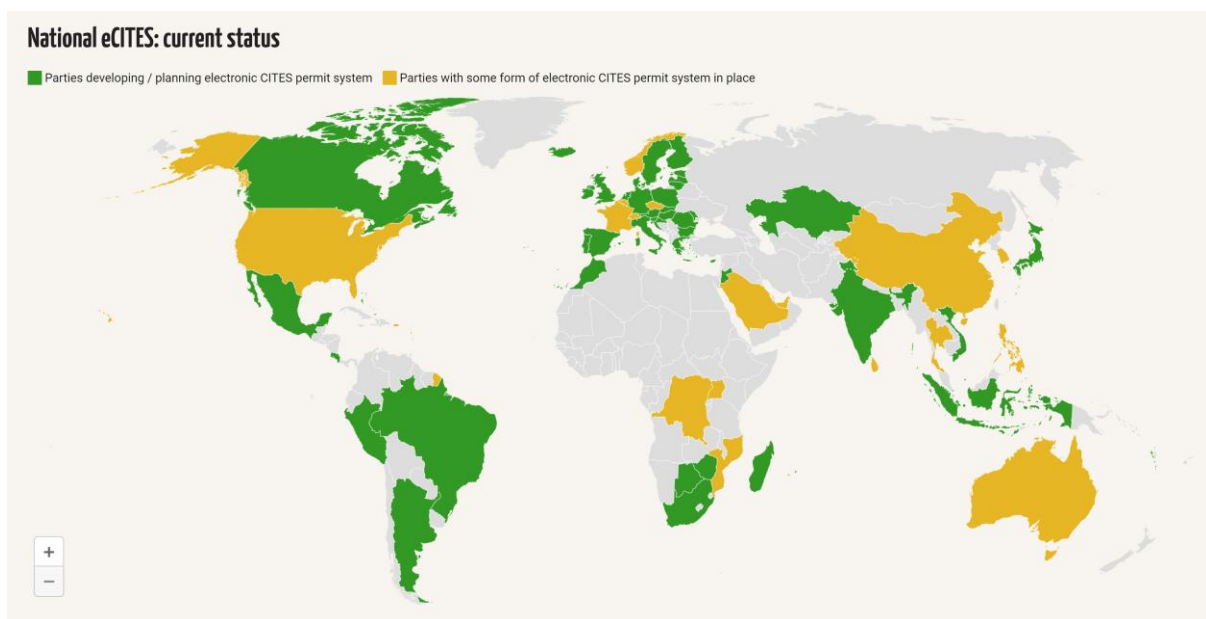
have a paper permitting system which is a 50-year-old permitting system that's open to fraudulent use and corruption, whereas in 2023 we should have a fully automated system” [13].

Why has this project, which is a critical first step to proving the sustainable use model, been ignored? **Who benefits from supply chains being opaque and that the true scale of the legal trade remains unknown?**



The slow speed of rolling out electronic permits is a global issue and not confined to developing countries:

1. Even though research [14] concluded Europe is the biggest profiler from the trade in wild species, **only 5 countries in Europe** have modernised their CITES permit system, Switzerland, Norway, France, Belgium and the Czech Republic. The remaining countries use the CITES 1970s paper permit system.
2. In 2022, the European commission created a harmonised electronic permit system which they presented at a CITES CoP19 side event. **No additional EU-27 country has implemented CITES electronic permitting** since.
3. Too many wealthy countries have been in the design/development stage (Green on eCITES map on CITES website [15]) for too long (4 years+). In addition to Europe, this includes, Japan, Canada, India.
4. There are also wealthy countries who have made no commitment (Grey on eCITES map on CITES website [15]) as yet. This includes countries such as New Zealand, Russia, Malaysia, Oman and Qatar.
5. **Only 3 countries in continental Africa** have implemented CITES electronic permitting.
6. **No country in Latin America** has implemented CITES electronic permitting.
7. **No country in Central Asia** has implemented CITES electronic permitting.
8. Critical countries in SE Asia are still using CITES 1970s paper permits. This includes **Cambodia, Viet Nam, Laos, Indonesia and Myanmar**.



Aside from a lack of funding, a key reason for the slow progress are the weak links made between conservation, geopolitics, trade and foreign policy. Too often CITES commitments are made the responsibility of the Ministry for the Environment, **even though this is an international convention on trade**. The environment ministry has limited powers, budget, and mandates. Together with the low status of the environment ministry, it also doesn't have the mandate to consider and respond to the geopolitical risks associated with the trade in wild species.

While CITES trade is ignored by the Ministries for Trade and Foreign Affairs, opportunities to modernise CITES and mitigate the trade and geopolitical risks of biomass extraction are missed. **Success will hinge on the talents of a government's foreign policy team.**

Nature Needs More first approached the Australian Federal Government's Department of Foreign Affairs and Trade, and relevant Ministers, about modernising CITES in 2019. There have been more discussions with ministers and shadow ministers of foreign affairs, trade, customs, aid (and their advisors) to support their understanding of the CITES but progress is slow. Similar discussion began in the USA in 2023 and earlier with the UK and continental Europe.

