

Task Force 04

**TRADE AND INVESTMENT FOR SUSTAINABLE AND INCLUSIVE GROWTH**

## End Illicit Wildlife Trafficking

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**TF04**

## Abstract

International illicit wildlife trafficking (IWT) and wildlife overexploitation harm ecosystems, animals and humans. As a result, much money that could be better spent on reaching the UN 2030 Agenda's Sustainable Development Goals (SDGs) is lost: SDG 13 on climate, SDG 14 and 15 on protecting life below water and on land, and SDG 16 on corruption, money laundering and organized crime. IWT is described as a “biodiversity apocalypse,” generating up to \$23 billion in illicit financial flows annually. It is a transnational organized crime, promoting armed violence and corruption and is linked to other serious crimes. Illicit unreported and unregulated (IUU) fishing wastes up to \$23.5 billion per year.

Many international institutions and laws comprise a global network that governs various aspects of IWT, including the G20. Since 2008, the G20 has made four IWT and 10 IUU commitments in its communiqués. The G20 leaders recognize the impacts of IWT and IUU on the environment and oceans. According to the G20 Research Group, the G20 has only 63% compliance with the one assessed IUU commitment, made at the 2021 Rome Summit.

Amid the twin crises of climate change and biodiversity loss, alongside health, peace and security concerns, more G20 action is urgently needed to address these risks to human and non-human health and security. This policy brief recommends 13 specific actions for the G20 leaders to commit to that support Brazil's summit priorities of social inclusion, environment and climate change, and global governance reform.

**Keywords:** Illicit Wildlife Trafficking, Climate Change, Biodiversity Loss, Corruption, Compliance.

## Diagnosis of the Issue

Addressing international illicit wildlife trafficking (IWT) is key to “building a just world and sustainable planet.” (Brazil Ministry of Foreign Affairs 2023) IWT drives many environmental/non-human, human and economic risks, with crime and corruption at the heart (see Figure 1).



FIGURE 1: Interconnection of some consequences of illegal wildlife trade

Source: Mozer and Prost 2023.<sup>2</sup>

**Environmental risks.** IWT is closely linked to environmental harms, including other environmental crimes, such as illegal logging and mining. It facilitates the introduction of invasive species, which bring diseases and alter ecologies, leading to biodiversity decline and species extinction (Mozer and Prost 2023; World Animal Protection 2021)

**Climate risks.** Ecosystems and climate systems are inextricably linked; the loss of habitat and the wildlife there increases climate risk by removing critical carbon sinks such

as hardwood trees. Endangering species that have unique functional traits in their ecosystems, such as pangolins and certain predators, can fundamentally alter the established balance of ecosystems and thus climate systems (United Nations Office on Drugs and Crime 2022).

**Health risks.** IWT has severe negative impacts on the physical and mental welfare of animals, increasing risks of illness and of disease transmission to humans (World Animal Protection, 2021). Approximately 70% of emerging zoonotic infectious diseases are believed to have originated from wildlife, contributing to global pandemics (World Animal Protection 2021; Gallo-Cajiao et al 2023). The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) does not focus on preventing zoonotic disease, with little disease screening of imported wild animals so pathogens can cross borders (World Animal Protection 2021). IWT is linked to SARS, Ebola and Covid-19, with the latter costing over three million lives.

**Peace and security risks.** IWT is linked to conflict-affected regions that are exploited for profit by organized crime syndicates and violent militias to fuel transnational crimes, including terrorism and transnational organized crime (see Appendix A) (INTERPOL 2023). Human-wildlife conflict negatively impacts local communities. Men are coerced into poaching through “masculinity-shaming” (Li and Seager 2023). Women are involved in processing what is hunted and in small market selling, and are often victims of sexual violence, prostitution and coercion (World Wildlife Fund 2021; Cao 2023).

The G20 has governed IWT and illicit unreported and unregulated (IUU) fishing in a limited capacity since its 2017 Hamburg Summit (see Appendix B). At Hamburg, the G20 released *High Level Principles on Combating Corruption Related to Illegal Trade in Wildlife and Wildlife Products* as a follow-up to the Anti-Corruption Action Plan 2017–18 (G20 2017). They cover:

1. Strengthening frameworks: legislative frameworks, enforcement networks, technical assistance and capacity building, CITES permit system, and multi sectorial dialogue.
2. Prevention: raising awareness, identifying corruption risks along the entire trade chain, risk mitigation, establishing and enforcing integrity and transparency policies, engaging the private sector, and engaging civil society.
3. Investigation, prosecution and sanctioning: capacity building, best practices, investigation, multi-agency and multi-jurisdictional investigations, sanctions and asset recovery, witness protection, and whistleblower protection.
4. (Self-)Assessment of Progress: further research to better understand how corruption facilitates and drives illegal trade in wildlife and wildlife products, data collection, and evaluating the impacts and promoting peer learning.

