A Blueprint For Modernising CITES

Immediate Steps For Discussion At CITES CoP20 To Ensure CITES Is Effective

NATURE NEEDS MORE

The Urgent Need To Modernise CITES

When CITES was conceived in the 1960s the international trade in wild flora and fauna was small. Total global exports, for **all** trade, were worth US$318billion in 1970 compared to US$32trillion in 2024, up from US$22trillion in just 4 years. The poor quality of data for the legal global trade in wild species means a precise value is difficult to calculate. Conservative estimates put its worth at over US$350billion annually, more than the overall value of all global trade when the CITES was conceived.

At the time of writing, the CITES Financial Reports for the period 2023-2025 have not been released for CoP20, nor has the Budget and Work Programme for 2026 to 2028. Historic documents confirmed the CITES annual budget to be US$6.2million in 2022, amounting to 0.00017% of the value of trade in wild species. While none of these values can be stated with precision, given the lack of good quality trade data, but **the stark mismatch in the value of trade compared to the funds invested in its regulation explains why it is so easy for the illicit trade to flourish.**

While the financial reports and budgets weren't published, other insightful documents are available. Document CoP20 Doc. 7.1 prepared by the Secretariat, stated, *"On 24 July 2025, the United States Administration signed legislation to rescind the entire amount of federal funding from the account which funds the bulk of recurrent contributions for UNEP and UNEP-administered MEAs, including CITES. In view of the possibility of* ***a loss of up to 22 percent of the core budget of the Secretariat****, the CITES Secretary-General was compelled to take decisive action to reduce financial risks and mitigate the potential financial shortfall. Agreed termination proposals for six staff members were prepared and finalized with the support of UNEP"*, and *"In this context, the recruitment of some new posts will be deferred"*.

A second document, CoP20 Doc. 14, submitted by the Chairs of the CITES Standing, Animals and Plants Committees, and the acting Chair of the Finance

and Budget Sub-committee of the CITES Standing Committee, lays bare that, *"The current mode of work is no longer viable"*. This is the most important document submitted to CITES CoP20. It states, *"****The current situation [in the CITES] has brought us to a critical point****, where addressing the increasing demands and expectations of every issue simultaneously has already gone beyond the capability of the Convention's operational framework"*.

If this is not addressed, the document states, *"we may have expanded beyond capacity [to deliver] the official mandate of the convention, which is to regulate trade in species and focus on topics* ***for which no other appropriate competent bodies exist."***, continuing, ***"Urgent action is therefore required to ensure that the essential function of the Convention remains effective into the future"***.

This is tragic because of what is stated in the document, *"****that the CITES [focuses] on topics for which no other appropriate competent bodies exist"***, which is true. It isn't only international organisations, like the WTO or the CBD, who can't do what the CITES can, neither can private entities.

In this context, focusing on proposals for amendment of the Appendices is akin to shuffling deckchairs on the Titanic. The fact that the CITES leadership have made this admission should be positive. It opens the door for those who have shown a deep discomfort in exposing the weaknesses of the current system to step up and help with the needed modernisation.

