

The background of the page is a solid green color. In the center, there are two overlapping silhouettes: a larger one of a dog's head and neck, and a smaller one of a cat's head and neck, both facing right. The silhouettes are a slightly darker shade of green than the background. The bottom right corner of the page features a subtle grid pattern.

## **Communication on an EU Strategy to tackle organised crime (2021-2025): the need to include illegal animal trade**

Policy Briefing  
April 2021

## Summary

As the pan-European animal advocacy organisation, the primary focus of Eurogroup for Animals is to improve the well-being of as many animals as possible and defend animals' interests. We represent 72 non-governmental organisations from all over Europe.

**Eurogroup for Animals welcomes the European Commission's initiative introducing the EU strategy for 2021-2025 to fight organised crime.** With the present submission, we would like to point out the need of including the illegal animal trade within the scope of the upcoming strategy.

The illegal animal trade is a booming industry rife with cases of consumer fraud, tax evasion, biosecurity concerns and animal abuse. The convergences between animal trafficking and other forms of transnational organised crime have been very well-established. The EU and Member States must take action to curb this serious form of organised crime, as it threatens European citizens, public health and the Single Market.

**Eurogroup for Animals advocates for the European Commission to:**

1. **Acknowledge transnational illegal trade of animals** in the Communication on an EU Strategy to tackle organised crime (2021-2025)
2. **Establish an EU taskforce** to tackle the cross-border illegal trade of animals and **ensure funding for enforcement projects** under the European Regional Development Fund and Internal Security Fund to **encourage close cooperation** between EU Member States, Europol, Eurojust and all the other relevant stakeholders
3. **Establish harmonised and dissuasive fines** to sanction animal trafficking, in proportion to the gravity of the offense
4. Link the **EU Strategy to tackle organised crime (2021-2025)** with the **EU Action Plan against Wildlife Trafficking**, the new post-2020 Action Plan and the revision of the **Environmental Crime Directive**

## Background

The United Nations Convention on Transnational Organized Crime (UNTOC) defines an **'organized criminal group'** as **“a group of three or more persons existing over a period of time acting in concert with the aim of committing crimes for financial or material benefit”**.

However, Europol acknowledges that modern networks involved in organised crime surpass this definition, thus it is not adjusted to the modern reality.

According to Europol, almost half of the organised crime groups operating in the EU are involved in more than one criminal activity. As the illegal pet and wildlife trade carries **low risks and high profits**, it serves either as a diversification of income sources for organised crime groups, or as a main activity. Largely controlled by highly organised criminal structures, this **multimillion euro industry** clearly falls under the definition of organised crime, and must be addressed accordingly. Estimates of the value of wildlife trafficking alone reach up to EUR 8 billion to EUR 20 billion annually.

Amongst other things, the EU Biodiversity Strategy for 2030 will encompass the revision of the Environmental Crime Directive, as well as the renewal of the EU Action Plan against Wildlife Trafficking. Both of these EU policy initiatives are highly relevant to tackling organised crime.

Animals illegally traded are often subject to immense suffering, and as 74% of Europeans believe the welfare of companion animals should be better protected than it is now, it is clear that this issue is of great importance to European citizens. Furthermore, The EU Security Union Strategy emphasises the need to tackle emerging threats and the importance of acknowledging the complex nature of organised crime. It is evident that **illegal animal trade plays an important role in the network of criminal activities**.

## Companion animals

Until now, any focus on the criminal pet trade has concentrated on the animal welfare and consumer fraud aspects, but today it has become clear that **illegal animal trade is structured and organised by criminal elements**.

Member States recognize the need to join forces to tackle this increasingly pressing problem and point to long-term solutions for the sake of protecting European citizens and the Single Market. Similar to the fight of central and local governments against drug trade and human trafficking, combatting pet trade controlled by criminal gangs must be assisted by **mechanisms of support at the EU level**.

The European Commission has **no central database** on numbers of dogs in the EU or, unlike farm animals, a centralised method of identifying and tracking the movement of those dogs. As government data is so poor on the legal trade, we are reliant on other sources such as non-governmental data to estimate that **8 million dogs are required annually with a value of €1 billion** to satisfy the European market (although some sources estimate the value at levels as high as €3 billion). Preliminary work shows that governments are **losing large amounts of tax revenue from illegal trade driven by organised criminal formations**, and that the trade reacts quickly to any enforcement of rules or other changes in the marketplace. Data showed that substantial amounts of revenue can be reclaimed from those illegally trading pets (in the UK, £5.3 million from 257 cases over a four-year period) and unpaid taxes together with profits from illegal activities can fuel other criminal operations. However, the suspects caught are merely the most minor actors of the criminal operations, as fines are not dissuasive enough.

