



Council of the
European Union

Brussels, 14 November 2022
(OR. en)

14718/22
ADD 2

ENV 1152
JAI 1459
CRIMORG 159
RELEX 1522
DEVGEN 204
COMER 137
EUROJUST 97
ENFOPOL 554
ENFOCUSTOM 165

COVER NOTE

From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

date of receipt: 9 November 2022

To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

No. Cion doc.: SWD(2022) 355 final

Subject: COMMISSION STAFF WORKING DOCUMENT EXECUTIVE SUMMARY OF THE EVALUATION of the EU action plan against wildlife trafficking Accompanying the document COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS Revision of the EU action plan against wildlife trafficking

Delegations will find attached document SWD(2022) 355 final.

Encl.: SWD(2022) 355 final



Brussels, 9.11.2022
SWD(2022) 355 final

**COMMISSION STAFF WORKING DOCUMENT
EXECUTIVE SUMMARY OF THE EVALUATION**

of the EU action plan against wildlife trafficking

Accompanying the document

**COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN
PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL
COMMITTEE AND THE COMMITTEE OF THE REGIONS**

Revision of the EU action plan against wildlife trafficking

{COM(2022) 581 final} - {SWD(2022) 354 final}

The EU action plan against wildlife trafficking (“2016 action plan”) was adopted in 2016, for the period 2016 to 2020. An initial review of implementation was undertaken in 2018¹. The evaluation was undertaken in the course of 2021-2022. More detail can be found in the support study.

The current evaluation covers action to combat illegal wildlife trade undertaken by the European Union and its Member States since the adoption of the 2016 action plan. It seeks to assess the 2016 action plan through evaluation of its effectiveness, efficiency, relevance, coherence and EU added value.

Due to the illegal nature of the activities, data on wildlife trafficking is neither widely available nor robust and complete. There is therefore a notable absence of a baseline against which to compare current action against wildlife trafficking as well as key measurable/performance indicators. Moreover, the action plan is broad and ambitious by its very design, encompassing a wide variety of actors and actions. Therefore, assessing achievements is challenging – especially due to the lack of a monitoring and evaluation framework. In addition, the 2016 action plan was adopted in the context of existing EU and Member State action against wildlife trafficking, seeking to raise ambitions and coordinate the existing efforts within the EU. Where new actions have been undertaken, it is impossible to prove that they would not have occurred without the Action Plan.

Taking these limitations into account, the evaluation drew on literature reviews, implementation reports, and a series of stakeholder consultations undertaken in 2021- 2022, to assess the coherence of efforts taken to address the illegal wildlife trade since 2016. The evaluation was used to inform the elaboration of the revised EU action plan against wildlife trafficking.

The evaluation found that there has been progress towards the implementation of the objectives of the action plan, leading to raising the profile and a strengthened response to illegal wildlife trade, as well as increased cooperation and coherence between Member States.

Due to the difficulties mentioned above, it was difficult to measure the cost efficiency of the action plan. Most of the actions, including projects, policy and legal initiatives, as well as outreach at the international level, did not come with dedicated funding and their results cannot be translated in economic terms. Even in case of EU funded projects, the actions listed in the action plan have often been implemented through contracts supporting wider environmental (e.g. biodiversity), enforcement (e.g. organized crime) and other goals. Moreover, in terms of measuring benefits, while the link between providing alternative, sustainable income to local populations and reducing poaching is well-established, there is little way to measure this impact directly. Many of the projects in third countries take a wide, community-based, approach within which action against wildlife trafficking is a constituting part rather than being the primary aim. Therefore, only general estimates are available.

The benefits generated by the action plan are also difficult to determine precisely. It is possible, however, to outline the potential benefits. Fighting the illegal wildlife trade contributes to preserving global biodiversity, which underpins all economic activity, and is presently worth an estimated 127 trillion EUR². In addition, the fight against the illegal

¹ European Commission, Directorate-General for Environment, *Study to support the Evaluation and Revision of the EU Action Plan against Wildlife Trafficking*, Publications Office, 2022.

² WWF, *Living planet report 2020: Bending the curve of biodiversity loss*, 2020.

wildlife trade contributes to strengthening rule of law, reducing threats to security, and is a key part of the fight against organized crime. The benefits of these issues are not easily quantifiable, and go beyond economics.

The analysis of the actions taken under each objective did not identify any contradiction, and it was possible to conclude that the action plan was internally consistent and coherent. While many actions against the illegal wildlife trade were occurring in the EU and Member States, and internationally, before its adoption, the action plan has proven to be a well-suited response to a need for an organized and coordinated response at an EU level. Coordination, funding and political prioritisation were key aspects where strong EU added value was noted.

Wildlife trafficking takes different forms in different Member States and requires adapted approaches to tackle the challenges at hand. However, coordination and cooperation between Member States is a key aspect as the EU is a single market, to ensure a common and level implementation of rules, and avoid loopholes in certain Member States being problematic for other Member States. In that sense, the illegal wildlife trade is to be tackled at the EU level, with a strong involvement of relevant authorities in the Member States. At the same time, the action plan was found to be sufficiently flexible to allow for Member States to prioritise actions that were most relevant to them, whether through the definition of a national action plan or through mechanisms that improve coordination and prioritisation of actions.

The comprehensive and ambitious nature of the action plan presented its own challenges. During consultations, the primary challenges to implementation identified by relevant stakeholders were the persistent lack of human and financial resources, and the wide-ranging scope of the action plan. Member States often lacked the time and staff to implement actions and faced difficulties in coordinating action between different authorities and actors, especially at the national level. The problem of lack of resources and coordination was found across the entirety of the action plan, but also notably when it came to reporting.

The action plan has been a crucial tool to coordinate the many aspects of the fight against wildlife trafficking and to raise the profile of this fight at Member State level and within the EU. While it is complicated to assess the extent to which the progress is attributable to the action plan itself, it speaks to the success of its approach as a comprehensive framework to tackle the fight against wildlife trafficking in the EU and its Member States. As the illegal wildlife trade remains an important threat to biodiversity and security both worldwide and the EU, the action plan remains an important and relevant tool to address it.