As with the Australian governments, the USA, the UK and the EU have been approached to fund low/middle-income countries roll out CITES electronic permits. Their lack of understanding of CITES means that they have responded too slowly, and opportunities have been missed [16]. **This includes not offering funding for the roll out of eCITES in countries, for example Myanmar and those of the Western Africa's 'coup belt', when they were still friendly to Western democracies.**

Throughout this financial year, Nature Needs More has:

1. In conjunction with our US partner, **Active for Animals**, worked with US government representatives to source funds to roll out ASYCUDA eCITES in the 49 CITES signatory countries of continental Africa who still use the paper permit trade system [17].
2. Worked on sourcing funds to roll out ASYCUDA eCITES in Fiji, PNG, Solomon Islands, Vanuatu, Samoa, Tonga and Palau.
3. Responded to a number of low- and middle-income countries requesting information on CITES decision 19.150f [18].



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.actsus.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.

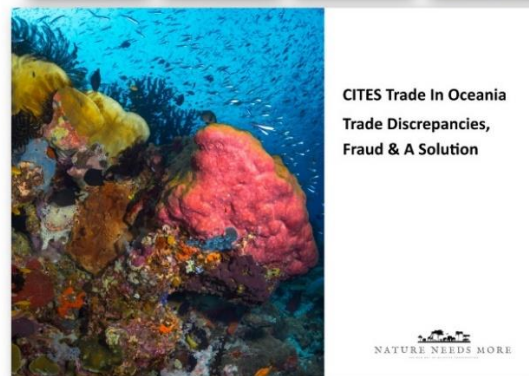
"Rolling out an electronic permit system within CITES would have an immediate benefit in driving down the illegal trade."

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>



It must be acknowledged that this work is becoming increasingly difficult as:

1. The world lurches to the right of the political spectrum, which tends to involve backsliding on environmental commitments and a push to further reduce, already minimal, regulations.
2. We transition from a unipolar to a multipolar world. The growing BRICS+ 'club' seems to be entirely focused on growing trade, not improving protections for wildlife and ensuring sustainability.

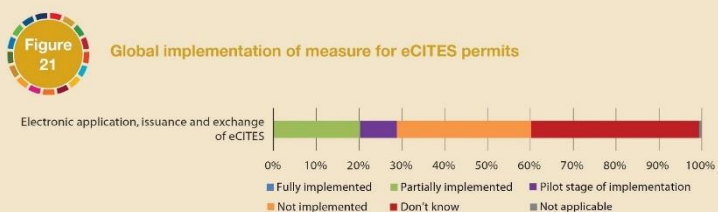
It cannot be ignored that the world is selling out wild species.

The most clear and damning summary comes in the **UN Digital and Sustainable Trade Facilitation: Global Report 2023** [19].

As the report concludes, **"no country recording full implementation [eCITES]"**. The final stage, electronic exchange of CITES permits/certificates, can only be achieved once eCITES is rolled out at scale.

Similarly, the Convention on International Trade in Endangered Species of Wild Fauna and Flora, known as CITES, is an agreement between Governments that aims to ensure that international trade in wild animals and plant specimens is regulated for the protection of those species. Electronic permits (eCITES) are an emerging digital solution for improving the implementation of the CITES Convention by simplifying the compliance procedure for trade in these goods. It is also being used as a means of combatting illegal trade.

In the 2023 Survey, the pilot-tested measure, 'trade facilitation and wildlife protection', addressed the implementation of the eCITES electronic permit system. The Survey found that there was a low level of implementation of this measure around the world, with implementation on a partial or pilot basis in 29% of countries surveyed, and no country recording full implementation (figure 21).



Source: The UN Global Survey on Digital and Sustainable Trade Facilitation, 2023. Available at untfsurvey.org

Industrial Scale Trade v. Small-Scale Community Use

It is critical that small-scale community and cultural use and large-scale global industrial scale extraction should not be 'lumped together' when discussing the legal trade in wild species. This will neither benefit indigenous people or the planet – but it is likely to achieve its real, unstated, goal - to defer needed government regulation.

CITES instigated a massive IPBES report [20] into sustainable use, which analysed over 6,000 scientific studies. Unfortunately for CITES this report **found that the international trade is linked with unsustainable use and the massive growth in international trade has driven the increase in unsustainable use.** This is a failure of regulation. Yet instead of addressing the underlying issues – the lack of funding and the lack of direct business regulation – the last decade has shown as attempt to conflate international trade with local use of wild species.

The importance of involving indigenous peoples in decision-making has become a common slogan in the conservation sector. While indigenous peoples and local communities have a right to be at the table, there is significant scepticism from these groups, given they have been excluded for decades. This scepticism is necessary, as first nations people worldwide need to question the underlying motives for this relatively recent change of heart in the conservation sector.

According to WWF's Living Planet Index Report [21], **global wildlife populations have plunged by an average of 73% in 50 years; the average decline in Latin America and the Caribbean being 95%.** Growing public awareness of biodiversity loss means businesses are also aware that they need to do something – anything – to prepare for when their years of greenwashing will be challenged.

Could this be the reason that indigenous groups are now, finally, being invited to the decision-making table? As the natural world is reaching the point of no return, but companies want to keep commercialising the little that is left and investors can make money banking on extinction, is it simply about covering this neoliberal greed by creating the illusion that extraction is supported by indigenous people?