Between 2017 and 2023, the G20 dedicated 13% of its communiqués to combating illegal wildlife, including illegal fishing. The G20 has linked IWT with two Sustainable Development Goals (SDGs): 16 (corruption) and 15 (life on land). It has linked IUU fishing with marine environment protection and the ocean-based economy. In 2021, it committed to combat other environmental crimes: illegal logging, mining, and the movement and disposal of waste and hazardous substances. The G20 has made just four IWT and 10 IUU fishing commitments.

The G20 Research Group assessed the G20's compliance with one IUU fishing commitment made at the 2021 Rome Summit and found just 63% compliance. No other commitments have yet been monitored for compliance.

At the ministerial level, in 2020 G20 agriculture and water ministers called on the One Health Tripartite – the World Health Organization (WHO), World Organisation for

Animal Health (WOAH) and the Food and Agriculture Organization (FAO) – to “develop a list of wildlife species and conditions under which they could present significant risks of transmitting zoonoses, and to issue guidelines towards mitigating these risks.” (G20 2020)



## Recommendations

At the 2017 Hamburg Summit, G20 leaders stated: “the G20, representing three quarters of international trade and two thirds of the world’s population, is uniquely placed to take action and lead by example” to combat corruption related to the illegal trade in wildlife and wildlife products (G20 2017). The G20 should thus do the following:

**Strengthen institutions for public health:** Aligned with SDG 17 (partnership for the goals) and SDG 3 (health), the G20 should commit to strengthen its support for the One Health Tripartite, along with the UN Environment Programme (UNEP), to control the spread of pathogens spread through IWT. It should recognize CITES in its communiqué, as it has never done so. It should encourage local law enforcement agencies to prioritize working closely with INTERPOL to build capacity to tackle IWT.

**Strengthen CITES:** The G20 should commit to strengthening the CITES permit system, and to adding the monitoring and regulating of the spread of zoonotic diseases to CITES, which currently lacks recognition of zoonotic disease prevention or biosecurity.

**Strengthen legal frameworks:** The Financial Action Task Force (FATF) reports that differing legal frameworks obstruct international cooperation on money laundering and the illegal wildlife trade (Financial Action Task Force 2020). The G20 should commit to closing loopholes among members’ federal and sub-federal governments in their IWT legislation. They should establish strong domestic legal frameworks to create cohesiveness among all levels of government, in line with the SDGs.

**Develop gender-informed policies:** G20 members should analyze the roles played by women and girls in IWT, including prevention (i.e., the female poachers, the Black Mambas, in South Africa), as well as the harm and links to sexual and gender-based violence and exploitation of women and girls. The G20 should commit to applying a



gender-based lens to IWT policies and legislation.

**Reduce demand for wildlife products:** Wildlife and wildlife products are used in various traditional, cultural and economic contexts, including medicinal ingredients, pets, jewelry, accessories, trophies, and entertainment (Masterson 2023; Naidoo, Bergin and Vertefeuille 2021). The G20 should endorse CITES Guidance to Develop and Implement Demand Reduction Strategies to Combat Illegal Trade in CITES Listed Species (CITES 2021). It should commit to developing domestic strategies to reduce demand in the short-term.

**Recognize the personhood of wild animals and their habitat:** G20 members Australia and India have given legal rights to rivers. Ecuador and Bolivia have enshrined rights to nature in their constitutions. The rights of non-humans is an emerging topic for discussion in planning human-planetary relations, and against the backdrop of biodiversity loss and climate change and their security implications (Law Society of England and Wales 2022). The G20 should engage in this conversation by tasking and funding a relevant core international organization, such as TRAFFIC, the WOAHP or the WHO, to develop a report exploring granting legal personhood to wildlife, starting with CITES' trade-prohibited species and endangered species on the red list published by the International Union for Conservation of Nature, with the goal of reducing demand while strengthening the global legal framework for holding perpetrators to account.

**Increase funding:** The G20 should increase funding to the Global Wildlife Program, a fund under the Global Environment Facility and hosted by World Bank. It should also increase funding to the One Health Tripartite, and to UNEP.

**Bring perpetrators to account:** The G20 should commit to follow the guidance produced by the UN Office on Drugs and Crimes (UNODC) and INTERPOL on holding perpetrators to account for illegal wildlife crimes. It should commit to strengthen



international cooperation among G20 members, with relevant international organizations, and with origin, transit and destination countries. G20 members should develop standards on rehabilitative measures for perpetrators serving jail time, to avoid revolving-door prisons and repeat offenders.

