



# THE ROLE OF FRANCE IN WILDLIFE TRADE

AN ANALYSIS OF CITES TRADE AND SEIZURE DATA

Joint  
report  
with

**TRAFFIC**  
the wildlife trade monitoring network



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\* TRAFFIC (2018) TradeMapper – a tool for visualising trade data. Available at [www.trademapper.co.uk](http://www.trademapper.co.uk)

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Légende: Common flower Lowland areas of West Papua, Indonesia (former Irian Jaya) -  
Orchidée commune des plaines de Papouasie occidentale, Indonésie

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# ABBREVIATIONS AND ACRONYMS

<b>AC</b>	CITES Animals Committee
<b>BPD</b>	Bodies, parts and derivatives
<b>CEN</b>	Customs Enforcement Network
<b>CITES</b>	Convention on International Trade in Endangered Species of Wild Fauna and Flora
<b>COM</b>	Collectivité d'outre-mer (overseas collectivities)
<b>CoP</b>	Conference of the Parties
<b>CTC</b>	Centre Technique du Cuir (Technical Centre for Leather)
<b>CU</b>	Collectivité unique (Unique administration)
<b>DAVAR</b>	Direction des affaires vétérinaires, alimentaires et rurales (Directorate for Veterinary, Food and Rural Affairs)
<b>DCPN</b>	Direction de la Conservation du Patrimoine Naturel (Directorate for the Natural Heritage Conservation)
<b>DEAL</b>	Direction de l'environnement, de l'aménagement et du logement (Directorate for the Environment, Local Planning and Housing)
<b>DRC</b>	Democratic Republic of the Congo
<b>DREAL</b>	Directions régionales de l'environnement, de l'aménagement et du logement (Regional Directorate for the Environment, Local Planning and Housing)
<b>DRIEE-IF</b>	Direction régionale et interdépartementale de l'environnement et de l'énergie en Ile-de-France (Regional and Interdepartmental Directorate for the Environment and Energy in Ile-de-France)
<b>DROM</b>	Département et région d'outre-mer (overseas department and region)
<b>DTAM</b>	Direction des territoires, de l'alimentation et de la mer (Directorate for Territories, Food and the Sea)
<b>ESA</b>	Endangered Species Act (USA)
<b>EU</b>	European Union
<b>EU-TWIX</b>	European Union Trade in Wildlife Information eXchange
<b>EC</b>	European Commission
<b>FAO</b>	Food and Agriculture Organization of the United Nations
<b>FO</b>	France overseas
<b>IUCN</b>	International Union for Conservation of Nature
<b>MTES</b>	Ministère de la Transition Ecologique et Solidaire (Ministry for the Environment)
<b>NGO</b>	Non-governmental organisations
<b>OCLAESP</b>	Office central de lutte contre les atteintes à l'environnement et à la santé publique (Central Office for combating environmental and public health-related crimes)
<b>OCT</b>	Overseas countries and territories
<b>OFB</b>	Office Français de la Biodiversité (French Office for Biodiversity)
<b>ONCFS</b>	Office national de la chasse et de la faune sauvage (National Hunting and Wildlife Office)
<b>OR</b>	Outermost region
<b>RILO WE</b>	Regional Intelligence Liaison Office for Western Europe
<b>SAR</b>	Special administrative region (Hong Kong SAR)
<b>SRG</b>	Scientific Review Group
<b>UAE</b>	United Arab Emirates
<b>UN</b>	United Nations
<b>UNEP-WCMC</b>	United Nations Environment Programme World Conservation Monitoring Centre
<b>US, USA</b>	United States of America
<b>UK</b>	United Kingdom
<b>WCO</b>	World Customs Organisation



# DEFINITIONS

- CITES SPECIES OR CITES SPECIMENS** any species or specimen of a species of fauna or flora listed in Appendices I, II or III of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) or, when used in the European context, any species listed in Appendices A, B, C or D of the European regulations governing trade in species of wild fauna and flora.
- CITES TRADE** any exchange within the scope of CITES, whether or not it is carried out for commercial purposes.
- COUNTRY OF DESTINATION** country into which the specimen is/should be legally or illegally imported, which is not always the country of final consumption.
- COUNTRY OF EXPORT** country from which the specimen is legally or illegally exported, which may be the same or different from the country of origin. It can also be identified as “country of departure”.
- COUNTRY OF ORIGIN** country in which a specimen was collected, artificially propagated or bred.
- ILLEGAL TRADE IN WILDLIFE** any export, re-export, import and introduction from the sea of specimens of CITES-listed species carried out in breach of the law in force.
- INTERNAL (SEIZURE)** specimens seized within the national territory (e.g. for production, possession, transfer with or without payment, use, transport, etc. in contravention of the legislation in force) and which were not, at the time of their seizure, subject to international trade.
- IVORY** in this report, the word “ivory” only stands for “elephant ivory”.
- NET EXPORTER** a country that has exported more goods than it has imported, over a given period of time.
- NET IMPORTER** a country that has imported more goods than it has imported, over a given period of time.
- TRANSIT COUNTRY** intermediate country on the planned or completed transport route.
- SEIZURE RECORDS** seizures which were divided per species concerned (for instance, a seizure of 3 elephant ivory jewellery and two Gabonese grey parrots will be separated into two seizure records: one record of African elephant specimens, on the one hand, and one record of the two Gabonese grey parrots, on the other hand).
- SPECIMEN** any animal or plant, living or dead, as well as any part (bones, skins, claws, teeth, etc.) or derivatives (leather goods, cosmetic or medicinal products, etc.) obtained from that animal or plant.
- WILDLIFE TRADE** any export, re-export, import and introduction from the sea of specimens of wild fauna or flora protected by CITES, whether or not it is carried out for commercial purpose.

# EXECUTIVE SUMMARY

The European Union (EU) is an important player in the international legal and illegal wildlife trade and is known to be a major destination market and trade hub for wildlife and their commodities, including species listed on the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Being one of the largest economies in the EU, France plays a crucial role in legal and illegal wildlife trade in the EU. France also has 12 overseas territories scattered from the subarctic (Saint-Pierre and Miquelon) to the Antarctic (Terre Adélie), through the tropical zones of the three largest oceans, which makes the country a host to a remarkable biological diversity and endemism. Being a CITES Party since 1978, France bears a responsibility in ensuring that trade in wild species is sustainable, legal and traceable, not only as an importer and re-exporter, but also as a range state for various wild species.

The aim of this report is to provide an assessment of the current state of France's legal and illegal trade in CITES-listed species for the period 2008 to 2017 so as to offer insights into the key commodities in trade, trends and main trading partners involved in order to encourage France's effort to fight further against wildlife crime. Data sources used include CITES trade data reported by France and other EU Member States, European Union Trade in Wildlife Information eXchange (EU-TWIX) seizure data, US CITES seizure data implicating France, and TRAFFIC's global seizure database containing seizure information from open sources.

CITES trade data between 2008 and 2017 indicated France was a main importing/destination country of wildlife commodities for the EU market, and (re-)export point to outside the EU; importer and re-exporter of live plants and plant products, reptile products, importer of corals, Queen Conch meat and medicinal leeches, and (re-)exporter of sturgeons and paddlefish specimens. The main trading partners varied depending on the commodities.

Among the various CITES-listed specimens seized in metropolitan France between 2008 and 2017, which totalled 3,342 seizure records according to EU-TWIX, the main commodity groups seized were elephant ivory, live reptiles, mammals (live mammals and mammal bodies, parts and derivatives), bird bodies, parts and derivatives by number of seizure records. The seizures were mainly carried out internally and on import while the main direction of trade and trading partners involved varied considerably depending on the commodity groups/species. It should be noted that any trends in illegal trade observed may in part be due to varying enforcement efforts and priorities over time, instead of shifts in demand or changes in illegal trade patterns.

Airports were the main location of seizures in France between 2008 and 2017, involving 813 seizure records involving 113,615 specimens and an additional 4,359 kg. Paris-Charles de Gaulle Airport was confirmed as the main airport of those seizures, with elephant ivory and reptile bodies, parts and derivatives being the main commodity groups. In contrast, seizures at mail centres and maritime ports seem to have been less frequent in France during the period.

Illegal wild meat trade is one of the areas which warrant further attention by the French authorities. The analysis of seizure data indicated seizures of wild meat in France between 2008 and 2017 were relatively low while most of them were transported from Central African countries and seized at airports on import as the previous studies suggested. Seizures of wild meat could be underreported as wild meat tends to be destroyed before species identification is made even if the specimen is CITES-listed species. With increasing human health concerns about pathogens as well as conservation, increased enforcement effort on shipments coming from Africa entering French airports are warranted.

**The EU is a market and a critical transit point for the legal and illegal trade in wild species**

**3342**

**is the number of seizure records involving metropolitan France between 2008 and 2017**



In terms of imports of CITES-listed species into France overseas (FO), those into the France outermost regions were reportedly much higher than those into the France overseas countries and territories between 2008 and 2017. Live orchids were the main commodity imported into both the France outermost regions and France overseas countries and territories by number of specimens while Queen Conch meat was the main commodity imported into the France outermost regions by weight. In addition, France overseas were implicated in a total of 217 seizure records reported by France in the EU-TWIX database between 2008 and 2017, most of which were related to the France Outermost Regions. Both CITES trade data and seizure data suggest that Queen Conch is a very important species for France overseas especially for Martinique, Guadeloupe and Saint Martin, all in the Caribbean, confirming a previous study (Prada et al., 2017) indicating demand for Queen Conch meat in the region.

**Key recommendations of the report include:**

- **National co-operation:** Co-operation, co-ordination and communication between all CITES authorities in France, including prosecutors, at all relevant institutional and policy levels, and national and regional levels (including France Overseas) should be given a higher priority in France to strengthen their operational work.
- **Law enforcement at airports:** additional resources should be dedicated to combatting the illegal wildlife trade in Paris-Charles de Gaulle Airport and engage with the private sector to ensure that aviation/airport personnel are aware of the risks of illegal wildlife trade.
- **Further research:** Further research should be conducted to better understand the extent of and the demand for wild meat in France and develop and implement actions accordingly to cope with the illegal wild meat trade.
- **Awareness raising:** Awareness should be increased among consumers, passengers (air, maritime, etc.), transport companies and their staff regarding rules for purchasing and consuming products containing CITES-listed species, and their transportation across borders. Careful attention should be accorded to the transportation of wild meat considering its potential health risks.
- **Improved reporting:** Tools for data reporting and information sharing on legal and illegal wildlife trade (such as EU-TWIX) need to be documented in as much detail as possible, in particular to foster dissemination of good practices and cooperation between enforcement agencies.

# RÉSUMÉ EXECUTIF

L'Union européenne (UE) est un acteur important dans le commerce légal et illégal d'espèces sauvages à l'échelle internationale. Elle est notamment identifiée comme un marché ainsi que comme une zone de transit importante pour les espèces sauvages, leurs parties et les produits qui en sont issus, y compris pour celles qui sont protégées par la Convention sur le commerce international des espèces de faune et de flore sauvages menacées d'extinction (CITES).

Figurant parmi les principaux acteurs économiques européens, la France joue un rôle clé dans le commerce légal et illégal d'espèces sauvages dans l'UE. Par ailleurs, la France comptant douze territoires d'outre-mer dispersés du subarctique (Saint-Pierre et Miquelon) à l'Antarctique (Terre Adélie), en passant par les zones tropicales des trois grands océans, elle abrite une diversité biologique et un endémisme remarquables. En tant que Partie à la CITES depuis 1978, la France a donc la responsabilité de veiller à ce que le commerce d'espèces sauvages soit durable, légal et traçable, non seulement en tant qu'importateur et (ré)exportateur, mais également en tant qu'État de l'aire de répartition de nombreuses espèces sauvages.

L'objectif de ce rapport est de présenter un état des lieux du commerce légal et illégal des espèces sauvages inscrites à la CITES ayant impliqué la France pour la période 2008-2017, permettant d'identifier les principales marchandises échangées, les éventuelles évolutions et les principaux partenaires commerciaux impliqués, afin de soutenir la France dans son engagement de lutter contre la criminalité liée aux espèces sauvages. Les données utilisées dans ce rapport proviennent de différentes sources: les données du commerce CITES rapportées par la France et les Etats membres de l'UE, la base de données EU-TWIX<sup>1</sup> (*European Union Trade in Wildlife Information eXchange*), les données rapportées par les Etats-Unis d'Amérique à la CITES pour des saisies impliquant la France, et la base de données mondiale de TRAFFIC contenant des informations sur les saisies provenant de sources libres d'accès.

Les données sur le commerce CITES entre 2008 et 2017 indiquent que la France est l'un des principaux importateur/pays de destination pour des produits issus d'espèces sauvages destinés au marché européen, et l'un des principaux points de sortie pour les (ré)exportations vers des pays tiers à l'UE. La France est un importateur et un (ré)exportateur de plantes vivantes et de produits végétaux et de produits de reptiles, un importateur de coraux, de viande de lambis et de sangsues médicinales, et un (ré)exportateur de spécimens d'esturgeons et de poissons-spatules. Les principaux partenaires commerciaux varient en fonction des marchandises.

De 2008 à 2017, 3 342 enregistrements de saisie réalisés en France métropolitaine ont été référencés dans EU-TWIX. Parmi les différents spécimens d'espèces inscrites à la CITES saisis en France au cours de cette période, les principaux spécimens saisis étaient l'ivoire d'éléphant, les reptiles vivants, les mammifères (vivants et leurs corps, parties et produits) et les corps, parties et produits d'oiseaux, en nombre d'enregistrements de saisie. Les saisies ont été principalement réalisées en interne et à l'importation, tandis que la direction du commerce et les principaux partenaires commerciaux impliqués varient fortement selon les groupes de marchandises ou les espèces saisis. Il convient de souligner que toute tendance observée en matière de commerce illégal peut être liée, en partie, à des efforts dans l'application des lois et à des priorités qui peuvent varier au fil du temps, plutôt qu'à des évolutions de la demande ou à des modifications des formes du commerce illégal.

Les aéroports ont été le principal lieu des saisies réalisées en France entre 2008 et 2017, avec 813 enregistrements de saisie portant sur 113 615 spécimens et 4359 kg supplémentaires. L'aéroport de Paris-Charles de Gaulle est identifié comme le principal aéroport français où ont eu lieu ces saisies, qui ont notamment porté sur de l'ivoire d'éléphant et des corps, parties et produits de reptiles. Les saisies dans les centres postaux et les ports maritimes semblent avoir été peu fréquentes en France au cours de la période.

**L'UE: un marché et une zone de transit importante pour le commerce légal et illégal d'espèces sauvages**

**3342**

**c'est le nombre d'enregistrements de saisie impliquant la France métropolitaine entre 2008 et 2017**

<sup>1</sup> - Plateforme d'échange d'informations sur le commerce illégal d'espèces sauvages dans l'Union européenne



Le commerce illégal de viande d'espèces sauvages représente également l'une des problématiques nécessitant davantage de prise en compte par les autorités françaises.

L'analyse des données relatives aux saisies indique en effet que celles relatives à de la viande d'espèces sauvages entre 2008 et 2017 ont été relativement faibles en France alors que la marchandise était principalement transportée depuis les pays d'Afrique centrale et saisie à l'importation dans les aéroports, comme le démontraient de précédentes études. Les saisies de viande d'espèces sauvages pourraient être sous-estimées car la viande est généralement détruite avant l'identification de l'espèce, même lorsqu'il pourrait s'agir d'une espèce inscrite à la CITES. Du fait des préoccupations croissantes concernant la conservation des espèces et les risques que présentent certains agents pathogènes pour la santé humaine, un renforcement des efforts de contrôle des marchandises entrant en France depuis l'Afrique via les aéroports français est recommandé.

En ce qui concerne les importations d'espèces inscrites à la CITES dans les outre-mer françaises entre 2008 et 2017, celles réalisées par les régions ultrapériphériques (RUP) françaises sont beaucoup plus élevées que celles réalisées par les pays et territoires d'outre-mer (PTOM). Les orchidées vivantes étaient la principale marchandise importée tant par les RUP que par les PTOM, en nombre de spécimens, tandis que la viande de lambi était la principale marchandise importée dans les RUP, au poids. Par ailleurs, les outre-mer françaises ont été impliquées dans un total de 217 enregistrements de saisie rapportées par la France dans la base de données EU-TWIX entre 2008 et 2017, dont la plupart concernaient les RUP. Les données relatives au commerce CITES et aux saisies de spécimens d'espèces CITES suggèrent que le lambi est une espèce particulièrement importante pour les outre-mer françaises, en particulier pour la Martinique, la Guadeloupe et Saint-Martin, toutes situées dans les Caraïbes, ce qui confirme une précédente étude (Prada et al., 2017) qui faisait état d'une demande pour la viande de lambi dans cette région.

**Sur la base des résultats présentés dans ce rapport, plusieurs recommandations ont été formulées, dont notamment:**

- **Coopération nationale:** une plus grande priorité devrait être accordée à la coopération, la coordination et la communication entre toutes les autorités CITES en France, y compris les procureurs, à tous les niveaux institutionnels et politiques pertinents, aux niveaux national et régional (y compris avec les outre-mer françaises), afin de renforcer leur travail opérationnel;
- **Application de la loi dans les aéroports:** des ressources supplémentaires devraient être consacrées à la lutte contre le commerce illégal d'espèces sauvages à l'aéroport de Paris-Charles de Gaulle et à la mobilisation du secteur privé pour s'assurer que le personnel du secteur aérien est conscient des risques liés au commerce illégal d'espèces sauvages;
- **Poursuivre les recherches:** des recherches supplémentaires devraient être menées pour mieux comprendre l'ampleur et la demande de viande d'espèces sauvages en France ; et des actions devraient être mises en œuvre pour limiter le commerce illégal de viande d'espèces sauvages ;
- **Sensibilisation:** La sensibilisation des consommateurs, des passagers (aériens, maritimes, etc.), les entreprises de transport et leur personnel sur les règles d'achat et de consommation des produits contenant des espèces inscrites à la CITES, ainsi que sur les modalités de leur transport international, doit être accrue. Une attention particulière doit être accordée au transport de viande d'espèces sauvages, compte tenu des potentiels risques sanitaires associés ;
- **Amélioration des rapports:** Les outils de rapportage de données et de partage d'informations relatives au commerce légal ou illégal d'espèces sauvages (tels que EU-TWIX) doivent être renseignés de la manière détaillée possible, notamment pour favoriser la diffusion des bonnes pratiques et la coopération entre agences de contrôle.

# 1. INTRODUCTION







Green turtle *Chelonia mydas* and fish swimming near Santa Cruz, Galapagos Islands, Ecuador

# 1.1 General context

Annually, international wildlife trade is estimated to be worth billions of euros and to involve hundreds of millions of plant and animal specimens. The trade is diverse, ranging from live animals and plants to various types of wildlife products derived from them, including food products, leather goods, musical instruments, timber, tourist curios and medicines. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is an international agreement to ensure that international trade in specimens of wild animals and plants does not threaten their survival, which came into force in 1975 and as of March 2020 has 183 Parties (including the European Union (EU) and all EU Member States). As the EU has the single market which allows the free movement of goods internally, CITES is regulated uniformly in all EU Member States through a set of regulations, the so-called EU Wildlife Trade Regulations<sup>2</sup>.

The EU is an important player in the international legal and illegal wildlife trade and is known to be a major destination market and trade hub for wildlife and commodities thereof (EC, 2016a). According to the latest financial valuation of the EU's legal trade conducted in 2017, the financial value of EU's imports of CITES-listed animals (excluding caviar extract due to their disproportionately high values) was estimated at approximately EUR 1.5 billion with top imported wildlife products by value being reptile small leather products, reptile skins, caviar and live long-tailed macaques. (Re-)exports of animal species exceeded this value, totalling approximately EUR 2.6 billion in 2017 with most of the estimated value being reptile small leather products, reptile skins and live falcons (UNEP-WCMC, 2019). For plants, the EU imported the value of EUR 241 million and (re-)exported a value of EUR 262 million (UNEP-WCMC, 2019). According to seizure data reported to EU-TWIX<sup>3</sup>, approximately 9% of seizure records reported in EU-TWIX in 2018 provided an estimated value of the commodities seized by the EU member states, which totalled EUR 2.3 million, more than the EUR 1.8 million reported in 2017 (10% of the seizure records reported a value in 2017) (TRAFFIC, 2020).

Being one of the largest economies in the EU, with about 67 million inhabitants (Eurostat, 2020), France plays a crucial role in legal and illegal wildlife trade in the EU. France has been one of the main EU Member States which reports seizure records over the last few years, particularly as a destination and transit point (Mundy-Taylor, 2013; TRAFFIC, 2020). Illegal trade tends to follow major trade routes for legal goods, concentrating on major airports (Sina et al., 2016) including Paris-Charles de Gaulle Airport, which is one of the largest European airports both for transporting passengers and for its freight and mail centre in 2018 (Eurostat, 2019). A study (Chaber et al., 2010) identified Paris-Charles de Gaulle Airport as an important trade hub for wild meat from Africa.

France also has 12 overseas territories scattered from the subarctic (Saint-Pierre and Miquelon) to the Antarctic (Terre Adélie), through the tropical zones of the three largest oceans, which makes the country a host to a remarkable biological diversity and being present in five of the 36 biodiversity hotspots (IUCN French Committee, 2005). For example, more than 1,500 vertebrate species and 5,500 vascular plant species are recorded in French Guiana (Direction de l'Environnement, de l'Aménagement et du Logement, 2011; IUCN French Committee, 2017) while 76% of species of flora are endemic to New Caledonia (WWF France, 2020). France, therefore, also has an important responsibility in ensuring that the use of wild species is well regulated to reverse the current loss of biodiversity.

**Millions of plant and animal specimens worth billions of euros are internationally traded every year**

<sup>2</sup> - Including Council Regulation (EC) No 338/97 on the protection of species of wild fauna and flora by regulating trade therein (the Basic Regulation), Commission Regulation (EC) No 865/2006 (as amended) laying down detailed rules concerning the implementation of Council Regulation (EC) No 338/97 (the Implementing Regulation) and Commission Implementing Regulation (EU) No 792/2012 of 23rd August 2012 laying down rules for the design of permits, certificates and other documents provided for in Council Regulation (EC) No 338/97 on the protection of species of wild fauna and flora by regulating the trade therein and amending Regulation (EC) No 865/2006 (the Permit Regulation)

<sup>3</sup> - European Union Trade in Wildlife Information eXchange

## INTRODUCTION

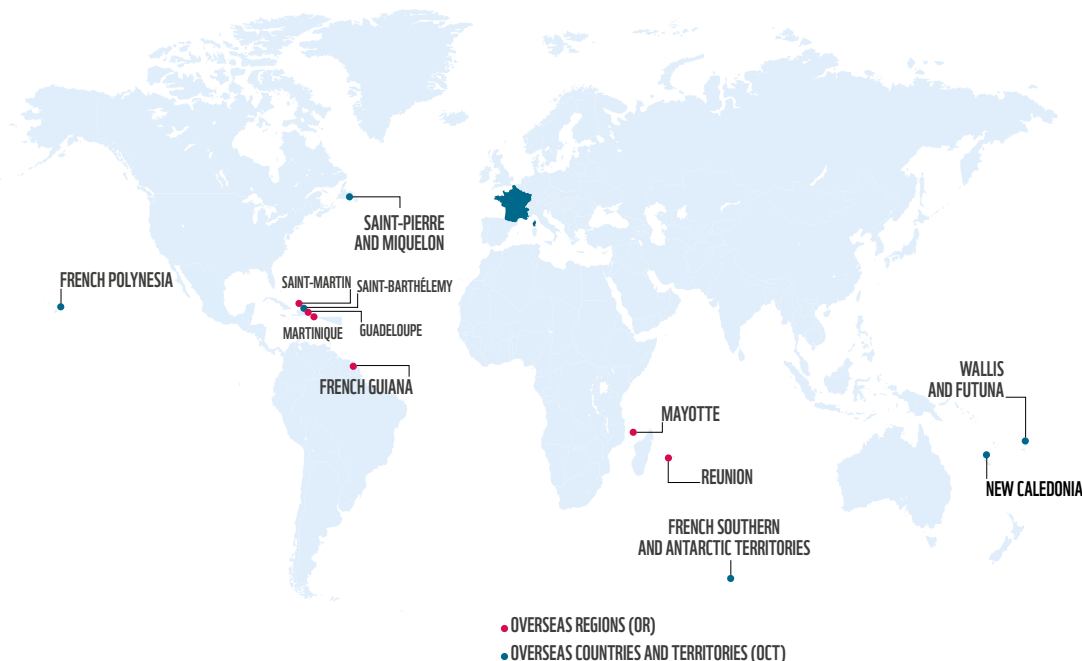
In February 2016, the European Commission adopted the “EU Action Plan against Wildlife Trafficking 2016–2020”, to demonstrate political commitment to improve enforcement of relevant legislation, enhance co-operation and to take measures to prevent illegal wildlife trade (EC, 2016a). France’s efforts to combat illegal wildlife trade in recent years include adoption of restrictions governing ivory trade in 2016 that go beyond the EU Wildlife Trade Regulations, participating in international/regional enforcement operations and supporting capacity building in countries mainly in Africa (Anon., 2018a).

These efforts are vital, but there remain concerns that current initiatives are not sufficient, and more could be done to halt the devastating impact of wildlife crime. A good understanding of the dynamics of the legal and illegal wildlife trade related to France will enable decision-makers to prioritise actions, taking into consideration the relative importance of species imported, (re-)exported and seized into/from/in France and trading partners. This report provides an assessment of the current state of France’s legal and illegal trade in CITES-listed species for the period 2008 to 2017 to provide insight into the key commodities in trade, prevailing trends and main trading partners involved in order to encourage France’s effort to fight against wildlife crime further.

**Illegal wildlife trade is still a major threat for some populations of wild species of fauna and flora**

## 1.2 CITES implementation in France

France is composed of metropolitan France and 12 overseas territories (hereafter referred to as France overseas) (Figure 1) which have different status in terms of degrees of legal and administrative autonomy<sup>4</sup>. Under the EU framework, those territories are divided into two categories: the outermost regions (OR), which are part of the EU even though geographically distant from the continent, and the overseas countries and territories (OCT), which are linked to EU Member States but are not part of the EU territory. For those categorised as outermost regions, EU legislation is directly and fully implemented while EU legislation is not implemented directly in the overseas countries and territories and localised application is required. The list of France overseas is shown in Table 1.



**Figure 1: Map of France overseas**  
Source: Kolodziejski (2018)

<sup>4</sup> - Clipperton Island is also part of the French territory but is permanently uninhabited. It is thus not covered by this analysis of commercial trade and seizures involving CITES-listed species.



## INTRODUCTION

In order to comply with CITES, all Parties must designate one or more Management Authorities and Scientific Authorities. In France, a specific department of the Ministry of the Environment (Ministère de la Transition écologique et solidaire – MTES) is the CITES Management Authority and the National Museum of Natural History (Muséum national d'histoire naturelle) is designated as Scientific Authority, except for New Caledonia where the Research Institute for Development (Institut de recherche pour le développement), based in Noumea, is the designated Scientific Authority. However, France being a decentralised country, local authorities have jurisdiction over CITES-related procedures as local Management Authorities as below e.g. issuance of CITES permits.

**Metropolitan France (13 Management Authorities in total):** the “Directions régionales de l'environnement, de l'aménagement et du logement” (DREAL – Regional directorate for the Environment) and the “Direction régionale et interdépartementale de l'environnement et de l'énergie en Ile-de-France” (DRIEE-IF – Regional directorate for the Environment and Energy) for the Paris area only;

**France outermost regions (one Management Authority for each):** the “Directions de l'environnement, de l'aménagement et du logement” (DEAL – Directorate for the Environment);

**France overseas countries and territories (one Management Authority for each)**

- French Polynesia: the Haut-Commissioner for the Republic;
- French Southern and Antarctic Territories: the “Direction de la Conservation du Patrimoine Naturel” (DCPN – Directorate for the Natural Heritage Conservation);
- New Caledonia: the “Direction des affaires vétérinaires, alimentaires et rurales” (DAVAR – the Directorate for Veterinary, Food and Rural affairs);
- Saint-Barthélemy and Saint Martin: local units from the Guadeloupe authority;
- Saint-Pierre and Miquelon: la “Direction des territoires, de l'alimentation et de la mer” (DTAM – the Directorate for Territories, Food and the Sea); and
- Wallis-and-Futuna: the local Senior Administration.

Regarding law enforcement, three main authorities have shared jurisdictions over CITES-related matters in France.

- **The French Customs** have jurisdiction to control international trade (i.e. imports, exports and goods in transit) and to fight fraud and transnational trafficking by intervening at borders and on all the national territory;
- **The French Office for Biodiversity (Office Français de la Biodiversité, OFB)**, which is composed of environmental inspectors, has a specific unit dedicated to CITES-related issues (called “CITES-capture”) which is in charge of monitoring of the trade of protected species in France, controlling wildlife facilities and training law enforcement officers on the implementation of CITES. The National Hunting and Wildlife Office (ONCFS) was its predecessor until January 2020, when it was merged with the French Agency for Biodiversity to create the OFB;
- **The French Gendarmerie**, under its Central Office for combating environmental and public health-related crimes (OCLAESP – “Office central de lutte contre les atteintes à l'environnement et à la santé publique”), is in charge of investigating and monitoring infringements to the CITES legislation involving France (including committed on France overseas territories or by French nationals) as well as identifying and dismantling criminal organisations taking part in such offences.

**The implementation of CITES in France is based on competences shared between different administrative, scientific and enforcement authorities**

## INTRODUCTION

FRANCE OVERSEAS	LOCATION	FRENCH LEGAL STATUS	EU LEGAL STATUS	IMPLEMENTATION OF CITES		
				DIRECT AND FULL IMPLEMENTATION OF EU LEGISLATION	TRADE WITH EU MEMBER STATES (INCLUDING METROPOLITAN FRANCE)	TRADE WITH NON-EU COUNTRIES
<b>GUADELOUPE</b>	Caribbean Sea	DROM	OR	Yes	No need for a permit, but evidence that the specimen was legally imported or obtained is necessary	CITES permit is required
<b>REUNION</b>	Indian Ocean	DROM	OR	Yes	No need for a permit, but evidence that the specimen was legally imported or obtained is necessary	CITES permit is required
<b>FRENCH GUIANA</b>	South America	CU	OR	Yes	No need for a permit, but evidence that the specimen was legally imported or obtained is necessary	CITES permit is required
<b>MARTINIQUE</b>	Caribbean Sea	CU	OR	Yes	No need for a permit, but evidence that the specimen was legally imported or obtained is necessary	CITES permit is required
<b>MAYOTTE*</b>	Indian Ocean	CU	OR	Yes	No need for a permit, but evidence that the specimen was legally imported or obtained is necessary	CITES permit is required
<b>SAINT-MARTIN</b>	Caribbean Sea	COM	OR	Yes	No need for a permit, but evidence that the specimen was legally imported or obtained is necessary	CITES permit is required
<b>FRENCH POLYNESIA</b>	South Pacific Ocean	COM	OCT	No	CITES permit is required because not part of the EU territory or the EU customs territory	CITES permit is required
<b>SAINT-BARTHÉLEMY**</b>	Caribbean Sea	COM	OCT	No	CITES permit is required because not part of the EU territory or the EU customs territory	CITES permit is required
<b>SAINT-PIERRE AND MIQUELON</b>	North America	COM	OCT	No	CITES permit is required because not part of the EU territory or the EU customs territory	CITES permit is required
<b>WALLIS AND FUTUNA</b>	South Pacific Ocean	COM	OCT	No	CITES permit is required because not part of the EU territory or the EU customs territory	CITES permit is required
<b>NEW CALEDONIA</b>	South Pacific Ocean	ad hoc status	OCT	No	CITES permit is required because not part of the EU territory or the EU customs territory	CITES permit is required/CITES implementation mechanisms adopted in 2016
<b>FRENCH SOUTHERN AND ANTARCTIC TERRITORIES</b>	Southern Indian Ocean	ad hoc status	OCT	No	CITES permit is required because not part of the EU territory or the EU customs territory	CITES permit is required

**Table 1: List of France overseas and corresponding regime of implementation of CITES**

Note: EU – European Union, DROM – Overseas departments and regions (meaning that those territories are fully integrated into France, as any other French departments would be), CU – Unique administration (same as DROM but the regional and departmental administrations are merged), COM (collectivité d’outre-mer in French or overseas collectives) and ad hoc status – Overseas administration which has got its own legislative body, OR – outermost region, OCT – overseas countries and territories.

\* Mayotte became an OR from an OCT in 2014 (Kolodziejcki, 2020).

\*\* Until 2007, Saint-Barthélemy and Saint Martin were both attached to Guadeloupe. Although they became autonomous overseas in 2007, they remained EU outermost regions. However, Saint-Barthélemy became an EU overseas country and territory on 1st January 2012.

Source: DROM-COM (2020); EC (2019; 2020a); Kolodziejcki, 2018; 2020.

## 2. METHODOLOGY







Macaws at the Tambopata National Reserve in the Peruvian Amazon Basin. Peru



## 2.1 CITES trade data

CITES trade data were used to understand the features of the legal trade of CITES-listed species implicating France. The CITES Trade Database<sup>5</sup> is managed by the United Nations Environment Programme World Conservation Monitoring Centre (UNEP-WCMC) on behalf of the CITES Secretariat, and contains reports submitted annually by importing and exporting countries/territories on their trade in CITES-listed specimens, including quantities, species and commodity type (e.g. live, meat).

In order to clarify France's position in the EU, all trade records by EU Member States during the period 2008–2017 were obtained from UNEP-WCMC on 19th November 2019. All 28 EU Member States (including the UK) submitted their annual reports up to 2017 although not all CITES Parties had submitted their 2017 (or previous) reports by this time. Trade data were filtered to include only commercial trade (purpose T) and to exclude seizures/confiscations (source I). Trade data were processed to standardise key units: converting grammes (g) to kilogrammes (kg), centimetres (cm) to metres (m) and millilitres (ml) to litres (l). Only commodities totalling over 100,000 units were considered and those reported as milligrammes (mg), microgrammes or cm<sup>3</sup> were excluded.

Country of origin is reported in the CITES trade database, but the “origin” column is left blank if the country of export is the country of origin, however it can also be left blank if the country of origin is not reported (CITES, 2013). In this report, however, if the origin column was blank, it was interpreted that the country of export and origin were the same and re-exports were those in which the “origin” column was filled in.

For section 3.1 (CITES trade data analysis – Imports), data reported by importers were used, while Section 3.2 (CITES trade data analysis – (Re-)exports) was based on exporter reported quantities i.e. data reported by EU Member States were mainly used for analysis. For these sections, trade records for which 28 EU Member States were indicated were used (i.e. excluding those reported as EU overseas entities).

CITES trade data regarding the 12 France overseas were also obtained. However, trade from FO is not distinguished from trade involving metropolitan France in annual reports submitted by France from 2009 onwards (UNEP-WCMC, *in litt.* to TRAFFIC, November 2019). Data reported by the trading partners were mainly used for the analysis of CITES trade data for FO for section 3.3. Therefore, specifically (re-) exports to the territories (i.e. imports into the territories) could be overestimated as the records are sometimes reported based on permits and certificates issued, rather than based on actual trade<sup>6</sup>.

Trade between France and France (i.e. between metropolitan France and FO or between FOs) was also reported, which involved a total of 63,357 specimens and 15,955 kg according to importer reported data, and 130,942 specimens and 30,626 kg according to exporter reported data, with the main species being plants, giant clams and Queen Conch.

When analysing CITES trade data for FO, these were classified into two groups: France Outermost Region and Overseas Countries and Territories. For those categorised as OR, EU legislation is directly and fully implemented, and no CITES permits were required for trade with EU Member States including metropolitan France although evidence that the specimens were legally imported or obtained is necessary i.e. trade data between OR and EU Member States (including metropolitan France) is likely to be underrepresented. In the OCT, EU legislation is not implemented directly and therefore CITES permits are required for trade with EU Member States including metropolitan France. For the list of FO, see Table 1.

Section 3.1 starts with examining all trade imported into the EU to identify the most important commodity groups and France's position within it before focusing on taxonomic families for which France was one of the top three EU importers. The main species and countries of (re-)exports for France in terms of number and

<sup>5</sup> - <https://trade.cites.org/>

<sup>6</sup> - Guidelines for the preparation and submission of CITES annual reports (December 2019) <https://cites.org/sites/default/files/notif/E-Notif-2019-072-A1.pdf>

## METHODOLOGY

weight were then analysed. Several important commodity groups identified were further analysed as case studies (3.1.4).

Similar to 3.1, section 3.2 begins with examining all trade (re-)exported from the EU to identify the most important commodity groups and France's position within it before identifying taxonomic families for which France was within the top three EU (re-)exporters. The main species and countries of (re-)exports for France in terms of number, weight and volume were further analysed. Trade data in which France was reported as country of origin were also analysed.

In section 3.3, imports and (re-)exports related to France overseas were analysed for the France outermost regions and the France overseas countries and territories respectively.

The methodology used to analyse the involvement of Belgium in wildlife trade (Musing et al., 2018) was slightly adapted (e.g. identifying taxonomic families for which France was one of the top three EU importers, not five) due to France's more dominant position in imports and (re-)exports of CITES-listed species in the EU.

There is often a discrepancy in the quantity reported by importers and exporters, which does not necessarily mean illegality. The reasons for this include:

- Differences in the basis of records used i.e. based on actual trade or permits/certificates issued;
- Differences in the units used, e.g. skins may be reported by number, area or weight;
- Specimens may be exported at the end of one year but not received by the importer until the following year;
- Trade may be reported at species level by one country/territory, whilst another country/territory reports it at a higher taxonomic level;

Some countries/territories report on the basis of the permits they have issued rather than on the actual number of items traded. This may lead to an overestimation of trade volume.

## 2.2 Seizure data

The illegal trade data analysis draws on data from three databases: EU-TWIX, CITES and TRAFFIC. At the time of download, the EU-TWIX database held the most complete dataset, therefore the analysis in Section 3.4 (Illegal trade data analysis) focuses primarily on these data, with US CITES seizure data and TRAFFIC's seizure data used to provide further context, where applicable.

The illegal trade data analysis begins by providing an overview of seizures reported to EU-TWIX and CITES, before analysing the main commodity groups reported to be illegally traded. For each commodity group, the number of seizure records and specimens, weight and/or volume are examined, followed by an analysis of the main species involved, trade routes and sources of the specimens.

It should be noted that although seizure data provide some information about the illegal trade, it does not necessarily present a comprehensive picture of illegal trade as not all illegally traded specimens are seized and the seizure rate is unknown (Underwood et al., 2013). Various factors may contribute to a country's seizure rate including the resources committed to law enforcement, the number of personnel, equipment, training and knowledge of staff (Underwood et al., 2013).

### 2.2.1 EU-TWIX

EU-TWIX (European Union Trade in Wildlife Information eXchange) is an internet tool developed to facilitate information exchange and international co-operation between European wildlife law enforcement and management officials. It consists of two components: a mailing list and a website containing useful resources and a database of seizures. Currently, 39 European countries participate in EU-TWIX.



## METHODOLOGY

EU-TWIX is the most comprehensive seizure data source for EU Member States although the actual number of seizures made in France were higher than the number of seizure records reported to EU-TWIX according to the French Customs.

Law enforcement agencies regularly report all seizure data available to them in one of three ways: directly to EU-TWIX staff, via CITES Management Authorities or via the World Customs Organization (WCO) through the Customs Enforcement Network (CEN) database. Although the aim is to record all seizures carried out by enforcement agencies in the EU-TWIX database, two elements must be considered. Firstly, some Member States provided only seizures deemed significant in the past. Additionally, the WCO used to have reporting limits in place for member states of the Regional Intelligence Liaison Office for Western Europe (RILO WE) until September 2017, which in turn influenced which data were transferred to the EU-TWIX database. It is important to note that countries in this region could report all their seizures to the WCO's CEN database at the time, if they wished to do so. The RILO WE reporting limits were as follows:

- Species listed in Annex I to the Convention – no limits;
- Species listed in Annex II to the Convention – reported only if for commercial use or criminal/judicial proceedings are initiated;
- Caviar: reported if it is 500 grammes or more;
- Ivory: reported if it is 100 grammes or more.

Additionally, if a seizure is related only to EU Member States (not on import or export, or in transit from/to outside the EU, e.g. seized in France on arrival from Germany), it is usually reported as an internal seizure, however some of these seizures were reported as import/export/transit. The direction of trade in such cases was kept as reported, i.e. these were not re-categorised as internal EU seizures even if the indicated trade route suggested so.

Illegal trade data implicating France (those reported by France and by other EU Member States) were extracted from the EU-TWIX database on 19th March 2019 for the period 2008–2017, following authorisation received from the relevant authorities. The seizure data regarding metropolitan France and FO were analysed separately. When both metropolitan France and FO were implicated, the seizures were analysed under the section of FO. The following data were included in the analysis of the seizure data related to FO: 1) FO were reported as exporter, transit or destination; 2) the locations of seizure were in FO; 3) FO were reported as country of origin. Seizures related to FO were analysed by the France outermost regions and the France overseas countries and territories respectively. Of the total of 3,559 records reported by France, 217 seizure records were relevant to FO. In addition, of 365 records reported by other EU Member States, six records were relevant to FO.

As for the seizure data regarding metropolitan France, top line analysis focused on the number of seizure records<sup>7</sup> which identified key commodity groups in trade. These commodity groups were then analysed in terms of number of specimens, weight and/or volume. Where the number of specimens and mass were simultaneously reported, both were considered in the analysis. If not stated otherwise, any listings in each of the sections are in order of importance, based on number of seizure records, number of specimens, weight and/or volume.