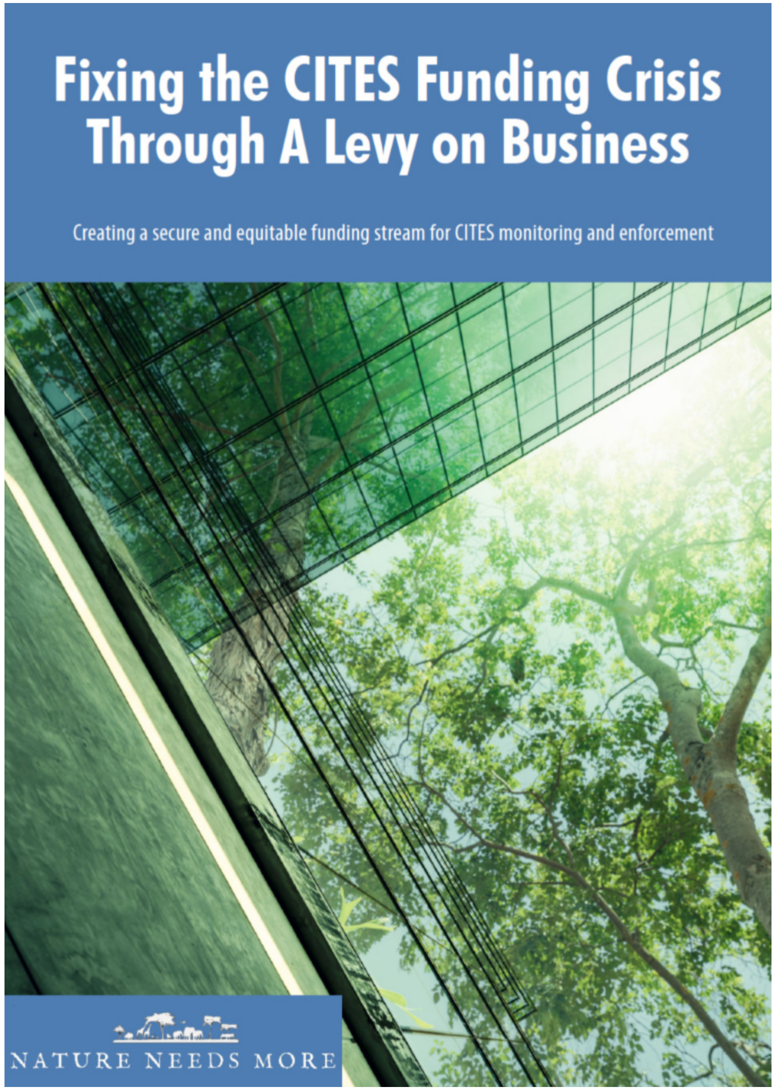
1 Fix The Funding Crisis

For decades the CITES has been an ineffective regulator due to its impoverished state. In 2025, the scale of the CITES funding crisis has reached a whole new level with the loss of US government funding, resulting in the possibility of a 22% drop of the core budget of the Secretariat. Corporate conservation organisations can no longer enable this crisis to fly under the radar, in the same way that they have done for decades.

The urgency of finding a solution to the deepening CITES funding crisis cannot be overstated. The CITES ongoing existence depends on creating a secure and equitable funding stream for monitoring and enforcement. **A substantial increase in funding for CITES can only be achieved by the businesses profiting from this trade covering the cost of regulation.** The trade in wild species is a perfect storm in terms of business greed, 1) They have ruthlessly taken advantage of imperfections, weaknesses and vulnerabilities within the regulator, 2) They don't contribute to the cost of regulation, and 3) When it is suggested they pay a levy of say 1% of the value of trade to cover the cost of regulation they suggest this is a slippery slope that "stifles" easy access to raw materials.

Yet, this is common practice in many industries, for example pharmaceutical companies have to cover the costs of drug trials and regulatory approval. In 2023, the total budget of the European Medicines Agency was €458 million. **Around 89.0% of the Agency's budget derives from fees and charges levied on business**, 10.9% from the European Union contribution for public-health issues and 0.1% from other sources. This example shows that substantial funds can be raised from industry if the model is set up correctly.

A short-term priority, to deal with the immediate funding crisis, is to collect a 1% levy on commercial imports to the main import markets (at a minimum the US, EU, China/HK, Japan, the UK and countries of the Middle East). How this can be done is outlined in Nature needs More's 2024 report, **Fixing The CITES Funding Crisis Through A Levy On Business.** Should businesses not commit to this then they must ultimately accept that this trade in non-essential goods must end.



2 Validate The Sustainable Use Model

In 2020, Nature Needs More published a report, **Debunking Sustainable Use**. After several years of research, we found no evidence that the extraction of wild species for the legal trade was proven to be sustainable.

