

The Wildlife Trade Has A Legitimacy Gap



It's Time To Close The Gap



The Wildlife Trade Legitimacy Gap

The *legal* trade in wild species is plagued by:

- A Transparency Gap,
- A Resource Gap, and,
- An Enforcement Gap.

From opaque supply chains to an underfunded regulator, **major evidentiary gaps are routinely overlooked**. Meaningful claims of sustainability, legality, and safety require far greater investment in verification infrastructure.

Legitimacy Gap:Transparency Gap:Resource Gap:Enforcement Gap:Evidentiary Gap

It's Time To Close the Gaps

The Transparency Gap



The Transparency Gap means there is NO proof of sustainability, legality and safety in the wildlife trade.

After seafood, fashion and furniture are among the biggest profiteers.

If Jeff Bezos ran Amazon like CITES, the company would not know what stock exists, couldn't reconcile sellers with buyers from different countries, or ensure a product reached its stated destination — with tracking updates appearing only at border crossings, sometimes years later.

The *legal* trade in wild species is a mess. It is a global business scandal that no one wants to talk about.



First Step In Closing The Transparency Gap

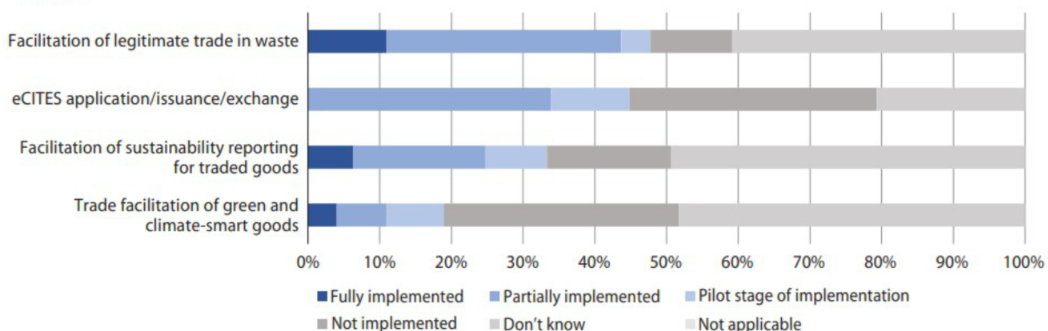
Force the wildlife trade into the digital age. CITES began discussing digital permits in 2002 and formed a working group in 2005, yet by 2019 only Switzerland and France had implemented them.

In 2019, a global eCITES rollout was estimated to cost US\$30 million, but the 2025 UN Digital and Sustainable Trade Facilitation Report **confirmed NO country has fully implemented eCITES**. As a result, claims of legality and sustainability rely on weak data.

Closing the Transparency Gap is essential to closing the Legitimacy Gap — because **data integrity is a prerequisite for credible sustainability and legality claims**.



State of implementation of 'green trade facilitation' measures globally



Source: The UN Global Survey on Digital and Sustainable Trade Facilitation, 2025. Available at untfsurvey.org.

The Resource Gap



The Resources Gap means there is no reliable proof of sustainability or legality in the trade of wild species.

The **legal** trade is valued at hundreds of billions, and possibly trillions, annually. Despite being described as *“one of the most lucrative trades in the world”*, **the CITES regulator has had to try to monitor this trade with the same pathetic budget for 25 years**, approximately US\$6.5 million annually.

In 2025, CITES committee chairs warned that ***“urgent action is required”*** to keep the convention functioning effectively, — a serious concern given that CITES oversees issues no other body is equipped to manage.

The CITES regulator is impoverished to the point of being meaningless. It is time for a **Profiler Pays model**.

Closing the Resource Gap is essential to build the verification system needed to address the trade’s Evidentiary and Legitimacy Gaps.



First Step In Closing The Resource Gap

Closing the Resource Gap begins with closing the Transparency Gap.

Greater transparency would **expose the true scale of profits** from wildlife trade, making it **harder for businesses to resist a Profiter Pays model**, for monitoring and regulation.

Only corporate and investor greed could see a 1% levy on import value as onerous.

For comparison, the European Medicines Agency received 89% of its 2023 €458 million budget from industry fees, showing that effective regulatory funding models are possible.

Until the CITES funding crisis is resolved, the **Resource Gap will continue to drive the Transparency Gap and Legitimacy Gap** in the global commercial trade of wild species.

It's Time To Close The Gaps.



The Enforcement Gap

Without mandatory enforcement, a regulator is little more than a set of guidelines.

The CITES Enforcement Gap means **there is still NO reliable proof of sustainability, legality and safety** in the wildlife trade.

A global review found that more than 80 CITES signatory countries lacked enforcement infrastructure. Without a CITES Enforcement Authority being made mandatory there is **no basis for believing the international trade has any genuine evidentiary oversight.**

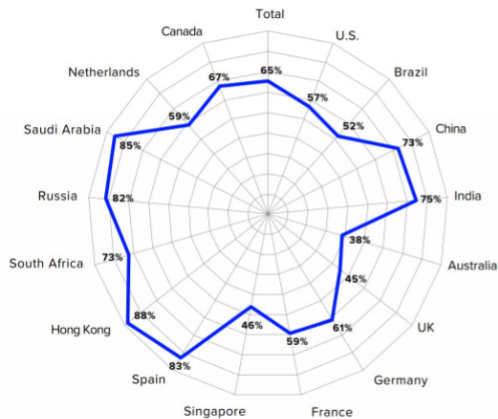
Assuming legality without verification amounts to selling out wild species for profit.