Maps were created using TradeMapper<sup>8</sup>, an interactive tool to visualise trade data, to illustrate key trade routes and the commodities involved.

Agencies that provide data to be uploaded to the EU-TWIX database may report the number of specimens/items seized as part of a seizure in different ways. The number of all specimens/items is mentioned in the “count” column, for example five live tortoises or two tusks. Any information about mass or volume (regardless of the description code) is indicated in the “mass” column, for example 2 kg of unworked ivory, 0.2 litre of medicinal liquid or 700 m<sup>3</sup> of timber. It is possible that both the number and the mass/volume of seized specimens/items were reported by law enforcement agencies.

<sup>7</sup> - Each seizure record does not necessarily represent one distinct seizure. Instead, seizures involving several different taxa and commodity types are separated and treated as distinct “seizure records” in the EU-TWIX database. Therefore, the number of seizures is lower than the number of seizure records.

<sup>8</sup> - <https://trademapper.apptivate.org/>

## METHODOLOGY

While the number of specimens was prioritised when various commodity groups were concerned, weight (kg) was used primarily for analysis of certain commodity groups depending on the preferred units in the guidelines for the preparation and submission of CITES annual reports<sup>9</sup> e.g. caviar.

However, it is important to highlight that the EU-TWIX database software used to store EU-TWIX data in the past had certain limitations. It was not possible to leave the “count” cell blank. For this reason, a “1” had to be added for cases where only the mass information had been provided by agencies, although the digit “1” might not reflect the actual number of specimens/items seized.

### 2.2.2 US CITES seizure data

Seizure data reported by the United States of America (USA) implicating France between 2008 and 2017, as reported using source code “I”, were obtained from the UNEP-WCMC on 9th August 2019. It should be noted that reporting seizures to the CITES trade database was not a formal requirement for Parties during that period and therefore there is an incomplete dataset between 2008 and 2017. However, each year, the USA submits detailed data on seizures as part of its CITES Annual Report and therefore, these sections of the analysis can provide insights into France’s involvement as a country of (re-)export and import, and transit point for illegally traded commodities. In the context of this study, 800 seizures records were analysed.

Top line analysis focused on the number of seizure records which identified key commodity groups in trade. These commodity groups were then analysed based on the number of specimens, weight and/or volume. Note that data can be aggregated in the CITES trade database and therefore the number of records is merely a proxy for the number of seizure cases that occurred. Consequently, the number of seizure cases is likely to be higher than the number of seizure records.

It is also important to note that the CITES trade database holds different information to EU-TWIX and therefore a direct comparison of data is not possible. For example, EU-TWIX holds information on mode of shipment, location of and reason for seizures while the CITES trade database does not.

### 2.2.3 TRAFFIC’s global seizure database

All seizure data implicating France were extracted from TRAFFIC’s global seizure database on 16th July 2019 for the period 2008–July 2019. TRAFFIC’s seizure database reflects TRAFFIC’s work programme priorities which are focused on areas where illegal wildlife trade is most prevalent e.g. Africa, Asia and the Americas. As TRAFFIC’s seizure data are not comprehensive for all countries and all species, the data were mainly used to add contextual information to the analysis by main commodity groups (3.4.3).

In order to avoid duplication of seizures reported into the EU-TWIX database, the 182 seizure records (160 seizures for metropolitan France and 22 for FO) reported by France and EU Member States to TRAFFIC’s global seizure database were excluded from the dataset, as well as an additional eight records related to multiple countries (INTERPOL’s operation). There were 48 records related to metropolitan France and seven records related to FO in the TRAFFIC database that were reported by non-EU Member States.

In this report, decimals are notated with periods although decimal commas are used in many European countries including France.

<sup>9</sup> - <https://cites.org/sites/default/files/notif/E-Notif-2019-072-A1.pdf>

# 3. RESULTS

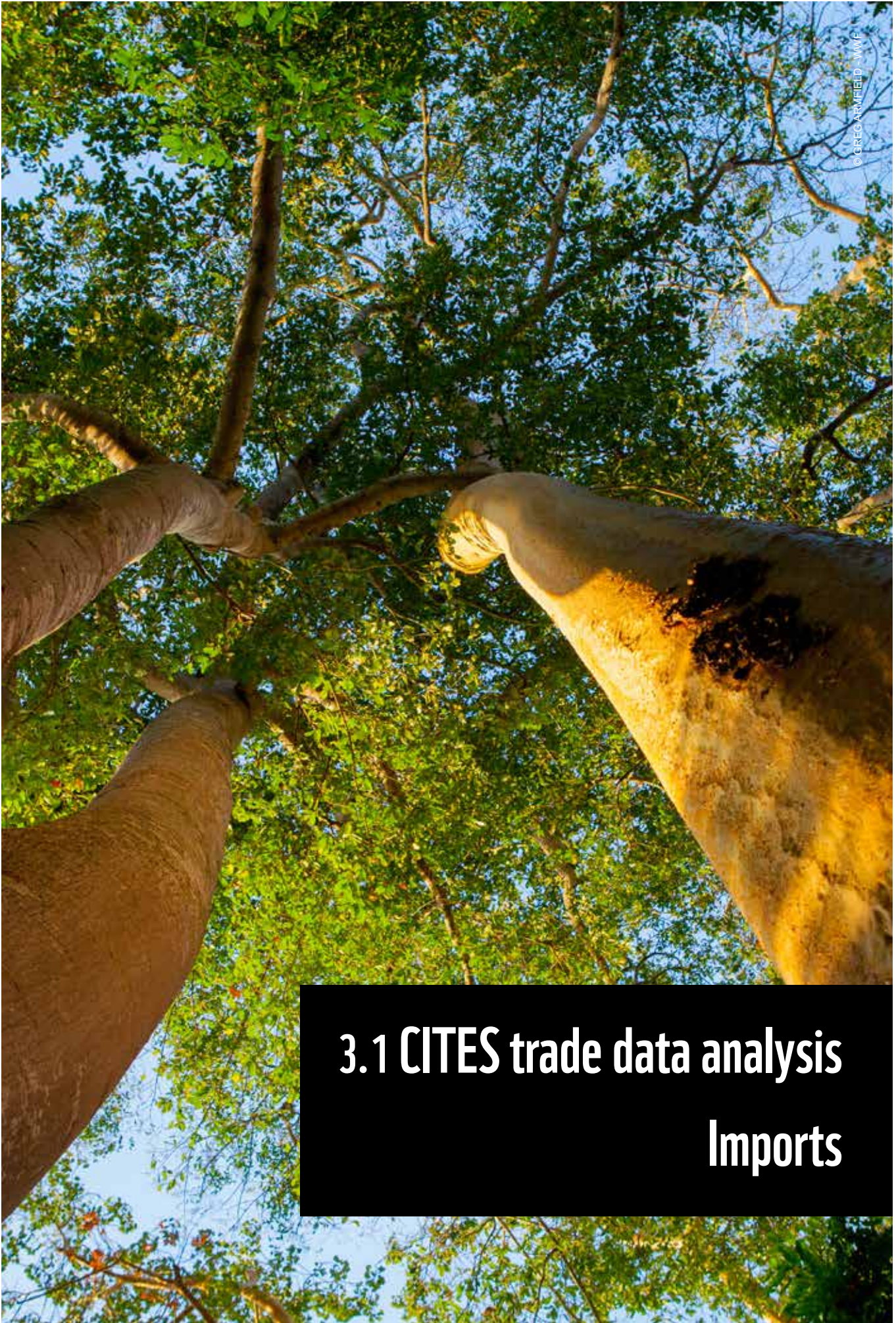






Indian (or Bengal) Tiger *Panthera tigris tigris* track in Royal Bardia National Park, Terai Arc, Nepal





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# 3.1 CITES trade data analysis

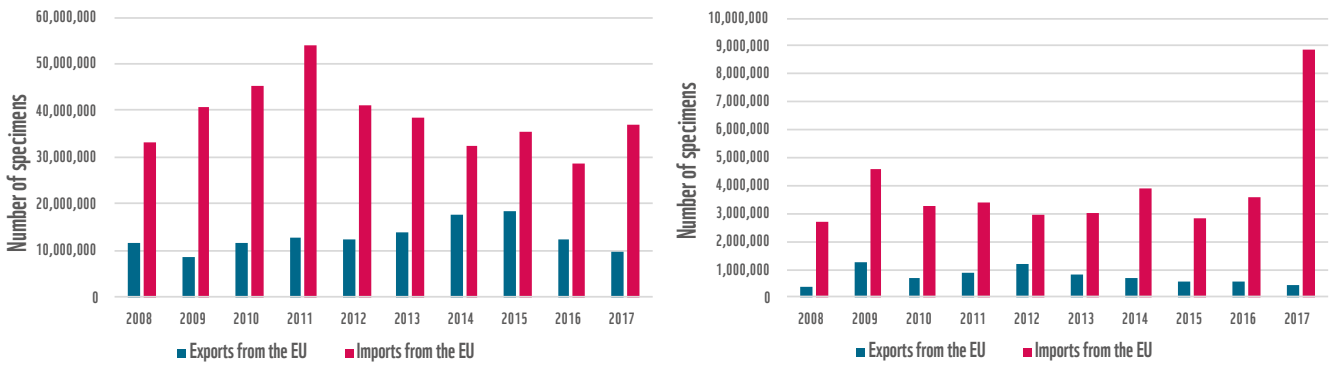
## Imports

Trees in the Selous Game Reserve, Tanzania



## RESULTS - CITES trade data analysis - Imports

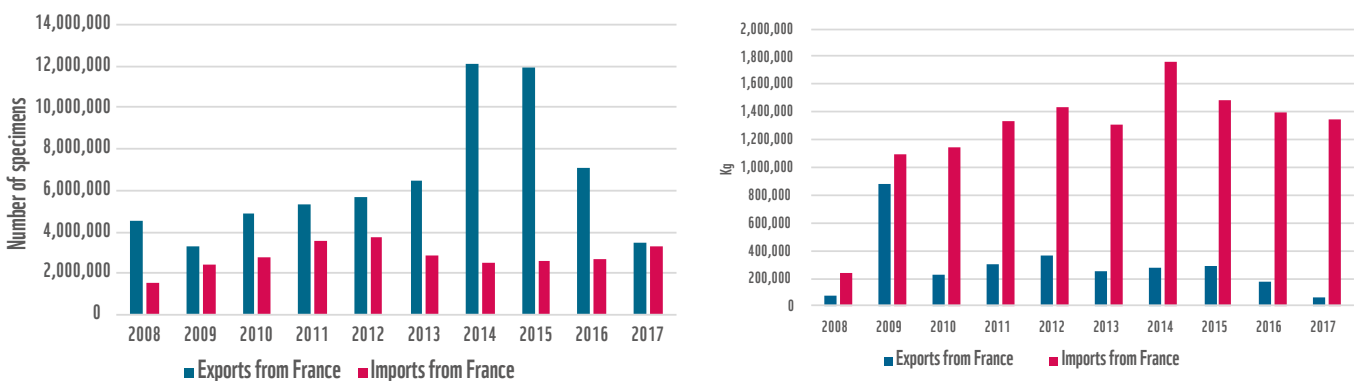
According to the CITES trade data between 2008 and 2017, the EU was a net importer of CITES-listed species traded commercially; approximately 130 million specimens were (re-)exported from the EU while ca. 386 million specimens were imported into the EU during the period. In addition, while over 7 million kg were (re-) exported from the EU, the imported weight reached 39 million kg (Figure 2). Furthermore, 27,015 m<sup>3</sup> and 2,022 l were (re-)exported from the EU while 123,445 m<sup>3</sup> and 153,712 l were imported into the EU.



**Figure 2: Commercial exports and imports from/into the EU between 2008 and 2017, as reported by number of specimens (left) and weight (kg) (right), based on importer (for import) and exporter (for export) reported quantities.**

Source: CITES trade database

France was a net (re-)exporter of CITES-listed species traded commercially by number of specimens; commercial exports from France were approximately 65 million specimens between 2008 and 2017 while imports into France were approximately 28 million specimens. Specifically, (re-)exports from France reached approximately 12 million specimens in 2014 and 2015 (Figure 3). On the other hand, imports into France exceeded considerably exports from France by weight (kg); nearly 3 million kg were (re-)exported from France while approximately 13 million kg were imported during the period.



**Figure 3: Commercial exports and imports from/into France between 2008 and 2017, as reported by number of specimens (left) and weight (kg) (right), based on importer (for imports) and exporter (for exports) reported quantities.**

Source: CITES trade database

## 3.1.1 EU IMPORTS

Commercial imports to the EU included over 386 million items reported without units, i.e. in number of specimens, 39 million kg reported by weight and more than 153,000 l and 123,000 m<sup>3</sup> of commodities reported by volume between 2008 and 2017. The following analysis identifies the most important commodities imported by the EU, and France's relative position as an importer



**CITES imports in the EU  
between 2008 and 2017:**

**386** millions of specimens

**39** millions of kg

**153,000** litres

**123,000** m<sup>3</sup>

**Trade reported without units**

The most traded commodity groups imported by EU Member States were plants, reptiles, leeches and mammals (Table 2); plants accounted for 90% of imports into the EU with ca. 349 million specimens. In terms of number of specimens, the most important commodities were live plants and plant parts e.g. roots.

It is important to note that in October 2005, the EU adopted a temporary ban on imports of wild birds in response to the spread of avian influenza. This was then made permanent two years later, hence the absence of legal trade in wild-caught birds between 2008 and 2017.

The largest share of EU imports by number of specimens was reported by the Netherlands (70%), followed by Germany (13%) and France (7%), making France the third most important EU importer by number of specimens.

## RESULTS - CITES trade data analysis - Imports

TAXONOMIC GROUP	NUMBER OF SPECIMENS**	PERCENTAGE OF TOTAL**	MAIN COMMODITY TYPE(S)
PLANTS	348,917,161	90%	Live, roots
REPTILES*	27,639,571	7%	Skins, small leather products
CORALS	5,602,352	1.4%	Live, raw corals
LEECHES	1,632,638	0.4%	Live
MAMMALS	1,327,359	0.3%	Skins
TOTAL FOR ALL OTHER TAXONOMIC GROUPS	1,385,692	0.4%	-
GRAND TOTAL	386,504,773	100%	-

**Table 2: The main taxonomic groups and commodity types imported by the EU between 2008 and 2017, reported as number of specimens, based on importer reported quantities.**

\* A further 264,023 reptile skins were reported with the unit "sides".

\*\* The total figures/percentage may not exactly add up to the grand total provided due to rounding.

Source: CITES trade database

## Weight

Of the approximately 39 million kg imported into the EU between 2008 and 2017, approximately two thirds (67%) were plants. The most important commodities in terms of weight were plant parts and derivatives (such as bark, wax, carvings and roots), corals, gastropod meat and fish bodies (Table 3). The largest share of EU imports by weight (kg) was reported by Germany (34%), followed by France (32%), and Italy (12%), making France the second most important EU importer of CITES-listed species by weight between 2008 and 2017.

TAXONOMIC GROUP	QUANTITY (KG)	PERCENTAGE OF TOTAL (%)*	MAIN COMMODITY TYPE(S)
PLANTS	26,186,607	67%	bark, wax, carvings, roots
CORALS	4,647,256	12%	raw corals
GASTROPODS	3,852,964	10%	meat
FISH	2,977,962	8%	bodies
TOTAL FOR ALL OTHER TAXONOMIC GROUPS	1,407,283	4%	-
GRAND TOTAL	39,072,072	100%	-

**Table 3: The main commodity groups and types imported by the EU between 2008 and 2017, as reported by weight (kg), based on importer reported quantities.**

\* The total percentage may not add up to or exceed 100% due to rounding.

Source: CITES trade database

## Volume (m<sup>3</sup>)

EU imports by volume mainly comprised sawn wood (102,563 m<sup>3</sup>). The largest share of imports by volume was reported by Denmark (53%), most of which were sawn wood and logs of *Afrormosia Pericopsis elata*. Germany (13%) and Italy (13%) were the second and third largest importers in the EU by volume. The majority of commodities were reported as sawn wood, logs and timber of *Gonystylus* spp. and *Afrormosia*.

France was the 5th most important EU importer with 4,966 m<sup>3</sup>, accounting for 4% of all commercial imports to the EU as reported by volume. Logs, sawn wood and veneer of *Afrormosia*, imported from the Democratic Republic of the Congo (DRC) and Cameroon, accounted for 99% of these imports; the imported volume declined over the years with some fluctuations (110 m<sup>3</sup> in 2017).

## Volume (l)

EU imports by volume (l) mainly comprised extracts (122,129 l), almost all of which derived from plants, more specifically, Cape Aloe *Aloe ferox* (117,162 l). The largest share of imports by volume was reported by Denmark (43%), followed by the UK (30%) and Austria (22%). France was the 12th largest importer in the EU with 92 l, most of which was oil containing agarwood *Aquilaria* spp.



## 3.1.2 FRANCE'S POSITION IN THE EU

Of the main commodities commercially imported into the EU between 2008 and 2017, as reported by number of specimens, weight and volume, France was found to be the main importer for five commodity groups (Table 4):

- top importer of **reptiles**, as reported by number of specimens, accounting for 37% of the EU's imports;
- top importer and third highest importer of **corals**, as reported by number of specimens and weight, accounting for 38% and 14% of the EU's imports respectively;
- top importer and second highest importer of **leeches**, as reported by number of specimens and by weight, accounting for 61% and 29% of EU's imports respectively;
- top importer of **gastropods (mainly Queen Conch)**, as reported by number of specimens and by weight, accounting for 52% and 99.6% of the EU's imports respectively and;
- second highest importer of **plants**, as reported by weight, accounting for 30% of the EU's imports.



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Between 2008 and 2017, France was the first EU importer of specimens of reptiles, corals, leeches and gastropods

Young Nile crocodile *Crocodylus niloticus*. Kwando river. Bwabwata National Park, Namibia

## RESULTS - CITES trade data analysis - Imports

TAXONOMIC GROUP	UNIT	FRANCE		EU	
		TOTAL QUANTITIES IMPORTED	POSITION IN EU IMPORTS (% OF TOTAL)	TOP EU IMPORTER (% OF TOTAL EU IMPORTS)	MAIN TAXA IMPORTED BY THE EU (%)
PLANTS	No. of specimens	14,330,330	3 (4%)	Netherlands (77%)	Giant Snowdrop <i>Galanthus woronowii</i> (41%)
	kg	7,912,663	2 (30%)	Germany (41%)	African Cherry <i>Prunus africana</i> (26%)
	m3	4,966	5 (4%)	Belgium (55%)	Afrormosia <i>Pericopsis elata</i> (73%)
	l	87	11 (0.1%)	Germany (43%)	Cape Aloe <i>Aloe ferox</i> (96%)
REPTILES	No. of specimens*	10,213,261	1 (37%)	France (37%)	American Alligator <i>Alligator mississippiensis</i> (40%)
	kg	47	8 (0.0%)	Belgium (91%)	Nile Crocodile <i>Crocodylus niloticus</i> (98%)
CORALS	No. of specimens	2,138,085	1 (38%)	France (38%)	Stony corals Scleractinia spp. (99%)
	kg	672,860	3 (14%)	Germany (38%)	Stony corals Scleractinia spp. (99.5%)
LEECHES	No. of specimens	1,000,000	1 (61%)	France (61%)	Medicinal leeches <i>Hirudo</i> spp. (100%)
	kg	2,891	2 (29%)	Germany (63%)	Medicinal leeches <i>Hirudo</i> spp. (100%)
MAMMALS	No. of specimens	79,550	4 (6%)	Germany (32%)	Collared Peccary <i>Pecari tajacu</i> (26%)
	kg	1,261	3 (0.3%)	Netherlands (77%)	Guanaco <i>Lama guanicoe</i> (79%)
GASTROPODS	No. of specimens	7,365	1 (52%)	France (52%)	Queen Conch <i>Strombus gigas</i> (87%)
	kg	3,838,787	1 (99.6%)	France (99.6%)	Queen Conch <i>Strombus gigas</i> (99.6%)
FISH	No. of specimens	71,887	4 (9%)	Poland (28%)	Sturgeons and paddlefish <i>Acipenseriformes</i> spp. (63%)
	kg	125,574	5 (4%)	Denmark (28%)	European Eel <i>Anguilla anguilla</i> (87%)

**Table 4: Commercial imports reported by EU Member States between 2008 and 2017 for the top five taxonomic groups, for trade reported by weight, number of specimens and volume (m3, l), based on importer reported quantities.**

\*A total of 266,343 reptile skins were reported with the unit "sides" (264,023 specimens) and "backskins" (2,320 specimens). Of the 266,343 specimens, those made from Caiman spp. (*Caiman crocodilus*, *C. crocodilus crocodilus*, and *C. crocodilus fuscus*) accounted for more than 99%. Italy imported 51% of these specimens while France imported 5% of these specimens with 12,832 specimens.

Source: CITES trade database

### Families for which France is a top three EU importer

Of all commercial EU imports between 2008 and 2017, exceeding 10,000 units (100,000 units for plants and excluding corals), France was among the top three EU importers for a total of 18 families (Table 5). The previous section (Table 4) identified France as a major importer of plants, reptiles, invertebrates, gastropods within the EU; this trend was also observed in the 18 families in which France is among the top three EU importers (Table 5):

- France was among the top three EU importers of several plant products, as reported by number of specimens and weight. For example:
  - ➔ France was a main importer of Rosaceae spp. (all trade reported as African Cherry *Prunus africana*) by weight, involving a total of 4,813,632 kg of wild-sourced specimens (more than 99% were bark), 72% of which came from Cameroon. Imports of Rosaceae spp. increased with fluctuations and reached 985,330 kg in 2014, after which it declined slightly and ranged from 520,000–540,000 kg per year during 2015–2017;
  - ➔ France was a main importer of Euphorbiaceae spp. (mainly Euphorbia spp.) by number of specimens and weight, involving a total of 572,812 specimens and 2,597,915 kg. By number of specimens, 56% were artificially propagated while the remaining 44% were from the wild. By weight, almost all the specimens (mostly wax) were wild-sourced, mainly imported from Mexico;
  - ➔ France was also a main importer of Leguminosae spp. (mainly Dalbergia spp.) by number of specimens, involving 235,972 specimens (more than 99% were wood products) mainly pre-Convention or artificial propagation sourced. More than 99% of specimens were imported in 2017 possibly due to the CITES genus listing of Dalbergia spp. coming into force that year;
  - ➔ Other families of which France was a main importer included cacti Cactaceae spp. and orchids Orchidaceae spp., most of which were from artificial propagation.
- France was among the top three EU importers of several reptile families (mainly as small leather products and skins) by number of specimens. For example,
  - ➔ France was the top importer of Alligators Alligatoridae spp. (mainly American Alligator *Alligator mississippiensis*), involving a total of 7,595,004 specimens, 95% of which were wild-sourced. The main countries of export included Switzerland and Tunisia, mainly of specimens that originated in the USA.
  - ➔ France was a main importer of Varanidae spp. (all trade reported as monitor lizards *Varanus* spp.), involving a total of 804,787 specimens, more than 99% of which were wild-sourced. The specimens (mainly skins and small leather products) were imported mainly from Madagascar and Mali.

France was identified as the main importer of certain families of mammals between 2008 and 2017. France imported a total of 27,777 specimens of Hippopotamidae spp. (all trade reported as Common Hippopotamus *Hippopotamus amphibious*) mainly carvings from China and Hong Kong Special Administrative Region (SAR). Almost all the specimens were wild-sourced and 95% (26,481 specimens) originated in Tanzania. Imports of Hippopotamidae spp. have declined over the years from ~5,700 specimens in 2008 to less than 40 specimens in 2017. In addition, France imported a total of 10,942 specimens of Elephantidae spp., 95% of which were reported as African Elephant.

## RESULTS - CITES trade data analysis - Imports

TAXONOMIC GROUP	FAMILY	UNIT	QUANTITY OF IMPORTS INTO FRANCE	MAIN (RE-) EXPORTERS (% OF QUANTITY)*	MAIN SOURCE(S) (% OF QUANTITY)*	MAIN TRADE TERM (% OF QUANTITY)*
<b>PLANTS</b>	Cactaceae	No. of specimens	1,123,739	South Korea (96%)	A (99%)	Live (42%), dried plants (34%)
	Euphorbiaceae	No. of specimens	572,812	Thailand (54%), Japan (40%)	A (56%)	Live (47%), derivatives (42%)
		kg	2,597,915	Mexico (76%)	W (>99%)	Wax (>99%)
	Leguminosae	No. of specimens	235,972	Indonesia (38%), China (23%)	O (72%)	Wood products (>99%)
	Orchidaceae	No. of specimens	11,933,867	Taiwan (61%), Thailand (37%)	A (>99%)	Live (70%)
	Portulacaceae	No. of specimens	152,020	South Korea (>99%)	A (100%)	Live (47%), dried plants (27%)
	Rosaceae	kg	4,813,632	Cameroon (72%)	W (100%)	Bark (>99%)
<b>MAMMALS</b>	Elephantidae	No. of specimens	10,942	Monaco (76%)	W (90%)	Hair (37%), derivatives (33%)
	Hippopotamidae	No. of specimens	27,777	China (58%), Hong Kong SAR (40%)	W (>99%)	Carvings (95%)
<b>REPTILES</b>	Alligatoridae	No. of specimens	7,595,004	Switzerland (32%), Tunisia (25%)	W (95%)	Small leather products (68%)
	Crocodylidae	No. of specimens	995,294	Zimbabwe (42%), Australia (23%)	C (45%), R (44%)	Skins (88%)
	Pythonidae	No. of specimens	670,522	Switzerland (35%), Singapore (16%)	W (45%), C (45%)	Small leather products (63%)
	Varanidae	No. of specimens	804,787	Madagascar (24%), Mali (22%)	W (99%)	Skins (61%)
<b>FISH</b>	Acipenseridae	kg	109,368	China (49%), USA (30%)	C (68%)	Caviar (93%)
	Arapaimidae	kg	10,190	Brazil (69%)	R (69%)	Meat (99%)
	Syngnathidae	No. of specimens	70,811	Viet Nam (74%)	F (75%)	Live (100%)
<b>BIVALVIA</b>	Tridacnidae	No. of specimens	104,783	France (29%), Tonga (16%)	F (47%), W (43%)	Live (99%)
<b>GASTROPODS</b>	Strombidae	kg	3,838,787	Jamaica (100%)	W (100%)	Meat (100%)
<b>INVERTEBRATES</b>	Hirudinidae	No. of specimens	1,000,000	Russia (100%)	C (100%)	Live (100%)

**Table 5: Families for which France was among the top three EU importers for commercial trade, 2008–2017, where total trade exceeded 10,000 units (100,000 units for plants) excluding corals, as reported by number of specimens (blank) and weight (kg), based on importer reported quantities.**

Note: Families for which France was the top EU importer are in bold. \* for France's imports

A = Artificial propagation;

C = Captive-bred;

F = Animals born in captivity;

O = pre-Convention specimens;

R = Ratched specimens<sup>10</sup>; and

W = Wild.

Source: CITES trade database

<sup>10</sup> - Specimens of animals reared in a controlled environment, taken as eggs or juveniles from the wild, where they would otherwise have had a very low probability of surviving to adulthood (CITES, 2013).



## 3.1.3 IMPORTS INTO FRANCE – MAIN SPECIES AND COUNTRIES OF (RE-)EXPORTS

As identified in the sections so far, France was a main importer of various CITES-listed commodities in the EU between 2008 and 2017. The imports of CITES-listed species into France increased over the years with some fluctuations both in terms of number of specimens and weight (kg).



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France's imports of CITES specimens increased over the 2008-2017 period

Moth orchid *Phalaenopsis hybrid*

## RESULTS - CITES trade data analysis - Imports

The number of specimens imported to France reached a peak of ca. 3,720,000 in 2012, after which it ranged between 2,500,000 and 3,300,000. The imports into France by weight reached a peak of ca. 1,760,000 kg in 2014 after the sudden increase from 2008 and 2009 (Figure 4).

In terms of volume (m<sup>3</sup>, l), France reported 4,966 m<sup>3</sup> and 92.4 l of imports during 2008 to 2017, most of which were *Afromosia Pericopsis elata* (4,924 m<sup>3</sup>, 99%), and Agarwood *Aquilaria* spp. (81 l, 88%). The following sections focus on trade reported by number of specimens and weight.

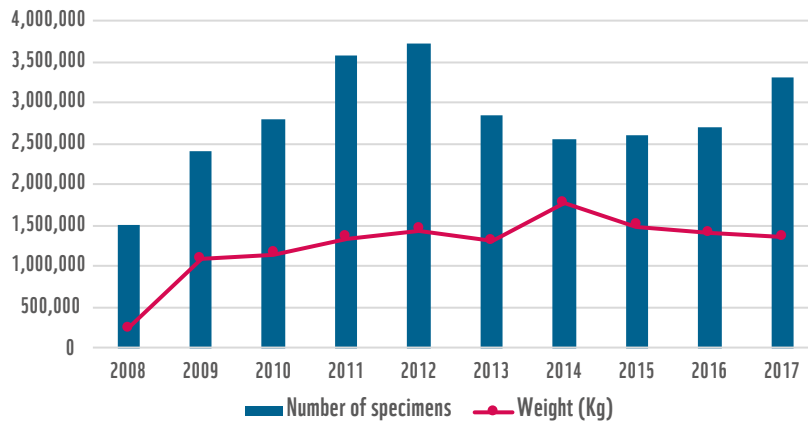


Figure 4: Imports of CITES-listed species into France by number of specimens and weight (kg) between 2008 and 2017, based on importer reported quantities.

Source: CITES trade database

### Main species imported by France

As identified in Section 3.1.2, France was a main importer in the EU of commodities of reptiles, corals, leeches, gastropods and plants. These trends were also observed when looking into France's imports at species level, as reported by number of specimens and weight.

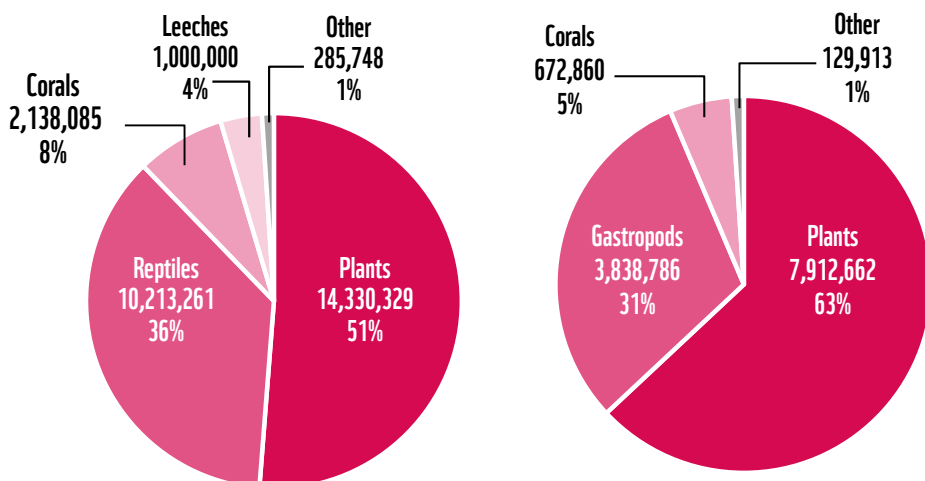


Figure 5: Main taxonomic groups imported into France between 2008 and 2017, reported as number of specimens (left) and weight (kg) (right), based on importer reported quantities.

In terms of trade reported as number of specimens, four out of the five top species imported by France were reptiles and plants. The main species was a *Phalaenopsis* hybrid and American Alligator *Alligator mississippiensis*, which accounted for 52% of all trade reported as number of specimens (Table 6). While all the orchids and Medical Leeches *Hirudo medicinalis* specimens were artificially propagated and captive bred, most of American Alligator specimens were from the wild and approximately half of the Nile Crocodile *Crocodylus niloticus* specimens were ranches. The main (re-) exporters for American Alligator specimens were Switzerland, Tunisia and the USA while for Nile Crocodile the main (re-) exporter was Zimbabwe.

## RESULTS - CITES trade data analysis - Imports

TAXA	QUANTITY (NO. OF SPECIMENS)	PERCENT IN FRANCE'S TOTAL IMPORTS	MAIN TERMS (%)	MAIN SOURCES (%)	MAIN (RE-) EXPORTERS (%)
<b>ORCHID</b> <i>PHALAEENOPSIS</i> HYBRID	7,246,883	26%	Live (69%), cultures (30%)	A (100%)	Taiwan (85%)
<b>AMERICAN ALLIGATOR</b> <i>ALLIGATOR</i> <i>MISSISSIPPIENSIS</i>	7,217,211	26%	Small leather products (68%), skins (25%)	W (97.1%), C (2.6%)	Switzerland (31%), Tunisia (26%)
<b>ORCHID</b> <i>DENDROBIUM</i> HYBRID	2,084,026	7%	Live (64%), cultures (36%)	A (100%)	Thailand (95%)
<b>MEDICINAL LEECH</b> <i>HIRUDO</i> <i>MEDICINALIS</i>	1,000,000	4%	Live (100%)	C (100%)	Russia (100%)
<b>NILE CROCODILE</b> <i>CROCODYLUS</i> <i>NILOTICUS</i>	562,591	2%	Skins (84%), small leather products (11%)	C (54.7%), R (44.8%)	Zimbabwe (74%)

Table 6: Main species imported by France between 2008 and 2017, reported as number of specimens, based on importer reported quantities.

Source: CITES trade database

The Medicinal Leech *Hirudo medicinalis* is distributed from the UK and southern Norway to the southern Urals (Utevsky et al., 2014) and was listed in CITES Appendix II in 1987 due to concerns around over-exploitation and global demand, especially in the pharmaceutical industry (CITES, 1987). Leeches have been used in medicine to treat nervous system abnormalities, dental problems, skin diseases and infections since the time of ancient Egypt (Krans and Watson, 2017). France imported 1,000,000 specimens and 1,901 kg of live specimens between 2008 and 2017.

All those reported by number of specimens were captive-bred and imported from Russia while the specimens reported by weight (all wild-sourced) were mainly imported from Turkey. Imports of Medicinal Leech halved to 60,000 specimens in 2017 (Figure 6). In addition to Medicinal Leech, 990 kg of wild-sourced live Southern Medicinal Leech *Hirudo verbana* were imported from Turkey. France began importing the species in 2013; CITES recognised the Southern Medicinal Leech as a different species from the Medicinal Leech in 2010 at CoP15 (CITES, 2010a; 2010b). Imports of leeches declined in recent years as they are produced in the EU (French CITES MA, *in litt.* to WWF France, March 2020). In fact, CITES trade data suggest France imported only 225 kg of live leeches (with source code W) from Turkey in 2018 according to importer reported data.

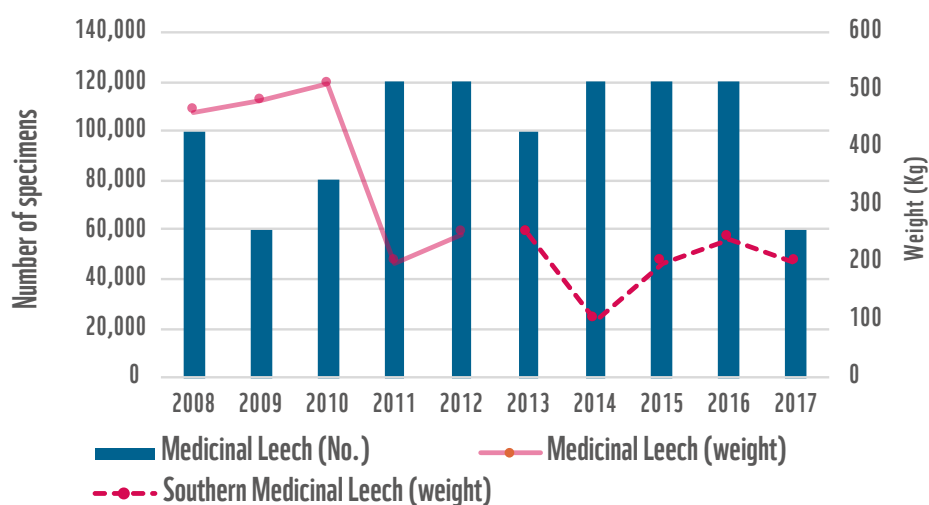


Figure 6: Imports of medicinal leeches into France by number of specimens and weight (kg) between 2008 and 2017, based on importer reported quantities.

Source: CITES trade database





Candelilla and the block of wax

Between 2008 and 2017, France mainly imported specimens of plants (African Cherry *Prunus africana* and Candelilla *Euphorbia antisyphilitica*) and Queen Conch *Strombus gigas* by weight, which accounted for 90% of all reported trade by weight (Table 7). Notably, all specimens of the top five species were wild sourced.

TAXA	WEIGHT (KG)	PERCENT IN FRANCE'S TOTAL IMPORTS	MAIN TERMS (%)	MAIN SOURCES (%)	MAIN (RE-) EXPORTERS (%)
<b>AFRICAN CHERRY</b> <i>PRUNUS AFRICANA</i>	4,813,632	38%	Bark (99.9%), extract (0.1%)	W (100%)	Cameroon (72%)
<b>QUEEN CONCH</b> <i>STROMBUS GIGAS</i>	3,838,787	31%	Meat (100%)	W (100%)	Jamaica (100%)
<b>CANDELILLA</b> <i>EUPHORBIA ANTISYPHILITICA</i>	2,597,875	21%	Wax (99.6%), extract (0.3%)	W (100%)	Mexico (76%)
<b>STONY CORALS</b> <i>SCLERACTINIA SPP.</i>	671,608	5%	Raw corals (68%), live (32%)	W (100%)	Indonesia (75%)
<b>CAPE ALOE</b> <i>ALOE FEROX</i>	190,741	2%	Extract (68%), powder (28%)	W (100%)	South Africa (96%)

**Table 7: Main species/taxa imported by France between 2008 and 2017, as reported by weight, based on importer reported quantities**

Source: CITES trade database

### Main countries/territories of (re-)export to France

The top five (re-)exporters to France, reported as number of specimens accounting for a total of 65% of France's imports were Taiwan, Thailand, Switzerland, Tunisia and the USA (Figure 7). Live orchids were the main commodity imported from Taiwan and Thailand while small leather products or skins from American Alligator *Alligator mississippiensis* were mainly imported from Switzerland, Tunisia and the USA.

## RESULTS - CITES trade data analysis - Imports

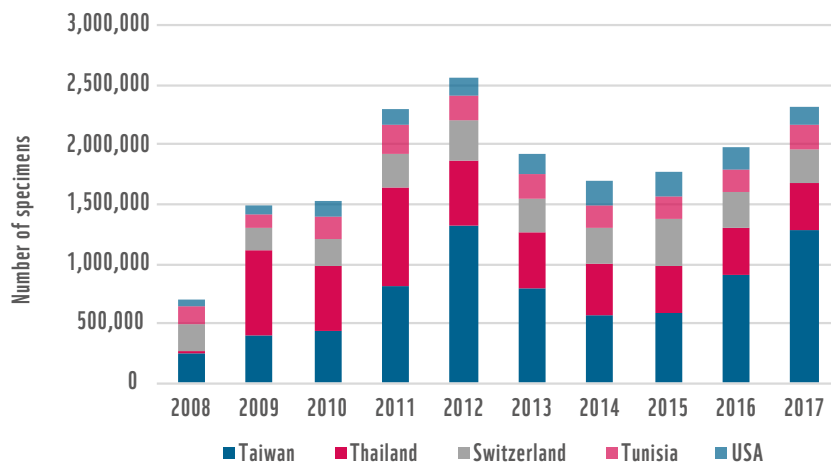


Figure 7: Top five (re-)exporters to France, reported as number of specimens between 2008 and 2017, based on importer reported quantities.

Source: CITES trade database

The top five countries which (re-)exported commodities to France between 2008 and 2017, accounting for a total of 87% of all France's imports, as reported by weight, were Jamaica, Cameroon, Mexico, Uganda and the USA (Figure 8). There was a significant increase in imports from ca. 40,000 kg in 2008 to 1,000,000 kg in 2009, reaching a peak of 1,600,000 kg in 2014. While imports from Jamaica were stable apart from 2008, imports from Cameroon, Mexico and Uganda fluctuated. The imports from Cameroon reached ca. 861,000 kg in 2014 while imports from Mexico reached a peak of 448,600 kg in 2010. There were no imports from Cameroon into France in 2008 and 2010, from Mexico in 2008, from Uganda in 2016.

Queen Conch *Strombus gigas* meat was the only commodity imported from Jamaica, all of which were wild sourced. The imports of Queen Conch meat from Jamaica reached a peak of ~650,000 kg in 2014. Similarly, the African Cherry *Prunus africana* bark (wild-sourced) was the only commodity imported from Cameroon and Uganda. Candelilla *Euphorbia antisiphilitica* wax was the main commodity (re-)exported from Mexico and the USA.