**Change profit incentives behind IWT:** The G20 should endorse the work of the FATF on IWT and environmental crimes and encourage countries to prioritize identifying, investigating and disrupting the financing networks that sustain IWT and adopt measures identified in the FATF’s 2020 report on “Money Laundering and the Illegal Wildlife Trade,” including incorporating IWT into national risk assessments and ensuring that national laws allow law enforcement to pursue and carry out financial investigations linked to IWT (Financial Action Task Force 2020).

**Link wildlife crime with land grabs:** The UNODC defines land grabbing as “the capturing of control of relatively vast tracts of land and other natural resources through a variety of mechanisms and forms that involve large-scale capital that often shifts resource use orientation into extractive character.” (United Nations Office on Drugs and Crime 2022). This definition often has negative implications for local and Indigenous communities’ traditional land use rights and the wildlife inhabiting that land. The G20 should recognize this link and commit to combat land grabs in connection with IWT.

**Address corruption and barriers to effective prosecution in the judiciary:** The G20 should commit to dedicating resources to boost local and national anti-corruption efforts, including by capacity-building of customs officials at border points, and to strengthen judiciary and law enforcement independence for effective prosecution.

**Encourage public-private information sharing partnerships:** The G20 should commit to working with public-private information sharing partnerships, including the United for Wildlife Foundation, between financial institutions and law enforcement, to

support the sharing of financial intelligence across sectors. This would allow financial institutions to identify IWT rings, report them to local financial intelligence units, and limit access to the formal financial system, making it harder for criminals to profit.

**Leveraging technology to combat IWT:** The G20 should commit to use modern technology and work with big tech companies, financial institutions and civil society wherever possible, to track IWT rings and sources of demand, shut down online marketplaces and social media accounts used to source and provide IWT products, identify the provenance of trafficked products, build traceability systems for endangered wildlife, support conservation efforts, and measure the impact of preventative measures to tackle wildlife trafficking (TRAFFIC n.d.).

**Align planetary issues with financial crimes:** The G20 should recognize and commit to combat ecocide, including by adding ecocide to domestic criminal codes. Wildlife crimes are driven by other environmental crimes, including illegal logging, sometimes referred to as ecocide or terracide. A holistic approach to addressing wildlife crimes is necessary (Terra Firmer n.d.).

## Scenario of Outcomes

There are three possible outcomes for the G20: (1) do nothing; (2) make symbolic statements; (3) prioritize tackling IWT.

With “do nothing” scenario, within our current lifetimes, the existential crisis of climate change combined with biodiversity loss leads to terracide, defined as the destruction of natural ecosystems. This would fuel conflicts as resource shortages that trigger severe food insecurity and famine resulting in fighting for survival.

With the “make symbolic statements” scenario, some G20 members may take domestic action. Any progress in tackling IWT, which remains a transnational crime, would be slow and localized and would have limited impact on disrupting transnational criminal networks.

With the “prioritize tackling IWT” scenario, the G20 could lead in producing effective global legal structures and standards for preventing, identifying, prosecuting and seizing IWT profits, which could disrupt trafficking networks and routes, and decrease the supply of goods and demand for them. Animals would be able to support the preservation of forests and ecosystems needed to fight climate change, and their peaceful co-existence with their human neighbours and communities could help restore peace in communities that have been affected by violence driven by efforts to meet IWT demand.

Potential trade-offs include the cost from reducing the income of poor people who must engage in IWT and IUU fishing in order to live. Options such as closing markets or restricting access to wildlife where trade is very localized or critical for livelihoods and subsistence present ethical dilemmas requiring careful consideration (Naidoo, Bergin and Vertefeuille, 2021). Compensating losses with direct payments or alternatives is a mitigating response.

The illegal wildlife trade itself deepens poverty and inequality, and threatens national and environmental security (Global Environmental Facility n.d.). By contrast, protecting wild animals and flora, and their sustainable and appropriate use or relationships with local communities, brings immense ecological, cultural and socioeconomic benefits that extend globally.

G20 leaders should consider the trade-offs and plan for them – especially unintended negative consequences for vulnerable wildlife, people and communities – in all the actions they take to combat IWT and IUU fishing.