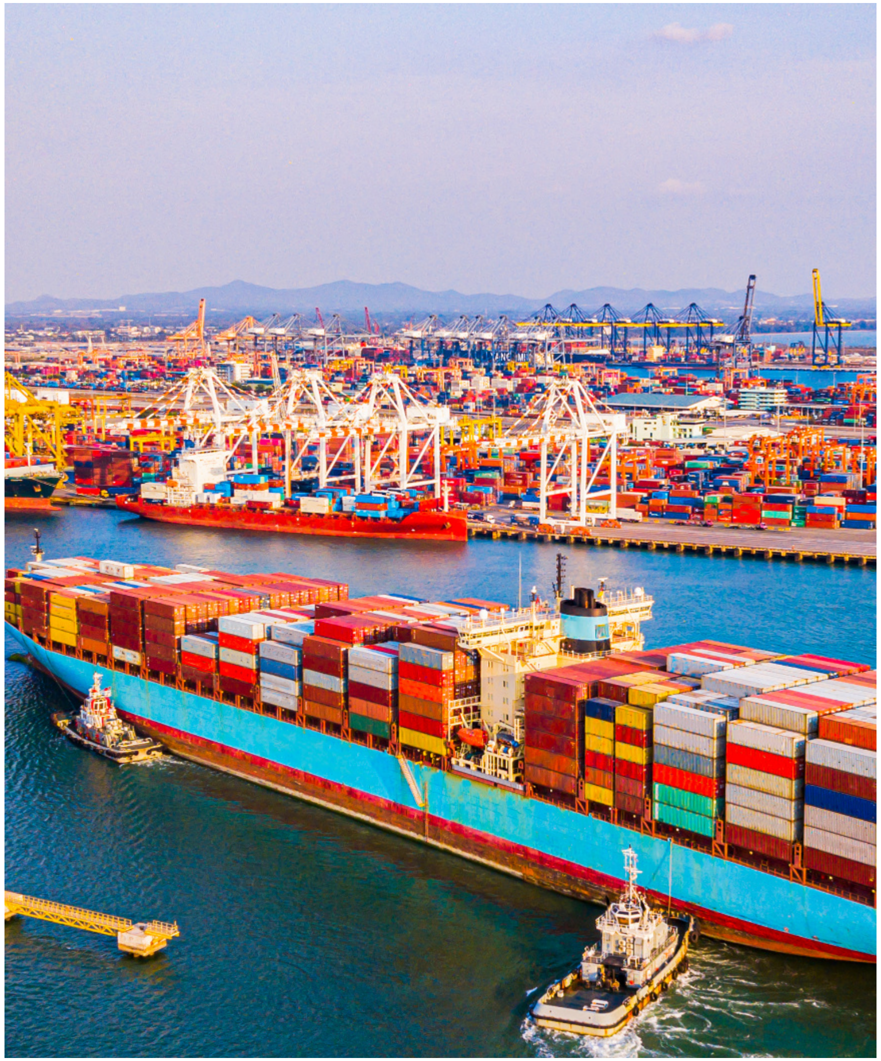
Yet, the overwhelming majority of conservation organisations and academics support the sustainable use model. **The big problem is that this is an act of 'faith' as conservation scientists are not actively publishing any proof that this extraction is sustainable**. In a 2024 study, "The Positive Impact Of Conservation Action", 33 authors conducted a meta-analysis of scientific studies on the impact of conservation interventions. Starting with a scan of over 30,000 potentially relevant publications, the finding on the impact of sustainable use interventions was 'inconclusive' because the meta-analysis could find only 5 publications related to the sustainable use of species they could use.

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 found a large negative effect of trade on species populations, stating, ***"We examined 1,807 peer-reviewed articles and >200 TRAFFIC reports yet found no support for a quantified, existing sustainable trade"***.

The CITES instigated a massive IPBES report, Assessment Report on the Sustainable Use of Wild Species, which analysed over 6,000 studies. Unfortunately for the CITES this report found the same problem – international trade is linked with overexploitation and the massive growth in international trade has driven the increase in unsustainable use.

Businesses' glossy sustainability reports on their use of CITES listed species are meaningless. **If the global trade in wild species is to continue, the lack of validation of the sustainable use model can no longer be ignored.**

3 Fix Supply Chain Transparency



As long as there is no comprehensive way of tracking the trade in CITES listed species in real time, from source to destination, no genuine monitoring and regulation is in place under the CITES. In the most recent UN Digital and Sustainable Trade Facilitation: Global Report, it is acknowledged that when it comes to a digital process for trade facilitation and wildlife protection, there was a low level of implementation of the CITES electronic permits (eCITES) and **as such no country could record full implementation**. As a result, big business and investors are enabled to profit from an unchecked global legal trade in endangered and exotic species.

The tragedy is that with a very limited investment into traceability, CITES trade could take big one step closer to being much more transparent.