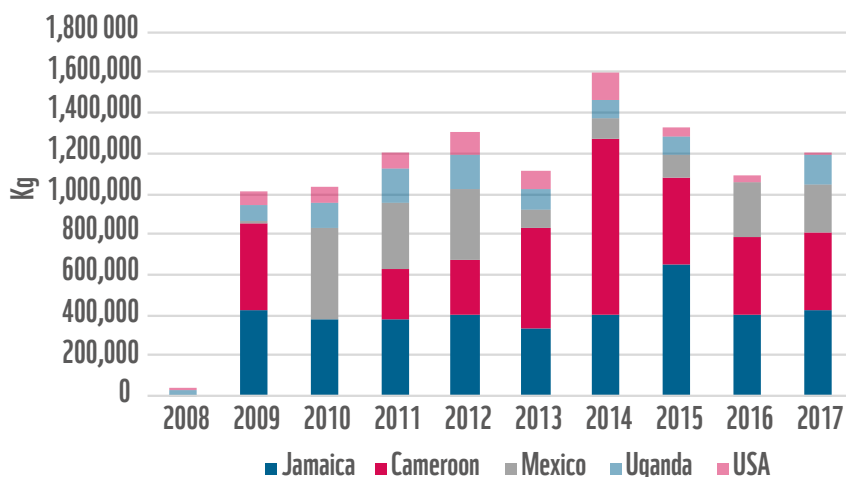
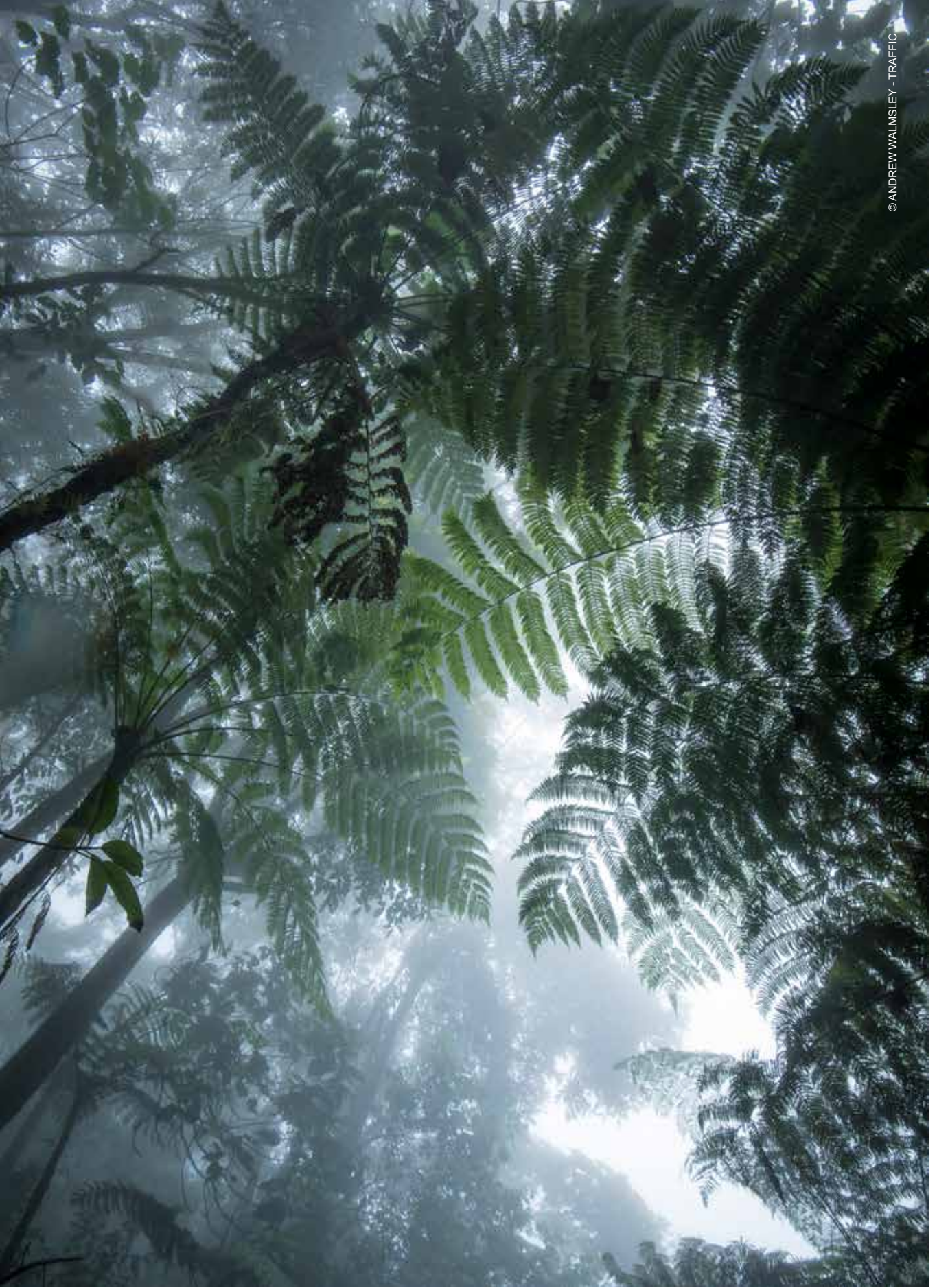


Figure 8: Top five (re-)exporters to France, as reported by weight (kg), between the years of 2008 and 2017, based on importer reported quantities.

Source: CITES trade database

In terms of volume (m<sup>3</sup>), imports from the DRC and Cameroon accounted for 99.2% of France's imports between 2008 and 2017. Logs and sawn wood of *Afrormosia Pericopsis elata* were imported from the DRC (4,148 m<sup>3</sup>), which declined over the years with some fluctuations from 721 m<sup>3</sup> in 2008 to 6 m<sup>3</sup> in 2017. Almost all the imports from Cameroon (a total of 777 m<sup>3</sup>) were sawn wood of *Afrormosia*, which ranged from 0 to 104 m<sup>3</sup> between 2008 and 2017, apart from 2013, when the import reached 412 m<sup>3</sup>.





Mount Cameroon, Cameroon



## 3.1.4 CASE STUDIES

Based on the analyses in Section 3.1.1 to 3.1.3, the following key species/commodities were identified as significant within France's imports between 2008 and 2017 and were analysed in further detail below:

- 1 - Plant products, specifically African Cherry;
- 2 - Reptiles;
- 3 - Sturgeon and Paddlefish products, specifically caviar;
- 4 - Corals;
- 5 - Queen Conch;
- 6 - Giant clams.



Spectacularly rich and vibrant soft coral reefs, Fiji



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African cherry *Prunus africana*, mainly used for its bark

### 1 - PLANTS

France imported a total of 14,330,330 specimens, 7,912,663 kg and 4,966 m<sup>3</sup> of plant specimens between 2008 and 2017, being the top-three importer of CITES-listed plants in the EU by number of specimens and weight. By number of specimens, 83% of the specimens were orchids *Orchidaceae* spp. (97% reportedly artificially propagated) and most of them were live specimens (accounting for 66%) and cultures (26%). In contrast, those imported into France by weight were mainly *Rosaceae* spp. and *Euphorbiaceae* spp. accounting for 61% and 33% respectively (98% of trade reportedly wild-sourced) and the main commodities were barks (61%) and wax (33%).

France's imports of CITES-listed plants between 2008 and 2017:

14,330,300 specimens  
7,912,663 kg  
4,966 m<sup>3</sup>

### African Cherry

African Cherry *Prunus africana* is a tree from the mountain areas of tropical Africa and Madagascar, a multiple-use hardwood species with local and international economic and medicinal value. Population declines have been caused by various reasons, including large-scale unsustainable harvesting for international trade. The European pharmaceutical market has driven demand for the bark of the species (Bodeker et al., 2014). This led to its listing in CITES Appendix II in 1995 and listing of the species as Vulnerable in the International Union for Conservation of Nature (IUCN) Red List (World Conservation Monitoring Centre, 1998).

France imported a total of 4,813,632 kg of African Cherry between 2008 and 2017, all of which were wild-sourced. France's imports of the species accounted for 71% of the EU imports during the period. Almost all were imported as bark (over 99%), but a small amount (3,404 kg) was also imported as extract. The main countries of export were Cameroon, accounting for 72%, Uganda (21%) and the DRC (6%) (Figure 9). Imports of African Cherry increased over the years and reached a peak of 985,330 kg in 2014, after which it slightly declined and ranged at 520,000–540,000 kg in 2015–2017.

## RESULTS - CITES trade data analysis - Imports

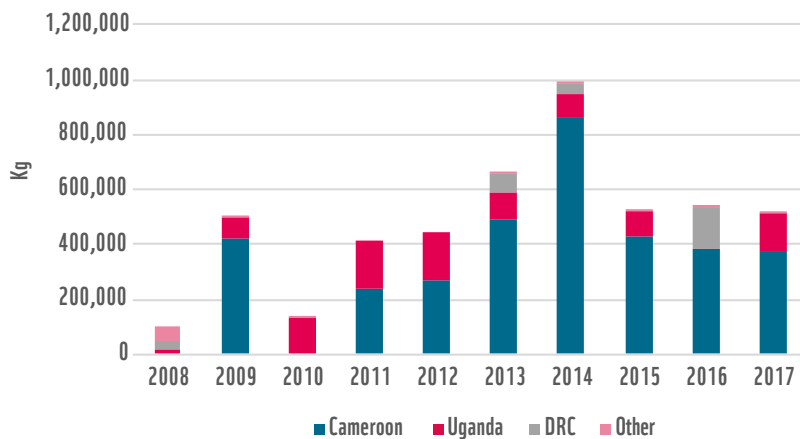


Figure 9: Imports of African Cherry by France between 2008 and 2017 by countries of export, as reported by weight (kg), based on importer reported quantities.

Source: CITES trade database

Concerns about over-exploitation of African Cherry had been discussed since its CITES listing in 1995 and CoP12 decided to include African Cherry in the Review of Significant Trade process in 2002, which eventually led to suspension of the trade from the DRC, Equatorial Guinea and Tanzania in 2009<sup>11</sup> (CITES, 2008; CITES, 2016). The DRC was able to resume its trade in 2012 with an export quota of 72,000 kg, which has increased since then to 232,000 kg for 2015 (CITES, 2016). France did not report imports of African Cherry from the DRC between 2009 and 2012, and imports from 2013 were less than the export quota set by the DRC, while imports from Equatorial Guinea and Tanzania to France have not been reported since 2009.

Regarding the imports from Cameroon, while the EU Scientific Review Group (SRG) formed a negative opinion between September 2007 and March 2011, it accepted the import of 505 t from old stocks from 2007 as an exceptional case after consideration of new data on legality and sustainability of the harvest of those stocks in March 2009 (SRG, 2009). France reported 420,000 kg of imports from Cameroon in 2009, which according to the French CITES MA, was based on five import permits in 2009 issued after the SRG decision with close attention and monitoring of export quotas (French CITES MA, *in litt.* to WWF France, March 2020).

As for the imports from Uganda, the SRG agreed to a positive opinion in 2008, based on an export quota of 75,893 kg<sup>12</sup> to be set by Uganda, which increased to 176,179 kg in 2012 and 252,267 kg in 2016 according to Species+, CITES trade data suggest that France imported 129,600 kg in 2010 (i.e. more than the quota) and Uganda also exported the same amount based on exporters' reports. However, according to the French CITES MA, the imports in 2010 did not exceed the quota as some of them were exported under the previous year's quota; of the seven import permits issued in 2010, three of them were for the specimens exported under the 2009 quota (a total of 54 t) and four of them were for the specimens exported under the 2010 quota (a total of 75.6 t).

## Conclusion

**Historically the over-exploitation of African Cherry has been driven by the demand for its bark by the European pharmaceutical market and CITES trade data indicate France was the top importer of African Cherry bark between 2008 and 2017. Imports of wild-sourced African Cherry from Equatorial Guinea into the EU are suspended by Suspension Regulation<sup>13</sup> and issues regarding conservation and management of the species persist, including the necessity of sustainable harvesting techniques and traceability systems (CITES, 2018). Further attention is warranted to ensure imports of the species are legal, sustainable and traceable.**

11 - Notification to the Parties No. 2009/003

12 - [https://circabc.europa.eu/sd/a/7aadfe6e-ocda-40e9-87d1-b1779a868f16/46\\_summary\\_srg.pdf](https://circabc.europa.eu/sd/a/7aadfe6e-ocda-40e9-87d1-b1779a868f16/46_summary_srg.pdf)

13 - <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1569933022179&uri=CELEX:32019R1587>





American Alligator *Alligator mississippiensis*

## 2 - REPTILES

France imported a total of 10,213,261 specimens of reptiles between 2008 and 2017, being the top importer of reptiles in the EU by number of specimens<sup>14</sup>. The main families imported were Alligatoridae, accounting for 74% of all reptile imports, Crocodylidae (10%), Varanidae (8%) and Pythonidae (7%). The main commodities included small leather products (59%), skins (33%) and skin pieces (4%). Imports of reptile specimens increased over the years, reaching a peak of approximately 1,233,000 specimens in 2015, after which it declined and shifted at over 1,000,000 specimens in 2016 and 2017 (Figure 10). The main countries of exports were Switzerland (27%), Tunisia (19%), the USA (14%) and Singapore (9%). Switzerland, Tunisia and Singapore were mainly a re-exporter, while most of the specimens exported from the USA originated in the country.

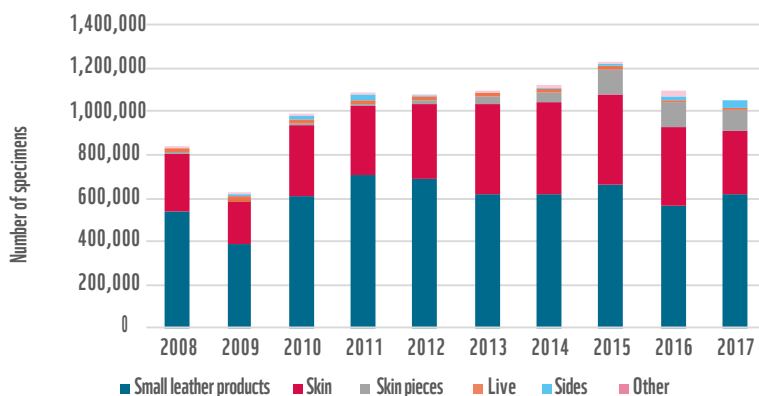


Figure 10: Imports of reptile specimens into France between 2008 and 2017 by commodities, reported as number of specimens, based on importer reported quantities.

Source: CITES trade database

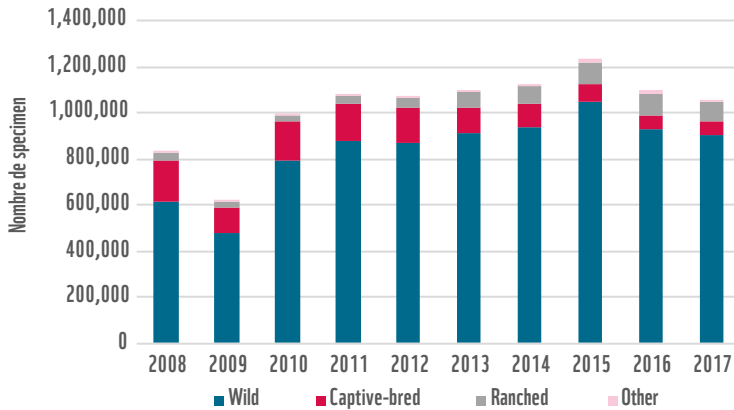
Of the 10,213,261 specimens, 82% of specimens were wild-sourced while 12% were captive bred with source code “C”, and 5% were ranched specimens with source code “R”. Imports of wild-sourced specimens accounted for 74% of imports in 2008 but it became higher over the years, reaching 86% in 2017 (Figure 11). This is mainly because of imports of wild-sourced American Alligator *Alligator mississippiensis*, whose imports accounted for 84% of all wild-sourced imports into France in the period.

14 - France also reported additional reptile imports including 47 kg of small leather products and skin pieces and 12,832 sides (all trade reportedly skins).



## RESULTS - CITES trade data analysis - Imports

According to the French CITES MA, the USA decided not to use source code “R” for Appendix-II listed specimens unless the species was downlisted to CITES Appendix II from Appendix I. Thus, the USA reports the source code of Alligator skins as “W” (wild) even though these come from the same farms as those previously reported with source code “R” (French CITES MA, *in litt.* to WWF France, March 2020).



**Figure 11: Imports of reptile specimens into France between 2008 and 2017 by source, reported as number of specimens, based on importer reported quantities.**

Source: CITES trade database

It should be noted that France (re-)exported a total of 16,675,854 specimens and 2,438 kg of reptile specimens between 2008 and 2017<sup>15</sup>. According to the French CITES MA, French companies outsource the manufacture of leather products outside the EU during several manufacturing processes, which leads to issuance of CITES permits several times for the same specimen (up to five round trips) (French CITES MA, *in litt.* to WWF France, March 2020). Therefore, the actual number of specimens traded could be much less than the reported number.

Reptiles are traded commercially for food, the pet trade, skins and as traditional medicines (Schlaepfer et al., 2005). The EU is one of the main consumer markets especially for reptile skins and the pet trade (UNEP-WCMC, 2009). According to exporters' reported data, globally roughly 12.3 million live animals, 4.2 million kg of meat and 31.3 million skins of CITES Appendix II listed reptiles from at least 372 species were traded between 1997–2007, most of which was trade in wild-sourced specimens (UNEP-WCMC, 2009).

Various reptile species have been included in the Review of Significant Trade process, which has led to trade suspension of some species from certain countries. The EU is still suspending imports of many reptile species from some range states<sup>16</sup>.

*CITES Resolution Conf. 11.12 (Rev. CoP15) on Universal tagging system for the identification of crocodylian skins* recommends that all raw, tanned and/or finished crocodylian skins, flanks and chalcos, be tagged individually before entering international trade from their countries of origin, using non-reusable tags. Parties re-exporting such items are recommended to ensure that they are re-exported with original tags intact unless the pieces originally imported have been further processed and cut into smaller pieces. According to CITES Resolution Conf. 11.12 (Rev. CoP15), Parties should accept export permits or re-export certificates for the international trade in crocodylian skins, only if they contain the relevant tag information noted above and if the related skins and parts are tagged in accordance with the provisions of the Resolution. In the case of re-exports, details of the original permit under which the skins, flanks and chalcos were imported should also be included in the re-export certificate. In addition, Resolution Conf. 17.12 was adopted in 2016 for facilitating conservation, sustainable use of and trade in snakes.

In France, when tags have been removed or lost (e.g. during processing) and re-tagging of skins is needed for re-export, the *Centre Technique du Cuir* (CTC) prepares a bulk order specifying tag numbers upon requests by companies and submits them for endorsement by the national CITES Management Authorities.

<sup>15</sup> - This excludes those reported in units e.g. m and mg

<sup>16</sup> - <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1569933022179&uri=CELEX:32019R1587>

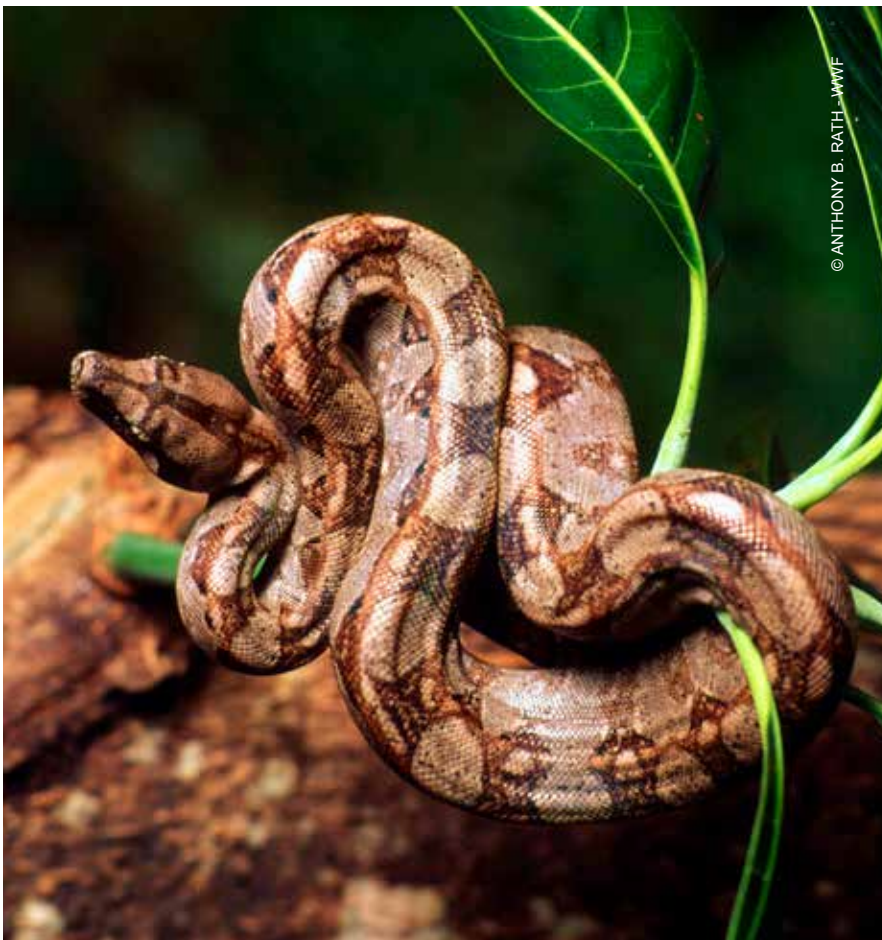
## RESULTS - CITES trade data analysis - Imports

The matching of imports and re-exports is verified by enforcement officers during random inspections, and by the CITES Management Authority when processing applications for re-export certificates (Mundy and Sant, 2015).

The French decree of 22nd November 2000<sup>17</sup> “on the marking procedure of whole flanks and skins of crocodylians for international trade of specimens of species covered by CITES” imposes the sealing of all crocodile skins upstream of the re-export, keeping the old loops in place if they were not lost during the tanning process. According to the French CITES MA, the decree was adopted to address problems related to loss or deterioration of tags during the manufacturing process (French CITES MA, *in litt.* to WWF France, March 2020). The decree was replaced by another decree, arrêté of 8th November 2010<sup>18</sup>.

### Conclusion

**France imported a total of 10,213,261 specimens of reptiles between 2008 and 2017, being the top importer and (re-)exporter of reptile products, specifically leather products and skins in the EU by number of specimens, indicating that France plays an important role in reptile trade in the EU. Although international trade in ranched and captive-bred specimens seems to have increased over the past few decades (Macgregor, 2002), wild-sourced specimens were dominant in the imports of reptile specimens into France between 2008 and 2017. Effective implementation of the relevant Resolutions specifically ensuring traceability of imported and (re-)exported specimens would be warranted.**



Boa constrictor *Boa constrictor* Dangriga, Belize

17 - <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT00000220466&categorieLien=id>

18 - <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000023082271&categorieLien=id>



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Sturgeon caviar

### 3 - CAVIAR

#### Caviar imports

Between 2008 and 2017, France reported commercial imports of 109,423 kg and 470 specimens of *Acipenseriformes* spp. (sturgeons [*Acipenseridae* spp.] and paddlefish [*Polyodontidae* spp.]), which made it the top importer of *Acipenseriformes* spp. by weight in the EU during the period. Of France's *Acipenseriformes* spp. imports, those of caviar<sup>19</sup> accounted for 99% by weight with 108,198 kg.

Of the 108,198 kg of caviar imported to France, the main species included White Sturgeon *Acipenser transmontanus* (29%), Russian Sturgeon *Acipenser gueldenstaedtii* (23%) and a hybrid between Kaluga *Huso dauricus* x Japanese Sturgeon *Acipenser schrenckii* (19%).

Imports of caviar increased over the years and reached a peak of 18,451 kg in 2017. The main exporters of caviar were China (50%), the USA (29%) and Uruguay (10%). Imports from China increased from 8,604 kg in 2016 to 15,543 kg in 2017 (Figure 12).

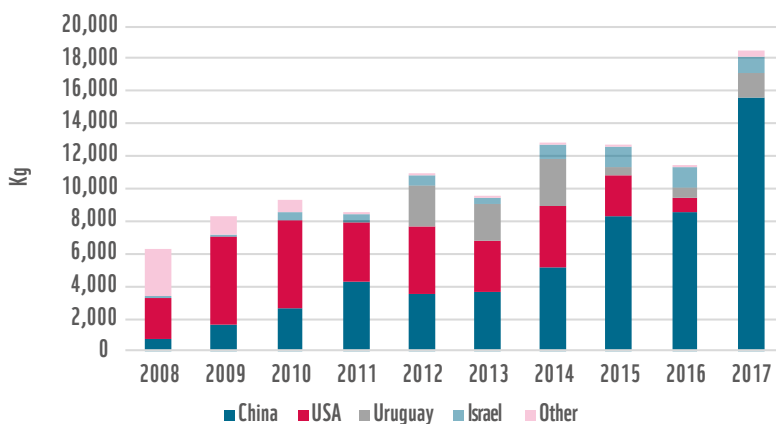


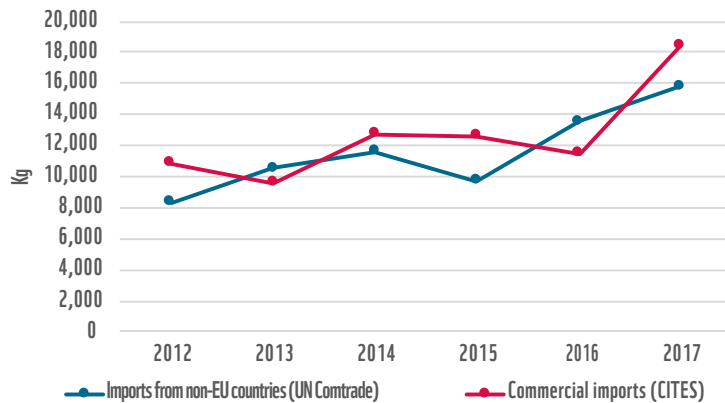
Figure 12: Commercial imports of sturgeon caviar by France between 2008 and 2017, as reported by weight (kg), based on importer reported quantities.

Source: CITES trade database

<sup>19</sup> - Those reported as caviar and eggs. Imports of live eggs were not reported during the period.

## RESULTS - CITES trade data analysis - Imports

Global import data for caviar have been available since 2012 when Harmonised System codes were designated for caviar (1604.31) and caviar substitutes (1604.32). According to UN Comtrade, France imported a total of 69,491 kg of caviar from non-EU countries between 2012 and 2017, while 75,699 kg were imported according to CITES trade database (commercial trade only). Imports of caviar into France from outside the EU increased over the years based on UN Comtrade, reaching a peak of 15,815 kg in 2017 (Figure 13). The main countries of exports were the same as indicated by CITES trade data.



**Figure 13: CITES commercial imports of sturgeon caviar into France and France's caviar imports from non-EU countries, between 2012 and 2017, as reported by weight (kg), based on importer reported quantities.**

Source: CITES trade database and UN Comtrade

UN Comtrade also indicates that France “imported” a significant amount of caviar from other EU Member States. The arrivals (equivalent to imports) of caviar into France from other EU Member States between 2012 and 2017 reached 520,731 kg while imports of caviar into France from outside the EU were 69,491 kg in the same period. It should be noted that there is potential for double/multiple counting due to caviar being traded before and after processing/repackaging.

While 98% of caviar imported by France were reportedly of captive-bred origin with source code C and F according to CITES trade data, 2% of imports (2,697 kg) were reportedly wild-sourced. The majority of those imports (2,621 kg) occurred in 2008 and imports were also reported in 2010 and 2012 (5 kg and 71 kg respectively). The main species were Stellate Sturgeon *Acipenser stellatus*, Beluga Sturgeon *Huso huso* and Russian Sturgeon *Acipenser gueldenstaedtii*. The trading partners included the United Arab Emirates (UAE) (1,862 kg, all specimens reportedly originated in Kazakhstan), Switzerland (459 kg, all specimens reportedly originated in Azerbaijan), Kazakhstan (300 kg), the USA (71 kg) and Azerbaijan (5 kg).

Since 1998, all 27 species of sturgeon and paddlefish *Acipenseriformes* spp. have been listed in CITES Appendix I or II as a result of population declines due to, among other threats, overexploitation including illegal fishing. CITES Resolution Conf. 12.7 (Rev.CoP17) on Conservation of and trade in sturgeons and paddlefish recommends relevant range states set export quotas for caviar and meat of *Acipenseriformes* spp. from shared stocks every year, although no relevant export quotas have been communicated to the CITES Secretariat by relevant range States since 2010<sup>20</sup>, meaning that no international trade in wild sourced caviar or meat of *Acipenseriformes* spp. from shared stocks should be allowed.

A universal labelling system for all caviar has been introduced to allow identification of the source of the caviar since 2000. CITES Resolution Conf. 12.7 (Rev.CoP17) recommends that Parties implement the universal labelling system for all caviar (wild sourced and derived from aquaculture) for international and domestic trade. Labels must be non-reusable, i.e. they cannot be removed undamaged or transferred to another container. The label may seal the container, or if not, the packaging should permit visual evidence of any opening. The EU Wildlife Trade Regulations recommend that all containers of sturgeon and paddlefish caviar should follow the obligatory universal caviar labelling set by CITES.

<sup>20</sup> - <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-17-01.pdf>



## RESULTS - CITES trade data analysis - Imports

In France, Arrêté of 23<sup>rd</sup> of February 2007<sup>21</sup> sets out the detailed rules for implementing the EU regulations, but this national regulations has not been updated after the EU Regulations and thus might create legal uncertainty (A1, pers. comm. to WWF France, March 2020).

Despite the introduction of CITES regulations and the rapid growth of aquaculture production, illegal fishing of sturgeon and illegal trade in wild caviar are still a serious threat to remaining *Acipenseriformes* spp. (e.g. Anon., 2019a). Some research suggests that illegal caviar trade was conducted by organised crime groups who bribed officials (van Uhm and Siegel, 2016). Physical market survey conducted in 2017 found that caviar claimed as wild-sourced could be obtained on the black market, but not openly, in France, as well as in Germany and Russia (Harris and Shiraishi, 2018).

### (Re)exports

It should be noted that France also (re-)exports a considerable amount of *Acipenseriformes* spp. (sturgeons [*Acipenseridae* spp.] and paddlefish [*Polyodontidae* spp.]). Between 2008 and 2017, France reported commercial (re-)exports of 801,820 kg and 19,662,699 specimens of *Acipenseriformes* spp. according to importer reported data, being the top (re-)exporter of *Acipenseriformes* spp. by number of specimens and top-two exporter by weight, after Italy, in the EU during the period.

### Conclusion

**Both CITES trade data and UN Comtrade data indicate that France plays an important role in imports and exports of caviar and sturgeons and paddlefish in the EU. According to the CITES trade database, caviar imports into France increased from ~12,000 kg in 2016 to over 18,000 kg in 2017 while approximately 14,600 kg of caviar exports from France were reported in 2017. It was suggested that France also exports live eggs and live specimens for farming. Although most of the global trade in sturgeons and paddlefish has reportedly shifted to captive-bred specimens due to the rapid growth of aquaculture production, illegal fishing and trade in wild caviar still pose a serious threat to remaining species in the wild (Harris and Shiraishi, 2018). Revision of Arrêté du 23 février 2007 would be required to align to the EU Wildlife Trade Regulations and ensure trade in sturgeons and paddlefish is legal, traceable and sustainable.**

21 - Arrêté du 23 février 2007 fixant les conditions d'autorisation d'introduction d'esturgeons et la procédure d'autorisation des établissements procédant au conditionnement ou au reconditionnement du caviar à des fins d'exportation, de réexportation ou de commerce intracommunautaire (JORF du 6 mai 2007).



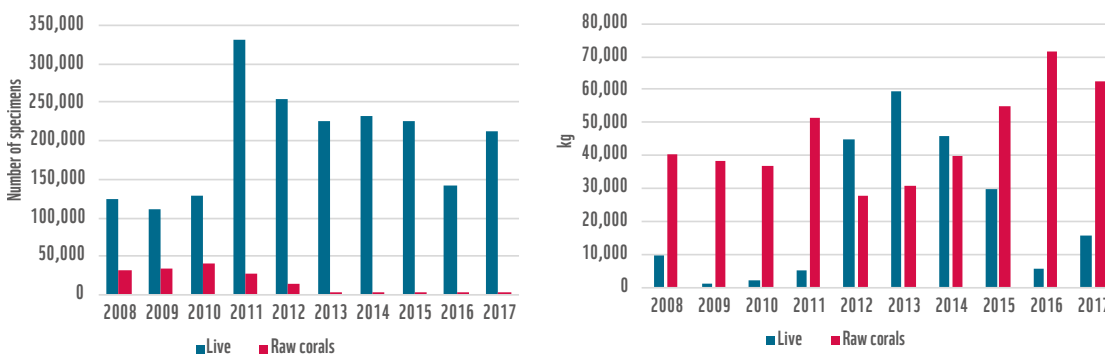
Brain & pocillopora corals, Fiji

## 4 - CORALS

Between 2008 and 2017, France imported 2,138,085 specimens and 672,860 kg of corals and coral products, according to importer reported data, which made France the top importer of corals within the EU by number of specimens and the third biggest importer by weight. As almost all the imports involved live specimens and raw corals during the period, the analysis below focuses on only these commodities. It should be noted that imports into France may include those into France Overseas.

By number of specimens, live specimens accounted for 93% of coral imports into France while raw corals accounted for the remaining 7%. Annual imports of live specimens increased dramatically from ~128,000 specimens in 2010 to approximately 331,000 specimens in 2011, after which they declined slightly and ranged between 140,000 and 255,000 specimens per year during the period 2012–2017. Imports of raw corals declined from more than 25,000 specimens until 2012 to less than 1600 specimens in 2013–2017 (Figure 14).

By weight, imports of raw corals accounted for 67% of coral imports into France. Imports of raw corals fluctuated over the years, reaching a peak of 71,404 kg in 2016. Imports of live specimens were mainly reported during 2012–2015, where 82% of all live coral imports took place; specifically, imports reached almost 60,000 kg in 2013.



**Figure 14:** Imports of live and raw corals into France between 2008 and 2017, as reported by number of specimens and weight (kg), based on importer reported quantities.

Source: CITES trade database

## RESULTS - CITES trade data analysis - Imports

The main species imported into France was stony corals *Scleractinia* spp. both by number of specimens and weight (accounting for more than 99% respectively). While detailed species information was not available for those reported by weight<sup>22</sup>, trade data reported by number of specimens suggested that the main taxonomic families in *Scleractinia* spp. were *Acroporidae* spp. (23%), *Caryophylliidae* spp. (19%) and *Mussidae* spp. (13%). All the specimens reported by weight were wild-sourced except for 1 kg of pre-Convention specimens, while for those reported by number of specimens, approximately 71% were wild-sourced and approximately 29% were captive-born (source code F)<sup>23</sup>.

The main trading partners were Australia (50%) and Indonesia (45%) by number of specimens, and Indonesia (75%) and Haiti (21%) by weight. While the number/volume is not high, Fiji was also an important trading partner and among the top three traders both by number of specimens and weight.

### Imports from Australia

France imported a total of 1,077,803 specimens and 489 kg of corals of live specimens and raw corals from Australia between 2008 and 2017. Almost all specimens were reportedly wild-sourced. By number of specimens, imports from Australia fluctuated over the years, reaching a peak of 253,530 specimens in 2011. Almost all the specimens imported were stony corals (99% by number of specimens and 100% by weight) and main species among stony corals included Elegant Coral *Catalaphyllia jardinei* and Whisker Coral *Duncanopsammia axifuga*.

### Imports from Indonesia

France imported a total of 966,451 specimens and 507,510 kg of live and raw corals from Indonesia between 2008 and 2017.

By number of specimens, 99% of specimens were stony corals *Scleractinia* spp., of which *Acropora* spp. accounted for 85% of stony coral imports. Imports of corals declined over the years due to a decrease in imports mainly of raw corals. There was a slight increase in the number of live specimens imported into France from Indonesia from ~72,000 specimens in 2008 to ~90,000 specimens in 2013–2017. Notably, the proportion of imports of captive-born live corals reported by number of specimens increased from 52% in 2008 to 90% in 2017 while those of wild-sourced live corals declined from 48% in 2008 to 8% in 2017 (Figure 15). According to the French CITES MA, it reflected the EU's request to the Indonesian government for the use of source code "F" (captive-born) instead of "W" (wild) after a mission in 2008. Among various families reported with source code "F", *Acroporidae* spp. (mainly *Acropora* spp.) accounted for 62% with 376,307 specimens between 2008 and 2017.

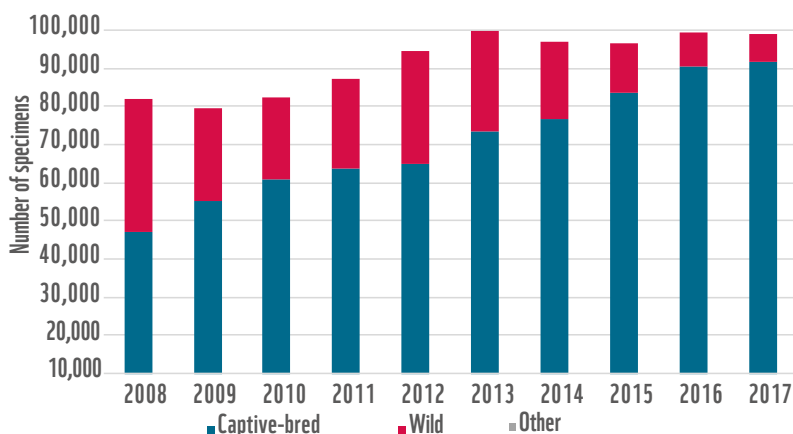


Figure 15: Imports of live corals into France from Indonesia between 2008 and 2017 by source, reported as number of specimens, based on importer reported quantities.

Source: CITES trade database

<sup>22</sup> - Specimens of "stony corals" reported by weight is a category of specimens for which Conf. Resolution. 11.10 (Rev. CoP15) indicates that they are not identifiable at the level of gender, but only at the level of order

<sup>23</sup> - There were also some specimens reported as R, D, U, A, O and C. It should be noted that sources D and A are errors which will be notified to the relevant DREAL/DEAL services (French CITES MA, *in litt.* to WWF France, March 2020).



## RESULTS - CITES trade data analysis - Imports

By weight, imports of raw corals increased with fluctuations, reaching a peak of 71,404 kg in 2016, while imports of live specimens saw a sudden increase from ~5,500 kg to approximately 15,000 kg in 2017. All the imported specimens reported by weight were wild-sourced stony corals, and more than 99% were reported at order level (*Scleractinia* spp.).

Indonesia reported coral exports involving a total of 1,131,861 specimens and 392,347 kg to France between 2008 and 2017 while France's imports were a total of 966,451 specimens and 507,510 kg. Comparison of exporters' and importers' reported data were impossible due to, among others, different units used for reporting, reporting at different level (e.g. order level) and potentially different descriptive terms used by exporters and importers (live/raw corals).

Indonesia is the largest exporter of live corals globally, accounting for an average of 70% of corals in trade reported by importers over the period 2000–2010 (Wood et al., 2012). Indonesia has one of the most extensive coral reef systems in the world, and along with Malaysia, the Philippines and Papua New Guinea, it also forms the Coral Triangle biodiversity hotspot (Hoeksema, 2007).

However, previous studies revealed that at least 30 % of the condition of Indonesian reefs are poor (UNEP-WCMC, 2014) and more than 85% of coral reefs within the Coral Triangle Regions are currently threatened due to various reasons including overfishing (Burke et al., 2012). The EU has raised concerns for certain species from Indonesia, some of which have resulted in import suspensions. Currently, imports of a total of 10 wild-sourced corals species are suspended as of January 2020, based on Commission Implementing Regulation (EU) No 2019/1587 prohibiting the introduction into the Union of specimens of certain species of wild fauna and flora (referred to as Suspensions Regulation)<sup>24</sup>.

CITES trade data indicated that France imported wild specimens of species suspended by Suspensions Regulation over the years including 65 specimens of *Trachyphyllia geoffroyi* (suspension until May 2015 followed by negative opinion in July 2015), 60 specimens of *Hydnophora microconos* (suspension until May 2015 followed by negative opinion in July 2015), 42 specimens of *Euphyllia paraancora*, 35 specimens of *Euphyllia yaeyamaensis* and *Euphyllia cristata* (suspension until May 2015 followed by negative opinion in July 2015), 33 specimens of *Euphyllia divisa*, 22 specimens of *Plerogyra turbida* (suspension as genus until May 2015 followed by negative opinion in July 2015). Imports of suspended species have been not reported from 2015 onwards. France began imports of captive-bred specimens of these species in 2012 and annual imports of certain species exceed 2,000 specimens in recent years.

Of note that Indonesia banned coral exports from May 2018 to December 2019 by refusing to issue a health certificate that is requested for any transport of corals, domestically and for exports (Dawes, 2019; Lilley, 2018), which seems to have been lifted at the beginning of January 2020 (Gercama and Bertrams, 2020). However, there are still concerns about overfishing and poaching by foreign vessels of wild coral, as well as difficulties in differentiating maricultured corals from wild ones, and risks to wild corals fraudulently declared as captive-bred or captive-born (Gercama and Bertrams, 2020).

### Imports from Haiti

France reported a total of 138,539 kg of coral from Haiti between 2008 and 2017, all of which were wild-sourced stony corals. Imports from Haiti, composed of raw corals (87%) and live specimens (13%), increased from approximately 3,569 kg in 2010 to 29,890 kg in 2011, after which they slightly declined and shifted to around 24,000–28,300 kg during 2012–2015 before imports fell to zero in 2016 and 2017. An import restriction regarding Lettuce Coral *Agaricia agaricites* is in place through the Suspensions Regulation. As Haiti is not a Party to CITES, the country does not report its annual trade to the CITES Secretariat.

**Australia, Indonesia, Haiti and Fiji are the main exporters of corals to France**

24 - <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1569933022179&uri=CELEX:32019R1587>

## RESULTS - CITES trade data analysis - Imports

### Imports from Tonga

France reported imports involving a total of 13,720 specimens between 2008 and 2017, all of which were wild-sourced live specimens, reported in 2015-2017. Among various species imported, *Acanthastrea amakusensis* accounted for 17% of imports. Tonga became a Party to CITES in 2016 and submitted an annual report for 2017 and 2018, although Tonga reported no coral exports France in 2017.