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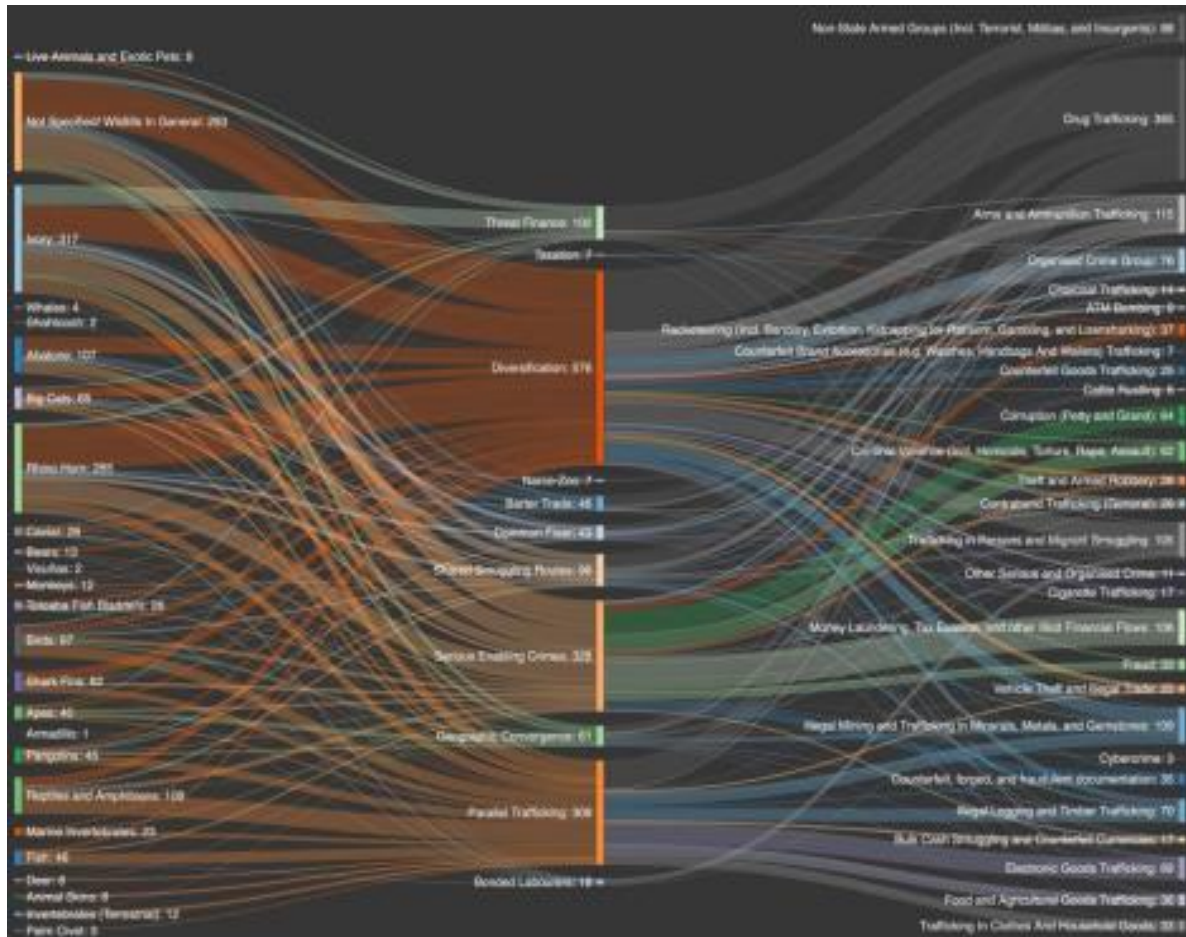
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## Appendix A: Types of Convergences between Illegal Wildlife Trade and Other Organized Crimes



Source: Anagnostou and Dobe, 2022.

**Appendix B: G20 Performance on Illegal Wildlife Trafficking and Illicit  
Unreported and Unregulated Fishing, 2008–2016**

Year	Words		Number of commitments		Number of dedicated documents
	Number	Percentage of total	Illegal Wildlife Trafficking	Illicit unreported and unregulated fishing	
2008–2016	0	0	0	0	0
2017 Hamburg	379	1.1%	3	3	1
2018 Buenos Aires	0	0	0	0	0
2019 Osaka	59	1.0%	1	0	0
2020 Riyadh	119	2%	1	0	0
2021 Rome	699	7%	6	1	0
2022 Bali	228	2%	2	0	0
2023 New Delhi	64	1%	1	0	0
Total	1,548	-	14	4	1
Average	81.5	13.1%	0.7	0.2	-

Notes: Number = number of words on illegal wildlife trafficking in G20 communiqués.

Percentage of total = percentage of words on illegal wildlife trafficking in G20 communiqués relative to all other subjects.



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