When indigenous groups offer their support for the extraction of species, are they offering their support for small-scale community, cultural use or for large-scale industrial scale extraction? The point is we don't know because these are 'lumped together' in the discussions. Exploitation of nature by big business is being enabled to hide behind the skirts of community livelihoods.

We know that hiding the corporate mode of exploitation is a tried and tested smokescreen by large corporations, and primary industries, to divert public attention away from what is really happening. When there is a threat of increased regulation or reduction of subsidies, corporate, industrialised agriculture hides behind small, family farmers struggling to survive. The fishing industry also uses the exact same playbook when it comes to fighting reductions in quota or any attempt at actual monitoring of catch levels and compliance with fishing regulations. The media will be guided to the small boats and struggling fishermen that make up most of the fleets but are largely irrelevant when it comes to catch levels and destructive practices.



The EU is very helpful in providing a detailed breakdown of its fishing fleet [22] from which we can learn that the total fleet comprised of 65,500 vessels in 2017, landing a total catch of 5.3million tonnes. Of those vessels nearly 80% (49,500 vessels) comprise the small-scale coastal fleet, those proverbial 'little' boats from the news. Yet these small-scale vessels land only 8% of the total catch. The rest is big business and big boats.

Any chance of proving that trade is sustainable and legal will fail if small-scale community, cultural use and large-scale global industrial scale extraction continue to be lumped together. Nature Needs More will continue to use our

communications platform to distinguish these two types of trade. This means also challenging the conservation organisations and the media outlets who conflate these issues.

As we discussed in detail in our **2021 Modernising CITES Report** [23], the convention does have strong inequities baked into its design. The countries of the Global South carry most of the costs of implementing the convention but get no funding to do so. The vast majority of the profits from the trade goes to large corporations in the Global North.



Lack of Validity Of The Sustainable Use Model

In 2017, Nature Needs More decided to dig deeper into the claims of the ‘win-win-win’ sustainable use model. For decades, ecologically sustainable development has promised a win-win-win scenario between economic growth, ecological sustainability and social justice outcomes. The resulting 2020 publication, the **Debunking Sustainable Use Report** [24], focused on the international trade in endangered wildlife and the lack of effective regulation under CITES. **The report highlighted how the current institutional settings continue to preference economic growth over both ecological sustainability and social justice outcomes.**

As a result of the research and report, Nature Needs More challenged all **stakeholders - business, government, investors, IGOs, NGOs - who want the sustainable use model to remain in place to commit to validating it.** When it comes to conservation scientists, the overwhelming majority support ‘sustainable’ use. The big problem is that **this is an act of faith, conservation scientists are not actively publishing any proof that extraction is sustainable.** This was clarified (again) earlier this year in a new study, The Positive Impact Of Conservation Action [25].

The paper, which had 33 authors and attracted global attention, conducted a meta-analysis of scientific studies on the impact of conservation interventions. Starting with a scan of over 30,000 potentially relevant publications, they found 186 studies evaluating the rate-of-change impact of conservation interventions globally over the past century. One type of conservation action they analysed was the sustainable use of species; **yet the finding on the impact of sustainable use interventions was ‘inconclusive’.** Why?

The major issue was that **this meta-analysis could find only 5 publications** related to the sustainable use of species that analysed a rate-of-change and a counterfactual to the intervention. This is particularly surprising given several of the authors are big proponents of the sustainable use of wild species. Given how broad the keyword search [26] was in the sustainable use of species category, compared to all the other categories, they tried very hard to find proof, but it simply didn’t exist.

Table S2. Keywords used for literature search.

Aichi Target	Intervention	Response key words	Pressure/state keywords	Scope keywords	Impact key words
5, 14, 15	Habitat loss reduction & restoration	"restoration" OR "connectivity" OR "offset" OR "REDD"	"habitat loss" OR "deforestation" OR "habitat degradation" OR "biodiversity"	NA	"Impact" OR "counterfactual" OR "outcome"
6	Sustainable use of species	"regulation" OR "conservation" OR "sustainable use" OR "rights based management" OR "individual transferable quotas" OR "eliminator trawl" OR "fishing gear" OR "by-catch exclusion" OR "no fish zones" OR "sustainability certification schemes" OR "harvest seasonal closures" OR "regulation of harvest regimes" OR "Marine Stewardship Council" OR "legislation and law enforcement" OR "community based conservation" OR "education" OR "capacity building" OR "Programme for the Endorsement of Forest Certification" OR "Forest Stewardship Council" OR "rights based management" OR "PES schemes" OR "eco-tourism" OR "ecotourism" OR "community based natural resource management" OR "joint forestry measurement" OR "devolution" OR "community management" OR "participatory approaches" OR "wildlife ranching" OR "game cropping" OR "trophy hunting" OR "game ranching" OR "wildlife-based land uses" OR "wildlife tourism" OR "mixed wildlife/livestock"	"overfishing" OR "overharvest" OR "poaching" OR "fishing" OR "hunting"	NA	"BACI" OR "meta-analysis" OR "metaanalysis"

This is not the first meta-analysis to struggle to find any positive (or even neutral) impacts of the sustainable use model. A 2021 publication, *Impacts Of Wildlife Trade On Terrestrial Biodiversity* [27] found a large negative effect of trade on species populations (compared to control

populations/sites). The authors stated, ***“We examined 1,807 peer-reviewed articles and >200 TRAFFIC reports yet found no support for a quantified, existing sustainable trade”***. As with the recently published paper, while they had different selection criteria, they had similar problems finding suitable studies to include at all.