The SRG formed the following opinions for imports from Tonga at its 71st meeting in April 2015: no opinion for import of specimens of *Favites* spp., *Platygyra* spp., *Acanthastrea* spp., *Oxypora* spp. and positive opinion for import of specimens of *Acropora* spp., *Montipora* spp., *Lobophyllia* spp. and *Pocillopora* spp.<sup>25</sup>. However, the EU suspended imports of *Acanthastrea hemprichii*, *Favites halicora* and *Platygyra sinensis* from Tonga in September 2019 through the Suspension Regulation taking into account recommendations made by the CITES Standing Committee at its 69th and 70th meetings, and also based on reports prepared for the SRG. France reported imports of 20 specimens of *Platygyra* spp. and *Favites* spp. respectively in 2015, but no imports were reported in 2016 and 2017.

### Conclusion

**CITES trade data indicated that France was the top importer of corals by number of specimens and among the top three importers by weight in the EU between 2008 and 2017, importing 2,138,035 specimens and 672,860 kg of corals and coral products. Although cultivation of live coral (mariculture) is reported to have been successfully initiated in some countries and imports of captive-bred specimens increased from certain countries over the years, it is vital that France, as well as other EU Member States, make sure through close monitoring that corals imported into the EU are not fraudulently declared as captive-bred or captive-born or against international/national regulations/decisions.**



Coral mariculture, Solomon Islands

25 - [https://circabc.europa.eu/sd/a/8c0ae0ef-10ea-4ea6-be24-cf4c1161547b/71\\_summary\\_srg.pdf](https://circabc.europa.eu/sd/a/8c0ae0ef-10ea-4ea6-be24-cf4c1161547b/71_summary_srg.pdf)



Queen conch *Strombus gigas* shell midden, Bahamas

### 5 - QUEEN CONCH

Queen Conch *Strombus gigas* is distributed throughout the Caribbean, found in the territorial waters of at least 36 countries and dependent territories (FAO, 2013). The species is one of the most important fishery resources in the Caribbean, with annual wholesale value estimated at around USD74 million (Prada et al., 2017). Over the past few decades, intensive fishing pressure has led to population declines, which led to the CITES listing of the species in 1992. Currently, the majority of Queen Conch is landed in the Bahamas, Nicaragua, Belize, and Jamaica (Prada et al., 2017). Queen Conch meat is consumed domestically and exported to major markets such as the USA, the EU and the French overseas territories in the Caribbean (Prada et al., 2017). Although cultivation of live Queen Conch (mariculture) has been experimented in some of the range states (FAO, 2013), farming production has not been reported to FAO up until 2017 (FAO, 2020).

Between 2008 and 2017, metropolitan France imported a total of 3,838,787 kg and 7,365 specimens of Queen Conch *Strombus gigas*, which accounted for more than 99% of imports into the EU by weight and 60% by number of specimens. All the specimens of Queen Conch imported into France were wild-sourced, apart from some pre-Convention specimens. Meat was the main commodity, accounting for 100% by weight and 99% by number of specimens. Jamaica was the top trading partner as well as country of origin, responsible for 100% by weight and 99% by number of specimens. Imports of Queen Conch by weight increased significantly from approximately 10,000 kg in 2008 to more than 400,000 kg in 2009 and reached a peak of 649,000 kg in 2015, after which it declined to around 400,000–430,000 kg in 2016 and 2017. By number of specimens, 99% of imports (7,280 specimens) were reported in 2012.

There were however large discrepancies between importer and exporter reported quantities; exporters reported a total of 179,750 kg and 44,226 specimens while France reported 3,838,787 kg and 7,365 specimens. This could partially be explained by the use of different units (e.g. number of specimens) by exporters. According to the “Guidelines for the preparation and submission of CITES annual reports” prepared by the CITES Secretariat, weight (kg) is the preferred unit for reporting the descriptive term “meat”. 43,875 specimens and 7,280 specimens were reported by exporters and importers respectively, which makes it difficult to compare importer and exporter reported data across quantities reported both by weight and number of specimens.

## 3.8 MILLION KG

of Queen conch were imported  
by France between 2008 and  
2017



## RESULTS - CITES trade data analysis - Imports

More importantly, exporters' reported data suggest that most of the Queen Conch were in fact exported to France overseas, totalling 2,294,450 kg and an additional 670,005 specimens. The specimens (all trade reportedly Queen Conch meat) were mostly exported from Jamaica to Martinique (accounting for 64% by weight and 66% by number of specimens), Guadeloupe (accounting for 34% by weight and by number of specimens respectively) and Saint Martin (2% by weight). It should be noted that France reported (re-)exports of 11,700 kg of Queen Conch meat with France between 2008 and 2017, suggesting trade between metropolitan France and France overseas or between France overseas.

France reported (re-)exports of only 41 specimens of Queen Conch (mainly carvings and derivatives) between 2008 and 2017, which is considerably less than the imports. As for France overseas, CITES Parties reported only 2 kg of Queen Conch imports from France overseas during the period. Therefore, much of the Queen Conch specimens imported by France overseas and metropolitan France are considered to be consumed domestically and/or in the EU.

Following the CITES listing, concerns were raised over the high levels of trade and insufficient implementation and enforcement of CITES provisions by range states (Mulliken, 1996). Queen Conch has been included in the Review of Significant Trade under CITES (in 1995 and 2001) and recommendations made to range states by the CITES Animals Committee. Trade suspensions have also been recommended for some range states and imports of Queen Conch from Grenada and Haiti are still suspended in the EU<sup>26</sup>.

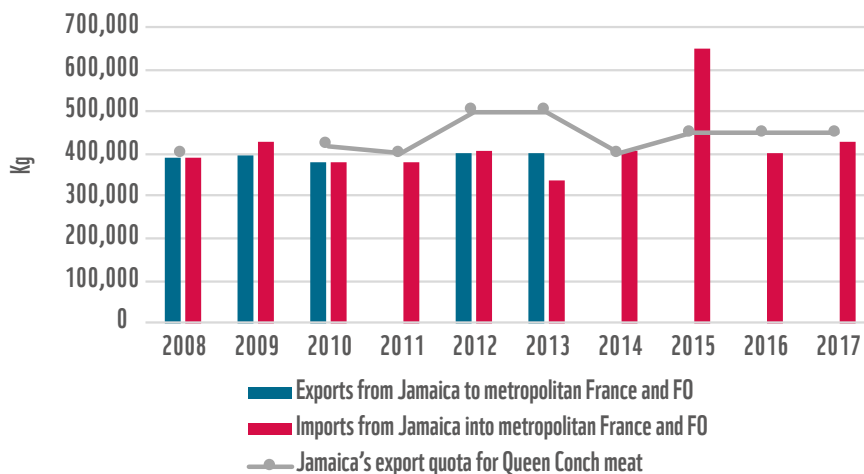
The SRG formed a positive opinion for imports of specimens of Queen Conch from Jamaica in 2009<sup>27</sup>. Jamaica also set an export quota of Queen Conch meat at 400,000–500,000 kg per year between 2008 and 2017, and according to exporters' reported data, Jamaica's Queen Conch meat exports were less than the export quota, apart from in 2009 when the export quota was not communicated to the CITES Secretariat. Queen Conch meat was exclusively exported from Jamaica to France and France overseas between 2008 and 2017 (1,976,294 kg), except for 2,270 kg to Cayman Islands. No exports of Queen Conch meat were reported by Jamaica since 2015 even though Jamaica has submitted its annual report up to 2017 (with the exception of 2015).

When comparing Queen Conch meat imports from Jamaica into metropolitan France and France overseas, exporter reported data and Jamaica's export quota for Queen Conch meat, importer reported data exceeded those reported by exporters in 2009 by 33,097 kg while almost the same amount was reported by both sides in 2008 and 2010. In addition, imports into France (648,874 kg) exceeded the export quota in 2015 (450,000 kg) by 198,874 kg (Figure 16). According to the French CITES MA, of the reported imports in 2015, a total of 34,592 kg was exported under the 2014 export quota and for an additional 17,840 kg, there is no indication of the import permit having been used/gone through customs procedure (still leaving 146,552 kg in excess of the quota set). It should be noted that all the exports of Queen Conch meat from Jamaica were reported by number of specimens in 2014, which is not comparable with importer reported data.

26 - <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1569933022179&uri=CELEX:32019R1587>

27 - [https://circabc.europa.eu/sd/a/62d19591-bb71-4ddd-ac2e-d255f1b12508/48\\_summary\\_srg.pdf](https://circabc.europa.eu/sd/a/62d19591-bb71-4ddd-ac2e-d255f1b12508/48_summary_srg.pdf)

## RESULTS - CITES trade data analysis - Imports



**Figure 16: Imports and exports of Queen Conch meat from Jamaica to France (metropolitan France and France overseas) and Jamaica's export quota on Queen Conch meat between 2008 and 2017, reported by weight (kg), based on importer and exporter reported quantities.**

\* Jamaica did not communicate an export quota for 2009 to the Secretariat while the SRG confirmed the positive opinion.

\*\* Jamaica reported exports of Queen Conch meat by number of specimens in 2011 and 2014 and France reported additional imports of Queen Conch meat by number of specimens in 2012<sup>28</sup>.

Source: CITES trade database, Species+ and CITES website

Various initiatives have been undertaken in order to promote fisheries and management of Queen Conch by range states, and a series of Decisions were adopted at the 18th meeting of CITES CoP in 2019, including enhancing the traceability of specimens and supporting the making of non-detriment findings<sup>29</sup>.

## Conclusion

France reported a total of 3,838,787 kg and 7,365 specimens Queen Conch imports between 2008 and 2017, being the top importer in the EU, although exporters' reports indicate most of the specimens were actually exported to France overseas in the Caribbean, specifically Martinique. All the specimens of Queen Conch imported into France were wild-sourced, apart from some pre-Convention specimens and imports from Jamaica accounted for more than 99% of imports by weight and number of specimens. CITES trade data suggest imports of Queen Conch meat imports into France may have exceeded the Jamaica's export quota set. However, it should be noted that the total of 3,838,787 kg is overestimated and should be 3,846,067 kg (French CITES MA, *in litt.* to WWF France, March 2020)<sup>30</sup>. Further attention and monitoring of Queen Conch trade is warranted in order to ensure legality and sustainability of the trade in the species.

<sup>28</sup> - According to the French CITES MA, these were reporting errors in unit and were a total of 7,280 kg, not 7,280 specimens. However, this was not reflected to the analysis as this was not reflected to the CITES trade data at the time of analysis (French CITES MA, *in litt.* to WWF France, March 2020).

<sup>29</sup> - <https://cites.org/eng/dec/valid17/82266>

<sup>30</sup> - For the period 2008-2017, the sum of the annual export quotas for Jamaica is 3,970 tonnes of Queen Conch meat, not including year 2009 for which the Jamaican quota was not published on the Secretariat's website but was approved by the SRG. During the same period, CITES data identify that France imported 3,838,787 tonnes of Queen conch meat and 7,365 specimens. However, two permits issued in 2012 include an error in the unit used (tonnes instead of kg). Once corrected, France has in fact imported: 3,846.067 tonnes of Queen conch meat (3,838.787 tonnes + 7.280 tonnes) as well as 85 specimens (7,365 - 7,280). These 3,846.067 tonnes imported by France over the period 2008-2017 represent 96.88% of the sum of the Jamaican annual quotas.



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Giant clam *Tridacna gigas*

## 6 - GIANT CLAMS

Globally there are 10 living giant clam (Tridacninae) species, which are distributed among the shallow coral reefs of the Indian and South Pacific Oceans (Bin Othman et al., 2010). Population numbers have declined in various countries due to environmental degradation and over-exploitation mainly for their meat (Neo, 2012; Sant, 1995). Shells are used as ornaments in the curio trade and small live clams are sold in the aquarium trade (Sant, 1995). All species of giant clams (Tridacninae spp.) have been listed in CITES Appendix II since 1985.

France imported giant clams Tridacnidae spp. involving a total of 104,783 specimens and 87 kg between 2008 and 2017, being a top importer of giant clams in the EU (accounting for 100% by weight and 34% by number of specimens).

All the specimens reported by weight (87 kg) were pre-Convention carvings of Giant Clam *Tridacna gigas* reported as (re-)imported from France, i.e. probably trade between metropolitan France and overseas territories or between overseas territories of France.

For the specimens reported by number of specimens, Small Giant Clam *Tridacna maxima* was the main species imported, accounting for 78%. Of this species, more than 99% were live specimens, and regarding their source, 57% were captive-born/bred (source code “F” and “C”) while approximately 43% were wild-sourced (the rest were pre-Convention specimens). The main countries of export were France (29%), Tonga (16%), Palau (13%) and French Polynesia (10%) (Figure 17).



**Figure 17:** Countries/territories of export for giant clams imported into France between 2008 and 2017, reported by number of specimens, based on importer reported quantities.

Source: CITES trade database



## RESULTS - CITES trade data analysis - Imports

Six species of giant clams in some range states were included in the Review of Significant Trade process in 2006 at the 22nd meeting of the Animals Committee (AC22), categorising the species as “of urgent concern” or “of possible concern” (CITES, 2006). Subsequently, the 57th meeting of the Standing Committee adopted recommendations including zero export quota for several species in certain countries (CITES, 2009). Currently, imports of nine species of Tridacnidae from several range States are still suspended in the EU (Table 8).

SPECIES	SOURCE COVERED	SPECIMENS COVERED	COUNTRY OF ORIGIN
<i>HIPPOPUS HIPPOPUS</i>	Wild	All	Tonga, Vanuatu, Viet Nam
<i>TRIDACNA CROCEA</i>	Wild	All	Cambodia, Fiji, Solomon Islands, Tonga, Vanuatu, Viet Nam
<i>TRIDACNA DERASA</i>	Wild	All	Fiji, Palau, Solomon Islands, Tonga, Vanuatu, Viet Nam
<i>TRIDACNA GIGAS</i>	Wild	All	Marshall Islands, Solomon Islands, Tonga, Viet Nam
<i>TRIDACNA MAXIMA</i>	Wild	All	Cambodia, Fiji, Marshall Islands, Micronesia, Mozambique, Solomon Islands, Tonga, Vanuatu, Viet Nam
<i>TRIDACNA NOAE</i>	Wild	All	Fiji, Micronesia, Solomon Islands, Vanuatu
<i>TRIDACNA ROSEWATERI</i>	Wild	All	Mozambique
<i>TRIDACNA SQUAMOSA</i>	Wild	All	Cambodia, Fiji, Mozambique, Solomon Islands, Tonga, Vanuatu, Viet Nam
<i>TRIDACNA TEVOROA</i>	Wild	All	Tonga

**Table 8: List of giant clams and countries of origin whose introduction into the EU are prohibited as of January 2020.**

Source: Commission Implementing Regulation (EU) No 2019/1587 prohibiting the introduction into the Union of specimens of certain species of wild fauna and flora

CITES trade data indicate that France imported 210 wild-sourced live specimens of Small Giant Clam *Tridacna maxima* from Micronesia in 2008 and 1,000 wild-sourced live specimens of the same species from Tonga in 2015 despite EU import suspensions for the species/country combination since 2006. However, these were errors, but not against the Suspensions Regulations: the first permit was issued with a mistake in the traded species, and the second permit was cancelled before being used on the basis on the suspensions in place (French CITES MA, *in litt.* to WWF France, March 2020).

## Conclusion

**France was the top importer of giant clams in the EU between 2008 and 2017, importing a total of 104,783 specimens and 87 kg between 2008 and 2017. The main country of export was France both by number of specimens and weight, suggesting much of the giant clams were traded between metropolitan France and France overseas or between France overseas themselves. Further attention and effort is warranted to ensure legality, sustainability and traceability of imported giant clams into France, notably considering the EU trade suspensions which still remain in place for certain species and countries.**

## 3.2 CITES trade data analysis (Re-)exports

A sponge next to a hard coral in the shallow waters around the Ba reef system. Northwestern, Viti Levu, Fiji

## 3.2.1 EU (RE-)EXPORTS - OVERVIEW

### Number of specimens

Of the approximately 130 million items that were (re-)exported from the EU between 2008 and 2017, the most important groups in trade were plants (31%), reptiles (28%), birds (20%), and fish (19%) (Table 9). France was the top (re-)exporter in the EU by number of specimens between 2008 and 2017, accounting for 50% of EU (re-)exports, followed by the Netherlands (26%) and Italy (10%).

TAXONOMIC GROUP	NUMBER OF SPECIMENS**	PERCENTAGE OF TOTAL*	MAIN COMMODITY TYPE(S)
PLANTS	39,515,232	31%	Live, roots
REPTILES	36,180,319	28%	Small leather products, skin pieces
BIRDS	25,740,561	20%	Medicine, live
FISH	24,280,678	19%	Live eggs
TOTAL FOR ALL OTHER TAXONOMIC GROUPS	3,791,115	3%	-
GRAND TOTAL	129,507,905	-	-

**Table 9: The main commodity groups and types (re-)exported by the EU between 2008 and 2017, as reported by number of specimens, based on exporter reported quantities.**

\* The total percentage may not add up to or exceed 100% due to rounding.

\*\* The figures /percentages may not add up to the figures in grand total/100% due to rounding.

Source: CITES trade database

### Weight

Of the approximately 7.4 million kg (re-)exported from the EU between 2008 and 2017, the most important commodities were fish, plants and birds (Table 10). France was the top exporter in the EU by weight (kg) as well, accounting for 39% of all EU exports, followed by Germany (27%) and Italy (14%).

TAXONOMIC GROUP	NUMBER OF SPECIMENS*	PERCENTAGE OF TOTAL	MAIN COMMODITY TYPE(S)
FISH	3,316,383	45%	Meat, live, bodies
PLANTS	2,774,171	37%	Wax, bark, extract
BIRDS	1,165,231	16%	Feathers
TOTAL FOR ALL OTHER TAXONOMIC GROUPS	161,720	2%	-
GRAND TOTAL	7,417,505	100%	-

**Table 10: The main commodity groups and types (re-)exported by the EU between 2008 and 2017, as reported by weight (kg), based on exporter reported quantities.**

\* The figures/percentages may not add up to the figures in grand total/100% due to rounding.

Source: CITES trade database



## 3.2.2 FRANCE'S POSITION IN THE EU

Of the main commodities commercially (re-)exported from the EU between 2008 and 2017, as reported by number of specimens and weight, France was found to be the main exporter for four commodities (Table 11):

- top exporter of **bird** commodities, as reported by number of specimens and weight (kg), accounting for 97% and 99% of the EU's exports respectively, most of which was medicine and feathers of Muscovy Duck *Cairina moschata*;
- top exporter of **reptile** commodities (mainly small leather products and skin pieces), as reported by number of specimens;
- top exporter of **fish** commodities (mainly live eggs of sturgeons), as reported by number of specimens, as well as second highest exporter as reported by weight;
- second highest exporter of **plants**, as reported by number of specimens and weight (kg).



Muscovy duck *Cairina moschata* with ducklings

## RESULTS - CITES trade data analysis - (Re-)export

TAXONOMIC GROUP	UNIT	FRANCE		EU	
		TOTAL QUANTITIES EXPORTED	POSITION IN EU EXPORTS (% OF TOTAL IN THE TAXONOMIC GROUP)	TOP EU EXPORTER (% OF TOTAL EU EXPORTS IN THE TAXONOMIC GROUP)	MAIN TAXA EXPORTED BY THE EU (%)
PLANTS	Number of specimens	2,044,458	2 (5%)	Netherlands (84%)	Giant Snowdrop <i>Galanthus elwesii</i> (34%)
	kg	892,078	2 (32%)	Germany (54%)	Candelilla <i>Euphorbia antisiphilitica</i> (39%)
BIRDS	Number of specimens	24,888,741	1 (97%)	France (97%)	Muscovy Duck <i>Cairina moschata</i> (97%)
	kg	1,164,550	1 (>99%)	France (>99%)	Muscovy Duck <i>Cairina moschata</i> (>99%)
REPTILES	Number of specimens	16,675,854	1 (46%)	France (46%)	American Alligator <i>Alligator mississippiensis</i> (61%)
	kg	2,438	3 (6%)	Italy (48%)	American Alligator <i>Alligator mississippiensis</i> (43%)
FISH	Number of specimens	19,662,699	1 (81%)	France (81%)	Siberian Sturgeon <i>Acipenser baerii</i> (85%)
	kg	801,820	2 (24%)	Italy (27%)	Siberian Sturgeon <i>Acipenser baerii</i> (45%)

Table 11: Commercial (re-)exports reported by EU Member States between 2008 and 2017 for the top four taxonomic groups, for trade reported by weight (kg), based on exporter reported quantities.

Source: CITES trade database

### Families for which France is a top three EU (re-)exporter

Of all commercial EU (re-)exports between 2008 and 2017 exceeding 10,000 units (100,000 units for plants), France was among the top three EU exporters for a total of 17 families. The previous section (Table 11) identified France as a major exporter of birds, fish, reptiles and plants within the EU; this trend was also observed in the 17 families in which France is among the top three EU exporters (Table 12):

- France was the top EU (re-)exporter of birds due to (re-)exports of Anatidae spp. (all trade reported as Muscovy Duck *Cairina moschata*) by number of specimens and weight, all of which were captive-bred. More than 99% of the trade was reported as medicine by number of specimens and feathers by weight.

Muscovy Duck was listed in Appendix III by Honduras until 10 March 2016<sup>31</sup>, therefore exports for 2017 were not reported. The specimens made from Muscovy Duck in a breeding operation in France were used as homeopathic medicines (French CITES MA, *in litt.* to WWF France, March 2020).

- France was also the main EU (re-)exporter of fish due to its exports of Acipenseridae spp. (mainly Siberian Sturgeon *Acipenser baerii*) by number of species and weight, involving a total of 19,662,428 specimens and 787,098 kg. The main commodities (re-)exported from France were live eggs by number of specimens and live specimens and bodies by weight, suggesting France (re-)exported mainly live sturgeons for aquaculture. Caviar was also the main commodity (re-)exported, totalling 147,894 kg and 131,421 specimens between 2008 and 2017.
- France was among the top three EU (re-)exporters of several reptile products by number of specimens. For example:
  - France was the top (re-)exporter of Alligators Alligatoridae spp. (97% of trade reported as American Alligator *Alligator mississippiensis*), involving a total of 15,077,292 specimens, 96% of which were wild-sourced. According to the French CITES MA, the USA does not use source code “R” for the Appendix II-listed species even if the specimens were produced as part of ranching programmes. The main countries of destination included Switzerland and Tunisia.

31 - Notification to the Parties No. 2016/008 (<https://cites.org/sites/default/files/notif/E-Notif-2016-008.pdf>)



Siberian weasel *Mustela sibirica* in the rocks, in Lazovsky State Nature Reserve, Far East, Russia

It should be noted that France was also the top importer of Alligators Alligatoridae spp. imported mainly from Switzerland and Tunisia (see 3.1.3). According to the French CITES MA, trade in these specimens are counted several times as these are traded before and after certain manufacturing process. Therefore, the actual number of specimens could be less than the reported number.

- France was a main (re-)exporter of Varanidae spp. (all trade reported as monitor lizards *Varanus* spp.), involving a total of 584,195 specimens, more than 99% of which were wild-sourced. France was also identified as a main importer of Varanidae spp. mainly from Madagascar and Mali (see 3.1.2).
- France was among the top three EU (re)exporters of several plant products, as reported by number of specimens and weight. For example:
  - France was a main (re-)exporter of Euphorbiaceae spp. (mainly *Candelilla Euphorbia antisiphilitica*) by number of specimens and weight, involving a total of 261,124 specimens and 233,700 kg, almost all the specimens were wild-sourced. France was also a main importer involving a total of 572,812 specimens and 2,597,915 kg (see 3.1.2);
  - France was also a main (re-)exporter of Rosaceae spp. (all trade reported as African Cherry *Prunus africana*) by weight, involving a total of 453,338 kg mainly originating in Cameroon (97%). France was also identified as a main importer of Rosaceae spp. importing 4,813,632 kg of wild-sourced specimens (see 3.1.2);
  - Ranunculaceae spp. was the top plant family (re-)exported from France by number of specimens, involving a total of 1,540,898 specimens, all of them were medicines made from artificially propagated specimens.

France was identified as the main (re-)exporter of certain families of mammals between 2008 and 2017. France (re-)exported a total of 60,347 specimens of Mustelidae spp. (more than 99% of trade reported as Siberian Weasel *Mustela sibirica*), mainly originating in China and a total of 10,197 specimens of Tayassuidae spp. (mainly Collared Peccary *Pecari tajacu*) originating mostly in Peru.

In addition, France was the main re-exporter of leeches Hirudinidae spp., Bivalvia Tridacnidae spp. and Gastropods Strombidae spp. all of which were among the species for which France was the top three importers in the EU (see 3.1.2).



## RESULTS - CITES trade data analysis - (Re-)export

TAXONOMIC GROUP	FAMILY	UNIT	QUANTITY EXPORTED FROM FRANCE	MAIN DESTINATIONS (% OF QUANTITY)*	MAIN SOURCE (% OF QUANTITY)*	MAIN TRADE TERM (% OF QUANTITY)*
PLANTS	<b>Euphorbiaceae</b>	Number of specimens	261,124	Japan (42%), Switzerland (33%)	W (98%)	Derivatives (60%)
		kg	233,700	USA (20%), Brazil (14%), Turkey (13%)	W (100%)	Wax (66%)
	Liliaceae	kg	108,518	USA (57%), Egypt (26%)	W (>99%)	Powder (90%)
	Orchidaceae	Number of specimens	120,126	China (23%), USA (23%)	A (>99%)	Derivatives (83%)
	<b>Ranunculaceae</b>	Number of specimens	1,540,898	USA (76%)	A (100%)	Medicine (100%)
	<b>Rosaceae</b>	kg	453,338	Madagascar (85%)	W (98%)	Bark (90%)
REPTILES	<b>Alligatoridae</b>	Number of specimens	15,077,292	Switzerland (41%), Tunisia (23%)	W (96%)	Small leather products (54%)
	Crocodylidae	Number of specimens	331,998	China (25%), USA (11%), Japan (10%)	C (67%)	Small leather products (55%)
	Pythonidae	Number of specimens	627,717	USA (22%), China (15%), Switzerland (10%)	C (67%)	Small leather products (89%)
	Teiidae	Number of specimens	35,886	USA (31%), China (17%)	W (98%)	Small leather products (80%)
	Varanidae	Number of specimens	584,195	China (19%), Japan (12%), USA (11%)	W (>99%)	Small leather products (48%)
BIRDS	<b>Anatidae</b>	Number of specimens	24,886,524	Russia (54%), USA (24%)	C (100%)	Medicine (>99%)
		kg	1,164,544	China (56%), Norway (36%)	C (100%)	Medicine (>99%)
FISH	<b>Acipenseridae</b>	Number of specimens	19,662,428	China (92%)	C (>99%)	Live eggs (96%)
		kg	787,098	Switzerland (46%), Russia (30%)	C (96%)	Live (39%)
MAMMALS	Mustelidae	Number of specimens	60,347	Japan (42%), USA (27%)	C (>99%)	Hair (63%)
	Tayassuidae	Number of specimens	10,197	Japan (65%), USA (13%)	C (>99%)	Garments (61%)
LEECHES	<b>Hirudinidae</b>	Number of specimens	1,125,954	USA (90%)	C (>99%)	Live (100%)
BIVALVIA	<b>Tridacnidae</b>	Number of specimens	175,707	USA (54%), France (20%)	W (96%)	Live (>99%)
GASTROPODS	<b>Strombidae</b>	kg	11,700	France (100%)	W (100%)	Meat (100%)

**Table 12: Families for which France was among the top three EU (re-)exporters for commercial trade, 2008–2017, where total trade exceeded 10,000 units (100,000 units for plants) excluding corals, as reported by number of specimens (blank) and weight (kg), based on exporter reported quantities.**

\* for France's (re-)exports

Note 1: Corals were excluded as most of the records were reported at the order level.

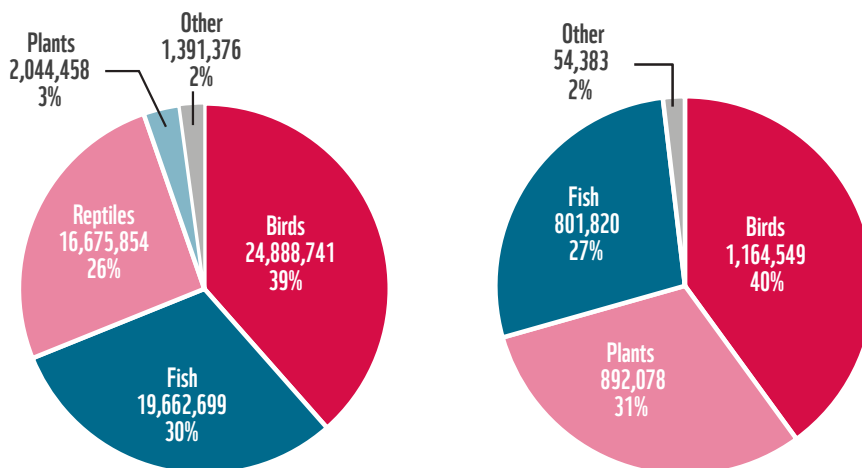
Note 2: Families for which France was the top EU importer are in bold. Source: CITES trade database (Re-)exports from France.

Source: CITES trade database (Re-)exports from France

## 3.2.3 (RE-)EXPORTS FROM FRANCE MAIN SPECIES AND COUNTRIES OF DESTINATION

### (Re-)exports from France

Between 2008 and 2017, approximately 65 million specimens and an additional 3 million kg were (re-)exported from France. While (re-)exports were also reported in volume (e.g. l), these were less than 1,000 units. The most frequently (re-)exported taxonomic groups from France were birds, accounting for approximately 40% by number of specimens and weight during the period, as well as fish, plants, reptiles (Figure 18).



**Figure 18:** Main taxonomic groups (re-)exported from France between 2008 and 2017, reported as number of specimens (left) and weight (kg) (right), based on importer reported quantities.

Source: CITES trade database

### Main species (re-)exported from France

The main species exported from France by number of specimens between 2008 and 2017 included Muscovy Duck *Cairina moschata*, Siberian Sturgeon *Acipenser baerii* and American Alligator *Alligator mississippiensis* (Table 13). It should be noted that of the top five species (re-)exported from France, two species (American Alligator *Alligator mississippiensis* and Medicinal Leech *Hirudo medicinalis*) were also among the main species imported into France. The number of specimens of these species (re-)exported from France exceeded imported number of specimens between 2008 and 2017 (e.g. 7,217,210 specimens of American Alligator and 1,000,000 specimens of Medical Leech<sup>32</sup> were imported by France) and the main traded terms were also the same between (re-)exports and imports. According to the French CITES MA, imported reptile skins are processed into skin cuts and watch bracelets before re-export, which makes the number of re-exported specimens higher than those imported. The main country of origin of these species was the USA while the other three species mainly originated in France. Siberian sturgeons were mainly (re-)exported from France as live eggs, suggesting France plays an important role as a provider of live sturgeons for aquaculture globally.

<sup>32</sup> - France mostly exports leeches which were not recently imported but produced in the EU (French CITES MA, pers. comm. to WWF France, March 2020).

## RESULTS - CITES trade data analysis - (Re-)export



American alligator *Alligator mississippiensis* Sanibel Island, Florida, United States of America

TAXA	QUANTITY (NO. OF SPECIMENS)	PERCENT IN FRANCE'S TOTAL EXPORTS	MAIN TERMS (%)	MAIN SOURCE (%)	MAIN COUNTRY OF ORIGIN (%)	MAIN DESTINATION (%)
<b>MUSCOVY DUCK</b> <i>CAIRINA MOSCHATA</i>	24,886,524	38%	Medicine (>99%)	C (100%)	France (100%)	Russia (45%)
<b>SIBERIAN STURGEON</b> <i>ACIPENSER BAERII</i>	18,799,656	29%	Live eggs (97%)	C (100%)	France (100%)	China (93%)
<b>AMERICAN ALLIGATOR</b> <i>ALLIGATOR MISSISSIPPIENSIS</i>	14,606,842	23%	- Small leather products (54%), - Skin pieces (45%)	W (98%)	USA (>99%)	Switzerland (41%)
<b>GOLDENSEAL</b> <i>HYDRASTIS CANADENSIS</i>	1,540,898	2%	Medicine (100%)	A (100%)	USA (66%)	USA (76%)
<b>MEDICINAL LEECH</b> <i>HIRUDO MEDICINALIS</i>	1,125,954	2%	Live (100%)	C (>99%)	France (70%)	USA (90%)

**Table 13: Main species/taxa (re-)exported from France between 2008 and 2017, as reported by number of specimens, based on exporter reported quantities**

Note: Pharmaceuticals and sturgeon eggs are accounted for per item (e.g. one sturgeon egg is considered one specimen).

Source: CITES trade database

In terms of trade reported as weight, the top two species (re-)exported from France were the same as those reported as number of specimens (Muscovy Duck and Siberian Sturgeon), but the main terms were different (Table 11). Almost all the sources of these species were reported as captive bred and originated in France.

African Cherry *Prunus africana*, Candelilla *Euphorbia antisyphilitica* and Cape Aloe *Aloe ferox* were also identified as the main species imported into France by weight (see Table 7). The (re-)exported weight was, however, much lower than imported weight (e.g. 4,813,632 kg of African Cherry, 2,597,875 kg of Candelilla and 190,741 kg of Cape Aloe were imported by France). The main traded terms were also similar between (re-)exports and imports except for Cape Aloe (powder accounted for 90% for (re-)exports while extract was dominant for imports [68%]). This suggests that some of these species are imported for processing and subsequent re-exports while others are utilised for the domestic/EU market. The country of origin of these species were Cameroon, Mexico and South Africa.



## RESULTS - CITES trade data analysis - (re-)export

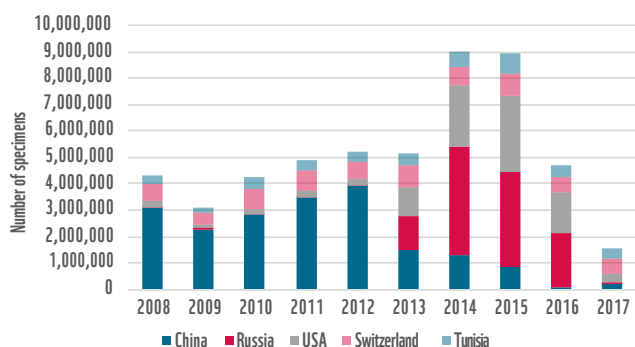
TAXA	QUANTITY (KG)	PERCENT IN FRANCE'S TOTAL TRADE	MAIN TERMS (%)	MAIN SOURCES (%)	MAIN COUNTRY OF ORIGIN	MAIN DESTINATION (%)
<b>MUSCOVY DUCK</b> <i>CAIRINA MOSCHATA</i>	1,164,544	40%	Feathers (>99%)	C (>99%)	France (100%)	China (56%)
<b>SIBERIAN STURGEON</b> <i>ACIPENSER BAERII</i>	686,602	24%	Live (42%), Bodies (35%)	C (98%)	France (90%)	Switzerland (50%)
<b>AFRICAN CHERRY</b> <i>PRUNUS AFRICANA</i>	453,338	16%	Bark (90%)	W (98%)	Cameroon (97%)	Madagascar (85%)
<b>CANDELILLA</b> <i>EUPHORBIA ANTISYPHILITICA</i>	233,700	8%	Wax (66%)	W (100%)	Mexico (>99%)	USA (20%)
<b>CAPE ALOE</b> <i>ALOE FEROX</i>	108,518	4%	Powder (90%)	W (>99%)	South Africa (100%)	USA (57%)

**Table 14:** Main species/taxa (re-)exported from France between 2008 and 2017, as reported by weight (kg), based on exporter reported quantities.

Source: CITES trade database

## Main countries of destination for France

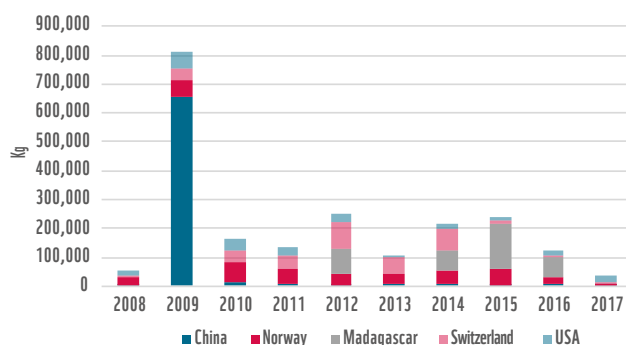
The top five countries where commodities were exported from France were China, Russia, the USA, Switzerland, and Tunisia, which accounted for a total of 79% of all France's exports, as reported by number of specimens. The total number of specimens exported to these five countries increased over the years, reaching a peak of nearly 9 million specimens in 2014, after which it declined dramatically in 2016 and 2017 (Figure 19). The relative importance of China declined over the years while those of Russia and the USA were considerable between 2013 and 2016. According to the French CITES MA, shipments are sent to Tunisia as part of the product manufacturing process; most of the specimens (re-)exported to Tunisia are reptile skin pieces and leather products.



**Figure 19:** Top five importers for France, as reported by number of specimens, between the years of 2008 and 2017, based on exporter reported quantities.

Source: CITES trade database

As for exports reported in weight, the top five countries of destination for France were China, Norway, Madagascar, Switzerland, and the USA (Figure 20), which accounted for a total of 73% of all France's exports. China was the top destination due to a large amount of imports exceeding 653,000 kg in 2009, more than 99% of which were Muscovy Duck *Cairina moschata* feathers, which came from French farms (French CITES MA, *in litt.* to WWF France, March 2020). (Re-)exports to Madagascar were reported only in 2012, 2014–2016 and all of them were African Cherry *Prunus africana* bark originating in Cameroon. According to the French CITES MA, the shipments are sent to Madagascar as part of the product manufacturing process. China and the USA were among the top five destinations both by number of specimens and weight.



**Figure 20:** Top five importers from France, as reported by weight (kg) between 2008 and 2017, based on exporter reported quantities.

Source: CITES trade database

## 3.2.4 FRANCE AS COUNTRY OF ORIGIN - EXPORTS FROM FRANCE

Between 2008 and 2017, 45 million specimens and an additional 1,912 t were directly exported from or originated in France, which accounted for 70% and 66% of all (re-) exports from France respectively.

Almost all the specimens were captive bred or artificially propagated, accounting for 99% by number of specimens and 97% by weight. The main species were Muscovy Duck *Cairina moschata* (mainly as medicine and feathers), accounting for 55% by number of specimens and 61% by weight of total exports from France, and sturgeons (mainly as live eggs, live and bodies), accounting for 43% by number of specimens and 37% by weight of total exports from France.

Of the direct exports from France, approximately 157,000 specimens and 43,000 kg were wild sourced specimens. These were mainly Small Giant Clam *Tridacna maxima*, accounting for over 99% by number of specimens<sup>33</sup>, stony corals and European Eel *Anguilla anguilla*, which in total accounted for 99% by weight (Table 15).

Exports of Small Giant Clams were recorded from 2010 onwards and reached a peak of over 35,000 specimens in 2014, after which they declined to approximately 13,000 specimens in 2017. The main importers were the USA, followed by France (likely trade between metropolitan France and France overseas) and other EU Member States. According to the French CITES MA, Small Giant Clams are exported from French Polynesia, whose fisheries are conducted by licenced companies and well-regulated and monitored by the Polynesian authorities. The Scientific Review Group (SRG) has formed a positive opinion for imports of Small Giant Clams from French Polynesia since 1997.

Stony corals were reportedly exported between 2009 and 2011, after which no exports were reported. As trade from dependent territories of France is not distinguished from trade involving metropolitan France (Price, B., UNEP-WCMC, *in litt.*, in November 2019), many of these specimens are likely to have been exported from France overseas.

Exports of European Eels were recorded only in 2009 and 2010 as exports of the species have been banned since December 2010 after the EU's SRG concluded that it was not possible to make a Non-Detriment Finding (NDF) for the export of European Eel while glass eels caught in the EU are still allowed to be traded within the EU.

TAXA	QUANTITY	MAIN TERMS (%)	MAIN IMPORTER(S)
<b>SMALL GIANT CLAM</b> <i>TRIDACNA MAXIMA</i>	156,876 specimens	Live (100%)	USA (54%), France (20%)
<b>STONY CORALS</b> <i>SCLERACTINIA SPP.</i>	28,400 kg	Live (100%)	USA (100%)
<b>EUROPEAN EEL</b> <i>ANGUILLA ANGUILLA</i>	14,225 kg	Fingerlings (>99%)	China (>99%)

**Table 15: Main species exported and originated from France with source code W, between 2008 and 2017, as reported by number of specimens and weight (kg), based on exporter reported quantities.**

Source: CITES trade database

<sup>33</sup> - All these clams are exported by French Polynesia where they are sustainably managed by locally licensed companies, whose activity is controlled and monitored by the Polynesian authorities. Even though these specimens are exported under the W code, it is a production which is assisted by local Polynesian producers who have spat collection panels in the lagoons. Imports of these specimens into the EU have been the subject of a favourable SRG opinion since 1997 (French CITES MA, *in litt.*, to WWF France, March 2020).

## 3.2.5 FRANCE AS COUNTRY OF ORIGIN - (RE-)EXPORTS FROM OTHER COUNTRIES

France was also reported as country of origin in trade between other countries between 2008 and 2017, with the trade involving mainly fish commodities, accounting for more than 95% of trade by number of specimens and weight (kg) according to importer and exporter reported data. According to importer reported data, of the total trade in fish species, European Eel *Anguilla anguilla* and sturgeons *Acipenseriformes* spp. accounted for more than 95% by weight and number of specimens respectively.