It seems utterly bizarre that recently one corporate conservation organisation made the statement, *"Furthermore, the introduction of concepts such as traceability confuse the core mandates of CITES"*. **Adding traceability is a requirement for supply chain transparency, and not something that 'confuses the core mandate' of CITES**. Even with their evidence-based mantra, when it comes to the legal trade in wild species too many conservation organisations are willing to sidestep George Henry Lewes recommendation of, ***"We must never assume that which is incapable of proof"***.

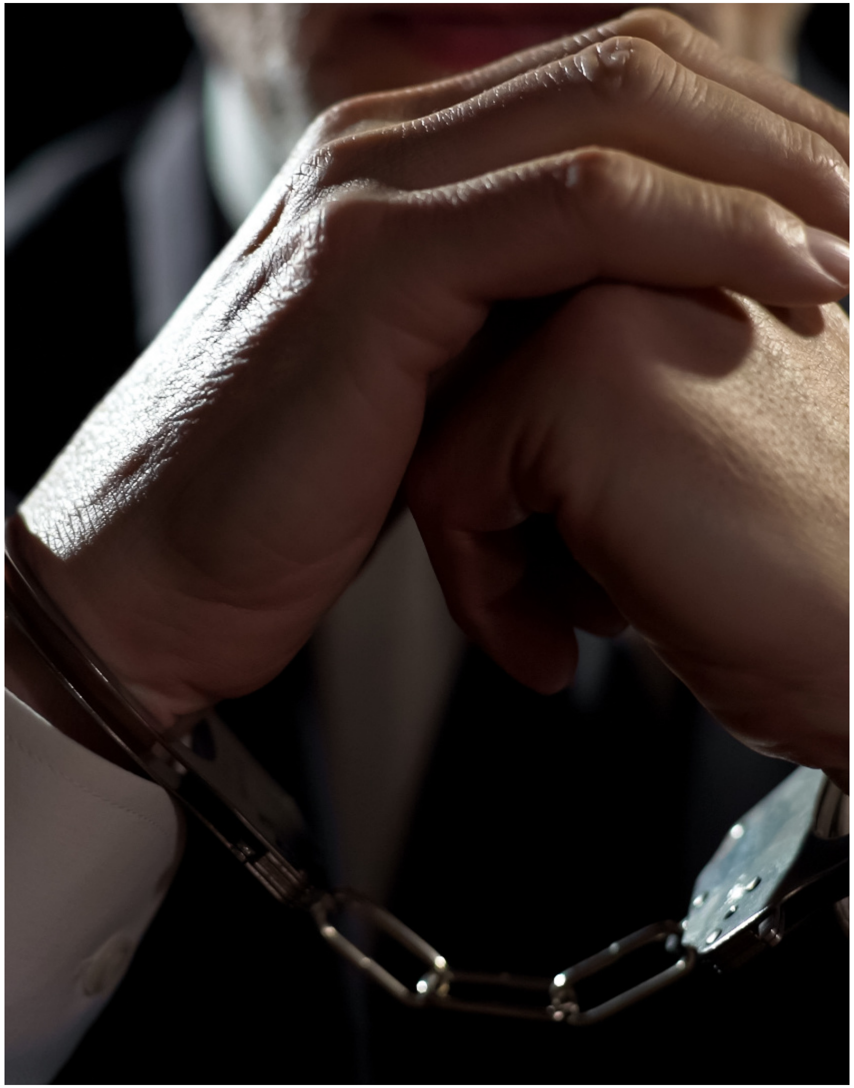
A date for the mandatory implementation of electronic permit systems must be set, and high-income countries must make funds available to low- and middle-income countries to modernise their systems.

Once that date is reached, any country that still uses the 1970s paper-permit system is suspended from CITES trade.

Then electronic permit exchange, centralised monitoring and real-time reporting of trade will be possible and should equally become mandatory.

4 CITES Enforcement Authority Must Be Mandatory, Not Optional

A regulator without a mandatory enforcement authority is nothing more than a paper tiger. The question is, **why doesn't the CITES mandate a national enforcement authority**, when it does mandate national management and scientific authorities?



Not making an enforcement authority mandatory at the launch of the CITES ensured the regulator was flawed from the start; possibly a result of the global power imbalances of the 1960s. Enforcement costs fall disproportionally on supply-side, low- and middle-income countries. Businesses pay a token fee (at the level of pocket change) for export permits. Import permits aren't mandatory, so businesses higher up the value chain most likely pay nothing.