The issue is not whether sustainable use is theoretically possible, but whether current enforcement systems can generate reliable data to assess it at all. They cannot.

The First Step In Closing The Enforcement Gap

Figure 2.7: Illegal activities

Do you know or suspect any of your third-party suppliers or their suppliers have been involved in any of the following?



A substantial 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 (Fig. 2.7).

Accept the 50-year experiment of self-regulation and voluntary governance has failed.

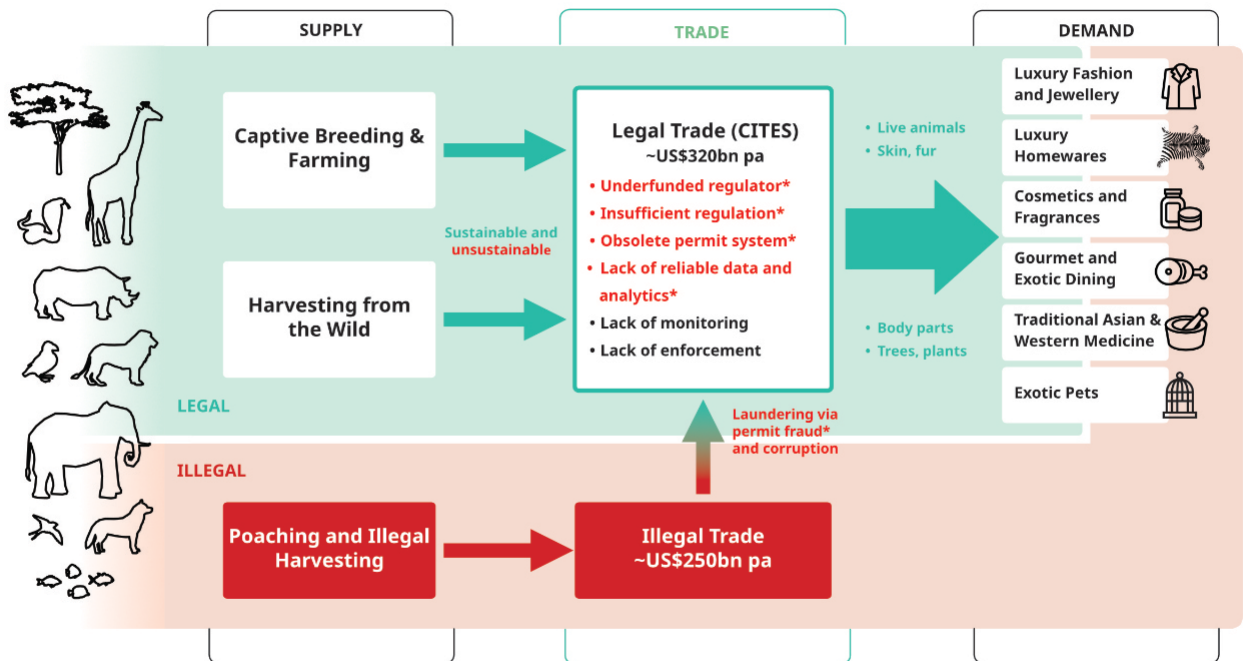
In a 2020 global survey and report, businesses acknowledged the scale of green crime in their supply chains:

- 65% of respondents know or suspect a range of illegal, environmentally damaging activities in their supply chain.
- **Only 16% of global respondents say that they would report** a third-party breach externally.
- 63% agreed that the economic climate encouraged organisations to take regulatory risks in order to win new business.

This is nothing short of a Global Business Scandal. Make an Enforcement Authority mandatory for ALL CITES signatory parties.

It's Time To Close The Enforcement Gap.

Closing The Gaps



Wild species supply the raw materials for industries worth trillions of dollars — from luxury fashion, watches, cosmetics, fragrances, gourmet foods, pharmaceuticals, traditional medicine and exotic pets.

Trade is now recognised as the biggest extinction risk for marine species and the second biggest for terrestrial and freshwater species.

Trade generating trillions of profit should not be regulated by an impoverished global authority lacking the resources to properly verify legality and sustainability.

The resulting Resource Gap has created Transparency, Enforcement, Evidentiary and ultimately Legitimacy Gaps.

There Is A Choice - Close The Gaps Or Ban The Trade.



A Global Business Scandal

The challenge for sustainability directors, managers, editors and journalists is that the wildlife trade's evidentiary weaknesses can no longer be ignored.

Claims of sustainable, legal or ethical sourcing are only as credible as the systems verifying them — and **in the global trade of wild species, those systems remain deeply inadequate.**

Sustainability narratives are just commercially or politically convenient. But they are nothing more than an ideology, which no current verification systems are capable of proving.

Until the Transparency, Resource and Enforcement Gaps are addressed, sustainability claims linked to wild species carry a significant unresolved Evidentiary Gap and Legitimacy Gap.

Silence about this Global Business Scandal is part of the problem.

Break The Silence. End Complicity.