### European Eel

According to importer reported data, a total of approximately 17 million kg of European Eels declared as originating in France were re-imported (i.e. imported from other Parties) globally between 2008 and 2017 with no imports reported for 2008 and 2017 (the CITES listing of the European Eel came into force in March 2009). Global (re-)imports of European Eels originating in France reached a peak of over 5 million kg in 2013, after which they declined gradually over the years (Figure 21). The main commodity traded was meat, accounting for 98% by weight. China was the main re-exporter (accounting for 99%) while Japan was the main importer (accounting for 98%). (Re-)imports of eels as pre-Convention specimens continued until 2013, after which only wild sourced specimens were recorded<sup>34</sup>, which are considered to be those imported from France before exports of the species from the EU were banned in December 2010, and kept in eel farms for a few years (see case study below).

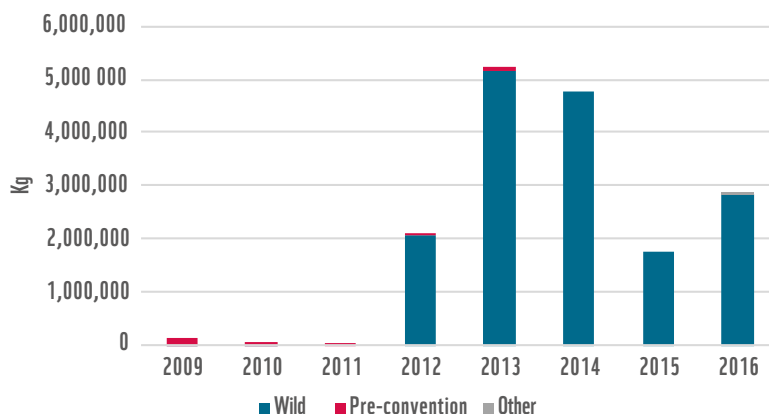


Figure 21: Global (re-)imports of European eels originated in France by source between 2008 and 2017, as reported by weight (kg), based on importer reported quantities.

Note: No (re-)imports were reported in 2017.

Source: CITES trade database

<sup>34</sup> - Apart from 20,000 kg reported with source code A (artificially propagated plants) in 2016, which is considered to be a reporting error.

### Sturgeons

According to importer reported data, 631,260 specimens and an additional ca. 28,000 kg of live sturgeons and their bodies, parts and derivatives (BPD) originating in France were traded globally between 2008 and 2017. The main commodities were medicine, derivatives and extract by number of specimens and caviar, meat and cosmetics by weight (kg). By number of specimens, all the specimens were sourced from captive breeding while 97% were captive-bred by weight. Germany and Israel were the main countries of export by number of specimens and weight respectively, while Georgia and Latvia were the main countries of import by number of specimens and weight respectively.

#### Case study - European Eel

The European Eel *Anguilla anguilla*, one of the 16 species in the family Anguillidae is distributed in most of Europe, Mediterranean Asia and parts of the North African coast (Jacoby and Gollock, 2014). All continental life stages of *A. anguilla* are commercially harvested, traded and used directly for human consumption (Crook and Nakamura, 2013). Wild juvenile glass eels or live eel fry are also caught and then used as “seed” in farming/aquaculture operations, as closed-cycle captive breeding of *Anguilla* spp. is not yet commercially viable (Shiraishi and Crook, 2015). While operations exist within Europe, *A. anguilla* glass eels had been widely used for farming in East Asia, particularly in China from the early 1990s (Ringuet et al., 2002; Shiraishi and Crook, 2015). Eels (including European Eels) are kept in eel farms for a couple of years until they reach their adult size and consequently consumed domestically or re-exported mainly as frozen or processed eels (Shiraishi and Crook, 2015).

Due to a significant depletion of stock, the species was listed as “Critically Endangered” on the IUCN Red List, and placed in CITES Appendix II in 2007, with the latter coming into force in 2009. In December 2010, the SRG concluded that it was not possible to make a non-detriment finding for the export of the species and subsequently a zero-import/export policy was set for the EU, and the decision has been confirmed every year subsequently (to 2020 at the time of writing) (EC, 2010; EC, 2020b). Despite the trade ban, illegal trade in *A. anguilla*, particularly in glass eels, is ongoing and it is recognised as one of the most serious wildlife crime problems the EU faces (EC, 2016b).

Glass eel fishing still takes place in Italy, France, Germany, Spain, and the UK in Europe, which totals around 60 t per fishing season, but the majority of the catch has been reported by France; 54 t of commercial glass eel catch was reported in France in 2018 (ICES, 2018). Glass eels are traded for restocking, aquaculture and direct consumption within the EU while a lack of an EU-wide traceability system leads to illegal exports of glass eels from the EU (Gollock et al, 2018).

Concerns over the lack of traceability and consequent unknown source of European Eels in eel farms were raised outside the EU as well. The Japanese Fisheries Agency and eel importers requested Chinese stakeholders examine the legality and traceability of *A. anguilla* grown out from glass eels imported from the EU prior to December 2010, and it was subsequently reported that re-export certificates from China would expire in June 2015, although this was delayed until 2016 (TRAFFIC, 2015; Shiraishi and Crook, 2015).

While a significant amount of European Eels is illegally traded as glass eels, European Eels are also illegally (re-)imported mainly as frozen meat after they are grown to marketable size in eel farms. In April 2019, the main importers of eel meat including the USA, Canada and some EU Member States participated in an operation targeting imports of frozen eel meat from China, which resulted in the detection of illegal shipments (Walsh-Thomas and Landry, 2020).

France bears a huge responsibility for ensuring the legality, sustainability and traceability of eels caught and traded in France as a main source of *A. anguilla* glass eels. See 3.4.3, case study n°7, for a seizure analysis of eels.



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European eel *Anguilla anguilla*



## 3.3 CITES trade data analysis

### France overseas

Islet Casey, South province of New Caledonia, France

## 3.3.1 IMPORTS INTO FRANCE OVERSEAS

### 1. FRANCE OUTERMOST REGIONS (OR)

Between 2008 and 2017, CITES Parties (re-)exported 3,517,727 specimens, 2,295,404 kg, 722 m<sup>3</sup> and 0.2 l to the France OR<sup>35</sup>. The most traded commodity groups (re-)exported to the France OR by other CITES Parties (including EU Member States) were plants and Gastropods, and to a lesser extent reptiles (Table 16); plants accounted for 81% of (re-)exports to the France OR with ca. 2.8 million specimens by number, and gastropods accounted for more than 99% of (re-)exports by weight (kg). By volume (m<sup>3</sup>), all of trade involved plants, mainly sawn wood.

TAXONOMIC GROUP	NO. OF SPECIMENS	WEIGHT (KG)	VOLUME (M3)
PLANTS	2,841,384	4	722
GASTROPODS	670,005	2,294,450	-
REPTILES	5,613	1	-
TOTAL FOR OTHER TAXONOMIC GROUPS	725	949	-
GRAND TOTAL	3,517,727	2,295,404	722

**Table 16: The main taxonomic groups (re-) exported to the France outermost regions by CITES Parties between 2008 and 2017, reported as number of specimens, weight (kg) and volume, based on exporter reported quantities.**

Note: 0.2 l of *Chlorocebus aethiops* specimens were also (re-)exported.

Source: CITES trade database

Of the 722 m<sup>3</sup> of plants exported to the France OR, Spanish Cedar *Cedrela odorata* sawn wood accounted for 99% by volume. The main exporter was Côte d'Ivoire, accounting for 98%, while Guadeloupe was reported as a main destination (95%). A large volume of exports was reported in 2011 and 2017, exceeding 200 m<sup>3</sup> respectively.

<sup>35</sup> - Guadeloupe, Reunion, Martinique, Mayotte, French Guiana and Saint Martin

## RESULTS - CITES trade data analysis - France overseas

### Plants

By number of specimens, (re-)exports of plants fluctuated over the years, reaching a peak of 963,264 specimens in 2017. Of the various species (re-)exported, those in Orchidaceae spp. accounted for 93% of (re-)exports, followed by Euphorbiaceae spp. and Cactaceae spp. Almost 100% of specimens were live. The specimens were mainly (re-)exported to Reunion, accounting for approximately 93%, but also to Guadeloupe (4.6%), Martinique (2%), and French Guiana and Saint Martin (<1% each). The main (re-)exporters included Thailand (accounting for 77%), South Africa (18%) and China (5%). More than 99% of the specimens were artificially propagated.

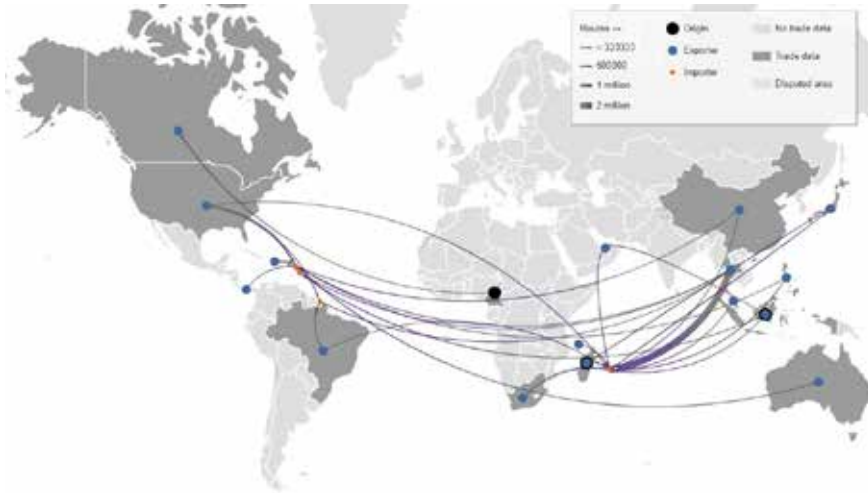


Figure 22: Country of exports and destination for plant specimens (re-)exported to the France outermost regions between 2008 and 2017, as reported by number of specimens, based on exporter reported quantities.

Source: CITES trade database

### Gastropods

Between 2008 and 2017, a total of 670,005 specimens and 2,294,450 kg of gastropods were (re-)exported to the France OR (all trade reported as Queen Conch *Strombus gigas* meat). By weight, (re-)exports of Queen Conch seem to have been stable between 2008 and 2014; by number of specimens, re-exports were reported only in 2011 and 2014, which may be the reason (re-)exports for these years by weight seems to be less (misreporting of units possibly occurred). However, (re-)exports declined dramatically from 2015, 2,727 kg in 2015 and no (re-)exports were reported in 2016 and 2017 (Figure 23).

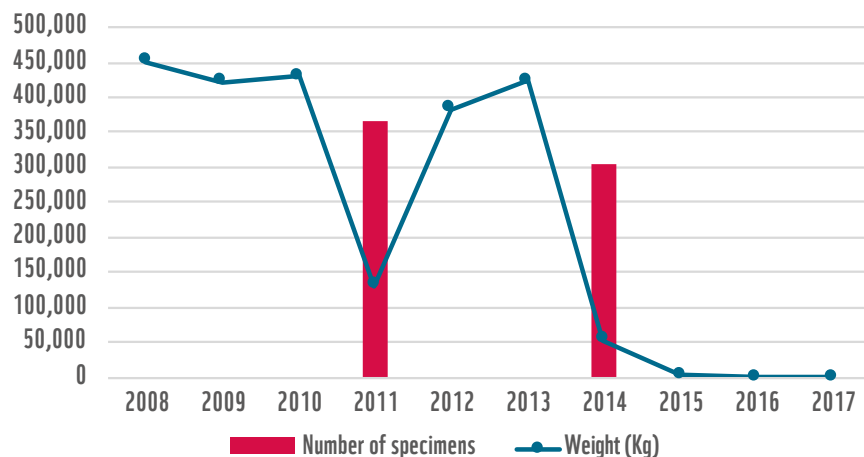


Figure 23: Re-exports of Queen Conch to the France outermost regions by CITES Parties between 2008 and 2017, as reported by number of specimens and weight (kg), based on exporter reported quantities.

Source: CITES trade database

## RESULTS - CITES trade data analysis - France overseas

Jamaica was the main country of export and origin (accounting for 79% by weight and 100% by number of specimens) and the specimens were mainly (re-)exported to Martinique (accounting for 64% by weight and 66% by number of specimens) and Guadeloupe (34% by weight and by number of specimens), and a small amount was also (re-)exported to Saint Martin (Figure 24).

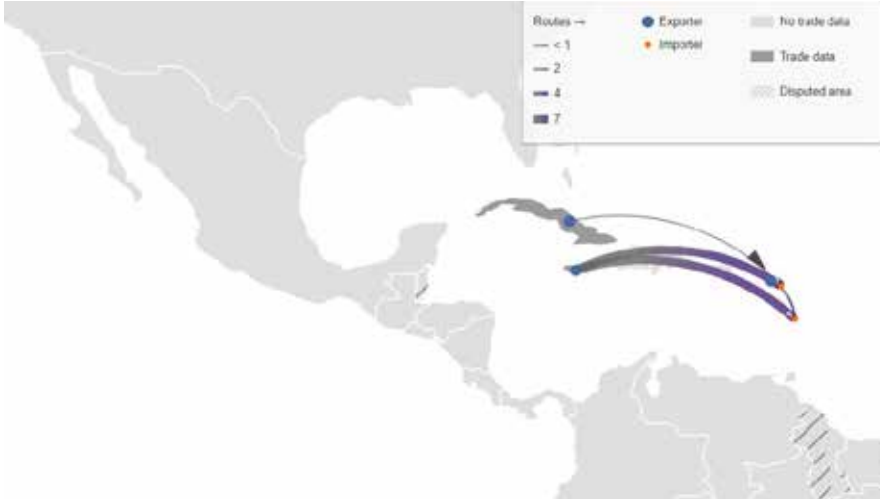


Figure 24: Country of exports and destination for Queen Conch specimens (re-)exported to the France outermost regions between 2008 and 2017, as based on records, based on exporter reported quantities.

Source: CITES trade database

## Reptiles

Between 2008 and 2017, a total of 5,613 specimens and 1 kg of reptile bodies, parts and derivatives were (re-)exported to the France outermost regions. The number of specimens (re-)exported to the France OR declined over the years after reaching a peak of 1,111 specimens in 2013. By number of specimens, more than 99% were small leather products and the main specimens were American Alligator *Alligator mississippiensis* (accounting for 63% by number of specimens) and African Python *Python sebae* (28%). The majority of the specimens (85%) were wild sourced. The main countries of (re-)exports were Switzerland (accounting for 45%), Senegal (28%) and the USA (21%) (Figure 25). While reptile products exported from Switzerland were all re-exports (mainly originating in the USA), the specimens exported from Senegal were all originating in that country and 80% of specimens from the USA originated in that country. The destinations were Guadeloupe (accounting for approximately 46%), Martinique (29%), Saint Martin (14%), Reunion (11%) and French Guiana (<1%).



Figure 25: Country of (re-)exports and destination for reptile bodies, parts and derivatives (re-)exported to the France outermost regions between 2008 and 2017, as reported by number of specimens, based on exporter reported quantities.

Source: CITES trade database



## 2. FRANCE OVERSEAS COUNTRIES AND TERRITORIES (OCT)

Between 2008 and 2017, CITES Parties (re-)exported 134,177 specimens, 1,497 kg (and 0.093 m<sup>3</sup> and 0.003 l) to the France OCT<sup>36</sup>. The most traded commodity groups exported to this group by other CITES Parties (including EU Member States) were plants (accounting for 90%) and reptiles (9%) by number of specimens, and fish (accounting for approximately 70%), reptiles (22%) and plants (9%) by weight. The main territories of import were New Caledonia and French Polynesia by number of specimens, and French Polynesia and Saint-Barthélemy by weight.

TAXONOMIC GROUP	NO. OF SPECIMENS	WEIGHT (KG)
PLANTS	121,134	129
REPTILES	12,484	322
FISH	385	1,046
TOTAL FOR OTHER TAXONOMIC GROUPS	174	-
GRAND TOTAL	134,177	1,497

Table 17: The main taxonomic groups (re-)exported to the France overseas countries and territories by CITES Parties between 2008 and 2017, reported as number of specimens and weight (kg), based on exporter reported quantities.

Note: A total of 0.093 m<sup>3</sup> (pre-Convention specimens mainly *Dalbergia* spp.) and 0.003 l of specimens containing Grivet Monkey *Chlorocebus aethiops* were also (re-)exported.

Source: CITES trade database

### Plants

Between 2008 and 2017, 121,134 specimens and 129 kg of plants and plant products were (re-)exported to the France OCT. By number of specimens, the main taxonomic family was Orchidaceae spp., accounting for 69%, followed by Ranunculaceae spp. (16%) and Euphorbiaceae spp. (9%), and main commodity types were live specimens (82%) and medicine (17%). The majority of specimens (98%) were artificially propagated. The main exporters of plants and plant products were Thailand (accounting for 77%) and France (17%) while New Caledonia was the top territory of destination, followed by French Polynesia (Figure 26). By weight, there was one main record involving 127 kg of wild-sourced Cape Aloe *Aloe ferox* derivatives exported from South Africa to New Caledonia in 2014.

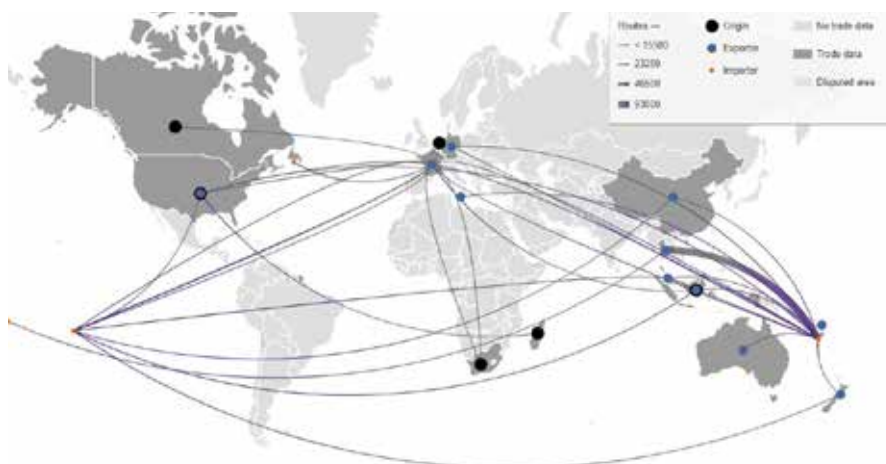


Figure 26: Country of exports and destination for plant specimens (re-)exported to the France overseas countries and territories between 2008 and 2017, as reported by number of specimens, based on exporter reported quantities.

Source: CITES trade database

36 - Wallis-and-Futuna, Saint-Barthélemy, Saint-Pierre-and-Miquelon, New Caledonia, French Polynesia and French Southern and Antarctic Territories

## RESULTS - CITES trade data analysis - France overseas

### Reptiles

Between 2008 and 2017, 12,484 specimens and 322 kg of reptile bodies, parts and derivatives and live reptiles were (re-)exported to the France OCT. For those reported by weight, all the specimens were captive-bred Saltwater Crocodile *Crocodylus porosus* (mainly meat) exported from Australia to French Polynesia and New Caledonia.

By number of specimens (re-)exports of reptile specimens increased from less than 140 specimens per year up to 2012 to over 2,000 specimens in 2013 onwards, which is mainly because of increase in (re-)exports to Saint-Barthélemy (Figure 27).

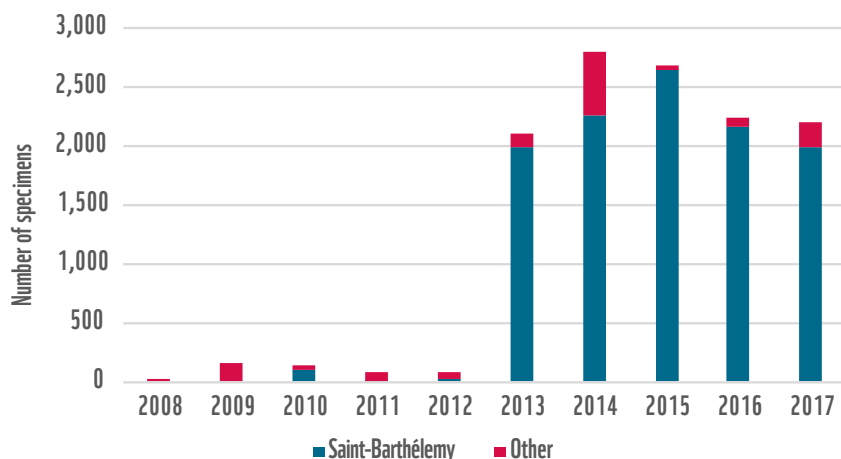


Figure 27: Imports of reptiles into the France overseas countries and territories between 2008 and 2017, as reported by number of specimens, based on exporter reported quantities.

Source: CITES trade database

By number of specimens, (re-)exports of small leather products accounted for 93%, although smaller numbers of other commodity types including meat and live specimens were also (re-)exported. Re-exports of live specimens involved a total of 180 specimens, all of which were tortoises *Testudinidae* spp. re-exported from Spain to French Southern and Antarctic Lands in 2016 and 2017.

Of the various species (re-)exported, the main taxonomic genus was *Caiman* spp. (accounting for 37%), *Crocodylus* spp. (22%), *Alligator* spp. (20%) and *Python* spp. (17%). The specimens were mainly (re-)exported by EU Member States (85%), notably Italy and France while Saint-Barthélemy was the dominant destination (89%), followed by New Caledonia (8%) and French Southern and Antarctic Lands (3%). The majority of specimens were wild sourced (60%).

### Fish

A total of 1,046 kg and 385 specimens of fish products were (re-)exported to the France OCT between 2008 and 2017. By weight, all the specimens were sturgeons and paddlefish *Acipenseriformes* spp. (98% of trade reported as caviar) while by number of specimens, live *Osteoglossiformes* spp. (all of the trade involved Asian Arowana *Scleropages formosus*) accounted for 83% and the remaining 17% were sturgeon derivatives. All specimens of Asian Arowana were exported from Singapore to French Polynesia with source code D (Appendix I animals bred in captivity). The extract taken from *Acipenser baerii* (67 specimens) originated in France and were re-exported from Australia to New Caledonia in 2011.

Re-exports of sturgeons and paddlefish specimens by weight fluctuated over the years, reaching a peak of 316 kg in 2016. Most of the specimens (98% by weight) were caviar and 99% of specimens were (re-)exported from EU Member States, with France and Germany being the top EU (re-)exporters. Most of the specimens were captive bred. The specimens were mainly (re-)exported to Saint-Barthélemy (accounting for 46%) and French Polynesia (40%).

## 3.3.2 (RE-)EXPORTS FROM FRANCE OVERSEAS

### 1. FRANCE OUTERMOST REGIONS (OR)

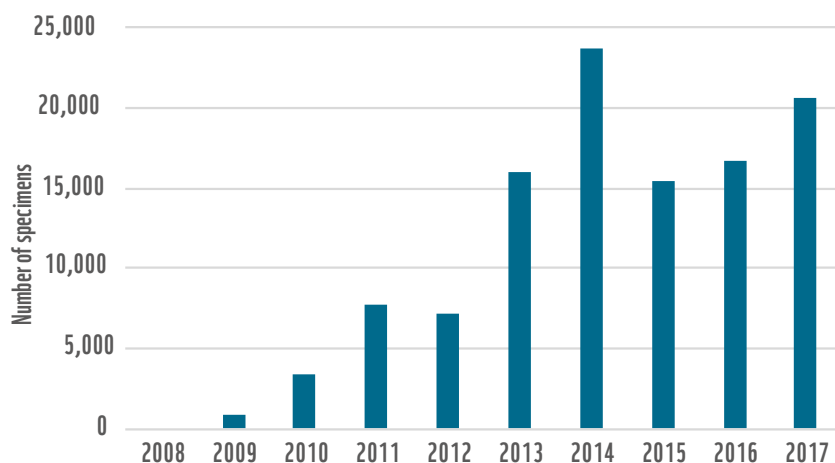
According to CITES trade data reported by trading partners, a total of 2,068 kg and six specimens were imported from the France OR between 2008 and 2017, all of which were re-exported wild-sourced specimens. The specimens were re-exported from Guadeloupe, French Guiana and Reunion. In 2008, Cuba imported 2,068 kg of Queen Conch *Strombus gigas* meat from Guadeloupe, which originated in Cuba. The six specimens were small leather products made from American Alligator *Alligator mississippiensis* or Reticulated Python *Python reticulatus*. Four specimens were re-exported from French Guiana to Australia in 2011, one specimen from Guadeloupe to the USA in 2012 and one specimen from Reunion to Switzerland in 2017.

### 2. FRANCE OVERSEAS COUNTRIES AND TERRITORIES (OCT)

According to CITES trade data reported by trading partners, a total of 114,873 specimens and 1,226 kg of CITES-listed species were commercially imported from the France OCT between 2008 and 2017, more than 90% also originated in the territories (114,734 specimens and 1,106 kg). By number of specimens, the specimens reportedly originated and were imported from French Polynesia and New Caledonia. By weight, 1,106 kg of wild-sourced stony raw corals were imported from French Polynesia by the USA in 2009.

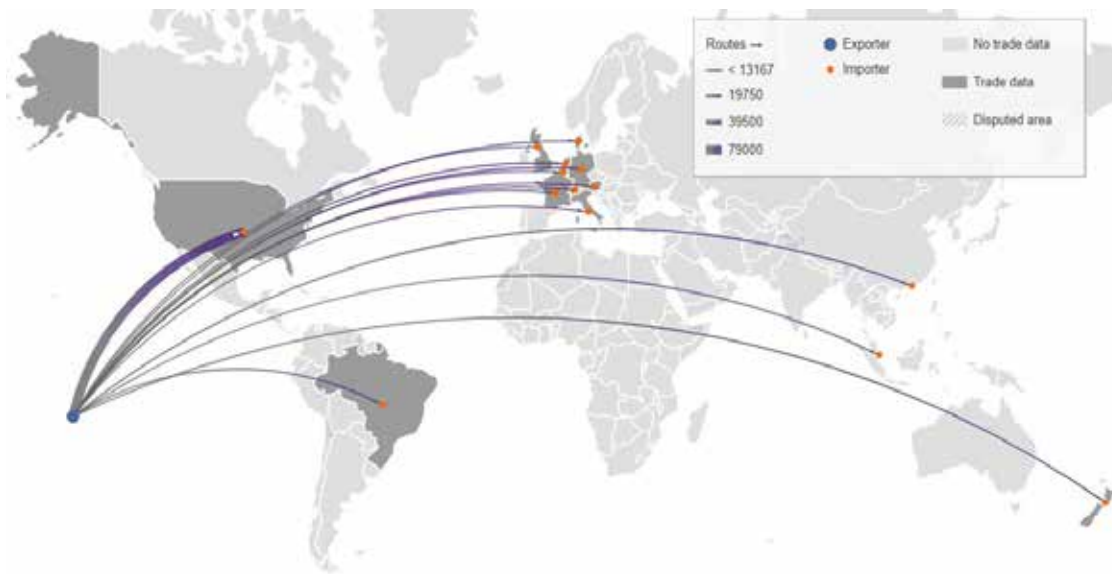
### Exports from France OCT

Of the 114,427 specimens imported from French Polynesia, 97% were Small Giant Clam *Tridacna maxima* (mainly live specimens) and the remaining 3% were stony corals (live specimens and raw corals). Imports of stony corals (2,984 specimens) were reported only in 2009 by the USA. Imports of Small Giant Clams increased over the years, reaching a peak of 23,770 specimens in 2014 (Figure 28). Almost all the specimens (99%) were wild-sourced. Of the various countries/territories which reported imports of Small Giant Clams from French Polynesia, the main importers were the USA (accounting for 71%), followed by Germany (13%) and France (10%) (Figure 29).



**Figure 28:** Imports of Small Giant Clam from French Polynesia between 2008 and 2017, as reported by number of specimens, based on importer reported quantities.

Source: CITES trade database



**Figure 29: Country of imports for Small Giant Clams originating and exported from French Polynesia between 2008 and 2017, as reported by number of specimens, based on importer reported quantities.**

Source: CITES trade database

Imports of 307 specimens of CITES-listed species originated from New Caledonia were also reported between 2008 and 2017. The USA imported 297 specimens of Hedgehog Seahorse *Hippocampus spinosissimus* in 2016, and France imported 10 stony coral carvings in 2008.

## Re-exports from France OCT

In addition, 139 specimens and 120 kg were re-exported from the France OCT between 2008 and 2017. By weight, all the specimens were *Cyathea* spp. carvings re-exported from New Caledonia to France in 2008. By number of specimens, all the specimens were reptile skins or small leather products, with *Python* spp. being the main species. The main territory of export was New Caledonia and these were mainly imported by the USA.

## Conclusion

**For the imports of CITES-listed species into France overseas, those into the France outermost regions were reportedly much higher than those into the France overseas countries and territories between 2008 and 2017. Live orchids were the main commodity imported into both the France OR and OCT by number of specimens while Queen Conch meat was the main commodity imported into the France OR by weight.**

**There were no reported direct exports from the France OR while 114,734 specimens (mainly Small Giant Clam) and 1,106 kg were exported from the France OCT. As almost all the Small Giant Clams exported were wild sourced, continual monitoring as to whether these are sustainably caught and traded would be warranted.**

**It is noted that EU legislation is directly and fully implemented in the France OR and no CITES permits were required for trade with EU Member States so that trade data between OR and EU Member States (including metropolitan France) is likely to be underrepresented.**



## 3.4 Illegal trade data analysis

Rocky Mountain Arsenal National Wildlife Refuge Repository in Commerce City, Colorado, where tons of seized ivory, animal parts illegally poached for fashion, decor and money are held once they've been seized by authorities.

# 3.4.1 EU-TWIX

## 1. SEIZURES REPORTED BY FRANCE

For the period 2008 to 2017, there were a total of **3,342 seizure records implicating metropolitan France reported by France in the EU-TWIX database**; 92% of these seizure records (3,090) involved species of fauna, and 8% involved species of flora (252). Of the total seizure records reported by France, 3% (105 seizure records) reported an estimated value of the seized specimens, which totalled ca. EUR230,000. Most of the seizure records during 2008–2017 were reported by the French Customs and French Office for Biodiversity (OFB; formally National Hunting and Wildlife Office until the 1st of January 2020) accounting for 50% and 48% respectively (Figure 30). French Customs reported mainly seizures related to international trade whereas OFB reported mainly internal seizures.

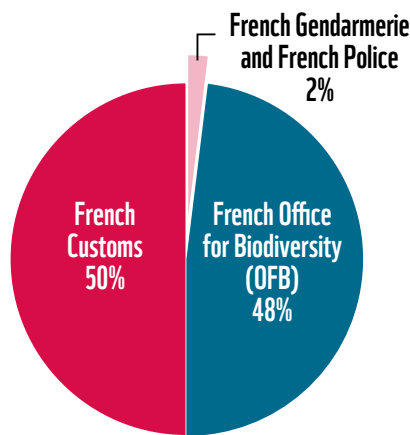


Figure 30: Reporting agencies of seizures reported by France, between 2008 and 2017, by number of seizure records.

Source: EU-TWIX database

It is noted that other seizure data from French Customs indicated that there was a total of 5,622 seizures in France between 2008 and 2017 with a total of 8,333 live animals seized. While the number of seizures was higher than those reported to EU-TWIX, it was less informative and therefore was not used for the analysis unless otherwise specified.

The number of seizure records overall increased between 2008 and 2017. The number of annual seizure records ranged between 95 and 205 during 2008–2012, 380–520 during 2013–2016 before reaching 847 in 2017 (Figure 31). It is important to note that any trends in illegal trade observed from the seizure data may be due to varying enforcement efforts over time, instead of shifts in demand or changes in illegal trade patterns.

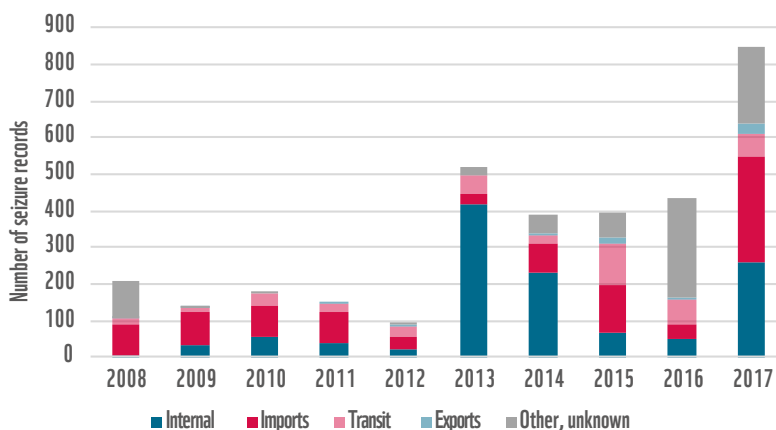


Figure 31: Total number of seizure records per direction of trade reported by France, between 2008 and 2017

Source: EU-TWIX database

## RESULTS - Illegal trade data analysis

### Direction of trade

Of the 3,342 seizure records reported by France, **35% (1,175 seizure records) were carried out internally**, 28% (941) on import, 13% in transit (431), 2% (57) on export, and the rest (738) was other or unknown (Table 18). The number of seizure records for which the direction of trade was “other or unknown” exceeded 200 records in both 2016 and 2017 (Figure 31).

DIRECTION OF TRADE	NUMBER OF SEIZURE RECORDS	% OF SEIZURE RECORDS	NUMBER OF SPECIMENS	ADDITIONAL WEIGHT (KG)	ADDITIONAL VOLUME (M <sup>3</sup> )
INTERNAL	1,175	35%	6,130	7,782	-
IMPORT	941	28%	98,407	21,354	20
TRANSIT	431	13%	35,275	2,931	-
EXPORT	57	2%	1,831,475 *	1,485	-
OTHER, UNKNOWN	738	22%	5,704	1,662	-
GRAND TOTAL	3,342	100%	1,976,991	35,214	20

Table 18: Seizures of CITES-listed species by direction of trade as reported by France between 2008 and 2017.

\* Including 1,785,960 pills and two pieces of medicines.

Source: EU-TWIX database

### Internal

Of the 1,175 internal seizure records, bodies (mainly birds) and live specimens (mainly birds and reptiles) were the main commodities seized, accounting for 37% and 31% respectively. The number of seizure records fluctuated between 2008 and 2017; while the number of annual seizure records ranged from 5–70 during 2008–2012, and 2015–2016, it reached over 400 in 2013 and 260 in 2017.

### On import

As many as 98 countries and territories were reported as countries/territories of export (countries/territories of departure of seized specimens), **Ukraine being the main country of export** (11%, 100 ) while 12% (112 ) of countries of export were unknown. All the commodities seized from Ukraine comprised caviar derived from *Acipenseriformes* spp. (81 specimens and an additional ca. 49 kg).

**North African countries** (Algeria, Morocco and Tunisia) were also the main countries of export for seizures on import reported by France, involving a total of 153 seizure records. Of the 153 seizure records, live tortoises of the family Testudinidae accounted for 82% of seizure records (125 seizure records) involving 634 specimens and an additional 3.2 kg.

### In transit

According to EU-TWIX data, between 2008 and 2017, a total of 431 seizure records were made in transit in France, and 55% of countries of export were African countries (Figure 32). The top five countries of export were Guinea, Cameroon, Nigeria, Benin, and Mali. The number of annual seizure records increased with fluctuation and reached 115 in 2015, after which it declined to less than 70 in 2016 and 2017.

China was reported as the main country of destination (44%) for the seizure records reported in transit via France, the total number of seizure records which were reportedly destined for China and Hong Kong SAR accounted for 51% of the seizure records (Figure 33). The main commodity seized in transit en route to China and Hong Kong SAR was ivory (121 seizure records involving 1,645 specimens and an additional ca. 27 kg, including 1,601 ivory carvings and 39 tusks).

## RESULTS - Illegal trade data analysis

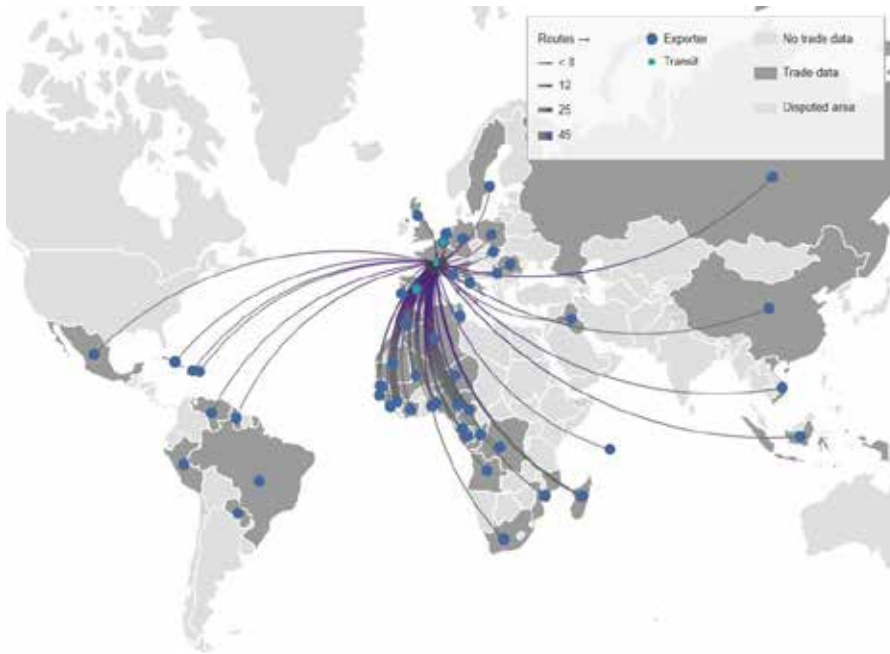


Figure 32: Country of export of seizures in transit through France, reported by France between 2008 and 2017.

Source: EU-TWIX database

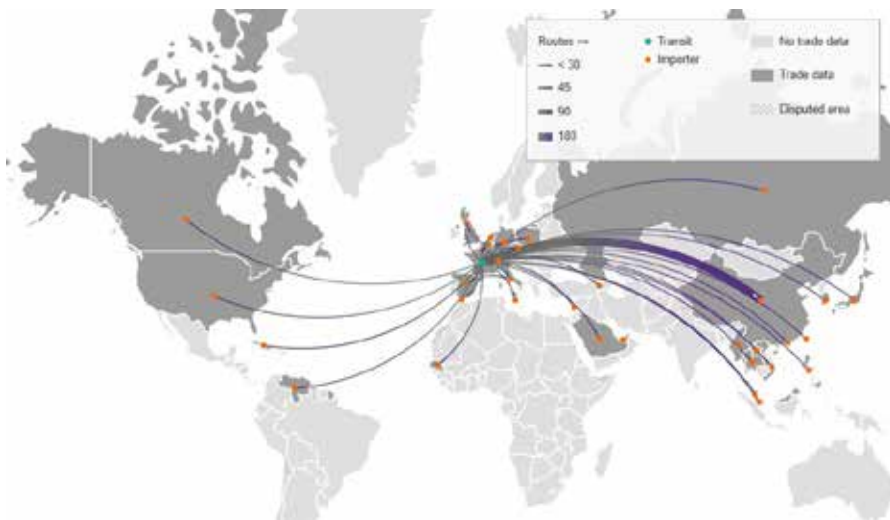


Figure 33: Destination of seizures in transit through France, reported by France between 2008 and 2017.

Source: EU-TWIX database

### Export

Of the 57 seizure records made on export from France, small leather products were the main commodities seized by number of records (13 seizure records) and main countries of destinations included Switzerland (7 seizure records) and the USA (6 seizure records). The number of seizure records on export increased overall over the years, reaching 26 records in 2017. A total of 1,831,475 specimens were seized on export, which includes 1,723,260 pills containing *Prunus africana* seized in January 2014.



## RESULTS - Illegal trade data analysis

### Main commodity groups

The main commodity groups seized in France between 2008 and 2017 were elephant ivory<sup>37</sup>, live reptiles, mammals (live, bodies, parts and derivatives)<sup>38</sup>, bird bodies, parts and derivatives<sup>39</sup> and reptile bodies, parts and derivatives<sup>40</sup> (Table 19). Plants were identified as the top commodity group by number of specimens and weight due to a large number of seized pills containing CITES-listed species (e.g. Cape Aloe *Aloe ferox* and African Cherry *Prunus Africana*) and logs (e.g. Cocobolo *Dalbergia retusa*).

COMMODITY GROUPS	NUMBER OF SEIZURE RECORDS	NUMBER OF SPECIMENS	ADDITIONAL WEIGHT (KG)	ADDITIONAL VOLUME (M3)
ELEPHANT IVORY	487	4,762	1,057	-
LIVE REPTILES	480	4,775	9	-
MAMMALS (LIVE, BODIES, PARTS AND DERIVATIVES)	429	1,035	849	-
BIRD BODIES, PARTS AND DERIVATIVES	417	2,043	10	-
REPTILE BODIES, PARTS AND DERIVATIVES	334	4,663	629	-
LIVE BIRDS	279	1,041	-	-
PLANTS	252	1,792,602*	29,464	20
CAVIAR	245	175	127	-
CORALS	141	2,826	115	-
EELS	57	182	1,598	-
FISH OTHER THAN CAVIAR, EELS AND SHARKS	57	160,532	1	-
OTHER	164	2,355	1,355	-
<b>TOTAL</b>	<b>3342</b>	<b>1,976,991</b>	<b>35,214</b>	<b>20</b>

**Table 19: Number of seizures and specimens by commodity types seized as reported by France between 2008 and 2017.**

\* Including 1,785,960 pills and two pieces of medicines.