In the remaining six years leading up to the UN Convention on Biological Diversity (CBD), 2030 Kunming-Montreal Global Biodiversity Framework targets and goals [28], **the sustainable use model must receive greater scrutiny** and interrogation. Why? Target 5 of the Kunming-Montreal Global Biodiversity Framework states, by 2030 ***“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”***.

And, Target 5 is not new, it is the evolution of CBD Aichi Biodiversity Target 6 [29]. The Aichi Targets constituted the CBD “Strategic Plan for Biological Diversity 2011-2020”, adopted by the Parties in 2010, Aichi, Japan.

Aichi Biodiversity Target 6 was in full: *By 2020 all fish and invertebrate stocks and aquatic plants **are managed and harvested sustainably, legally** and applying ecosystem based approaches, so that overfishing is avoided, recovery plans and measures are in place for all depleted species, fisheries have no significant adverse impacts on threatened species and vulnerable ecosystems and the impacts of fisheries on stocks, species and ecosystems are within safe ecological limits.*

None of the 2020 Aichi Targets were achieved. Will this also be the case with the 2030 Kunming-Montreal Global Biodiversity Framework targets? [30]

CITES ‘AND’ The CBD NOT CITES ‘OR’ The CBD

As a reminder, CITES entered into force on 1 July 1975. Due to concerns over the continued rapid decline in biodiversity, the Convention of Biological Diversity (CBD) was agreed in 1992 and entered into force on 29 December 1993. The CBD’s 3 main objectives are [31]:

1. The **conservation** of biological diversity
2. The **sustainable use** of the components of biological diversity
3. The **fair and equitable sharing** of the benefits arising out of the utilization of genetic resources

The difference between CITES and the CBD is that, while CITES does have the opportunity to sanction signatory countries that are non-compliant, the CBD, like all the most recent global conventions, relies on voluntary compliance.

Nature Needs More’s concern is that we are already hearing from representatives of conservation organisation **that the governments they work with “don’t like to discuss their treaty obligations under the CITES” but they are “happy to discuss their treaty obligations under the CBD”**. As a result, some conservation organisations have told us that they don’t talk about CITES with government representatives, they stick to the CBD. They do this because discussing the country’s lack of compliance to CITES commitments means they lose access. Obviously, this situation is worrying and needs to be made transparent.

The CBD cannot achieve its targets and goals without CITES receiving significant, ongoing investment and the system being modernised to cope with current and future trade conditions. **Nature Need More can with 100% certainty state that, under the currently accepted trade model for wild species, there is No Chance of achieving Target 5 by 2030.**

Moving To A Reverse Listing Model Is Now Time Critical

Without an acceptance that the current model, where the default is ‘to trade’ in wild species until it is proven to be detrimental, doesn’t work, the decline in biodiversity will continue. The fact that global wildlife populations have plunged by an average of 73% in 50 years is clear evidence that the current model of trade is nothing but greenwashing and selling out the natural world.

Based on the fact that the extractive industries for wild species have either no mandatory regulation or impoverished regulators, **what happens on 1 January 2031 if Target 5 of the CBD isn't achieved?**

1. Will there be an acceptance that the current model of voluntary self-regulation doesn't work?
2. Will business, industries, and investors finally accept mandatory domestic and global regulation must be implemented to ensure that extraction is sustainable and legal?
3. Will global and domestic regulators be modernised, empowered and adequately resourced to cope with current and future trade conditions?
4. Will business and investors finally accept those who profit have to pay for the full cost of trade regulation and monitoring, and finally also accept the shareholder primacy model must go?

What SHOULD happen after 2030 is obvious:

1. **All trade in wild species moves to a reverse (white-)listing model, first proposed in 1981 [32], fully implementing the precautionary principle**, outlined at the UN 'Earth Summit', in Rio de Janeiro 1992 [33].
2. The **new regulatory framework is based on the 'business pays' model** in which those profiting the most, pay the most.
3. National and international legislation is changed to bring the **consequences of corporate crime in line with the consequences of street crime**, which means dissolving the limited liability model together with the right to destroy, under private property legislation.

In the remaining years leading up to 2030, what evidence needs to be finally accepted to trigger the needed transformation? Do we need to look to history to clarify the failure of the last 250 years when it comes to the integrity of the biosphere?

As long ago as 1778, the local government of the Qing dynasty declared the Bogd Khan in Mongolia a protected site, making it the oldest national park in the world [34]. This was a century before Yellowstone National Park, USA was created in 1872. In 1871, Ferdinand V. Hayden published the Hayden Geological Survey of 1871 of the region. He warned that if the park wasn't created, there were those who would come and **"make merchandise of these beautiful specimens"** [35], continuing, **"the vandals who are now waiting to enter into this wonder-land, will in a single season despoil, beyond recovery, these remarkable curiosities"**.