If an enforcement authority had been made mandatory, then a funding mechanism would have to be agreed to pay for it, which probably explains why it didn't happen. Not mandating an enforcement authority from the start was nothing other than malicious and cruel behaviour towards wild species. The fact that this has not been remedied in the intervening 50 years has left the CITES significantly compromised.

The fact that the CITES has had only one review in its 50-year history means this and other fatal flaws have never been addressed. It should come as no surprise that **businesses know (and ignore) green crime in their supply chains**. 2020 research confirmed that globally 65% of respondents know or suspect that third parties they conduct business with may have been involved in a range of illegal, environmentally damaging activities; at a country level this included Spain 83%, India 75%, and Saudi Arabia 85%. Only 16% of respondents said they would report a third-party breach externally and 63% agreed that the economic climate encouraged organisations to take regulatory risks in order to win new business.

A date for mandatory implementation of an enforcement authority in all signatory countries must be set and businesses in the major import markets must face a levy to cover the costs of enforcement throughout the whole value chain. If an enforcement authority isn't in place by the agreed date, trade sanctions must be applied to all exports, imports and re-exports from the country.

5 CITES Strategic Review & Modernisation

A Blueprint For Fixing CITES

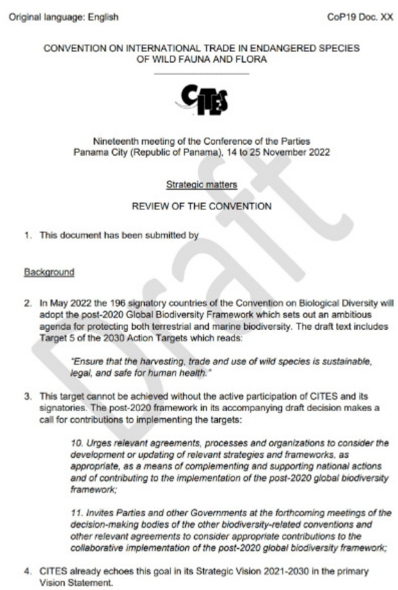
The CITES has had only one strategic review in its 50-year history, which was back in 1994. Nature Needs More put the need for a strategic review of the convention on the table in the run up to CoP18 and lobbied hard for it to be on the agenda of CoP19. The conservation organisations we approached during this time were fearful of a strategic review, none of the signatory countries we approached were prepared to put forward a submission for a comprehensive review of the CITES and the Standing Committee dismissed it as unnecessary.

Less than 3 years later submission documents to CoP20 clarify that CITES can no longer cope (CoP20 Doc. 14) and will potentially lose over 20% of its core operating budget (CoP20 Doc. 7.1).

50 years after its inception, with zero chance of meeting its 2030 Strategic Vision, if this doesn't trigger the long overdue comprehensive review, then the CITES leadership, its signatories and the conservation sector have accepted that the regulator has slid into irrelevance.

The fact that the CITES leadership have made this admission should be positive. It opens the door for those who, for whatever reason, have shown a deep discomfort in exposing the weaknesses of the current system to step up and help with the needed modernisation.

Even though CITES is within the 150-day submissions period, this emergency situation warrants the creation of an intersessional working group to study proposals to address the funding shortfall, an enforcement mechanism and how the regulator has to be modernised to significantly improve the probability that CITES will make all trade legal and sustainable by 2030.