Source: EU-TWIX database

Reptiles (both live reptiles and reptile bodies, parts and derivatives), mammals (live, bodies, parts and derivatives) and elephant ivory were among the top five commodity groups seized in all trade directions; on import, export, in transit and internally. Caviar accounted for the highest number of seizure records on imports (205 seizure records). Bird bodies, parts and derivatives and live birds were frequently seized internally while these were not among the top five commodity groups in international trade. Seizures of plants, live reptiles and mammal bodies, parts and derivatives were noticeable for the seizure records the direction of which was unknown/other.

### Location of seizures

Based on the number of seizure records, private houses and airports were the main locations of seizures with 25% and 24% respectively (Figure 34). Regarding airports, seizures mainly took place at Paris-Charles de Gaulle Airport, which accounted for 54% of seizure records made at airports whose detailed locations were reported. Seizures at fairs, exhibitions, shows and auction houses, markets and shops, and mail centres were also frequent (decreasing order).

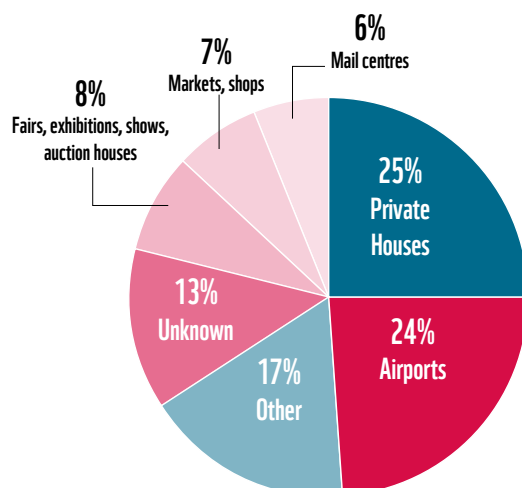
37 - Includes CAR – carving; IJW – ivory jewellery; IVC – ivory carving; IVP – ivory pieces; TUS – tusks of family Elephantidae.

38 - Includes BOD – body; BON – bone; BOP – pieces of bone; CAR – carving; CLA – claw; CLO – cloth; DER – derivative; FOO – foot; GAR – garment; HAI – hair; HOP – horn piece; HOR – horn; IVP – ivory pieces; IVC – ivory carving; LIV – live; LPS – small leather products; MEA – meat; MUS – musk; PLA – plate; POW – powder; SCA – scales; SKE – skeleton; SKI – skins; SKP – skin piece; SKU – skulls; TAI – tails; TEE – teeth; TRO – trophy; TUS – tusks; WHO – whole body.

39 - Includes BOD – body; CLA – claw; DER – derivative; EGG – egg; FEA – feather; LIV – live; LPL – large leather products; LPS – small leather products; MEA – meat; SKE – skeleton; SKI – skins; SKU – skulls.

40 - Includes EGL – egg (live); LIV – live.

## RESULTS - Illegal trade data analysis



**Figure 34: Types of location of seizures reported by France, between 2008 and 2017**

Source: EU-TWIX database

By location, mammals were among the top five commodity groups seized in main types of locations (private houses, airports, fairs/exhibitions/shows/action houses, markets/shops and mail centres). Elephant ivory was among the top five commodities in airports, fairs/exhibitions/shows/auction houses, market/shops and mail centres; specifically, 183 seizure records were reported at the airports. Bird bodies, parts and derivatives and live birds were frequently seized in private houses. Caviar accounted for the highest number of seizure records in mail centres (129 seizure records) (Table 20).

TYPES OF LOCATION	COMMODITY GROUPS	NO. OF SEIZURE RECORDS
PRIVATE HOUSES	Bird BPD*	329
	Live reptiles	164
	Live birds	136
	Mammals**	76
	Reptiles BPD*	52
AIRPORTS	Elephant ivory	183
	Reptiles BPD*	130
	Mammals**	125
	Caviar	76
	Corals	73
FAIRS/EXHIBITIONS/SHOWS/AUCTION HOUSES	Plants	143
	Elephant ivory	48
	Mammals**	22
	Insects	14
	Corals	12
MARKETS/SHOPS	Bird BPD*	58
	Mammals**	46
	Elephant ivory	44
	Plants	25
	Caviar	17
MAIL CENTRES	Caviar	129
	Elephant ivory	15
	Reptiles BPD*	13
	Mammals**	8
	Live reptiles	5

**Table 20: The top five commodity groups by main types of location, in number of seizure records as reported by France, between 2008 and 2017**

\* BPD – bodies, parts and derivatives; \*\* Excluding elephant ivory

Source: EU-TWIX database

## RESULTS - Illegal trade data analysis

### Airports and mail centres

Of the total 813 seizure records carried out at airports (involving 113,615 specimens and an additional 4,359 kg), those seized at Paris-Charles de Gaulle Airport accounted for 33% with 265 seizure records, while those reported as Paris airport accounted for an additional 15% with 126 seizure records. There were an additional 11 seizure records for which Paris Orly Airport was mentioned and 102 which took place in airports outside the Paris region (e.g. 22 seizure records at Merignac airport, 13 seizure records at Lyon airport, etc.). Paris-Charles de Gaulle Airport is one of the largest European airports both for transporting passengers and for freight and mail centre in 2018 (Eurostat, 2019); 80% of air freight in France take place at the airport and it accounts for 35% of air passengers in France (Union des aéroports français, 2018). There were 320 seizure records for which the details of the airport were not reported and the number of seizure records made at other airports in France were less than 25 respectively.

A total of 402 seizure records involving 5,749 specimens and an additional ca. 1406 kg was reported at airports in Paris (Paris-Charles de Gaulle Airport, Paris Orly Airport and those reported as Paris airport) between 2008 and 2017. By number of seizure records, elephant ivory was the main commodity group, accounting for 31% of seizures with 963 specimens and an additional ca. 129 kg, followed by reptile bodies, parts and derivatives (65 seizure records, 16%) and mammal bodies, parts and derivatives (48 seizure records, 12%) (Table 21). Among elephant ivory, the main commodities seized at the airports were ivory carvings (110 seizure records involving 896 specimens and an additional 127 kg), followed by ivory tusks (10 seizure records involving 49 specimens).

COMMODITY GROUPS	NO. OF SEIZURE RECORDS	SUM OF NO. OF SPECIMENS	KG	MAIN SPECIES*	MAIN DESCRIPTION*
ELEPHANT IVORY	126	963	129.2	African Elephant <i>Loxodonta africana</i>	Ivory carvings
REPTILES BODIES, PARTS AND DERIVATIVES	65	367	501.1	Pythons Pythonidae spp. and Crocodiles Crocodylidae spp.	Small leather products
MAMMAL BODIES, PARTS AND DERIVATIVES	48	99	384.9	Pangolin Manis spp.	Bodies
CAVIAR	42	32	10.9	Sturgeons and paddlefish Acipenseriformes spp.	Caviar
CORALS	39	646	40.5	Stony corals Scleractinia spp.	Raw corals
LIVE REPTILES	28	456	3.0	Tortoise Testudinidae spp.	Live
FISH BODIES, PARTS AND DERIVATIVES (EXCEPT FOR CAVIAR)	23	2461	205.7	Seahorses Hippocampus spp.	Bodies
OTHER	31	725	130.8	-	-
TOTAL	402	5,749	1,406.1	-	-

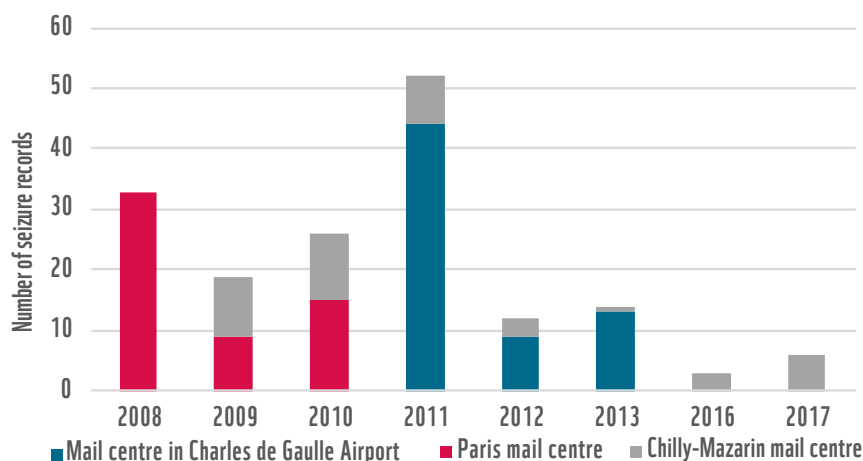
**Table 21: Seizures carried out at airports in Paris, by commodity groups, as reported by France, between 2008 and 2017.**

\*based on number of seizure records

Source: EU-TWIX database

## RESULTS - Illegal trade data analysis

Of the 186 seizure records carried out at mail centres in France, those reported at Charles de Gaulle airport, Chilly-Mazarin mail centre and those reported as Paris mail centre accounted for 89% with 165 seizure records, all of which were reported by the Customs. The number of seizure records fluctuated over the years reaching a peak of 52 in 2011, after which it declined significantly to less than 10 records in 2016 and 2017 (Figure 35).



**Figure 35: Number of seizure records carried out at mail centres in Paris, as reported by France, between 2008 and 2017.**

Source: EU-TWIX database

Caviar was the main commodity seized at every mail centre with a total of 127 seizure records involving 127 specimens (Table 22). Other main commodity groups include elephant ivory (12 seizure records with 89 specimens) and reptile bodies, parts and derivatives (9 seizure records involving 18 specimens).

By number of specimens, live seahorses *Hippocampus* spp. were the main species seized: in 2016, a total of 2007 live Short-snouted Seahorse *Hippocampus hippocampus* were seized in two different parcels at Chilly-Mazarin mail centre on import from Guinea due to lack of CITES permit. In addition, 900 specimens of shark teeth were seized at Chilly-Mazarin mail centre on import from the USA in 2017.

COMMODITY GROUPS	NO. OF SEIZURE RECORDS	SUM OF NO. OF SPECIMENS	KG	MAIN SPECIES	MAIN DESCRIPTION
CAVIAR	127	127	-	Sturgeons and paddlefish <i>Acipenseriformes</i> spp.	Caviar
ELEPHANT IVORY	12	89	-	African Elephant <i>Loxodonta africana</i>	Ivory carvings
REPTILE BODIES, PARTS AND DERIVATIVES	9	18	-	Pythons <i>Pythonidae</i> spp.	Bodies
QUEEN CONCH	4	18	-	Queen Conch <i>Strombus gigas</i>	Shell
CORALS	3	9	1.6	Stony corals <i>Scleractinia</i> spp.	Raw corals
MAMMAL BODIES, PARTS AND DERIVATIVES	3	3	-	African Elephant <i>Loxodonta africana</i> , Macaque <i>Macaca</i> spp. and Pangolin <i>Manis</i> spp.	Derivative, scale, skull
LIVE FISH	2	2007	-	Seahorses <i>Hippocampus</i> spp.	Live
OTHER	5	1107	-	-	-
TOTAL	165	3,378	1.6	-	-

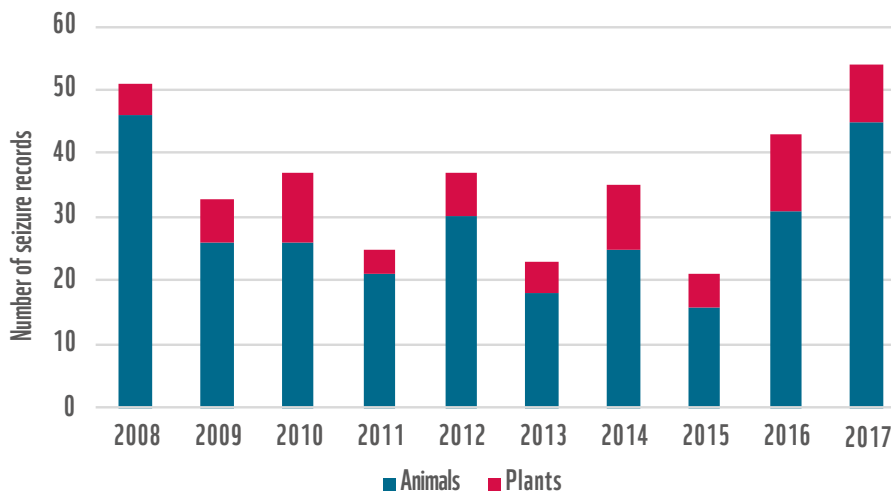
**Table 22: Seizures carried out at mail centres in Paris, by commodity groups, as reported by France, between 2008 and 2017.**

Source: EU-TWIX database



### 2. SEIZURES RELATED TO FRANCE REPORTED BY OTHER EU MEMBER STATES

Between 2008 and 2017, there were a total of 359 seizure records related to France reported by other EU Member States; 79% of these seizure records (284) involved species of fauna, and 21% involved species of flora (75). Most of the plant specimens were medicines including those containing Costus Root *Saussurea costus*. The number of seizure records fluctuated over the years ranging between 21 and 54, reaching a peak in 2017 (Figure 36). Of the 16 Member States which reported seizure records related to France, Germany accounted for 29% of seizure records (105), followed by the UK (18%, 64) and Italy (14%, 50). The majority was seized at airports (63%, 226 records).



**Figure 36: Total number of seizure records implicating France, reported by other EU Member States between 2008 and 2017**

Source: EU-TWIX database

Other EU Member States reported 29 seizure records involving 200 specimens and an additional 1 kg and 0.1 l where France was reported as the country of export between 2008 and 2017, the majority of which was seized at airports (19 seizure records). Of the 29 seizure records, 38% involving 124 specimens also reportedly originated in France, notably medicines containing Costus Root *Saussurea costus* (4 seizure records involving 7 specimens) or orchids (3 seizure records involving 110 specimens).

The main commodity groups re-exported from France included stony corals (5 seizure records involving 15 specimens and an additional 1 kg), cosmetics containing caviar (3 records involving 49 specimens and an additional 0.1 l) and reptile parts and derivatives (3 records involving 5 specimens). In addition, two elephant carvings were exported from France.

Other EU Member States reported 185 seizure records involving 1,482 specimens and an additional 6 kg for which France was indicated as the country of destination. Of the 185 seizure records, 53% (98 records) were seized in transit and 15% (28) on import. 54% (100 records) of those seizure records were reported by Germany. The main commodity groups seized were reptile bodies, parts and derivatives (48 records), live corals (46) and live reptiles (45) (Table 23).

## RESULTS - Illegal trade data analysis

COMMODITY GROUPS	NO. OF SEIZURE RECORDS	NO. OF SPECIMENS	ADDITIONAL VOLUME (KG)
REPTILE (BODIES, PARTS AND DERIVATIVES)	48	231	-
CORALS	46	329	-
LIVE REPTILES	45	220	-
MAMMALS (BODIES, PARTS AND DERIVATIVES)	20	171	-
PLANT PARTS AND DERIVATIVES	11	408	5
BIRDS (LIVE, BODIES, PARTS AND DERIVATIVES)	9	11	-
OTHER	6	112	1.15
<b>TOTAL</b>	<b>185</b>	<b>1,482</b>	<b>6.15</b>

**Table 23: Main commodity types seized implicating France as country of destination, as reported by other Member States between 2008 and 2017.**

Source: EU-TWIX database

Other EU Member States reported 145 seizure records involving 7,336 specimens and an additional 82 kg for which France was reported as a transit. Of the 145 seizure records, 89% (129 records) were seized on import. The UK was the main reporting country, accounting for 42% (56 records), followed by the Czech Republic (20 records) and Austria (19 records). Of the 145 seizure records seized in transit, the main commodity groups were plant parts and derivatives, reptiles, and corals (Table 24).

COMMODITY GROUPS	NO. OF SEIZURE RECORDS	NO. OF SPECIMENS	ADDITIONAL VOLUME (KG)
PLANT PARTS AND DERIVATIVES	52	6,656	0.1
REPTILES (LIVE, BODIES, PARTS AND DERIVATIVES)	39	200	-
CORALS	21	197	-
MAMMALS (EXCEPT FOR ELEPHANT IVORY)	20	231	0*
LIVE BIRDS	3	8	-
QUEEN CONCH SHELLS	3	22	-
CAVIAR	2	2	-
ELEPHANT IVORY	2	14	0.5
LIVE FISH	2	-	81.6
GIANT CLAM SHELLS	1	6	-
<b>TOTAL</b>	<b>145</b>	<b>7,336</b>	<b>82.2</b>

**Table 24: Commodity types seized implicating France as country of transit, as reported by other Member States between 2008 and 2017.**

\* less than 1 kg.

Source: EU-TWIX database

Plant parts and derivatives mainly involved medicines containing Costus Root (37 seizure records involving 6,469 specimens). Reptile BPD mainly involved small leather products made from crocodiles *Crocodylia* spp. (16 seizure records involving 68 specimens). China was the main country of export (48 records involving 3663 specimens and an additional 0.1 kg). Medicine containing Costus Root *Saussurea costus* was the main commodity seized (28 seizure records involving 3,445 specimens). EU Member States were the main countries of destinations including the UK (56 seizure records with 3,730 specimens) and the Czech Republic (27 seizure records involving 3,226 specimens).

## 3.4.2 US CITES SEIZURES

According to US CITES seizure data, France (excluding overseas territories) was implicated in 753 seizure records between 2008 and 2017; 675 seizure records in which France was the exporter, and 78 seizure records where France was reported as importer/destination. In terms of France as a country of (re-)export, there were 602 seizure records in which France was the re-exporter, and 73 seizure records (11%) where France was also reported as the country of origin.



Seized leopard skins

### France as country of export and origin

The number of seizure records reported to the CITES trade database by the USA each year was relatively stable at approximately 10 records between 2008 and 2017, except for 2015 and 2017 when the records reached 14 and 21 respectively.

Species of fish (excluding sharks) were most commonly seized (41%) between 2008 and 2017, as based on the number of seizure records, followed by species of birds (19%) and mammals (14%) (Table 25). Caviar derived from *Acipenseriformes* spp. was the main type of commodity with 21 seizure records involving ca. 397 kg and an additional 2 specimens. Of the bird bodies, parts and derivatives, Muscovy Duck *Cairina moschata* was the main species seized with 5 seizure records involving 2,000 live eggs, ca. 6,463 kg of feathers and 60 garments, all of which were seized during 2011–2015.

Most seizure records involved specimens that were either for commercial or personal purposes (63% and 21%, respectively), followed by 12% for scientific purposes, 1% for educational, medicinal purposes and zoo purposes respectively.

## RESULTS - Illegal trade data analysis



Blue and yellow macaw *Ara ararauna*, Juruena National Park, Brazil

COMMODITY	NO. OF RECORDS	NO. OF SPECIMENS	WEIGHT (KG)	VOLUME (ML)
CAVIAR	21	2	397	-
BIRDS (BODIES, PARTS AND DERIVATIVES)	14	2,078	6,463	-
MAMMALS (LIVE, BODIES, PARTS AND DERIVATIVES)	10	25	3	30
REPTILES (BODIES, PARTS AND DERIVATIVES)	9	39	0*	-
FISH (BODIES, PARTS AND DERIVATIVES, EXCEPT FOR CAVIAR)	9	83	220	-
PLANTS (LIVE, PARTS AND DERIVATIVES)	6	32	3	-
OTHER	4	25	0*	-
<b>TOTAL</b>	<b>73</b>	<b>2,284</b>	<b>7,086</b>	<b>30</b>

**Table 25: US CITES seizures as reported by commodity group implicating France as country of export and origin between 2008 and 2017.**

\* less than 1 kg.

Source: CITES trade database

### France as re-exporter

In terms of France as a country of re-export, the number of seizure records reported to the CITES trade database by the USA was relatively stable ranging between 52 and 72 during 2008–2017, with 2013 being the year in which the highest number of seizure records occurred (72 seizure records).

The 602 seizure records implicating France as the country of re-export were reported either as number of specimens (91%), by weight (kg, g and mg) (8%) and by volume (l, ml) (1%). Most seizure records involved specimens that were either for commercial or personal purposes (70% and 25%, respectively), followed by 3% for scientific purposes, 1% for hunting trophy and medical purposes respectively, and 0.2% for circus or travelling exhibition.

Reptile bodies, parts and derivatives were the most frequently seized commodity group (371) by the USA implicating France as re-exporter between 2008 and 2017, involving 10,065 specimens and 0.1 kg. Seizures of mammals (live, bodies, parts and derivatives) (81) and elephant ivory and ivory products (34) were also relatively frequent by number of seizure records. By number of specimens and weight, caviar and plants were also the main commodity groups seized on import from France (Table 26).



## RESULTS - Illegal trade data analysis

COMMODITY GROUPS	NUMBER OF RECORDS	NUMBER OF SPECIMENS	ADDITIONAL WEIGHT (KG)	ADDITIONAL VOLUME (L)
REPTILES	371	10,065	0.1	-
MAMMALS (EXCEPT FOR ELEPHANT IVORY)	81	1,214	16.0	0.4
ELEPHANT IVORY	34	564	-	-
CORALS	28	55	-	-
CAVIAR	26	-	128.6	19.0
BIRDS	25	51	0.0	-
FISH (EXCEPT FOR CAVIAR)	17	753	114.5	-
PLANTS	8	30	312.1	-
OTHER	12	23	-	-
<b>TOTAL</b>	<b>602</b>	<b>12,755</b>	<b>571.3</b>	<b>19.4</b>

**Table 26: US seizures of CITES-listed species implicating France as re-exporter between 2008 and 2017.**

Source: CITES trade database

It is noted that the number of seizure records the USA made on import from France (675 seizure records) between 2008 and 2017 were significantly higher than seizure records made in France on export (57 seizure records) reported to EU-TWIX during the period. The commodity groups frequently seized in the USA on import from France (reptiles, mammal bodies, parts and derivatives, elephant ivory and corals) were similar to those reported in France. As reptile products are the main commodity group legally re-exported from France (see 3.2 and 3.1.4 case study n°2).

### France as country of destination

The USA reported a total of 78 seizure records on export to France between 2008 and 2017. The number of seizure records reported to the CITES trade database fluctuated over the years, with 2013 the year in which the highest number of seizure records occurred (17 seizure records). There were 50 seizure records in which the USA was the re-exporter, and 28 seizure records where the USA was also reported as the country of origin. Reptile bodies, parts and derivatives were the most frequently seized commodity group, with 39 records involving 18,141 specimens (99% of which were American Alligator by number of specimens). Bird bodies, parts and derivatives and mammal bodies, parts and derivatives were also frequently seized (Table 27).

COMMODITY TYPES	NUMBER OF RECORDS	NUMBER OF SPECIMENS	ADDITIONAL WEIGHT (KG)*	ADDITIONAL VOLUME (ML)
REPTILE BPD**	39	18,141	-	-
BIRD BPD**	15	59	-	-
MAMMAL BPD** (EXCEPT FOR ELEPHANT IVORY)	12	281	-	28
PLANT PARTS	4	-	15	-
ELEPHANT IVORY	3	6	-	-
CAVIAR	1	-	201	-
OTHERS	4	10	-	-
<b>TOTAL</b>	<b>78</b>	<b>18,497</b>	<b>216</b>	<b>28</b>

**Table 27: US seizures of CITES-listed species on (re-)export to France by commodity type between 2008 and 2017.**

\*Excluding those reported in mg; \*\* BPD – bodies, parts and derivatives

Source: CITES trade database

## 3.4.3 COMMODITY GROUPS

Based on the analyses in Section 3.4.1 and 3.4.2, the following key species/commodities were identified as significant between 2008 and 2017 and were analysed in further detail below:

- 1 - Elephant ivory
- 2 - Mammal bodies, parts and derivatives (except for Elephant ivory)
- 3 - Reptiles
- 4 - Birds
- 5 - Plants
- 6 - Sturgeons and paddlefish
- 7 - Eels
- 8 - Corals



Elephant ivory souvenir seized at Heathrow Airport, United Kingdom

### 1. ELEPHANT IVORY

#### EU-TWIX and other seizure data in France

Elephant ivory was a main commodity seized by France, with a total of 487 seizure records involving 4,762 specimens and an additional ca. 1,057 kg of elephant tusks, carvings, jewellery and pieces of ivory reported between 2008 and 2017 according to EU-TWIX. Ivory carvings were the main commodity seized by France (54%, 261 seizure records), followed by tusks (27%, 133 seizure records) and ivory pieces (16%, 80 seizure records). The number of seizure records increased over the years with some fluctuations; it reached a peak of 100 seizure records in 2017 (Figure 37).

## RESULTS - Illegal trade data analysis

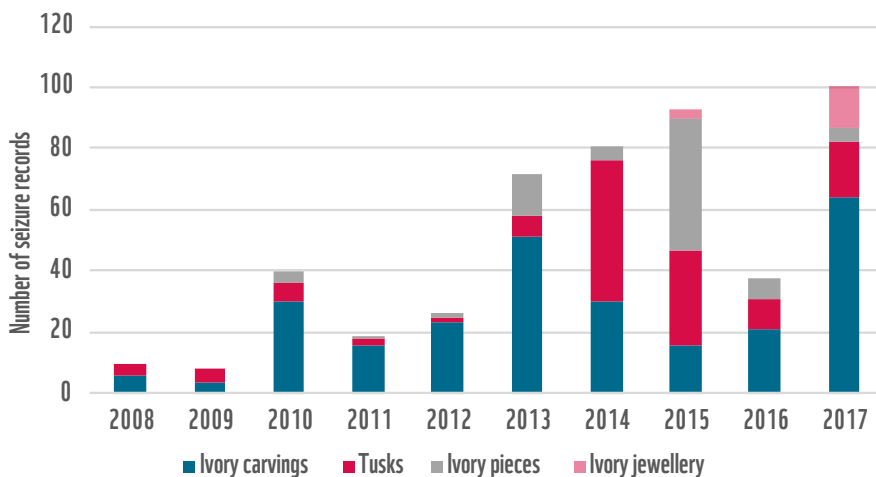


Figure 37: Total number of seizure records involving elephant ivory, as reported by France between 2008 and 2017.

Source: EU-TWIX database

The number of specimens seized annually increased from 60–350 specimens between 2008 and 2013 to more than 880 specimens between 2014 and 2016, after which it declined ca. 540 specimens. More than 70% of tusks were seized in 2014 while most ivory jewellery was seized in 2015 (Figure 38).

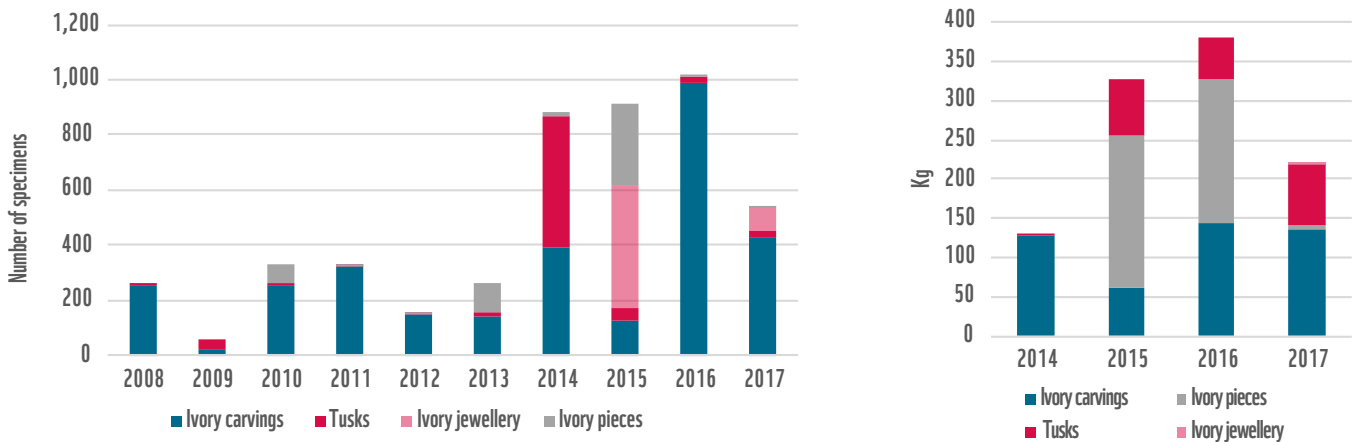


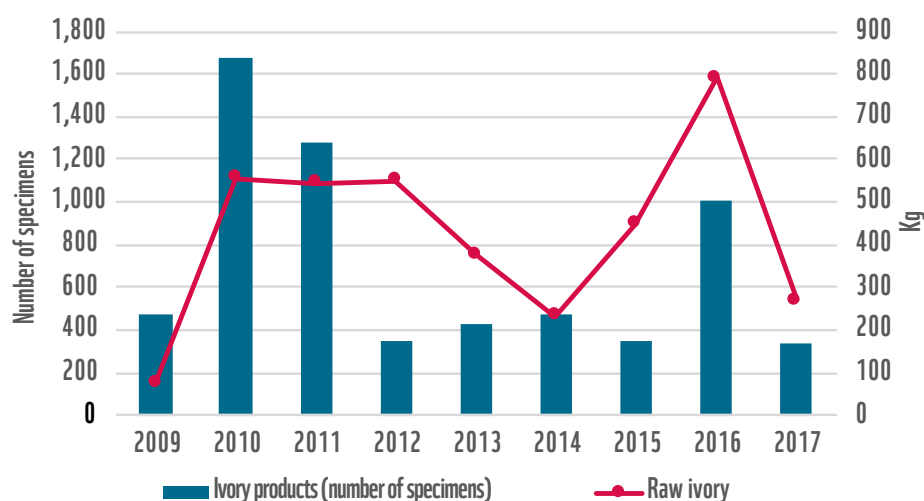
Figure 38: Seizures of elephant ivory and its products by number of specimens (left) and weight (right), as reported by France between 2008 and 2017.

Source: EU-TWIX database

Based on the number of seizure records, number of specimens and weight (kg), airports were the main locations of elephant ivory seizures (183 seizure records involving 2201 specimens and an additional ca. 719 kg). The main reported airport where seizures took place was Paris-Charles de Gaulle Airport. Elephant ivory was also frequently seized at fairs, exhibitions, shows, auction houses (48 seizure records), markets and shops (44 seizure records).

According to another source of France Customs seizure data, a total of 3,847 kg of raw ivory and 6,376 specimens of ivory products were seized in France between 2009 and 2017. Annual seizures of raw ivory fluctuated over the years reaching a peak of 790 kg in 2016. The annually seized number of ivory products also fluctuated, reaching above 1,000 specimens in 2010, 2011 and 2016. The annually seized number of ivory products also fluctuated, reaching a peak of 790 specimens in 2016. While the number of seizures was higher than those reported to EU-TWIX, further details were not available for the analysis.

## RESULTS - Illegal trade data analysis



**Figure 39: Total number of seizure records involving elephant ivory, as reported by France between 2008 and 2017.**

Source: French Customs

Elephant ivory was mainly seized in transit (34%, 166 seizure records) and internally in France (31%, 153 seizure). Seizures on import (20%, 96 seizure records), on export (3%, 13 seizure records), and other/unknown (12%, 59 seizure records) were also reported between 2008 and 2017 (Table 28).

DIRECTION OF TRADE	NO. OF SEIZURE RECORDS	PERCENTAGE OF SEIZURE RECORDS	NUMBER OF SPECIMENS	ADDITIONAL WEIGHT (KG)
TRANSIT	166	34%	2,182	553
INTERNAL	153	31%	1,448	175
IMPORT	96	20%	573	145
OTHER, UNKNOWN	59	12%	458	13
EXPORT	13	3%	101	171
<b>TOTAL</b>	<b>487</b>	<b>100%</b>	<b>4,762</b>	<b>1,057</b>

**Table 28: Elephant ivory and ivory products seized by France between 2008 and 2017.**

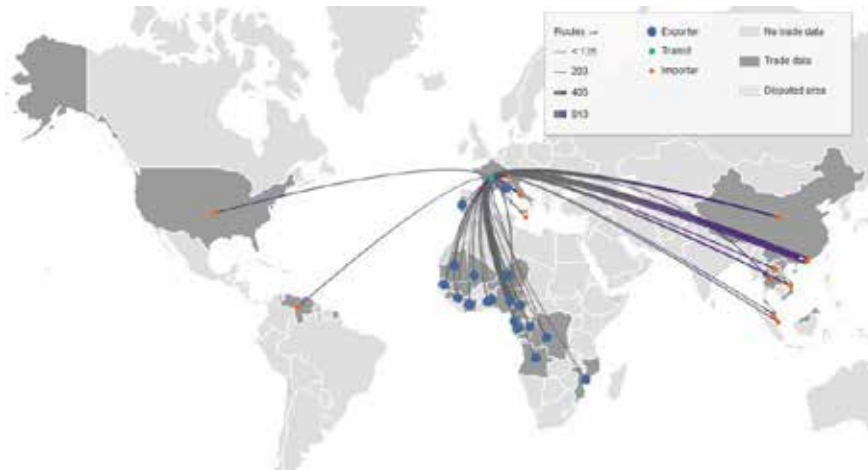
Source: EU-TWIX database

The main countries of export for seizures of elephant ivory in transit and on import were within the African continent, notably countries in West and Central, accounting for 65% of seizure records. Guinea and Nigeria were the leading countries of export of ivory in terms of number of seizure records and number of ivory specimens respectively.

The leading country of destination of elephant ivory seizures in transit during 2008–2017 was China accounting for 111 seizure records involving 774 specimens and an additional ca. 20 kg (Figure 40, 41). Other main destinations included Viet Nam (11 seizure records involving 91 specimens and additional 363 kg) and Hong Kong SAR (10 seizure records involving 871 specimens and an additional 8 kg). It seems that ivory products have been transported through France because of air routes linking African ivory producing countries with Asian ivory manufacturing and consuming markets like Belgium (see Musing et al. (2018)).

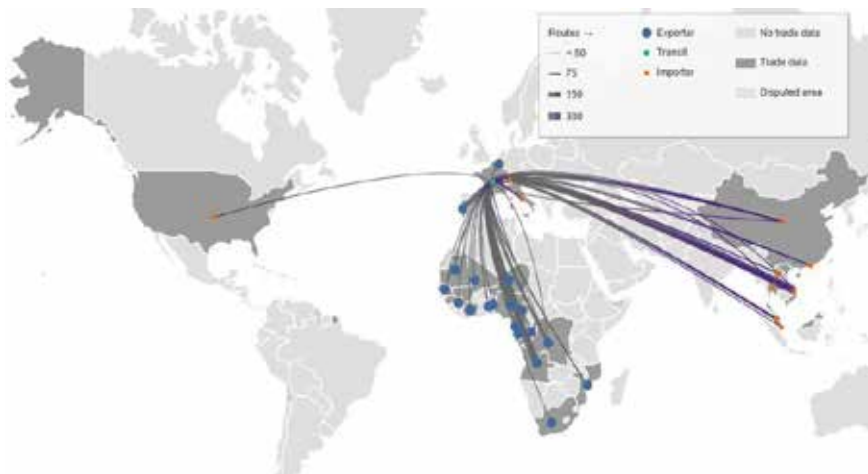


## RESULTS - Illegal trade data analysis



**Figure 40:** Trade routes of elephant ivory seized in transit through France, in terms of number of specimens between 2008 and 2017

Source: EU-TWIX database



**Figure 41:** Trade routes of elephant ivory seized in transit through France, in terms of weight (kg) between 2008 and 2017

Source: EU-TWIX database

Viet Nam was the main country of destination for elephant ivory products seized on export from France, involving three seizure records with 171 kg.

According to the EU-TWIX database, nine records involving ivory were reported by other EU Member States implicating France between the years 2010 and 2017. In total, these seizures involved 22 specimens and an additional 0.5 kg of ivory carvings and tusks. These were reported by Germany, the United Kingdom (2 seizure records respectively), Belgium, the Czech Republic, Hungary, Portugal and Romania (1 seizure record respectively). France was reported as country of destination in five seizure records, as country of export for two seizure records and as country of transit for two seizure records (on export and import each).

In France, an administrative act (arrêté ministériel) titled “Decree of 16 August 2016 on the prohibition of trade in elephant ivory and rhino horn in the national territory (Arrêté du 16 août 2016 relatif à l’interdiction du commerce de l’ivoire d’éléphants et de la corne de rhinocéros sur le territoire national)”<sup>41</sup> was adopted in August 2016 to introduce strict restrictions on domestic ivory trade.

The act was amended in May 2017 to relax the conditions governing trade in some ivory items, particularly antiques, ivory parts of some musical instruments, knives and pipes. The current rules ban domestic trade in raw ivory, other than for public, scientific or cultural presentation, and prohibits trade in worked ivory items with some exemptions where trade is unregulated. The following exemptions apply:

41 - <https://www.legifrance.gouv.fr/eli/arrrete/2016/8/16/DEVL1615873A/jo/texte>

## RESULTS - Illegal trade data analysis

- pre-1947 objects containing less than 20% ivory;
- pre-1947 objects containing more than 20% ivory are subject to declaration;
- objects with less than 200 grammes of ivory items which were manufactured before 1975 and imported into the EU before 1990.
- some musical instruments (bows and keys), specimens for public, scientific of cultural presentation, and knives and pipes manufactured before 1947 and imported into the EU before 1990;

For the international ivory trade, the EU regulation is applied. According to EU-TWIX, no major changes to internal seizures of elephant ivory were observed in 2016 and 2017 compared to previous years.

### US CITES seizure data

According to US seizure data, the USA seized 564 ivory specimens on import from France between 2008 and 2017, mostly ivory carvings (553 specimens) but a small number of other commodities were also seized (five tusks, five ivory pieces and one item of ivory jewellery). Of the 564 specimens, 83% were for personal purposes. The number of ivory specimens seized fluctuated over the years, reaching a peak of 270 specimens in 2010. While for 98% of specimens the country of origin were unknown, those reported for the remainder included Central African Republic (6 specimens), the DRC, Mali (three specimens each) and Chad (one specimen). In addition, a total of six specimens of elephant ivory carvings were seized in the USA on export to France, which was reported in 2010 and 2013.

### TRAFFIC's global seizure database

According to the TRAFFIC's global seizure database, 23 records involving elephant ivory were reported by non-EU Member States (no seizures were reported by the USA) implicating France between January 2008 and July 2019. In total, these seizures involved 588 specimens and an additional 179 kg of ivory carvings, tusks and pieces of raw ivory. Although most of them were ivory carvings (541 specimens and an additional 87 kg), tusks (27 specimens and an additional 85 kg) and ivory pieces (20 specimens and an additional ca. 7 kg) were also seized. The seizures were mainly reported by China (15 records, 65%), followed by Viet Nam (6 records, 26%). Most of the specimens were exported from France. Of note this included specimens reportedly coming from two or more countries (i.e. France and other countries). Of the 23 records, 70% were transported by air (e.g. in postal parcel, personal baggage or freight).

#### Conclusion

**EU-TWIX, US seizure data and TRAFFIC's global seizure database highlight the use of France as an exit point and transit hub in the shipment of elephant ivory, particularly of ivory carvings but also tusks and other ivory products, from Africa to Asia. While France has made a collective effort to combat illegal ivory trade by strengthening law enforcement at its border, the USA and other countries seized a significant number of ivory products on import from France, indicating strengthening enforcement targeting exported ivory products would be warranted especially at airports. As France adopted stricter domestic measures governing ivory trade in 2016 that go beyond the EU Wildlife Trade Regulations, further monitoring and examination of changes in ivory seizures would be useful for the effective implementation of these measures.**

#### Example of seizure

In January 2016, 456 African Elephant ivory carvings were seized at an airport in transit from Nigeria to Hong Kong SAR. The specimens were transported via air freight and detected because of targeting.



Leopard *Panthera pardus* skull and skin

## 2. MAMMAL BODIES, PARTS AND DERIVATIVES, AND LIVE MAMMALS (EXCLUDING ELEPHANT IVORY)

### EU-TWIX

Between 2008 and 2017, France reported 429 seizure records involving 1,035 specimens and an additional 849 kg of mammal bodies, parts and mammal bodies, parts and derivatives and live mammals, excluding elephant ivory. The number of seizure records fluctuated over the years, reaching over 80 records in 2014 and 2017.

The main taxonomic family seized included Felidae spp. (103 seizure records with 215 specimens and an additional 0.51 kg), Manidae spp. (43 records with 29 specimens and an additional 687 kg), Elephantidae spp. (37 records with 91 specimens and 6 kg). By weight, scales were the main commodity type (16 seizure records involving 3 specimens and ca. 612 kg), all of them were pangolins *Manis* spp.

TAXONOMIC ORDER	NUMBER OF SEIZURE RECORDS	NUMBER OF SPECIMENS	ADDITIONAL WEIGHT (KG)	MAIN SPECIES	MAIN COMMODITY
CARNIVORA	147	312	4.3	Felidae spp.	Live, bodies
PRIMATES	99	256	94.2	Cebidae spp.	Live, skulls, meat
PHOLIDOTA	43	29	687.1	Manidae spp.	Scales
PROBOSCIDEA	37	91	6.5	Elephantidae spp.	Derivatives
ARTIODACTYLA	37	136	8.9	Hippopotamidae spp.	Teeth, meat, carvings
PERISSODACTYLA	22	72	12.1	Rhinocerotidae spp.	Horns
CETACEA	20	80	-	Monodontidae	Bone
RODENTIA	18	46	35.8	Hystricidae spp.	Meat
OTHER	6	13	-	-	-
GRAND TOTAL	429	1,035	848.9	-	-

Table 29: Seizures of mammal bodies, parts and derivatives in France by taxonomic order seized between 2008 and 2017.