The evidence of the last century – Appendix A – seems to conclude 'the vandals' have succeeded.

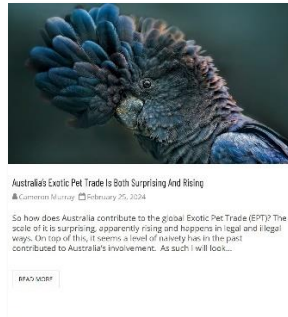
Can The Trade In Live Species Be The Catalyst for The Reverse Listing Model?

Starting in late 2023, Nature Needs More has investigated if the exotic pet trade could be used to create a global precedent for the reverse (positive) listing model to be used for all trade in wild species. Does perhaps the exotic pet trade have the emotional pull to garner public support for such a change?

A 2020 publication, Animal Traffic, Lively Capital in the Global Exotic Pet Trade [36], highlighted that mortality rates are estimated to be as high as 70%, saying **"For every ten birds or reptiles captured in the wild, as few as three actually make it to the pet store"**, and continued, **"The chances of a new exotic pet living through its first year after purchase is just over 20 percent"**.

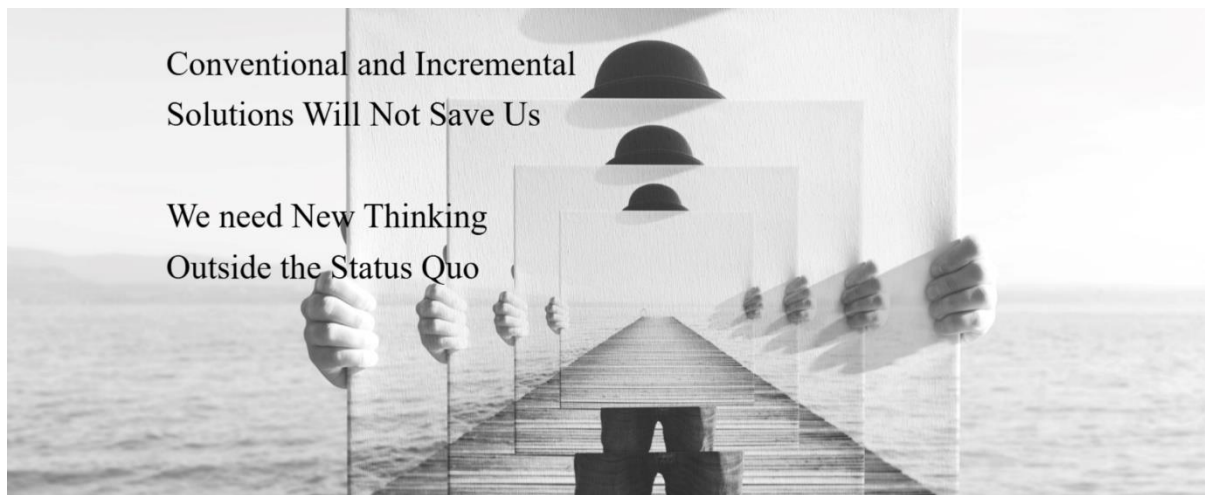
While these figures would seem sufficiently tragic to make consumers think again when considering buying exotic pets, this isn't necessarily the case. A 2016 consumer research and survey [37] of people in the market for an exotic pet confirmed that consumers cannot be dissuaded from their purchase by being educated about the species being threatened by trade or knowing the animals are likely to suffer at all stages of the supply chain. Those surveyed for research said, **"Even if the animals were endangered or were going to suffer while being caught and transported, they'd buy them anyway"**.

Nature Needs More will explore empathy with exotic pet animals further, as a way to reduce consumer demand. Triggering status anxiety and health anxiety will also be investigated, given these were found to be the only reasons consumers would stop purchasing rhino horn. Nature Needs More used these findings in the Breaking The Brand (to stop the demand) campaign [38]. As a starting point, Nature Needs More investigated Australia's role in this trade and how the extraction of species from the wild is monitored and regulated [39].



These Australian findings were compared with the work on existing movements to adopt a positive listing model for the exotic pet trade in the EU and other jurisdictions.

Truthtelling, Not Just Storytelling - LynnJohnson.News (LJN)



The articles in **LynnJohnson.News (LJN)** [40] cover the forces shaping our world, with a focus on those driving biodiversity loss and climate collapse.

LynnJohnson.News works to make the links between, for example, environment, politics, geopolitics, law, business, economics and greenwashing, to tell the full story of the global breakdown underway. Articles provide examples, including from history, to explore how we got to this point. The articles also cover how power imbalances can be addressed and provide examples of real, not phantom, solutions to the existential threats the world is collectively facing.

As the site as continued to evolve over the last couple of years, the focus has shifted strongly to calling out the underlying drivers of global breakdown and adding historical context and background to the highly visible examples of collapse. **We continue to advocate for bold and systemic change, as incremental changes within the current system have no chance of success.**

Sometimes this 'new thinking' we advocate is actually 'old thinking', remembering what was done previously, for example when monopolies and oligarchy was reigned in with the New Deal in the US and how we used to have strong regulations to keep corporate power in check.