Original language: English CoP19 Doc. XX

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

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

Strategic matters

REVIEW OF THE CONVENTION

1. This document has been submitted by

Background

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

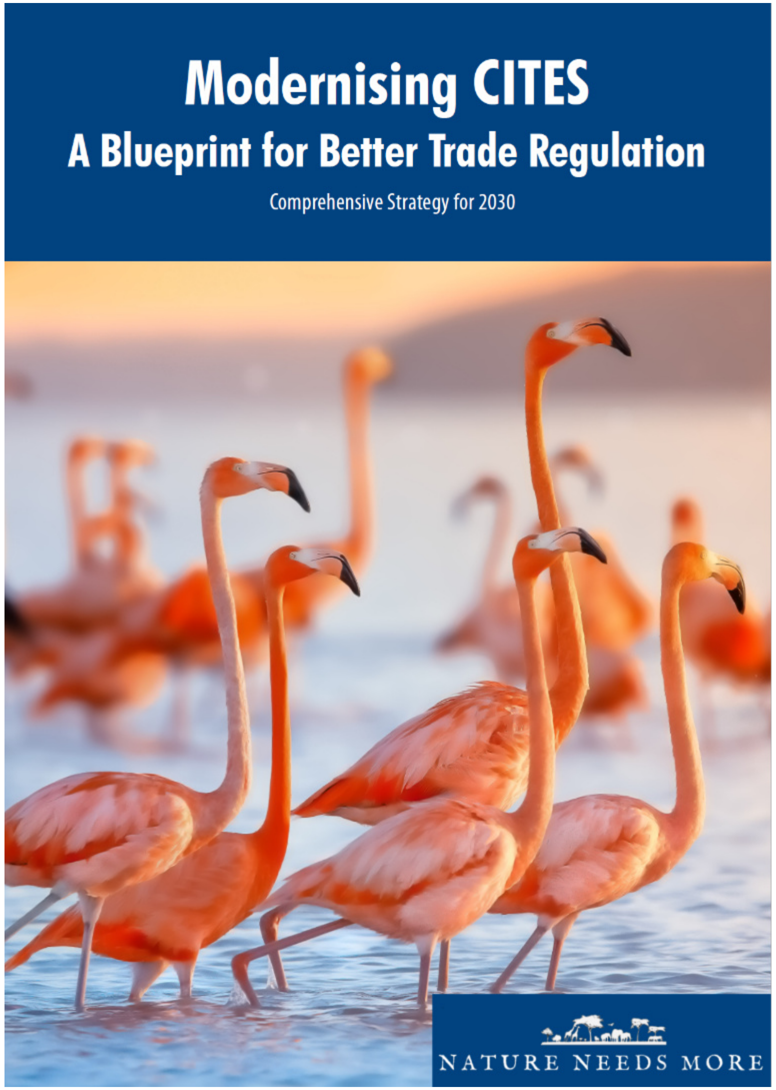
   "Ensure that the harvesting, trade and use of wild species is sustainable, legal, and safe for human health."

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

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

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

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



6 SULi Is NOT Part Of The CITES Convention

In the same way that the sustainable use model is unproven, so is the assertion that the global trade in wildlife contributes to community livelihoods.

This is a baseless claim, which ignores property rights, land rights, extraction rights and who really profits from the international trade. In many/most instances these community groups have no rights that allow them to refuse extraction. Even when they do, the power differentials involved means community resources aren't well-defined or secure, and the communities don't genuinely have the freedom to act in accordance with their values. Most often there is no alternative to extraction presented, such as a basic income for conservation.

As with the sustainable use model, just because the link between the commercial trade in wild species and community livelihoods is commonly made, this does not make it true. In a recent publication researchers urged people to stop promoting the wildlife trade as important to livelihoods ***"unless proven to be factual"*** because currently any **proof *"is thin on the ground"***.

Despite this, there has been an increasing focus on Sustainable Use and Livelihoods (SULi) on the committee and CoP agendas of CITES. While indigenous peoples and local communities have a right to be at the table, it is important to ask the purpose of inferring that community groups have decision making abilities on a global trade that they have no control over. The purpose of 'CITES and Livelihoods' must be clarified. The stakeholder with the least power in the global commercial trade in wild species cannot be used as a pawn for greenwashing, virtue signalling or to deflect from the large businesses that control and profit from this trade.

7 The Failure Of Strategic Vision 2030 & Target 5 Of The KMGBF

The CITES Vision 2030 Statement is: By 2030, **all international trade in wild fauna and flora is legal and sustainable**, consistent with the long-term conservation of species, and thereby contributing to halting biodiversity loss, to ensuring its sustainable use, and to achieving the 2030 Agenda for Sustainable Development.

This is closely related to KMGBF (CBD) 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.

Nature Need More can with 100% certainty state that there is No Chance of achieving the CITES Vision 2030 or the KMGBF Target 5 by 2030. Why do we say this?

