



NATURE NEEDS MORE

THE NEW WAY OF WILDLIFE CONSERVATION

His Royal Highness The Duke of Cambridge
The Royal Foundation
C/o Kensington Palace
London
W8 4PU
United Kingdom

Thursday, 20 February 2020

Regarding: Ensuring the Success of the Transport Taskforce

Dear Prince William,

I have been following your work to combat the illegal wildlife trade since 2014. The Transport Taskforce, together with United for Wildlife's other projects, is a very good idea.

Our own conservation work started in 2013 and initially focused on reducing the demand for rhino horn. As our understanding of the trade in endangered species evolved, in 2017 we reached the conclusion that the illegal trade cannot be decisively tackled until the mechanism that facilitates the legal trade is modernised; the current 1970s paper-based permit system is being extensively exploited by the wildlife traffickers.

We wanted to bring these legal loopholes to your attention, as the Transport Taskforce could play a role in influencing CITES and its signatory countries to move to an electronic permit system, which can be integrated with customs; this has been discussed for nearly a decade. While the current, paper-based system remains in place, any work the Transport Taskforce undertakes is limited by this obsolete trade monitoring system and can only scratch the surface of the issue.

Currently, most CITES signatory countries still issue paper-based permits that are easily copied or forged. Of the countries that have electronic permitting, many use stand-alone systems that are not integrated with customs and cannot be verified in real time. Illegal shipments are often 'legalised' by going via countries with poor compliance with CITES rules and regulations, which includes accepting counterfeit, paper permits.

Whilst CITES has been talking about moving to electronic permits for over a decade, the investment into creating a suitable solution has been slow, but now a system does exist. UNCTAD has developed such a system called eCITES¹ for CITES signatory parties and is making the **eCITES BaseSolution** available at a cost of less than US\$150K per installation. The cost of rolling out the system

throughout all 183 CITES signatories is estimated to be less than US\$30 Million, which is nothing compared to that value of the legal trade in endangered species, estimated to be US\$20 Billion in a 2012 UK Parliament report².

The roll-out of the **eCITES BaseSolution** can be done within 6-12 weeks, with UNCTAD customising the system to any country's needs and guaranteeing the success of the implementation, which makes it a risk free, cost effective solution. This system can be desktop or smartphone based, so in most cases there are no further hardware costs.

Given the minimal progress after a decade of discussion at CITES on electronic permitting, some countries have developed their own system for domestic purposes. What is critical is that we have consistency, security and trust across all 183 signatory parties, which the **eCITES BaseSolution** offers. In addition, **eCITES** makes issuing CITES permits much easier, because species names, appendix listings, units and classifications are populated via drop down menus in accordance with CITES rules; and can be centrally updated as trade in individual species changes so ensuring it is always up to date on the trade restrictions for all the 36,000 species listed for CITES trade regulations.

The **World Bank Global Wildlife Program** has indicated that they would make funding for this available should it be requested by an eligible country.

In order to address widespread international fraud in CITES permits, regulations need to be tightened both nationally and internationally. The first step in making this possible is for all 183 signatory parties to adopt secure electronic permits, integrate CITES permits with customs and to have electronic permit exchange. This would also result in changing data collection practices to real-time collection. In turn, this would enable real-time trade analytics and risk flagging of shipments or trends in imports/exports, which would greatly assist national customs services in deciding what shipments to inspect.

Trade analytics are the basis for being able to state the trade in endangered species is ecologically sustainable; currently there is no proof of the validity of the sustainable-use model in relation to endangered species. We recently undertook an informal investigation of CITES legal trade data with a global consulting firm and we were assured by these world-leading experts on trade analytics that the CITES trade database is the worst designed and most impenetrable data source they have ever come across. They explicitly stated that 'they would have given up trying to use the database within 5 minutes of looking at the CITES trade database without our help', it is so bad. They also stated that they agreed that as a first step to fixing the issues an electronic permit system would need to be adopted by all Parties.

In addition, we know from conversations with people with intimate knowledge of the illegal wildlife trade that going to electronic permitting would close one of the most widely abused loopholes, as it takes away the 'plausible deniability' that so many countries are currently hiding behind. Permits issued with the **eCITES Base Solution** are fully auditable and can be verified in real time anywhere in the world. With UNCTAD hosting the system, cybersecurity is also ensured.

We believe that that the United for Wildlife Transport Taskforce advocating for CITES signatory parties countries to implement the **eCITES BaseSolution** would be very much in line with both the stated intent of the Transport Taskforce and also with the self-interest of the 100+ transport companies that have signed up. Businesses could approach governments about this, as industry tends to have more leverage with governments than conservation NGOs.

In Australia, we are working both with the Minister for the Environment and the Assistant Minister responsible for Customs on promoting global adoption of **eCITES**. We have detailed knowledge of the **eCITES BaseSolution** system and would value a further discussion with you on our findings, to assist to you and the Transport Taskforce to consider incorporating this into the work of the taskforce. If there is an opportunity for a brief meeting during your upcoming trip to Melbourne, we would appreciate the chance to discuss this in person.

We would also like to connect your representative managing this Transport Taskforce project at United for Wildlife to the people at UNCTAD responsible for rolling out the system and the World Bank representative who discussed funding for eligible CITES signatory countries.

All countries could adopt electronic permitting 2022 and CITES CoP 19 in Costa Rica, which would strike a decisive blow to the illegal wildlife trade.

Yours faithfully

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C.C. A copy of this letter/email has been emailed to Lord Hague

1. [https://natureneedsmore.org/wp-content/uploads/2019/08/ASYCUDA-eCITES-BaseSolution .pdf](https://natureneedsmore.org/wp-content/uploads/2019/08/ASYCUDA-eCITES-BaseSolution.pdf)
2. <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvaud/140/140.pdf>