Source: EU-TWIX database

## RESULTS - Illegal trade data analysis

Other EU Member States reported 36 seizure records of mammal bodies, parts and derivatives and live mammals implicating France between 2008 and 2017, involving 399 specimens and an additional 0.04 kg.

The main commodities were medicines containing *Panthera* spp. (11 seizure records involving 71 specimens) and *Moschus* spp. (8 seizure records involving 296 specimens).

In addition, according to US seizure data, the USA seized a total of 1,214 specimens and 16 kg and 0.4 l of mammal bodies, parts and derivatives between 2008 and 2017 on import from France and 281 specimens and 100 mg and 28 ml of mammal bodies, parts and derivatives between 2008 and 2017 on export to France.



### *Big cats*

Between 2008 and 2017, a total of 103 seizure records involving 215 specimens and an additional ca. 0.5 kg of big cats (*Felidae* spp.) specimens were reported in France. The number of annual seizure records reached 17 in 2008 but shifted between 2 and 5 during 2009–2012 before increasing and shifted to 14–15 records during 2013–2017. *Panthera* spp. accounted for more than 60% by number of seizure records and specimens with 65 seizure records involving 147 specimens and ca. 0.5 kg. The main big cat commodity types seized were live (22 seizure records involving 39 specimens), skins (22 seizure records involving 18 specimens) and bones (17 seizure records involving 18 specimens).

The specimens were mainly seized internally (45 seizure records involving 82 specimens) or on import (14 seizure records involving 36 specimens). The direction of trade for 35 records (78 specimens) were reported as other or unknown. The countries of exports for the specimens seized on import or in transit included Canada, Benin, Guinea and Venezuela (two records each). The countries of destination for the specimens seized on export or transit included China (3 seizure records involving 11 specimens). The main types of location of seizure were private houses, zoological gardens and animal parks, and market and shops. The live specimens were mainly seized at zoological gardens and animal parks.

Other EU Member States reported a total of 17 seizure records involving 77 big cat specimens involving France between 2008 and 2017. Medicines containing *Panthera* spp. accounted for 92% by number of specimens (11 seizure records involving 71 specimens) which were seized in the UK or Portugal on import from China or Hong Kong SAR, transported via France.

According to US CITES seizure data, 14 big cat specimens were seized on import from France between 2008 and 2017, with African Lion *Panthera leo* being the main species seized (seven specimens). The commodity types included claws and garments, and the specimens were traded for commercial or personal purposes. Additionally, the USA seized two Cheetah *Acinonyx jubatus* skin pieces on export to France in 2015.



### *Primates*

A total of 99 seizure records involving 256 specimens and an additional ca. 94 kg of primate specimens were seized in France between 2008 and 2017. The main commodity types were live specimens (36 seizure records involving 85 specimens) and skulls (25 seizure records involving 95 specimens). The main species reported were *Cebidae* spp. and *Cercopithecidae* spp. The specimens were mainly seized internally (32 seizure records involving 63 specimens) and on import (31 seizure records involving 47 specimens and an additional ca. 94 kg) while the direction of trade for 29 records were unknown. The main countries of export of the specimens seized on import and transit included Cameroon (11 seizure records involving 45 specimens and ca. 4 kg) and Central African Republic (10 seizure records involving 12 specimens and an additional ca. 84 kg). The main types of location of seizure were airports and private houses.



## RESULTS - Illegal trade data analysis

Other EU Member States reported one seizure record related to primates involving France between 2008 and 2017. Belgium seized six primate skulls in 2014 at a mail centre, which was in transit from Togo to France. The US reported a total of 29 seizure records of primate specimens on import from France during the period, which involved 149 specimens and ca. 1 kg and 0.5 l. Most of them were specimens with Crab-eating Macaque *Macaca fascicularis* being the main species involved. The USA also seized 234 specimens and 28 ml of primate specimens (three records) on export to France during the period, most of which were Crab-eating Macaque specimens for medical purposes.



### Pangolins

Between 2008 and 2017, a total of 43 seizure records involving 29 specimens and an additional ca. 687 kg of Pangolin Manis spp. specimens were seized in France. The number of annual seizure records were less than six except for in 2014 (10 seizure records) and 2017 (12 seizure records). The main commodity types were meat (17 seizure records involving four specimens and an additional ca. 75 kg) and scales (16 seizure records involving three specimens and an additional ca. 612 kg). Most of the specimens were seized on import (22 seizure records involving 22 specimens and an additional ca. 70 kg) or in transit (17 seizure records involving three specimens and an additional ca. 617 kg). The main countries of export for the specimens seized on import or in transit were Cameroon, Central African Republic and Nigeria. The main countries of destination of the specimens seized in transit were China and Lao PDR (Figure 42). The specimens were mainly seized at airport (38 seizure records involving 25 specimens and an additional ca. 685 kg), namely Paris-Charles De Gaulle Airport.

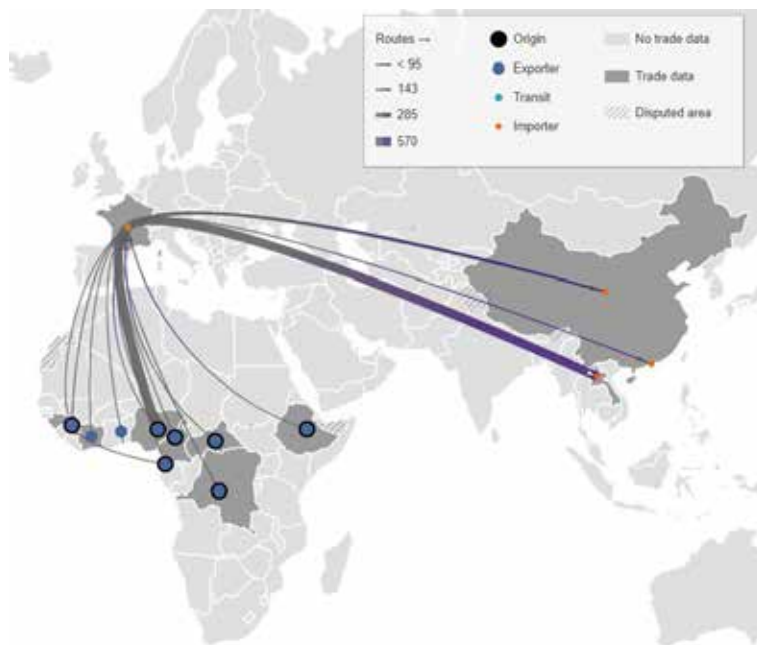
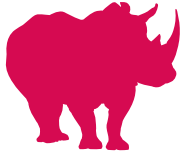


Figure 42: Trade routes of pangolin specimens seized in France on import and in transit, in terms of weight (kg) between 2008 and 2017

Source: EU-TWIX database

According to the US CITES seizure data, the USA seized 2 kg of pangolin meat on import from France in 2017. In addition, according to TRAFFIC's global seizure database, Switzerland reported one seizure record involving two pangolin bodies.

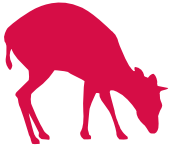
## RESULTS - Illegal trade data analysis



### Rhinos

Between 2008 and 2017, a total of 17 seizure records of *Rhinoceros Rhinocerotidae* spp., involving 66 specimens and an additional ca. 12 kg, were recorded in France. Most of specimens were reported at the family level. The main seized commodities were horns (11 seizure records involving 38 specimens and an additional 0.6 kg) and horn pieces (2 seizure records involving eight specimens and an additional 11.5 kg). The specimens were mainly seized internally (six records involving seven specimens) and in transit (five seizure records involving 22 specimens and an additional 0.6 kg). All the specimens seized in transit (powders, horn pieces and horns) were exported by tourists from Guinea en route to China or Hong Kong SAR in 2014 and 2015 and intercepted at airports.

According to US CITES seizure data, the USA seized one rhino horn carving in 2009 and one rhino carving in 2011 on import from France, and one rhino horn carving on export to France in 2009, all of which were traded for commercial purposes. In addition, there were six seizure records involving 38 rhino horn and its carvings implicating France in TRAFFIC's global seizure, all of which were reported in 2013 and 2015. All the specimens were transported by air, mainly in personal baggage, from France and seized in China or Viet Nam.



### Mammal meat

France reported a total of 53 seizure records involving 329 specimens and an additional 31 kg of mammal meat during 2008–2017. The number of seizure records was less than five except for 2014 (23 seizure records) and 2017 (19 seizure records). The main taxonomic orders involved were Primates (19 seizure records involving 117 kg and an additional 25 specimens) and Pholidota (17 seizure records involving 75 kg and an additional four specimens). More than 30% of species were reported on order/family level and detailed species information was not provided. Seizures on import accounted for 77% with 217 kg and an additional 23 specimens. By number of seizure records, 90% of specimens seized on import were exported from Central Africa, with Cameroon (17 seizure records involving 45 kg and two specimens) and the Central African Republic (12 seizure records involving 133 kg and an additional nine specimens) being the main trading partners (Figure 43). Most of the specimens were seized at airports (44 seizure records involving 220 kg and an additional 27 specimens).

Other EU Member States did not report any seizures of mammal meat implicating France during the period.



**Figure 43:**  
Trade routes of  
mammal meat seized  
in France, in terms  
of number of seizure  
records between 2008  
and 2017

Source: EU-TWIX  
database

## RESULTS - Illegal trade data analysis

### US CITES seizure data

The USA reported three seizure records of mammal meat on import from France, involving a total of one specimen and 3 kg between 2008 and 2017, all of which were traded for personal purposes. It included 2 kg of Pangolin meat seized in 2017, 1 kg of African Manatee *Trichechus senegalensis* meat (originated in the DRC) seized in 2016, and one piece of guenon *Cercopithecus* spp. meat seized in 2012.

A previous study, which examined flights arriving at Paris-Charles De Gaulle Airport in 2008, revealed that Central African Republic, Cameroon and Republic of Congo were the main sources of bushmeat and nearly 40% of bushmeat was CITES listed species, estimating 273 tonnes of bushmeat arrives at Paris-Charles De Gaulle Airport annually (Chaber et al., 2010). EU-TWIX data indicated that Cameroon and the Central African Republic were the main countries of export between 2008 and 2017 although the seized amount was considerably lower than the estimate. As illegally imported meat tend to be destroyed immediately after confiscation without DNA tests for species identification (Swiss Customs Administration et al., 2014), seizures of mammal meat are likely to be under-presented in the database.

Another study pointed out Paris-Charles De Gaulle Airport is also a transit hub to other European countries; Wood et al. (2014) estimated that at least 40 tonnes of bushmeat are smuggled to Switzerland annually with most of the flights that landed with bushmeat in Zurich or Geneva coming from inside Europe, mainly Brussels airport (43%) or Charles De Gaulle airport in Paris (16%).

### Conclusion

**Both EU-TWIX and US seizure data confirmed France's involvement in the illegal trade of mammal body, parts and derivatives, however the datasets indicated different commodities in trade. EU-TWIX data showed that France is increasingly being used as a transit point for specimens including pangolin scales from Africa. US seizure data alternatively provide insight into the use of France as an export country of mammal parts and derivatives specifically African Civet and Siberian Weasel.**

**In addition, further monitoring and investigation would be warranted for illegal imports of mammal meat. The scale of the trade and consumption of wild mammal meat and/or bushmeat in France and the EU is unknown. Yet, Anon (2020) points out that the link between bushmeat consumption and trade and emerging infectious diseases has been established in several cases (such as the shift from FIV to HIV, Ebola or SARS) (Karesh et al., 2005; Swift et al. 2007). The bushmeat trade is expanding internationally via air and sea trade routes (Brown 2004; Temmam et al. 2017). Further studies regarding wild mammal meat/bushmeat trade and consumption in France and the EU, as well as tightened enforcement controls would be warranted as was suggested at the bushmeat conference in December 2019<sup>42</sup>.**

### Example of seizures

In January 2015, eight rhino horn pieces and 14 bottles of rhino powder were seized at an airport in transit from Guinea to China. The specimens were found in personal baggage due to a random check.

In August 2017, a total of ca. 10 kg of Pangolin meat and ca. 8 kg of primate meat was seized at Lyon-Saint Exupéry airport on import from Central African Republic. The specimens were transported by air.

42 - <https://www.eurogroupforanimals.org/news/conference-brussels-bushmeat-and-exotic-pet-trade>



A Royal python *Python regius* seized by the French customs in 2017 in a passenger's luggage at Paris-Charles de Gaulle airport

### 3. REPTILES

Between 2008 and 2017, France reported 814 seizure records in EU-TWIX, involving 9,438 specimens and an additional ca. 638 kg of live reptiles and reptile bodies, parts and derivatives. Half of the number of specimens seized (51%) were live.

#### Live reptiles

A total of 480 seizure records involving 4,775 specimens and an additional 9.1 kg of live reptiles were reported in EU-TWIX by France between 2008 and 2017. The number of seizure records increased over the years, reaching 156 records in 2017. In terms of the number of specimens seized, there were two years where a significant number of live reptiles were seized: in 2014 and 2017 involving over 1000 specimens per year (Figure 44). Notably, there was two major seizures: one in 2017, which involved 940 live specimens of tortoises *Testudo* spp. which were confiscated on a road on the way from Slovakia to Spain, and one in 2014, involving 600 specimens of Chinese Stripe-necked Turtle *Mauremys sinensis* seized at the airport, which were exported from Singapore.

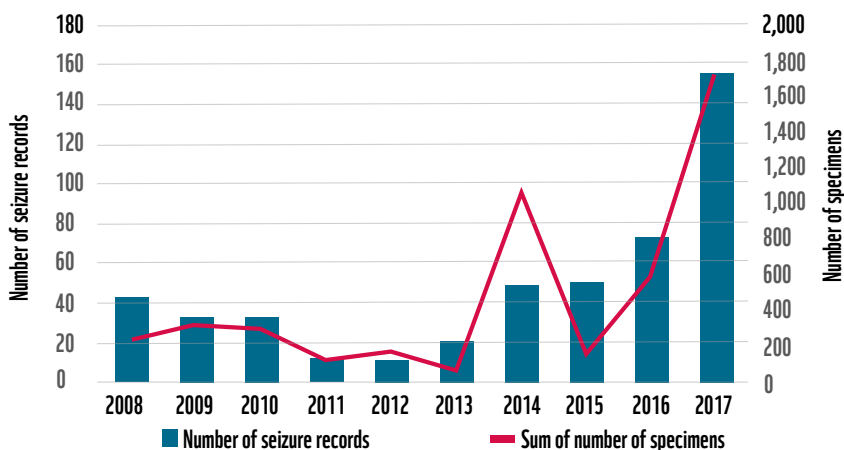


Figure 44: Number of seizure records and number of specimens of live reptiles seized by France between 2008 and 2017.

Source: EU-TWIX database



## RESULTS - Illegal trade data analysis

Live turtles in the order Testudinata were the most frequently seized species with 319 seizure records involving 3,726 specimens and an additional 3.2 kg, accounting for 66% and 78% of live reptile seizures by number of records and specimens. *Testudo* spp. was the main species seized with 227 records involving 2,447 specimens and an additional 3.2 kg. The number of seized specimens increased over the years with fluctuations, reaching a peak of 1,266 specimens in 2017. Live Testudinata spp. were mainly seized in transit and on import by number of specimens. North African countries (Algeria, Tunisia and Morocco) were the main countries of exports for those seized on import and in transit with a total of 132 records. The main types of locations included private houses (100 seizure records involving 414 specimens), airports (48 seizure records involving 1262 specimens) and maritime ports (36 seizure records involving 456 specimens). A total of 199 live Testudinata spp. was seized at Marseille maritime port between 2008 and 2017, all of which were exported from Tunisia and Algeria.

A total of 97 seizure records involving 281 live snakes *Serpentes* spp. were reported in France between 2008 and 2017, many of which were seized internally. Pythons *Pythonidae* (54 records involving 134 specimens) and Boas *Boidae* spp. (37 records involving 95 specimens) were the main species involved.

In addition, a total of 44 seizure records involving 709 live *Sauria* spp. were reported in France during the period. The main species seized were Chameleons *Chamaeleonidae* spp. and seizures were mainly carried out in transit (11 records involving 502 specimens).



**Figure 45: Trade routes of live reptiles seized on import in France, in terms of number of specimens between 2008 and 2017**

Source: EU-TWIX database

Other EU Member States reported France as country of destination of live reptiles in a total of 45 seizure records involving 220 specimens, and as country of transit in four seizure records involving nine specimens between 2008 and 2017.

Of the 220 specimens for which France was reported as the destination, 84% were reported by Italy. Most of the specimens (91%) were *Testudo* spp. and the main countries of export were Tunisia (accounting for 77%), followed by Algeria (8%) and Morocco (5%). Nearly 90% of specimens were seized at maritime ports, indicating that ferries and ships connecting North Africa and Southern Europe are used for illegal trade. For example, Italy seized 57 specimens of live Spur-thighed Tortoise *Testudo graeca* at a maritime port in May 2012 on import from Tunisia; the specimens were destined for France.

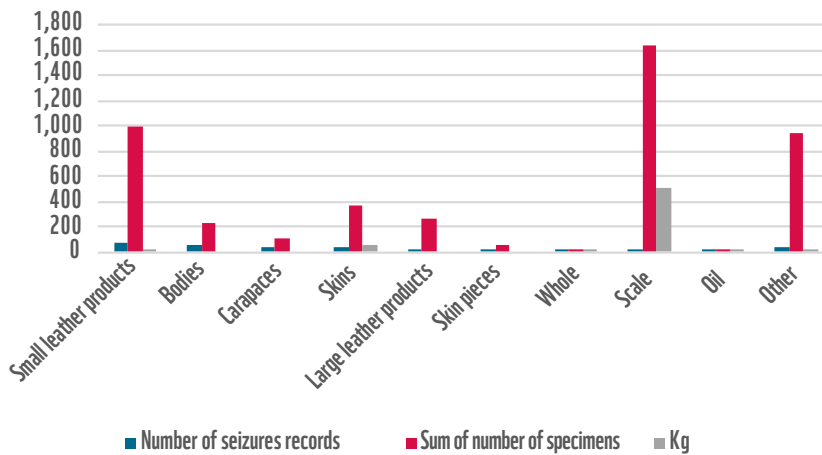
## RESULTS - Illegal trade data analysis

All the nine specimens for which France was reported as transit country were Testudinidae spp. exported from Morocco and Algeria. For example, Finland seized two live Algerian Tortoise at the airport in 2012, which were imported from Algeria via France.

No seizures related to live reptiles implicating France were reported by the USA and to TRAFFIC's global seizure database for the period examined.

### Reptile bodies, parts and derivatives

A total of 334 seizure records involving 4,663 specimens and an additional ca. 629 kg of reptile bodies, parts and derivatives were reported by France between 2008 and 2017. Small leather products, bodies, carapaces and skins were the main commodities seized by number of seizure records, while the main commodities were scales (1,636 specimens) and small leather products (1,003 specimens) were the main commodities by number of specimens, and scales (511 kg) by weight (Figure 46).



**Figure 46: Number of seizure records, specimens and weight seized involving reptile bodies, parts and derivatives, between 2008 and 2017.**

Source: EU-TWIX database

The main species included Crocodylidae spp. (17%), Pythonidae spp. (17%), Cheloniidae spp. (16%) and Testudinidae spp. (15%) by number of seizure records while Cheloniidae spp. (41%) and Pythonidae spp. (18%) were the main species by number of specimens, and the majority of specimens were Cheloniidae spp. by weight (81%).

Based on the number of seizure records, reptile bodies, parts and derivatives were mainly seized on import (121 seizure records involving 1,479 specimens and an additional ca. 37 kg), followed by internal seizures (79 seizure records involving 170 specimens), seizures in transit (58 seizure records involving 1,849 specimens and an additional ca. 510 kg) and on export (19 seizure records involving 177 specimens and an additional ca. 76 kg). The direction of trade for the remaining 57 seizure records (988 specimens and an additional ca. 5 kg) were reported as other or unknown.

The specimens seized on import came from various countries, including Madagascar (14 seizure records), Indonesia (11) and Cameroon (10). Senegal and Indonesia were the main exporters by number of specimens (Figure 47).

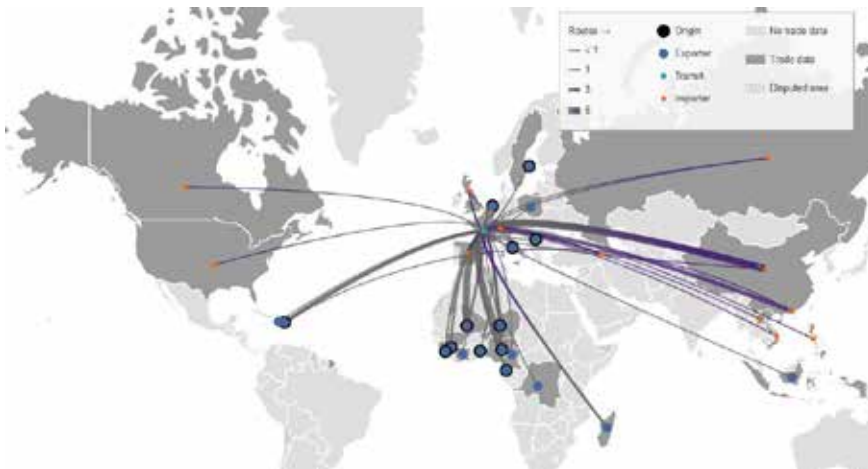
## RESULTS - Illegal trade data analysis



**Figure 47:**  
Trade routes of reptile bodies, parts and derivatives seized on import in France, in terms of number of seizure records between 2008 and 2017

Source: EU-TWIX database

Of the seizures carried out in transit, 47% (27 seizure records) came from West and Central Africa, with Nigeria and Mali reported as the main countries of export and China was the main destination with 16 seizure records (Figure 48). By number of specimens, the Dominican Republic was the top country of export and Lao PDR was the main destination due to a large scale of seizures; in January 2016, France seized 1,411 scales of Hawksbill Turtle *Eretmochelys imbricata* (App. I/Annex A) in transit from the Dominican Republic to Lao PDR, which were found in express freight at an airport. By weight, Haiti was the main exporter and Viet Nam was the top destination because of a large scale of seizures; in July 2017, France reported a seizure involving 496 kg of sea turtles *Cheloniidae* spp. (App. I/Annex A) scales which were intercepted at Paris-Charles de Gaulle Airport on the way from Haiti to Viet Nam.



**Figure 48:**  
Trade routes of reptile bodies, parts and derivatives seized in transit in France, in terms of number of seizure records between 2008 and 2017

Source: EU-TWIX database

The main locations of seizures of reptile bodies, parts and derivatives were airports (130 records), followed by private houses (52 seizure records). Among the airports, Paris-Charles de Gaulle Airport was the primary location where these seizures took place.

The other EU Member States reported 33 seizure records involving 188 specimens of reptile bodies, parts and derivatives involving France as a transit point on import or export into/from the EU. The majority (26 seizure records involving 133 specimens) was seized on import into EU Member States through France, mainly reported by Italy and Austria. The main country of export was Senegal with 69 specimens. Small leather products were the main commodities and the main species included *Alligatoridae* spp. and *Pythonidae* spp.

Other EU Member States also reported 48 seizure records involving 231 specimens of reptile bodies, parts and derivatives in which France was reported as the destination of the seized specimens. By number of specimens, 85% of which were reported by Germany and Indonesia was the main country of export. The majority of specimens were small leather products and *Pythonidae* spp. was the main species seized.

## RESULTS - Illegal trade data analysis

According to CITES trade data, the USA seized a total of 10,104 specimens and an additional 0.1 kg of reptile bodies, parts and derivatives on import from France between 2008 and 2017. The number of specimens seized in the USA fluctuated over the years, reaching a peak of 1,994 specimens in 2010. More than 90% of the specimens were small leather products and Alligatoridae spp. (70%) and Pythonidae spp. (15%) were the main species seized. The USA was the main country of origin, accounting for 64% of all specimens seized on import. According to the French CITES MA, the USA agreed to release the seized goods after they explained that the particular tanning process could involve a loss of the original tags, but the traceability of the skins is kept and recorded in a register which lists the correspondence between the old and the new tags. In France, the decree of 22.11.2000 was adopted to address problems related to loss or deterioration of tags during the manufacturing process (French CITES MA, *in litt.* to WWF France, March 2020).

The USA also seized a total of 18,141 specimens and an additional 350 mg of reptile bodies, parts and derivatives on export to France between 2008 and 2017, 99% of which were skins by number of specimens. The number of seizures increased from less than 50 specimens until 2011 to 8,057 specimens in 2012, after which it declined and ranged at 980–4,400 specimens during 2013–2016, before further reducing to 14 specimens in 2017. American Alligator was the dominant species seized (98%) and 98% of the total specimens originated in the USA.

According to TRAFFIC's global seizure database, a total of 10 seizure records involving 838 specimens and an additional ca. 43 kg of reptile bodies, parts and derivatives implicating France were recorded between 2008 and July 2019. For example, in September 2010, Singapore seized five packages containing 470 Reticulated Python *Python reticulatus* and 363 Water Monitor Lizard *Varanus salvator* skins sent from Indonesia to China, France and the USA via courier services, which were falsely declared as synthetic leather (TRAFFIC, 2011).

### Conclusion

**EU-TWIX data reported by France and other EU Member States confirmed France's involvement in illegal trade in live reptiles. It is indicated that France is the destination country for live Testudo spp. from North African countries, which warrants further monitoring and investigation in France and other EU Member States.**

**In addition, both EU-TWIX and the US seizure data indicated France's involvement in illegal trade in reptile products. The analysis of CITES trade data identified France as a top importer and re-exporter of reptile products in the EU, specifically small leather products from American Alligator (see 3.1 and 3.2), while some of the specimens seems to have been seized in the USA on re-export from France. Although some of the specimens were approved after the CITES MA's explanation, a significant number of specimens have been seized on import into the USA every year at least until 2017. This would warrant further investigation by France's authorities and/or communication with the USA to examine why the specimens were seized e.g. (re-)tagging issues.**

### Example of seizure

In January 2016, a total of 115 live reptiles including 55 specimens of Peacock Day Gecko *Phelsuma quadriocellata* was seized at an airport in transit from Madagascar to the USA. The specimens were transported in air freight and detected due to a random check.

In January 2016, 1,411 scales of Hawksbill Turtle *Eretmochelys imbricata* were seized at an airport in transit from Dominican Republic en route to Lao PDR. The specimens were transported via air freight and detected due to a random check. The appearance of the specimens was modified.





Blue-and-yellow macaw *Ara ararauna* in the Pacaya Samira Reserve in the Peruvian Amazon

## 4. BIRDS

Between 2008 and 2017, France reported 696 seizure records in EU-TWIX, involving 3084 specimens and an additional 10 kg of live birds and bird bodies, parts and derivatives. 34% of the number of specimens seized were live.

### Live birds

France reported a total of 279 seizure records involving 1,041 specimens of live birds between 2008 and 2017 according to EU-TWIX database. The number of seizure records and seized specimens fluctuated over the years, reaching a peak in 2017 by number of records with 89 records and in 2008 by number of specimens with 332 specimens (Figure 49).

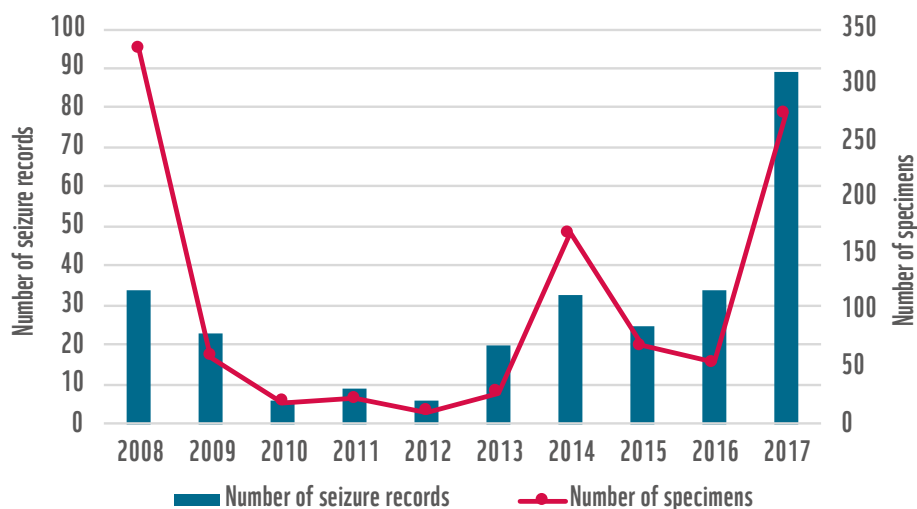


Figure 49: Number of seizure records and number of specimens of live birds reportedly seized by France between 2008 and 2017.

Source: EU-TWIX database

## RESULTS - Illegal trade data analysis

Psittaciformes was the main taxonomic order by number of seizure records and specimens (176 seizure records involving 447 specimens). Passeriformes spp. (12 seizure records involving 242 specimens) and Strigiformes spp. (27 seizure records involving 148 specimens) were the other main taxonomic orders by number of specimens. By taxon, Red-billed Leiothrix *Leiothrix lutea* was the top species seized with 6 seizure records involving 226 specimens. For instance, France intercepted 109 live Red-billed Leiothrix in a vehicle on the way to Belgium in December 2008.

By number of seizure records, 52% were seized internally (146 seizure records, 332 specimens), ca. 9% on import (24 seizure records, 83 specimens), ca. 4% in transit (10 seizure records, 98 specimens) and <1% on export (2 seizure records, 112 specimens) while for 35% of the records, the direction of trade was reported as other/unknown (97 seizure records, 416 specimens). For the seizures on import, Algeria was the main country of export by number of seizure records and Gabon by number of specimens. For the specimens seized on transit, the main countries of export were Morocco and Slovakia while all the countries of destination were EU Member States except for unknown destination.

The specimens were mainly seized in private houses (136 seizure records, 280 specimens), zoological gardens and animal parks (55 seizure records, 262 specimens), road, highways, public parking (15 seizure records, 155 specimens). For example, a total of 180 live birds including 29 Barn Owl *Tyto alba* were seized in August and September 2008 due to illegal display for commercial purposes and lack of commercial registration.

Other EU Member States reported 10 seizure records involving 15 live birds implicating France between 2008 and 2017. France was implicated as country of destination in 7 seizure records (involving 7 live birds of Psittaciformes spp. and Falconiformes spp.) seized in Italy, Germany and Hungary, mainly in transit. The main country of export was Tunisia and the specimens were mainly seized at maritime ports. In addition, the Czech Republic reported three seizure records involving 8 live birds *Anodorhynchus* spp. in June 2010 in which France was reported as one of several transit countries. The specimens were imported from Brazil via Portugal, France and Germany before being seized in the Czech Republic.

According to US seizure data, the USA seized one specimen of live Orange-winged Parrot *Amazona amazonica* exported from France (originated in Trinidad and Tobago) in 2014.

According to TRAFFIC's global seizure database, three seizure records involving nine live Paradisaeidae spp., eight live *Garritornis isidorei* and seven live *Epimachus* spp. were reported in Indonesia in June 2014. They were supposed to enter the EU territory through France.

### Bird bodies, parts, derivatives

Between 2008 and 2017, a total of 417 seizure records involving 2,043 specimens and an additional 10 kg of bird bodies, parts and derivatives were seized by France. By number of seizure records, 87% of specimens were seized internally (362 seizure records with 1,736 specimens), 2% in transit (9 seizure records with 44 specimens) and 1% on import (6 seizure records involving 208 specimens and an additional 10 kg). There were additional 40 seizure records (55 specimens) for which direction of trade is unknown. By number of seizure records, 73% were seized in 2013. The specimens were mainly seized in private houses (329 seizure records involving 1,432 specimens) and market and shops (58 seizure records involving 302 specimens). The countries of export for the seized specimens included various countries including Cameroon and Senegal, and the main country of destination for the specimens seized in transit was the UK (five seizure records involving 33 specimens).

The main commodity type was bodies, accounting for 94% by number of seizure records (involving 1512 specimens). Of the various bird species seized, those of hummingbirds Trochilidae spp. accounted for 56% by 234 seizure records with 1,313 specimens.



**Between 2008 and 2017, France seized 1,041 live birds**

## RESULTS - Illegal trade data analysis

Other EU Member States reported two seizure records involving four bird bodies, parts and derivatives implicating France as country of destination between 2008 and 2017. Both seizure records were reported by the Netherlands, three large leather products made from Falconiformes spp. imported from Peru were seized in transit in 2012, and one body of a Passeriformes spp. was seized in 2016.

According to US seizure data, the USA seized a total of 2,128 specimens and 6,463 kg of bird bodies, parts and derivatives on import from France between 2008 and 2017. The specimens were mainly seized in 2015 by number of specimens, and in 2012 by weight. The main commodities were live eggs by number of specimens (2,000 specimens) and feathers by weight (6,463 kg). Almost all the specimens seized by the USA were those made from Muscovy Duck *Cairina moschata* (2,060 specimens and 6,463 kg), almost all of which reportedly originated in France. The USA also seized 59 specimens of bird bodies, parts and derivatives on export to France 2008 and 2017, all of which were reported in 2012 and 2013. The main species and commodity were Polyplectron spp. feathers with 47 specimens.

### Conclusion

**EU-TWIX and US seizure data confirmed France's involvement in the illegal trade in bird bodies, parts and derivatives, although the datasets indicate different commodities in trade. EU-TWIX data show that illegal trade mainly involves bird hides, occurs mainly internally. Seizures in the USA were dominated by live eggs and feathers of Muscovy Duck *Cairina moschata*, which was listed in Appendix III by Honduras until 10th March 2016.**

**Illegal bird trafficking has long been recognised as a significant problem within the EU (EC, 2016b). EU-TWIX data indicate France's involvement in illegal trade in live birds especially within the EU. In addition, despite import restrictions on the import of live birds into the EU since 2005, live birds are still being smuggled into/through the EU, including France, indicating involvement in the illegal trade of live birds for the commercial domestic/EU market, in particular species of parrots Psittaciformes spp.**

### Example of seizure

In August 2017, a total of 27 live birds including four Grey Parrots *Psittacus erithacus* were seized from a private house in Maureillas, southern France, due to illegal sale/offering/keeping/transporting for sale.



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Grey parrot *Psittacus erithacus*



Logs transported in Cameroon

## 5. PLANTS

### EU-TWIX

Between 2008 and 2017, France reported 252 seizure records involving 1,785,960 pills and 6,642 specimens, and an additional 29,464 kg and 20 m<sup>3</sup> of plants and plant products. By number of seizure records, seizures of live plants accounted for 60% of plant seizures (645 specimens and additional 184 kg) while medicines (1,785,960 pills and three specimens, five records) and jewellery (4,201 specimens, two records) were the main commodity types by number of specimens, and logs (20,000 kg and 20 m<sup>3</sup>, two records) and roots (7,404 kg, three records) were the main commodity types by weight. The number of seizure records was less than 25 records per year except for 2016 when it reached 165 seizure records in 2016.

The main family was Orchidaceae spp. by number of seizure records (150 seizure records involving 635 specimens and 525 kg), Leguminosae spp. (21 seizure records involving 4,585 specimens and an additional 20,019 kg and 20m<sup>3</sup>) and Amaryllidaceae spp. (two seizure records involving 7,400 kg) by number of specimens and weight.

By number of seizure records, 26% were seized on import (66 seizure records involving 62,700 pills, 5,195 specimens, and an additional 20,619 kg and 20m<sup>3</sup>), 11% in transit (28 seizure records involving 1,050 specimens and an additional 450 kg), 5% internally (12 seizure records involving 23 specimens and an additional 7,400 kg) and 2% on export (four seizure records involving 1,723,260 pills, 4 specimens and an additional 795 kg). For the remaining 56%, the direction of trade was reportedly unknown.

For those seized on import, the main countries of export were the USA (15 seizure records involving 62,700 pills and 155 specimens), followed by Thailand (nine seizure records). France reported two seizure records involving 62,700 pills containing Cape Aloe *Aloe ferox* on import from the USA, which were found at an airport in January 2014.

China and El Salvador were the main countries of export by number of specimens and weight respectively. France reported two seizure records involving 4,201 specimens of jewellery made of *Dalbergia* spp. in 2017, which were detected on import from China. Additionally, France detained 20 t of Cocobolo *Dalbergia retusa* logs at a maritime port on import from El Salvador in January 2016.



## RESULTS - Illegal trade data analysis

According to the French CITES MA, the import permit was requested by the French importer a few days before the specimens arrived, but the insurance of the permit was not possible in time and the specimens were detained while the French CITES Management Authority consulted the El Salvadorian Management Authority and determined the permit could be issued (French CITES MA, *in litt.* to WWF France, March 2020).

Of the seizures in transit, the main countries of export included Mexico, Madagascar and China while the main countries/territories of destination were China, Hong Kong SAR, USA and Italy.

The countries of destination for those seized on export were the UAE, the USA and Japan. France seized 1,723,260 pills made from African Cherry *Prunus africana* in January 2014 on export to unknown destination.

By number of seizure records, seizures at fairs, exhibitions, shows and auction houses accounted for 57% (143 seizure records involving 267 specimens). Other main locations of seizure included airports (61 seizure records involving 62,700 pills, 1,623 specimens and an additional 989 kg) and maritime ports (five seizure records involving 135 specimens and 20,002 kg).

Other EU Member States reported 75 seizure records involving a total of 7,186 specimens and an additional ca. 5 kg of plants and plant products implicating France between 2008 and 2017. Notably, France was reported as a transit country on import into other EU Member States where specimens were seized in 52 seizure records involving 6,656 specimens and an additional 0.06 kg. The main commodity type was medicine, accounting for 90% of seizure records with Costus Root *Saussurea costus* being the dominant species (37 seizure records involving 6,459 specimens). The main countries of export were China, accounting for 63% while Canada was the main exporter by number of specimens. For example, the Czech Republic seized 3,000 tabs of medicine containing Costus Root in April 2015 imported from Canada via France. France was also reported as a country of dispatch (equivalent to imports) in 12 seizure records involving 122 specimens and an additional 81 kg, all of which were medicine containing orchids, *Saussurea costus*, American Ginseng *Panax quinquefolius* or Agarwood *Aquilaria malaccensis*.

### US CITES seizure data

According to US seizure data, the USA seized 315 kg and 62 specimens of plants and plant products on import from France between 2008 and 2017. Notably, the USA reported a seizure involving 312 kg of African Cherry *Prunus africana* extracts in 2008. The USA also seized a total of 14.6 kg of American Ginseng *Panax quinquefolius* roots on export to France between 2008 and 2017, all of which originated in the USA and traded for personal purposes.

### Conclusion

**EU-TWIX and US seizure data indicated that France is involved in illegal trade in plants and plant products, with medicines being the main commodity seized in France, other Member States and the USA. EU-TWIX data reported by other EU Member States suggest that a large amount of specimens was imported from outside the EU via France potentially slipping through controls in France.**

### Example of seizure

In April 2015, 398 kg of orchid flowers *Acianthus* spp. were seized at an airport on import from Thailand. The specimens were transported by air and seized due to lack of CITES permit.



Sturgeon caviar

## 6. STURGEONS AND PADDLEFISH

According to EU-TWIX, France reported 253 seizure records involving 806 kg and an additional 120,115 specimens<sup>43</sup> of sturgeons and paddlefish *Acipenseriformes* spp. between 2008 and 2017. By number of seizure records, seizures of caviar accounted for 97% (245 seizure records involving 850 kg and an additional one specimen).

### Caviar

According to EU-TWIX, seizures of caviar fluctuated over the years in France; by number of seizure records, they declined from 50 records in 2011 to less than 18 records during 2012-2016, increasing again to 45 records in 2017. By weight, seizures of caviar ranged at 5-60 kg over the years except for 2008 and 2009 when they reached 343 kg and 226 kg respectively (Figure 50).

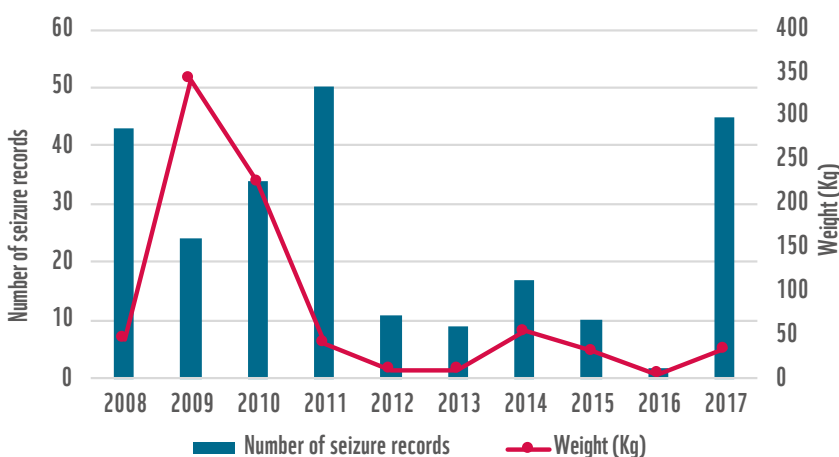


Figure 50: Seizures of caviar in France by number of seizure records and weight (kg) between 2008 and 2017.

Source: EU-TWIX database

Main species of seized caviar were *Acipenser* spp. (155 seizure records involving 203 kg) while many were reported at order level. By number of seizure records, 84% of caviar was seized on import (205 seizure records involving 722 kg), while the other seizures were made internally (27 seizure records involving 53 kg), in transit (three seizure records involving 16 kg) and on export (three seizure records involving 2 kg).

<sup>43</sup> - Weight (kg) was prioritised here as it is the preferred unit for caviar under the Guidelines for the preparation and submission of CITES annual reports.