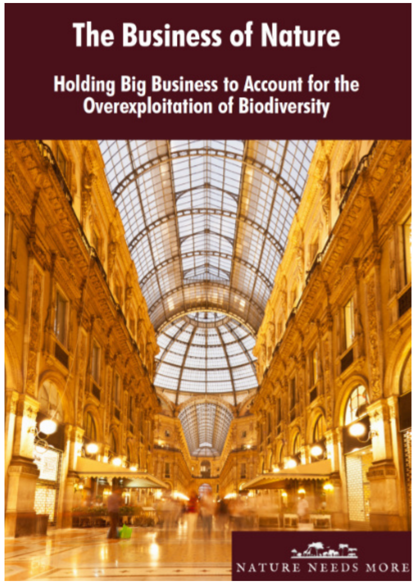
The CITES Vision 2030 and the CBD KMGBF Target 5 are both hollow statements because no useful actions are being taken to address the root causes of the biodiversity crisis. The CITES ‘blacklisting’ model has failed in its stated objective of protecting endangered species from overexploitation through trade, with this systemic and structural failure being predicted by CITES CoP3, in 1981. The CITES blacklisting model cannot be justified, and listing more species is a failure, not seen as a success.

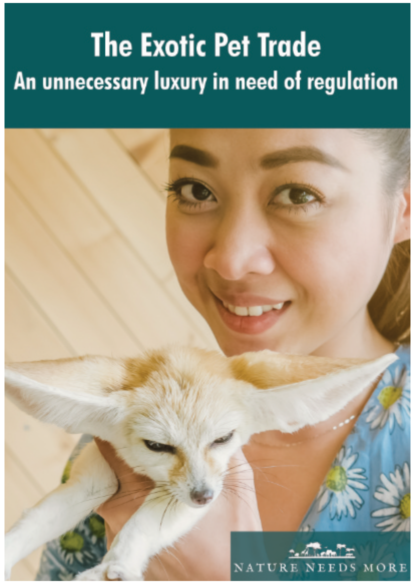
The CBD entered into force on 29 December 1993. It’s stated 3 main objectives are 1) The conservation of biological diversity, 2) The sustainable use of the components of biological diversity and 3) The fair and equitable sharing of the benefits arising out of the utilization of genetic resources. The CBD has failed in these 3 objectives. It has no mechanism to hold signatory parties to account.

The CITES has been impoverished to the point of being meaningless for years, and in 2025 it has potentially lost 22% of its core operational budget. The CBD/KMGBF Cali Fund remains starved of resources.

In the face of these fatal flaws not being challenged let alone addressed, the activities undertaken from commenting on Appendix listing changes under the CITES to spending years working on measurement indicators for the KMGBF is nothing more than performative inaction.

Nature Needs More's CITES & Trade Reports 2020 - 2025





After years of researching and working on the demand for illegal wildlife 'products', in 2017 Nature Needs More concluded that **the illegal trade cannot be tackled until the loopholes in the LEGAL trade in endangered and exotic species are closed.**

We decided to fully investigate the reasons why the CITES is failing and becoming evermore ineffective, as the number of species in need of protection continues to rise. We researched regulatory models in other industries and the history of regulatory failures to draw conclusions about the suitability of the basic building blocks of the current CITES framework.

With our **2020 Debunking Sustainable Use report** we demonstrated that with those basic building blocks remaining in place, CITES cannot be effective and cannot arrest the decline in populations.

Our **2021, Modernising CITES – A Blueprint for Better Trade Regulation**, outlined a new regulatory framework for CITES based on whitelisting, regulating business directly and businesses paying the full cost of regulation.

Nature Needs More's reports show that regulating the wildlife trade is neither hard to do nor does it require the end of capitalism. It does require remembering that we had previous periods where certain industries were subjected to greater regulation as the result of a crisis.

Upcoming Report: Unsellable

The biodiversity and climate crisis are both a result of the overexploitation of natural resources by our industrial, fossil-fuel economy. They came about because of the 'never-ending economic growth and progress' narrative that has shaped capitalism and especially the last 45 years of neoliberalism. The economic 'theory' underpinning the narrative – neoclassical economics – is only distinguished by the sheer stupidity of its most basic assumptions. In turn, this has led to the creation of a massive, unproductive financial sector.