To effectively fight this criminal activity, competent authorities must prioritise resources across all the illegal trade activities. As pet traders traffic across multiple countries and are often based in countries other than the final destination of the animals (pets tend to be

## Companion animals

bred in eastern Europe, but are sold to northern European markets at a significant margin - the cost of breeding a puppy can be as low as 25 EUR while the market price could easily reach 1000-2000 EUR) **international cooperation is required**.

## Threats

1. Illegal pet trade fulfills all the potential requirements to be linked to other organised criminal activities, such as drug or human trafficking.
2. Biosecurity concerns including [bioterrorism](#). Pets can be used as bioweapons - inconspicuous carriers of disease are capable of inflicting serious damage on the public health sector, and as a result, destroy economies. Increased transmission of pathogens among animals can result in widespread health crises impacting wildlife, pets and farm animals.
3. [Health of consumers](#) at risk. Rabies, a lethal zoonosis causing [59 000 deaths globally](#) each year, is becoming more prevalent in countries such as the Netherlands or France due to the influx of unvaccinated puppies from Eastern European countries. Other risks include parasitic and bacterial infections with severe implications for human health, such as intestinal worm infestations and alveolar echinococcosis caused by *Echinococcus multilocularis*.
4. [Consumer fraud](#) and violations of import [rules](#). The pet's health status, country of origin, vaccination status, breed and even [existence](#) can all be falsely presented to the consumer.

## Recommendations

### Recommendations for the EC communication on the EU strategy to tackle organised crime (2021-2025)

1. **Implement an EU taskforce** to tackle the cross-border illegal pet trade with formal representation from each EU Member state and non-EU State representation (agencies and organizations such as Europol and [Eurojust](#), [Interpol](#), [the World Customs Organisation](#) should be included). This task force would be a permanent body to centralise information exchange, ensure operational coordination by developing and executing national multi-agency operations, and offer and undertake training. The [NEST](#) and [Biocrime](#) models could be examined.
2. Other **enforcement projects should be funded** under the European Regional Development Fund and Internal Security Fund based on the Biocrime model at key borders crossed by the pet trade using the links between animal and human health and the 43 International Police Cooperation Centres.
3. **Closer cooperation** between Member States and with the aforementioned agencies and organizations is encouraged.

## Wildlife

Wildlife trafficking is one of the [most profitable forms](#) of transnational crime along drug, human and arms trafficking. The highly organised criminal activity poses a risk to [biosecurity](#), [biodiversity](#), wildlife conservation, and is a major animal welfare concern. [Interpol](#) reports the **links of wildlife trafficking to other serious criminal activities** and points to the low-risk and high-profit ratio as a major driver of environmental crime, stating that 60% of surveyed countries recognised a growing sophistication and adaptation to environmental crimes committed by transnational organised crime groups.

Controlling and eradicating invasive alien species, treating people for [zoonotic diseases](#), fighting against illegal trade and culling thousands of farm animals in order to prevent the spread of illness, are all direct consequences of **absent or inadequate laws and regulations on exotic pet trade**. In recent years, the growing trend for exotic pet keeping includes an increasing range of species on sale that are caught in the wild elsewhere around the globe, and the commercial trade in captive-bred wild animals.

### **Recommendations for the EC communication on the EU strategy to tackle organised crime (2021-2025)**

1. The EU strategy to tackle organised crime (2021-2025) should be **linked with the forthcoming revision of the [EU Action Plan against Wildlife Trafficking](#)**, the new post-2020 Action Plan and the **revision of the Environmental Crime Directive**
2. Preventive **legislation under the form of an EU Positive List of allowed exotic pet species must be adopted** to tackle commercial trade in critically endangered species, and facilitate enforcement against wildlife trafficking
3. Wildlife crime should be acknowledged as a serious form of organised crime and **proportionate and dissuasive penalties** need to be adopted at EU level



# EUROGROUP FOR ANIMALS

© Eurogroup for Animals, April 2021

Eurogroup for Animals

Rue Ducale 29 – 1000 Brussels

Tel: +32 (0)2 740 08 20

[info@eurogroupforanimals.org](mailto:info@eurogroupforanimals.org)

[eurogroupforanimals.org](http://eurogroupforanimals.org)