We see LynnJohnson.News as a small contribution to alleviate the threats of misinformation, disinformation and AI generated content, including the more pronounced shift of the MSM towards being propaganda outlets for corporations instead of trusted information sources for the public. By its nature LJN will remain a niche publication, but we value our slow but steady subscriber growth. All the articles and campaigns on LynnJohnson.News are free to view, free to republish, free to use.

The Desire To Supply - Groundhog Day On Rhinos



Having followed the rhino horn trade debate since 2012 and been actively involved in demand reduction campaigns [41] between 2013 and 2019, the **desire to supply rhino horn**, by creating a legal international trade is the reason that there has been minimal progress on overcoming poaching.

The South African (SA) Government is pro-trade, but it can't really move on this until it proves to the world that the legal trade of rhino horn can be managed without further

endangering the species. Together, the SA government or pro-trade private rhino owners have proposed scenario after scenario aiming to demonstrate trade can work.

The merry-go-round continues with the new draft SA National Biodiversity Economy Strategy [42]. When it comes to rhinos, the SA government proposes setting up *"health clinics to administer traditional remedies using rhino horn for health tourists from the Far East"* [43]. The medical tourism fallacy was proposed previously in the run up to South Africa hosting CITES CoP 17, in 2016 [44]. It was rejected then and had been taken off the table for a while, but the never-ending desire to turn rhino horn into dollars means that any half-baked idea will be resurrected if it makes an argument for legalising the trade.

The fact that the SA government and private rhino owners are sitting on an enormous stockpile of rhino horns from (legal) dehorning means that the government is constantly pushing the boundaries to try and circumvent the international trade ban for rhino horn, in place since 1977. After successfully overturning the domestic trade ban for raw rhino horn in South Africa in 2017, pro-trade private owners have now managed to lobby the government to include a potential trade in processed horn as part of a larger draft National Biodiversity Economy Strategy. The name says it all, really, but in case of any doubt, *"the stated purpose of the NBES is to optimize biodiversity-based business potentials and contribute to economic growth"* [45]. The NBES talks explicitly about creating a market for medical tourism from the "Far East" to South Africa so that tourists can buy powdered rhino horn for **personal consumption**, and also states they should also be able to buy horn carvings.



Of course, this means overturning the existing ban on the sale of processed rhino horn in South Africa and it will guarantee a run-in with CITES as the **'personal effects' exemption** under CITES does not apply to Appendix I listed species. There is always the possibility that, as with elephants, SA will try to move its white rhinos to Appendix II. This type of split listing, with some countries having a species on Appendix I while others have it on Appendix II, has caused significant tensions for elephants. **Either way, ensuring the legality of supply of powdered horn or small carvings will be impossible without expensive DNA testing, that no one will be willing to pay for.**

And, in all this time those who have the desire to supply have shown very little interest in understanding the consumers or the nature of the demand. Their business plan over the years has never evolved beyond, *"Rhino horn and these other products are status goods, they are prestige goods. What they are used for is hardly relevant. The fact is that people are willing to pay extremely, extraordinary high prices for them"* [46].

In the end, the push for an international trade in rhino horn will continue because those who would like to supply, governments and business, know that they don't have to prove that they understand what constitutes a sustainable offtake or that they can manage/validate it by providing a transparent supply chain. **Why? Because under the current CITES system, no such proof is required. CITES has no agreed standards for its Non-Detriment Findings and its trade data collection is incomplete, inconsistent and useless** [47].

Organisational Change And Fundraising

Nature Needs More successfully applied for Deductible Gift Recipient (DGR) status this financial year.

The new federal government changed the DGR endorsement rules for environmental charities to make such an application possible for Nature Needs More. Under the previous rules environmental charities had to include a clause in their constitution that effectively allowed the environment minister of the day to interfere in the work of the organisation. This was not something that Nature Needs More would agree to and so we had to forfeit access to Deductible Gift Recipient (DGR) status.

In addition, prior to the rule change, DGR applications were processed by the environment department (not the ATO) and typically took 2-3 years to process; only environmental charities were subject to this DGR application process. After lobbying from environmental funding bodies such as the Australian Environmental Grants Network, the current government abolished these rules and created a much simpler framework for DGR endorsement and a streamlined application process through the ATO.

NNM met the new requirements and applied for DGR status in May 2024 which was subsequently endorsed by the ATO. With DGR endorsement we will be able to explore new funding options such as grants in the next financial year.

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 believe 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 2024-25

Given CBD CoP16 in late 2024 and CITES CoP20 in late 2025, Nature Needs More's research, campaigns and activities will continue to focus on **what is needed to guarantee that the trade in wild species is both sustainable and legal.**

This will include, but is not limited to:

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. **Advocating for a business pays model** to fix the CITES funding crisis.
3. **Advocate for the move to a reverse-listing model**, so that all trade in wild species is governed by the precautionary principle.
4. Highlight the **lack of proof of sustainability statements** by business and their overselling of the benefits of sustainability.
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, demand reduction and behaviour change through **campaigns and writing blogs, articles and reports.**
7. Direct lobbying of CITES signatory government, CITES management and scientific authorities to **fix and modernise the regulatory system.**
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 and James.