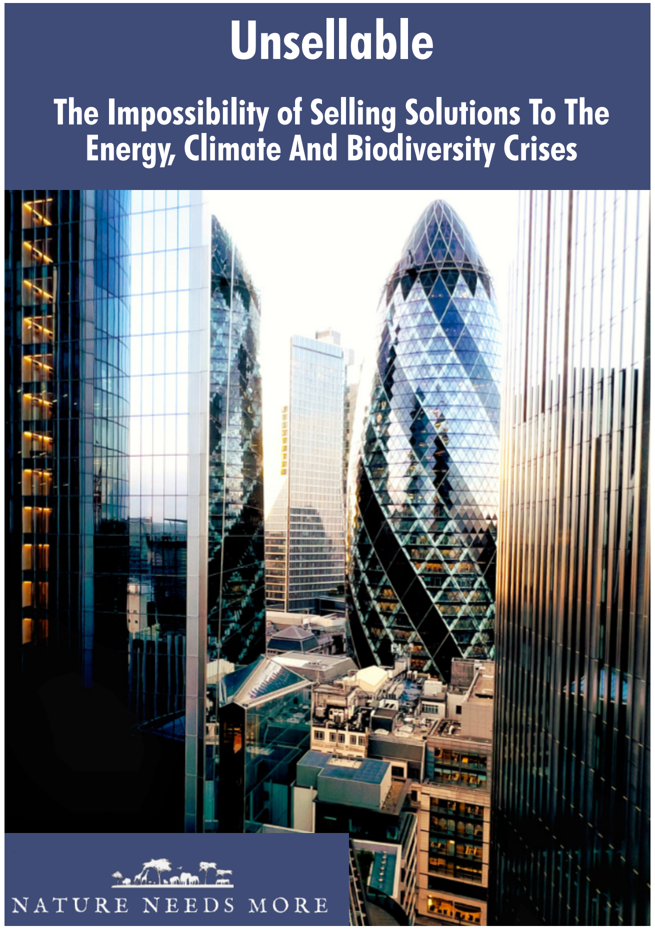
In our reports to-date we have demonstrated that even with greater levels of regulation, to genuinely protect species from overexploitation, significant profits can still be made. The unwillingness of businesses, investors and the markets to even minimally curtail their shareholder primacy doctrine means that we can only explore a course-correction to abandon the guiding ideology of the last 300 years – human domination over nature, 'progress', linear time, economic growth and accumulation of 'stuff'.

It is a fact that wild species and planetary resources are being continuously overexploited to fuel unnecessary consumption and unneeded development. There is no regard for planetary boundaries and limits of material/energy extraction. We are using up fossil fuels that will be needed to cushion the collapse to manufacture unnecessary 'stuff'. The top 10% are responsible for more than half of all consumption and basically all luxury consumption.

Collapse is not an event; it's a process that takes decades. It has been a normal part of human history since the advent of settled agriculture. Without accumulation there can be no collapse. The difference between collapse and degrowth is elite behaviour and the past indicates that the elites double down on their own self-interest during collapse. The current behaviour of the global elites shows they are acting no differently this time around.

The last 40 years have seen a massive rise in inequality in the West and globally. Billionaires have managed to successfully brand themselves as wealth creators, not extractors. The excess of the current phase and the misallocation of capital is a result of policies adopted over the last 150 years as capitalism evolved. Many of these policies must go if we want to achieve a course-correction. Yet, no counter-narrative to the never-ending growth and progress story really exits; selling decline to a populace raised on growth is a non-starter.

Instead, a **plethora of phantom solutions** (offsets, credits, certifications, ESGs etc) have been proposed to 'ward off the day' when a planned and regulated reduction of production and consumption are adopted to best manage the course-correction needed.



Beyond a course-correction, which will cushion the fall, we need to abandon the guiding ideology of the last 300 years – human domination over nature.

In a follow up to Nature Needs More's report, **The BU$IN€$$ of Nature**, in 2026 we will publish **Unsellable: The impossibility of selling solutions to the biodiversity and climate crisis**

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https://natureneedsmore.org

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Nature Needs More works on tackling the key systemic enablers of biodiversity loss, including unconstrained consumer demand for products made from wild species and the significant deficiencies in the legal trade system under CITES. **Currently, the legal and illegal trade are so intertwined that they are functionally inseparable.**

The legal trade has been allowed to fly under the radar for decades. 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.

To stop the extinction crisis we need to form a new relationship with the natural world.

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