For more information on this annual report or Nature Needs More Ltd, contact:

Dr Lynn Johnson

e: lynn@natureneedsmore.org

p: +61 418 124 660

Appendix A: Historic Evidence of A Failed System

1. 1900: International cooperation to conserve the wildlife and natural resources of Africa was first agreed by the then colonial powers of Great Britain, France, Germany, Portugal, and Spain to preserve African wildlife (Belgium did not participate). The treaty prohibited the killing of certain African animals and *"all other animals which each local government judges necessary to protect, either because of their usefulness or because of their rarity and danger of disappearance."* **The treaty was proposed because of the rapid depletion of African big game which was being hunted for pleasure by Europeans**, with a secondary motive being to preserve the remarkable and novel wildlife and fauna of the continent.
2. 1933: The Convention Relative to the Preservation of Fauna and Flora in their Natural State. **It has been called the Magna Carta of wildlife conservation.** The Convention obligated signatories to, *"establish parks and reserves and limit human settlement therein, to domesticate useful animals, and to prohibit unsportsmanlike methods of take. It also required states to give special protection to a list of species."*
3. 1948: The International Union for Conservation of Nature (IUCN) to monitor the status of the natural world and the measures needed to safeguard it. Over the years this evolved into the its stated mission to, *"Influence, encourage and assist societies to conserve the integrity and diversity of nature and ensure that any use of natural resources is equitable and ecologically sustainable"*. At the time of its founding IUCN was the only international organisation focusing on the entire spectrum of nature conservation.
4. 1949: The IUCN organised the Conference on Protection of Nature and drafted the **first list of "gravely endangered species"**.
5. 1961: To establish a stable financial basis for its work, IUCN participated in setting up the World Wildlife Fund (now the World Wide Fund for Nature, WWF). The WWF was conceived to act as an international fundraising organisation to support the work of existing conservation groups, primarily the International Union for Conservation of Nature.
6. 1964: The first year that the IUCN's Red Data Book on the conservation status of species was published.
7. 1968: The founding of the Club of Rome to look at problems of humankind—environmental deterioration, poverty, health, urban blight, criminality— as linked. The club's first report, **Limits to Growth, suggested that growth of production and consumption could not continue indefinitely.**
8. 1971: The World Economic Forum was founded as a platform for resolving international conflicts, including the conflict over resources.
9. 1971: The Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat is an international treaty for the conservation and sustainable use of wetlands.
10. 1972: UN Conference on the Human Environment in Stockholm was the first world conference to make the environment a major issue. The outcome - Stockholm Declaration - contained 26 principles. Principle 2: *"The natural resources of the earth, including the air, water, land, flora and fauna and especially representative samples of natural ecosystems, must be safeguarded for the benefit of present and future generations through careful planning or management, as appropriate."* The conference led to the establishment of:
 - a. 1972, UN Environment Programme (UNEP), with a mandate to, *"provide leadership, deliver science and develop solutions on a wide range of issues, including climate change, the management of marine and terrestrial ecosystems, and green economic development"*.
 - b. 1975, launch of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). CITES was set up to address the **depletion of wild species resulting from demand for luxury goods such as furs in Western countries** to ensure sustainable offtake.
11. 1981: At CITES CoP3, Australia submits a proposal to move CITES trade to a reverse-listing model (a precautionary principle model, where the default is no trade without upfront research to prove it can be sustainably managed). The basis of this submission is that under the CITES model - trade until it is proven a problem – the prediction is that the trade will grow quickly and CITES will lose control. The reverse listing model is rejected.

12. 1982: The establishment of the World Resources Institute (WRI) by Gus Speth, to study sustainable practices for business, economics, finance and governance.
13. 1992: United Nations Conference on Environment and Development (UNCED), also known as the Rio de Janeiro Conference or the Earth Summit. This leads to the establishment of:
 - a. 1992, the Convention on Climate Change (UNFCCC),
 - b. 1993, the Convention on Biological Diversity (CBD). It's stated 3 main objectives are:
 - i. The conservation of biological diversity
 - ii. The sustainable use of the components of biological diversity
 - iii. The fair and equitable sharing of the benefits arising out of the utilization of genetic resources
 - c. 1995, the World Business Council for Sustainable Development (WBCSD) is a CEO-led organization of over 225 international companies.
14. 1992: Following the 1992 IUCN World Parks Congress, a new system of categorising protected areas was developed, with new categories introduced that allowed resource extraction.
15. 2002: At the IUCN World Parks Congress two new categories were adopted which enable extraction. Since then, there has been an explosion of 'protected areas', with most growth being in the new categories. The authors of a 2005 paper, "Rethinking protected area categories and the new paradigm", made very clear their thoughts on the new categories, going as far as saying "**Category V has been used or proposed for use in a manner that tortures the notion of PA so badly as to make it unrecognizable**", and concluding, "*The vision of a humanised PAs presented by the new paradigm will lead to a biologically impoverished planet*".
16. 2010: At CBD CoP10, signatories agreed on 20 targets for 2020, the "Aichi Biodiversity Targets", to stem biodiversity loss.
17. 2010: The United Nations General Assembly urges the United Nations Environment Programme to establish the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services IPBES. It is launched in 2012.
18. 2015: Sustainable Development Goals (SDGs), 17 global objectives established as part of the 2030 Agenda for Sustainable Development.
19. 2019: Landmark IPBES Global Assessment report established that trade is the biggest extinction risk for marine species and the second biggest risk for terrestrial and freshwater species.
20. 2020: World fails to meet a single Aichi Biodiversity Targets to stop destruction of nature.
21. 2022: At CBD COP15, signatories agree on 23 targets for 2030, the "Kunming-Montreal Global Biodiversity Framework (GBF)", to stem biodiversity loss. Given the CBD's 3 main objectives, a key target is **Target 5, which states unsustainable and illegal extraction of biomass must be stopped by 2030**.
22. 2024: At CBD CoP16, more than 85% of signatory countries miss the deadline to provide national action plans, CoP16 ends in disarray and indecision.
23. 2024: The 15th edition of WWF's Living Planet Report confirms a catastrophic **73% decline in the [global] average size of monitored wildlife populations over just 50 years (1970-2020)**; **Latin America and the Caribbean, have recorded a staggering 95% average decline**.

References

1. <https://activeforanimals.org/transparency-matters/>
2. <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvaud/140/140.pdf>
3. [https://www.europarl.europa.eu/RegData/etudes/STUD/2016/578025/EXPO_STU\(2016\)578025_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2016/578025/EXPO_STU(2016)578025_EN.pdf)
4. https://wwf.panda.org/discover/our_focus/wildlife_practice/problems/illegal_trade/
5. <https://natureneedsmore.org/wp-content/uploads/2024/02/Fixing-the-CITES-Funding-Crisis.pdf>
6. <https://natureneedsmore.org/wp-content/uploads/2021/06/Modernising-CITES-Web-Version.pdf>
7. <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-18-03.pdf>
8. <https://natureneedsmore.org/wp-content/uploads/2023/09/The-Business-of-Nature-Web-Version.pdf>
9. <https://www.amazon.com.au/Predators-Icons-Exposing-Myth-Business/dp/080147566X>
10. <https://natureneedsmore.org/keep-it-simple-stupid-asyCUDA-ecites-v-blockchain/>
11. <https://www.ecites.org/>
12. <https://cites.org/eng/news/sg-statements/eCITES-transforming-global-wildlife-trade-management>
13. <https://www.wbur.org/onpoint/2023/06/08/cites-a-historic-treaty-protecting-endangered-species-turns-50-is-it-still-an-effective-tool>
14. <https://natureneedsmore.org/is-the-wildlife-trade-helping-the-poor-or-the-rich/>
15. <https://cites.org/eng/prog/eCITES>
16. <https://natureneedsmore.org/wp-content/uploads/2023/12/NNM-Annual-Report-FY22-23.pdf>
17. See 16
18. See 16
19. <https://www.untfsurvey.org/report>
20. <https://www.ipbes.net/sustainable-use-assessment>
21. https://assets.wwf.org.au/image/upload/f_pdf/LPR.9.30.24_Full_Report_Embargo10Oct_REDUCED?_a=AT02Bcc0
22. <https://op.europa.eu/en/publication-detail/-/publication/d50d4b75-4bc5-11ea-8aa5-01aa75ed71a1/language-en>
23. See 6
24. <https://natureneedsmore.org/wp-content/uploads/2020/06/Debunking-Sustainable-Use-Report.pdf>
25. <https://www.science.org/doi/10.1126/science.adj6598>
26. See 25
27. <https://www.nature.com/articles/s41559-021-01399-y>
28. <https://www.cbd.int/gbf>
29. <https://www.cbd.int/sp/targets>
30. <https://natureneedsmore.org/the-consequences-of-no-consequences/>
31. <https://www.cbd.int/intro>
32. <https://natureneedsmore.org/reverse-listing/>
33. <https://www.cbd.int/doc/ref/rio-declaration.shtml>
34. <https://www.discovermongolia.mn/blogs/the-oldest-national-park-in-the-world-bogd-khan-uul-national-park>
35. <https://www.amazon.com.au/Yellowstone-Great-Marlene-Deahl-Merrill/dp/0803282893>
36. <https://www.dukeupress.edu/animal-traffic>
37. <https://www.nationalgeographic.com/animals/article/exotic-pets-wildlife-watch>
38. <https://natureneedsmore.org/btb-campaign-examples/>
39. <https://natureneedsmore.org/blog/>
40. <https://www.lynnjohnson.news/>
41. See 38
42. https://www.dffe.gov.za/sites/default/files/legislations/nemba_draftbiodiversityeconomystrategy_g50279gon4492.pdf
43. <https://www.dailymaverick.co.za/article/2024-06-20-sweeping-new-wildlife-plan-must-go-back-to-the-drawing-board-say-ngos/>
44. <https://theconversation.com/medical-tourism-to-south-africa-will-only-drive-rhino-closer-to-extinction-65769>
45. <https://eia.org/blog/extinction-tourism/>
46. <https://vimeo.com/135540882>
47. See 6