## RESULTS - Illegal trade data analysis

For the seizures on import<sup>44</sup>, the main countries of export were Ukraine (100 seizure records, 147 kg) and Russia (51 seizure records, 45 kg) by number of seizure records while China was the top country of origin by weight. For example, France seized 319 kg of caviar imported from China at an airport in December 2009 due to lack of CITES permit. For those seized in transit, caviar was exported from Russia, Poland and Romania and destined for other EU Member States.



Figure 51: Trade routes of caviar seized on import in France by weight between 2008 and 2017.

Source: EU-TWIX database

By number of seizure records, seizures at mail centres accounted for 53% (129 seizure records, 146 kg) while by weight, airports were the top location for caviar seizures (76 seizure records, 425 kg), followed by seizures reported as made inland (4 seizure records, 165 kg). For example, France seized 137 kg of caviar, which was found inside a vehicle, on the way to Hungary in December 2010.

While Arrêté du 23 février 2007, which sets out detailed rules for implementing the EU regulations, has not been updated to include the EU requirements (from the 2008 regulation) on caviar labelling, the EU regulations are applied directly in France, which may have led to caviar seizures due to mislabelling. This inconsistency has been a challenge for law enforcement officers and judiciary as it could be used as a counter argument by offenders in court cases (A1, pers. comm. to WWF France, March 2020).

### Sturgeons and Paddlefish excluding caviar

France reported seizures of cosmetics, extracts and live specimens between 2008 and 2017. Seizures of cosmetics involved 11,288 specimens and an additional 1 kg. For example, France seized 10,008 specimens and cosmetics containing *Acipenser* spp. caviar in April 2017 on import from South Korea at a maritime port. France also seized a total of 108,825 specimens of sturgeon extract, through two seizures reported in 2016: one seizure in January involved 107,625 specimens on export from France to an unknown destination, while the other seizure involved 1,200 specimens and was seized in December at an airport in transit from Brazil to the UAE. Finally, France seized two live specimens of Siberian Sturgeon *Acipenser baerii* in a market/shop due to illegal sale in March 2008.

Other Member States reported eight seizure records involving approximately 8 kg and an additional 49 specimens and 0.07 l of sturgeons and paddlefish specimens implicating France between 2008 and 2017, all of which were caviar and cosmetics. The cosmetics (49 specimens and 0.07 l) were seized in Germany in transit from France to South Africa in December 2017. France was mainly implicated as a transit country for caviar seized on import; for instance, the UK seized 5.5 kg of caviar imported from Mongolia via France in August 2008.

44 - Including imports from other EU Member States

## RESULTS - Illegal trade data analysis

According to US CITES seizure data, the USA seized a total of 851 kg, 828 specimens and 19 l of specimens of sturgeons and paddlefish on import between 2008 and 2017, most of which were traded for commercial purposes. The main commodities seized were caviar (526 kg, two specimens and 19 l)<sup>45</sup> and extract (325 kg and 719 specimens) and the main species were Siberian Sturgeon *Acipenser baerii* (by weight and number of specimens) and White Sturgeon *Acipenser transmontanus* (by number of specimens). Seizures fluctuated over the years, reaching a peak of 183 kg and 481 specimens in 2015 (19 l of seizure were reported in 2017) (Figure 52). France was the top country of origin by weight while Italy and Spain were the main countries of origin by number of specimens.

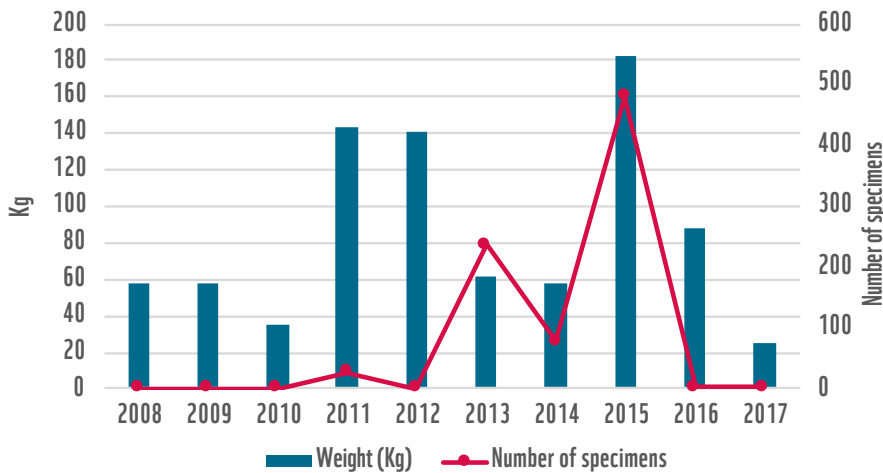


Figure 52: Weight and number of specimens of sturgeons and paddlefish seized by the USA on import from France between 2008 and 2017.

Source: CITES trade data

It is noted that caviar from sturgeon species listed as endangered or threatened under the US Endangered Species Act (ESA) generally cannot be imported or exported in the USA. The beluga sturgeon is listed as threatened<sup>46</sup> under the ESA<sup>46</sup>.

### Conclusion

Both EU-TWIX and US seizure data indicated France's involvement in illegal trade in sturgeons and paddlefish, specifically caviar and cosmetics and extracts containing sturgeons. France is also one of the main importers and exporters of sturgeons and paddlefish *Acipenseriformes* spp. in the EU. Considering that illegal trade remains a threat to wild sturgeons, France and other EU Member States are encouraged to strengthen enforcement and monitoring to address illegal trade. As for cosmetics containing sturgeons, awareness raising of CITES permitting requirements in the cosmetic industry and with traders could help improve compliance.

### Example of seizure

In January 2013, 3.6 kg of caviar Shortnose Sturgeon *Acipenser brevirostrum* were seized at Chilly-Mazarin mail centre on import from Russia. The specimens were sent in a postal parcel and seized due to lack of CITES permit.

45 - Including those reported as eggs.

46 - <https://ecos.fws.gov/ecpo/profile/speciesProfile.action?spcode=EoA2>



## RESULTS - Illegal trade data analysis



Seizure of European eels *Anguilla anguilla* by the French customs at Paris-Charles de Gaulle Airport

### 7. EELS

Between 2008 and 2017, France reported a total of 57 seizure records involving 1,598 kg and an additional 182 specimens of European Eel *Anguilla anguilla*, 95% of which were live specimens (including fingerlings). All the seizures were reported from 2014 onwards and 89% were reported in 2017. By number of seizure records, the seizures were mainly reported by French Agency for Biodiversity (33 records) and Gendarmerie française (12 records). The direction of trade for most seizures was reported as unknown or other (47 seizure records involving ca. 838 kg and an additional 182 specimens); there were three seizure records on export (442 kg) to Thailand (200 kg), Spain (200 kg) and China (42 kg). There were also two seizures in transit (132 kg), which included 120 kg of live eels seized in transit from the UK to Hong Kong SAR in 2015, and two internal seizures (165 kg). The main types of location of seizures included river ports (11 seizure records involving 11 kg) such as Bouin (western France) and Marans (southwestern France), roads/highways/public parking (four seizure records involving 202 kg) and airports (3 seizure records involving 362 kg) while it was reported as unknown for most of the seizure records. According to the OCLAESP (Gendarmerie française), Spain and Portugal are cooperating with France in fighting this illegal trade, and the fact that eel fishing is legal in France (subject to quotas) makes enforcement activities more difficult.

Other EU Member States reported two eel seizure records implicating France, both of which involved live eel seizures reported by Spain. Spain seized 45 kg of live eel on export via France to Viet Nam in 2017 and 36 kg of on export via France to Hong Kong SAR in 2016. Both of these shipments were seized at airports. These are both transported in personal baggage/suitcases and found through random checks or after being X-rayed.

## RESULTS - Illegal trade data analysis

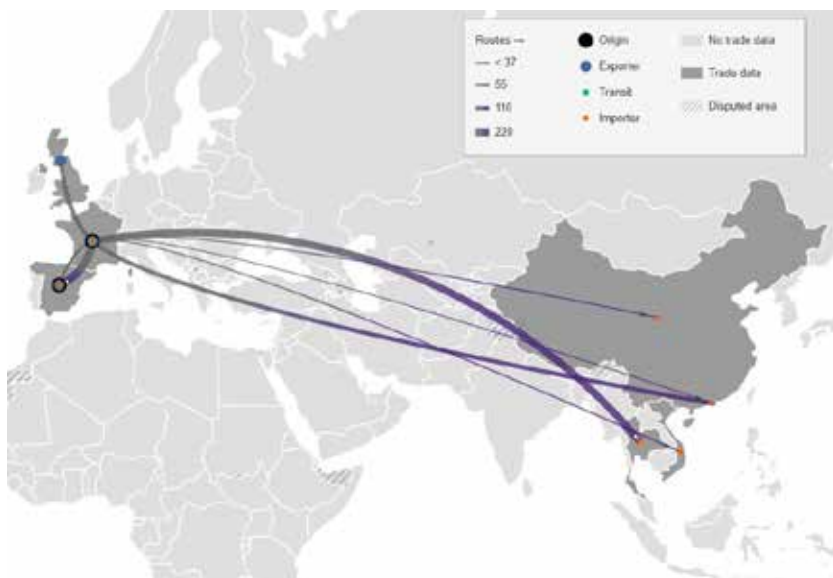


Figure 53: Trade routes of seized live eels relevant to France, seized by France and other EU Member States by weight between 2008 and 2017.

Source: EU-TWIX database

There was one relevant seizure record in the TRAFFIC's global seizure database. In Hong Kong SAR, 48 kg of live European Eels were found in check-in baggage and seized at an airport on import from Bilbao, Spain via Paris<sup>47</sup> in February 2016. According to media reports and other sources, there have been several additional eel seizures implicating France recently. For example, France reported eel seizures including 3,901 kg of live eels seized at premises in 2018 (TRAFFIC, 2020). In addition, 16 people involved in illegal trade in European Eels were arrested and 400 kg of glass eels were seized in Spain in 2019, some of which has been illegally obtained in France before being transported to Portugal and illegally exported to Asia<sup>48</sup>. In addition, a total of 90 kg of glass eels were seized in October 2019 in Paris-Charles de Gaulle Airport on the way from Toulouse to China. Furthermore, 320 kg of glass eels, which reportedly originated in Portugal, were seized in Castets (South west of France), France on the way to Paris in January 2020. These cases suggest France is used as a source and transit country for illegal trade in European glass eels.

### Conclusion

Although the scale of illegal trade of *A. anguilla* glass eels is difficult to quantify, a large amount of glass eels has been seized in the last few years with authorities in the EU increasingly reporting the involvement of organised criminal networks (Musing et al., 2018). For instance, Europol reported 5,789 kg of glass eel seizures and 154 suspects arrested in the 2018-2019 fishing season (Europol, 2019). As France is the largest catcher of *A. anguilla* glass eels, close monitoring of glass eel fishing and trade to ensure legality and traceability would be warranted.

### Example of seizure

In February 2017, 200 kg of live European Eels were seized at Paris-Charles de Gaulle Airport on export to Thailand.

47 - <https://www.info.gov.hk/gia/general/201602/11/P201602110307.htm>

48 - <https://www.guardiacivil.es/es/prensa/noticias/7144.html>



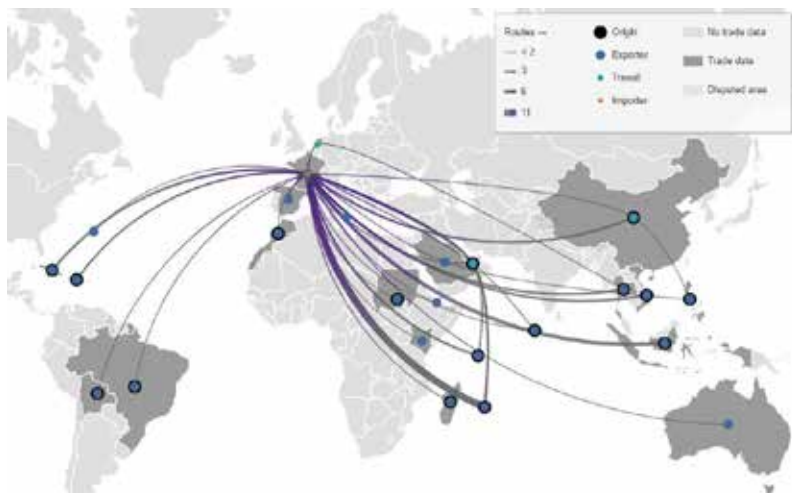
Corals

## 8. CORALS

### EU-TWIX

France reported 141 seizures involving 2,826 specimens and an additional 115 kg of corals between 2008 and 2017. By number of seizure records, stony corals *Scleractinia* spp. accounted for 78% of coral seizures by France with 2,280 specimens and 66 kg. The number of seizure records fluctuated over the years, reaching a peak of 59 seizure records in 2017. The main commodity was raw corals, accounting for 81% with 2,251 specimens and 113 kg. Other commodities included live corals (10 seizure records, 380 specimens), carvings (eight seizure records, 106 specimens and 1.6 kg), derivatives (eight seizure records, 88 specimens) and body (one seizure record, one specimen).

By number of seizure records, 56% of corals were seized on import (79 seizure records involving 1,348 specimens and an additional ca. 50 kg), 18% internally (26 seizure records involving 973 specimens and an additional ca. 10 kg), 12% in transit (17 seizure records involving 424 specimens), and 1% on export (two seizure records involving 13 specimens). For those seized on import, the main countries of export were Mauritius (12 seizure records involving 332 specimens and an additional 5 kg) by number of records and Indonesia and Thailand by number of specimens (Figure 54).



**Figure 54:** Trade routes of corals seized on import in France, in terms of number of seizure records between 2008 and 2017.

Source: EU-TWIX database

## RESULTS - Illegal trade data analysis

By number of seizure records, seizures at airports accounted for 52% of seizures (73 seizure records involving 1,534 specimens and an additional 97 kg), followed by maritime ports (24 seizure records, 163 specimens and 8 kg), and fairs, exhibitions, shows or auction houses (12 seizure records involving 548 specimens). Paris-Charles de Gaulle Airport was the main airport where coral seizures were reported, while La Ciotat maritime port was the main maritime port where corals were seized.

Other EU Member States reported 73 seizure records involving 542 specimens and an additional 1 kg of corals implicating France between 2008 and 2017. France was identified as country of destination in 35 seizure records involving 223 specimens, which were reported by Germany, the Netherlands and Hungary. The main commodity type was raw corals (30 seizure records involving 209 specimens) and the main countries of export included Indonesia, Mauritius and Qatar by number of seizure records and specimens. France was also identified as a transit country in 19 seizure records involving 195 corals (all trade reportedly stony corals) reported by other EU Member States, mainly reported by the Czech Republic. For example, the Czech Republic seized 52 specimens of stony raw corals at an airport in February 2009 imported from Mauritius via France to the country. France was reported as country of dispatch (equivalent to export) in six seizure records involving 16 specimens, which were reported by Germany, Latvia and Poland.

### US CITES seizure data

According to US seizure data, the USA seized a total of 58 specimens of corals on import from France between 2008 and 2017, 81% of which were traded for commercial purposes. Raw corals accounted for 79% while the remaining 21% were carvings. The number of specimens seized fluctuated over the years, reaching a peak of 17 specimens in 2009. Stony corals Scleractinia spp. was the main taxonomic order with 34 specimens, followed by Gorgonacea spp. (precious corals Corallium spp., 21 specimens). Of the stony corals whose origin is reported, Solomon Islands were the main country of origin (17 specimens). The USA also seized eight specimens of raw stony corals on export to France in 2015, which were traded for personal purposes.

### Conclusion

**Both EU-TWIX and US seizure data indicated France's involvement in illegal trade in corals. It was suggested that Mauritius, Indonesia and Thailand are the important countries of export for seized corals. While France seized a number of corals in country, EU-TWIX data reported by other Member States suggest that some corals were illegally imported from outside the EU via France. As France is one of the top importers of corals in the EU, further monitoring and law enforcement is warranted.**

### Example of seizure

In July 2017, 373 stony corals were seized at Paris-Charles de Gaulle Airport in transit from Indonesia to Belgium. The specimens were transported by air.



# 3.4.5 ILLEGAL TRADE RELATED TO FRANCE OVERSEAS

## 1. EU-TWIX

Between 2008 and 2017, France overseas (FO) were implicated in a total of 217 seizure records reported by France in the EU-TWIX database. In addition, FO were implicated in a total of six seizure records reported by other Member States in the EU-TWIX database between 2008 and 2017.



## France outermost regions (OR)

### *Seizures reported by France*

Between 2008 and 2017, France reported 193 seizure records involving 25,737 specimens and an additional 3,788 kg implicating France outermost regions.

#### • Seizures in metropolitan France

A total of 80 seizure records involving 913 specimens and ca. 2 kg on arrival from OR into metropolitan France were reported during the period, accounted for 41% of seizures by number of seizure records. The main taxonomic groups were corals, accounting for 69% by number of seizure records (55 seizure records involving 821 specimens and 1.6 kg) and Gastropods accounting for 19% (15 seizure records involving 48 specimens).

The specimens were mainly dispatched (exported) from Guadeloupe (38 seizure records involving 479 specimens and an additional ca. 1 kg) and Martinique (29 seizure records involving 350 specimens and an additional ca. 0.5 kg), but also from French Guiana (8 seizure records) and Reunion (6 seizure records).



Matécho forest near Saïil in the center of French Guiana.

By number of seizure records, 83% were seized at mail centres (66 seizure records involving 810 specimens and an additional 1.5 kg) and 11% were seized at airports (nine seizure records involving 87 specimens), most of which were those in Paris.

In addition, a total of 59 specimens (three seizure records) were seized in metropolitan France in transit to OR between 2008 and 2017, all of which were small leather products made from alligators or snakes. The specimens were exported from Senegal and Burkina Faso to Martinique. Metropolitan France also seized 12 specimens of Queen Conch jewellery in transit from Martinique to Ukraine at Paris Orly in 2017.

It is noted that EU legislation is directly and fully implemented in the EU outermost regions, and no CITES permits were required for trade with EU Member States including metropolitan France although evidence that the specimens were legally imported or obtained is necessary.

### • Seizures in the France outermost regions (OR)

A total of 53 seizure records involving 7,624 specimens and an additional 2,771 kg intercepted on import into OR between 2008 and 2017. By number of seizure records, 36% were seized in French Guiana, 30% in Reunion, 15% in Martinique, 8% in Guadeloupe and Mayotte respectively, and 4% in Saint-Martin. Seizures were reported only in 2011-2012 and 2015-2017 and the annual number of seizure records increased from less than five up to 2016 to 40 in 2017.

The main taxonomic groups seized were reptiles, accounting for 32% by number of seizure records involving 467 specimens and an additional 32 kg, and gastropods (23%, 12 seizure records involving 5,381 specimen and an additional 2,242 kg) (Table 30). By number of specimens, plants were also identified as main species, due to a large number of specimens seized (1,600 live orchids seized in Guadeloupe on import from Thailand in 2017). Main countries of export were Suriname and Madagascar by number of seizure records, Thailand and China by number of specimens, and Saint-Barthélemy by weight.

## RESULTS - Illegal trade data analysis

COMMODITY GROUPS	NO. OF SEIZURE RECORDS	NO. OF SPECIMENS	WEIGHT (KG)	MAIN SPECIES	MAIN DESCRIPTION
REPTILES	17	467	32	Snakes <i>Serpentes</i> spp.	Oil
GASTROPODS	12	5,381	2,242	Queen Conch <i>Strombus gigas</i>	Meat, live
MAMMALS	8	7	490	Colored Peccary <i>Pecari tajacu</i> and White-lipped Peccary <i>Tayassu pecari</i>	Meat
BIRDS	5	23	-	Parrots	Live, meat
CORALS	4	-	7	Stony corals	Raw corals
FISH	3	95	-	Seahorses <i>Hippocampus</i> spp.	Bodies
PLANTS	3	1,650	-	Orchids <i>Orchidaceae</i> spp.	Live
ARACHNIDS	1	1	-	Scorpion <i>Pandinus</i> spp.	Live
<b>TOTAL</b>	<b>53</b>	<b>7,624</b>	<b>2,771</b>	-	-

Maritime ports were the main types of location, with 11 seizure records involving 468 specimens and 59 kg while markets/shops and high seas were the main locations by number of specimens and weight respectively. These are due to seizures of large number/weight of Queen Conches; a total of 5,380 specimens of Queen Conch meat was seized at markets/shops in Saint Martin in 2017 (with country of export unknown). In addition, Martinique seized a total of 2,133 kg of live Queen Conch on high seas on import from Saint-Barthélemy (1,500 kg), St Lucia (513 kg) and Saint Vincent and the Grenadines (120 kg).

In addition, a total of 33 internal seizures were reported in the France OR between 2008 and 2017, which involved 450 specimens and an additional 201 kg (Table 31).

TERRITORY OF SEIZURE	NO. OF SEIZURE RECORD(S)	NUMBER OF SEIZURE RECORDS	WEIGHT (KG)	MAIN SPECIES	MAIN DESCRIPTION
FRENCH GUIANA	24	29	82	Alligators	Live, meat
GUADELOUPE	9	195	75	Queen Conch	Live, meat
MARTINIQUE	1	-	286	Queen Conch	Whole
MAYOTTE	1	-	1	Stony corals	Raw coral
REUNION	1	208	-	African elephant	Carving
SAINT MARTIN	3	5,380	300	Queen Conch	Meat
<b>TOTAL</b>	<b>39</b>	<b>5,812</b>	<b>744</b>	-	-

There were four seizure records involving five specimens and an additional 7 kg of specimens in transit. For example, Mayotte seized 6 kg of raw stony corals in 2017 at maritime port in transit from Mauritius to China. Additionally, three seizure records involving two specimens and an additional 8.2 kg were reportedly made on export.

Furthermore, a total of 13 seizure records involving 16,672 specimens and an additional 767 kg whose direction of trade was unknown was reported between 2008 and 2017. Queen Conch was the main species seized (six seizure records involving 16666 specimens and an additional 766 kg) For example, 16,656 specimens of Queen Conch shells were seized in Guadeloupe at maritime port on the way to Finland in Finland, and 300 kg of Queen Conch meat were seized in Saint-Martin at markets/shops in 2017.

Finally, a total of three seizure records involving ca. 32 kg for which the France OR was indicated as country of origin. In 2017, ca. 2kg of raw stony corals originated in Reunion were seized at Paris Charles de Gaulle airport on way to Poland. In addition, 15 kg of South American Tapir *Tapirus terrestris* meat and 15 kg of caiman meat both originated in French Guyana were seized in 2016 and 2014 respectively, but direction of trade and relevant countries were unknown.

**Table 30:**  
Seizures on import in the France outermost regions, by commodity groups, between 2008 and 2017.

Source: EU-TWIX database

**Table 31:**  
Internal seizures in the France outermost regions between 2008 and 2017.

Source: EU-TWIX database





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Hawksbill Turtle *Eretmochelys imbricata* swimming in the New Caledonia Barrier Reef, France

### **Seizures reported by Other EU Member States**

Between 2008 and 2017, the France OR were implicated in three seizure records involving 22 specimens reported by other EU Member States, all of which were seized in metropolitan France (reported by Luxembourg) in 2008. Two seizure records involved stony coral derivatives; twelve derivatives and one derivative were seized on import from Guadeloupe and Martinique respectively. In addition, nine Queen Conch *Strombus gigas* shells were seized on import from Guadeloupe.

### **France overseas countries and territories (OCT)**

#### **Seizures reported by France**

France reported 24 seizure records involving 420 specimens and ca. 21 kg implicating OCT between 2008 and 2017, which were reported in 2009, 2010, 2016 and 2017.

By number of seizure records, seizures on import from the France OCT to metropolitan France accounted for 71% with 400 specimens and 5.5 kg. The main territories of exports were French Polynesia, New Caledonia and Saint-Barthélemy. Raw corals were the main commodity types, accounting for 65% by number of seizure records (11 seizure records involving 391 specimens and 3.2 kg). Other commodities included five specimens of small leather products, three specimens of giant clam *Tridacninae* spp. shells, 1.3 kg of elephant ivory pieces, one specimen and 1 kg of *Cyatheaceae* spp.

The specimens were seized at airports (12 seizure records involving 358 specimens and 0.2 kg) or maritime ports (four seizure records involving one specimen and 5.3 kg) (the type of location of one record was unknown). Notably, all the specimens (mainly corals) seized at maritime ports were imported from New Caledonia in 2015. Additionally, France reported one seizure record involving 1.54 kg of raw stony corals originated in French Polynesia and exported from unknown country in 2017. There were some additional seizure records for which France OCT was implicated. For example, France seized 6.5 kg of live European Eel on export to French Polynesia in 2015. French Polynesia seized three small leather products made of American Alligator on import from the USA at an airport in 2017. In addition, French Polynesia reported four seizure records involving 17 specimens and an additional 7.2 kg in 2017, direction of trade or countries involved of which were unknown. Notably, eight carapaces and eight bodies of Green Turtle *Chelonia mydas* were seized due to illegal capture and possession.



## RESULTS - Illegal trade data analysis

### Seizures reported by other EU Member States

Between 2008 and 2017, France OCT were implicated in three seizure records involving 67 specimens reported by other EU Member States in the EU-TWIX database, all of which involved raw stony corals and French Polynesia. In two seizure records, French Polynesia was implicated as a territory of export. In 2008, 24 specimens of stony corals were seized at an airport in the Czech Republic on import from French Polynesia via the USA and metropolitan France. In addition, 39 specimens of stony corals were seized in Germany in transit from French Polynesia to France in 2016. French Polynesia was implicated as territory of transit in one seizure record; four stony corals were seized at an airport in the Czech Republic in 2017 on import from unknown country via French Polynesia and metropolitan France.

## 2. US CITES SEIZURE DATA

According to US CITES seizure data, FO were implicated in 47 seizure records between 2008 and 2017; 46 seizure records in which FO was the (re-)exporter, and 1 seizure record where FO were reported as importer; the USA seized two small leather products made from American Alligator *Alligator mississippiensis* on export to Saint-Barthélemy in 2017.

### France outermost regions (OR)

The USA seized a total of 123 specimens and 1 kg of CITES-listed species on import from the France OR (only Guadeloupe, Martinique and Reunion were implicated), of which 103 specimens (accounting for 84%) and 1 kg also originated in the territories.

For the specimens exported and originated in the France OR, Martinique was the main exporter with 50 specimens and 1 kg, followed by Reunion (45 specimens) and Guadeloupe (eight specimens). By number of specimens, 94% of seizures were reported in 2009 and 2012. The main species and commodity types were 50 raw stony corals *Scleractinia* spp., 45 fire corals *Millepora* spp. specimens (Table 32). By number of specimens, 92% were traded for scientific purposes.

TAXONOMIC GROUP	NUMBER OF SPECIMENS	WEIGHT (KG)	MAIN SPECIES	COMMODITIES
CORALS	50	-	Stony corals <i>Scleractinia</i> spp.	Raw corals
HYDROZOA	45	-	Fire corals <i>Millepora tenera</i>	Specimens
GASTROPODS	5	1	Queen Conch <i>Strombus gigas</i>	Shells and meat
BIRDS	2	-	Parrots Psittaciformes spp.	Feathers
REPTILES	1	-	Pythons <i>Python</i> spp.	Small leather products
TOTAL	103	1	-	-

Table 32: Seizures by the USA on import/originated from the France outermost regions by commodity groups between 2008 and 2017.

Source: CITES trade database

In addition, the USA seized a total of 20 specimens on re-import from the France OR between 2008 and 2017. Of the 20 specimens, 12 specimens were re-imported from Guadeloupe, all of which were small leather products mainly made of American Alligator, traded for commercial or personal purposes, and eight specimens were seized on re-import from Reunion in 2015, all of which were macaws *Ara* spp. feathers traded for commercial purposes.

### France overseas countries and territories (OCT)

The USA seized a total of 136 specimens and 22 kg of CITES-listed species on import from the France OCT, the majority of which also originated in the territories (81 specimens and 22 kg).



Radiated young tortoise *Astrochelys radiata*

For the specimens exported and originated in the France OCT, French Polynesia (78 specimens and 2 kg) and New Caledonia (one specimen and 20 kg) were the main countries of export by number of specimens and weight. Two specimens were also seized on import from French Polynesia. A larger number/weight of seizures was reported in 2008, 2011 and 2013. The main species and commodity types were giant clams Tridacnidae spp. (59 specimens and 0.4 kg) and corals (19 specimens and ca. 22 kg) (Table 33).

TAXONOMIC GROUP	NUMBER OF SPECIMENS	WEIGHT (KG)	MAIN SPECIES	COMMODITIES
<b>GIANT CLAMS</b>	59	0.4	Giant clams Tridacnidae spp.	Live, shells
<b>CORALS</b>	19	21.8	Stony corals Scleractinia spp.	Raw corals, live corals
<b>REPTILES</b>	2	-	Pythons Python spp.	Small leather products
<b>PLANTS</b>	1	-	Cacti Cactaceae spp.	Live
<b>TOTAL</b>	81	22.2	-	-

**Table 33:**  
Seizures by the USA  
on import/originated  
from France  
Overseas Countries  
and Territories by  
commodity groups  
between 2008 and  
2017.

Source: CITES trade  
database

In addition, the USA seized a total of 55 specimens of CITES-listed species on re-import from France Overseas Countries and Territories between 2008 and 2017, which were reported by French Polynesia (54 specimens) and Saint-Barthélemy (one specimen). The seizures were reported between 2015 and 2017. The main species and commodity types were elephant ivory carvings (38 specimens), which were traded for commercial purposes, re-exported from Saint-Barthélemy (originated in unknown country) and seized in 2017. Other commodities were raw stony corals (nine specimens), six small leather products (mainly American Alligator), one Leopard skin and one American Crocodile skull.

### 3. TRAFFIC'S GLOBAL SEIZURE TRADE DATABASE

Between January 2008 and July 2019, France overseas territories were implicated in seven seizure records reported by non-EU countries. Reunion was implicated in six seizure records; all of them involved turtles Testudines spp. including 103 live specimens of Madagascar Tortoise *Astrochelys yniphora* and 9 live specimens of Radiated Tortoise *Astrochelys radiata*, both of which are endemic to Madagascar. All the specimens were seized in Madagascar on export via Reunion to Asia (Thailand, India and China). In addition, New Caledonia was implicated in one seizure record; ivory products, weighing 208.7 grams in total were seized in Nanning in China in January 2019, which were transported in a postal parcel from New Caledonia and found after X-rayed.

# 4. DISCUSSION







Poached ivory elephant tusks confiscated by anti-poaching patrols, Gabon, Africa.



# DISCUSSION

The analysis of legal and illegal CITES-listed species trade data for the period 2008-2017 confirmed France as an important trade hub for wildlife commodities within the EU. CITES trade data indicate France is a main importing/destination country of wildlife commodities for the EU market, and (re-)export point to outside the EU. Over the period, France imported about 28 million specimens and 13 000 tonnes and (re) exported about 65 million specimens and 3 000 tonnes, with significant shares of this commercial trade concerning only a few species and specimens (e.g. of sturgeon, orchids, reptiles or gastropods).

For trade reported under CITES, France was the main importer for plants (Rosaceae, Euphorbiaceae and Portulacaceae), reptile products, corals, Queen Conch meat and medicinal leeches, as well as for some species of plants (Euphorbiaceae, Portulacaceae and Rosaceae) between 2008 and 2017. Its important trading partners included Taiwan, and Thailand for orchids, Switzerland and Tunisia for reptile products, Jamaica for Queen Conch, Cameroon and Uganda for African Cherry, and Mexico for Candelilla wax. Imports and re-exports of CITES-listed species fluctuated over the years by number of specimens and weight (kg).

France was also the main (re-)exporter of various species including bird parts and derivatives (only Muscovy duck, which is no longer CITES-listed), reptile products, sturgeons and paddlefish specimens (mainly live specimens and bodies) and plant derivatives. The main destinations included China (for sturgeon live eggs and Muscovy duck feathers), Switzerland (live sturgeons and reptile products), Tunisia (reptile products), Madagascar (African Cherry bark), and the USA (Cape Aloe powder and Candelilla wax).

Globally, key commodity types include bark, wax, dried plants and live specimens for plants, and small leather products, skins, caviar, carvings and live specimens (mainly fish, Bivalvia and Invertebrates) for animals<sup>49</sup>.

Regarding reported cases of illegal trade, various CITES-listed species were seized in France between 2008 and 2017 (a selection of seizures reported in EU-TWIX and implicating France between 2008 and 2017 can be found in the “Annex” section). 3,342 seizure records involving 1,976,991 specimens, 35,214 kg and an additional 20 m3 were reported by France in EU-TWIX for metropolitan France and 217 for its overseas. Of the total number of seizure records involving metropolitan France, only 3% (105 seizure records) reported an estimated value of the seized specimens, which totalled ca. EUR 230,000<sup>50</sup>. The number of annual seizure records increased over time between 2008 and 2017; it ranged between 95 and 205 during 2008-2012, 380-520 during 2013-2016 before reaching 847 in 2017. The number of specimens and weight seized annually increased overall with some fluctuations due to large scale seizures. Most of the commodity groups have seen an increased number of seizure records over the years. For instance, the number of seizure records for elephant ivory increased from 10 records in 2008 to 100 records in 2017 while those for live reptiles increased from 42 records in 2008 to 156 records in 2017.

It should be noted that any trends in illegal trade observed may in part be due to varying enforcement efforts and priorities (including those in terms of reporting into EU-TWIX) over time, instead of shifts in demand or changes in illegal trade patterns. For example, elephant ivory was identified as the top commodity seized in France by number of seizure records between 2008 and 2017 based on EU-TWIX, which could be due to tackling ivory trafficking being a priority for the EU, and does not necessarily mean illegal trade in elephant ivory is more prevalent than other commodities. Changes in both national and international regulations (e.g. new CITES listing) could also have considerable impact, as goods that were previously legal suddenly become subject to strict regulation and vice versa (UNODC, 2016). Based on the available data sources used in this report, it is also not possible to verify which species and commodities are intended for France’s domestic market due to the EU’s single market and free movement of goods.

The seizures were mainly carried out internally (35%), but also on import (28%), in transit (13%) and on export (2%) by number of seizure records while the direction was

**France is an important trade hub for wildlife commodities within the EU**

49 - This report does not focus specifically on live CITES-listed animals internationally traded by France. As mentioned into the methodology, only commodities totalling over 100,000 units were considered. Then, this report does not underline level of trade of live specimens of Amphibians, Reptiles, Birds and Mammals if the number of their respective commodities is under 100,000 units. It is worth noting that the number of live CITES-listed animals imported and (re)exported amounted to more than 3 million specimens, mainly Invertebrates and fish during the 1990-1999 period (Affre and Ringuet, 2002, not published).

50 - For instance, ca. 137 kg of sturgeon caviar were seized by the French customs in 2010 on import from Hungary and estimated at EUR 61,213; one live Blue-and-yellow Macaw was seized by the ONCFS in a private house in 2017 and estimated at EUR 1,500; and 34 live Hermann’s tortoises were seized internally by the ONCFS in 2017 and estimated at EUR 5,100.

other/unknown for the remaining 22%. The main countries of export for those seized on import were Ukraine and North African countries (Algeria, Morocco and Tunisia). Seizures in transit mainly involved those exported from African countries, with China being the main destination, which is the same trend as the seizures in Belgium (Musing et al., 2018). In addition to China, seizures in transit en route to other Asian countries (Lao PDR, Vietnam and Hong Kong SAR) were also reported. Recently ca. 6 kg of pangolin scales were seized at an airport in France in transit from Cameroon to Viet Nam in 2018 (TRAFFIC, 2020).

The main commodity groups seized were elephant ivory, live reptiles, live mammals and mammal bodies, parts and derivatives, bird bodies, parts and derivatives by number of seizure records, and live plants and plant parts and derivatives and live fish and fish bodies, parts and derivatives by number of specimens. The commodity groups indicated both by the analysis of CITES trade data and seizure data included sturgeon caviar, reptile products and plant derivatives.

Among the main taxonomic groups for which France was a main EU importer as reported under CITES (i.e. plants, reptiles, corals, leeches and gastropods), seizures of plants, reptiles, corals on import into France were reported to some extent while those of Queen Conches and leeches were less frequent. In addition, while France was identified as a major (re-)exporter of birds, reptiles, fish and plants according to CITES trade data, seizures on export were in general much less frequent (57 seizure records based on EU-TWIX between 2008 and 2017) although these taxonomic specimens were seized. A table summarising direction of trade, relevant countries in trade, and locations of seizures by commodity types are shown as Table 34.

It is noted that the number of seizure records the USA made on import from France (675 seizure records) between 2008 and 2017 were significantly higher than seizure records made in France on export (57 seizure records) reported to EU-TWIX during the period. The commodity groups frequently seized in the USA on import from France (reptiles, mammal bodies, parts and derivatives, elephant ivory and corals) were similar to those reported in France. While the French authorities seem to have discussed with the US government the tagging issues of reptile bodies, parts and derivatives which accounted the majority of the US seizures on import from France, further monitoring on (re-)exports of CITES-listed specimens would be warranted.

In terms of number of specimens seized, airports were the main location of seizures in metropolitan France between 2008 and 2017, involving 813 seizure records involving 113,615 specimens and an additional 4,359 kg. Paris-Charles de Gaulle Airport was confirmed as the main airport of those seizures, with elephant ivory and reptile bodies, parts and derivatives being the main commodity groups. Although the role of postal services in wildlife trade has been indicated (Illes et al., 2016), seizures at mail centres seem to have been less frequent compared to other locations in France during the period (186 seizure records involving 3,554 specimens and an additional 6 kg). Considering Paris-Charles de Gaulle Airport is one of the largest European airports for transporting passengers and for freight and mail (Eurostat, 2019), further strengthening of law enforcement efforts would be warranted with additional resources e.g. personnel, technical equipment and tools to assist enforcement.

Illegal wild meat trade is another commodity which warrants further attention by French authorities. It is known that Europe has a certain market for exotic meat and the significance of the trade into the EU mainly from Africa has been documented by previous studies (Chaber et al., 2010; Wood et al., 2014). Between 2008 and 2017, France reported 66 seizure records involving wild meat. Most of them were seized on import, 90% of which (by seizure records) were from Central African countries. Airports including Paris-Charles de Gaulle Airport and Lyon airport were the main locations of seizures. Seizures of wild meat could be underreported as wild meat tends to be destroyed before species identification is made even if the specimen is CITES-listed species. As there are human health concerns about pathogens in addition to conservation concerns, increased enforcement efforts on shipments coming from Africa entering French airports are warranted. In addition, further research is essential to better understand the extent of and the demand for wild meat in France and in the EU possibly for initiatives which work towards a sustained and transformative change in attitudes.

## **Airports were the main location of CITES seizures which took place in metropolitan France between 2008 and 2017**

## DISCUSSION

Consistent and comprehensive reporting is important as that allows for monitoring trends in legal and illegal trade. The report has identified a number of reporting issues. As for trade reported under CITES, France's CITES annual reports appear to be based on CITES documents issues and not on documents used, which can result in an overestimation of trade levels. As for reporting seizures, some details in the EU-TWIX data were missing in particular in recent years, which makes it more difficult to conduct robust analyses. While this report did not specifically look into the reporting of intelligence, the use of appropriate, secure channels for sharing intelligence are clearly essential for ensuring a quick and adequate law enforcement response.

COMMODITY TYPES		MAIN DESCRIPTIVE TERMS	MAIN DIRECTIONS OF TRADE	MAIN COUNTRIES OF EXPORT (SEIZED ON IMPORT OR IN TRANSIT)	MAIN COUNTRIES OF DESTINATION (SEIZED ON EXPORT OR IN TRANSIT)	MAIN TYPES OF LOCATION OF SEIZURE
MAMMAL BODIES, PARTS AND DERIVATIVES	Elephant ivory	Ivory carvings, tusks, ivory pieces	Transit, internal	West and Central Africa (e.g. Guinea, Nigeria)	China	Airports
	Big cats	Live, skins, bones	Internal, import	Various	(France)	Private houses, zoological gardens/animal parks, markets/shops
	Pangolins	Meat, scales	Import, transit	Cameroon, Central African Republic, Nigeria	China, Lao PDR	Airports
	Rhinos	Horns, horn pieces	Internal, transit	Guinea	China, Hong Kong SAR	Airports
	Mammal meat	Meat	Import	Cameroon, Central African Republic	(France)	Airports
REPTILES	Live reptiles	Live	Import, internal, transit	Algeria, Tunisia, Morocco	USA, EU Member States	Private houses, airports
	Reptile bodies, parts and derivatives	Small leather products, scales	Import, transit	Madagascar, West and Central Africa	China	Airports
BIRDS	Live birds	Live	Internal	-	-	Private houses, zoological gardens/animal parks
	Bird bodies, parts and derivatives	Bodies	Internal	-	-	Private houses, markets/shops
PLANTS		Live, medicine	Import, transit	USA, Thailand	Various (China, Hong Kong SAR, USA and Italy)	Fairs/exhibitions/Shows/auction houses, airports
STURGEON CAVIAR		Caviar	Import	Ukraine, Russia, China	-	Mail centres, airports
EELS		Live	Export, transit, internal	France and other European countries	China, Hong Kong SAR, Viet Nam	Airports
CORALS		Raw corals	Import	Mauritius, Indonesia, Thailand	(France)	Airports, maritime ports, fairs/exhibitions/shows/auction houses

Table 34: Main features of seizures of CITES-listed species in France by main commodity types, based on EU-TWIX (2008-2017).

## DISCUSSION

### FRANCE OVERSEAS

To date, few studies have assessed the importance of CITES-listed species trade involving French overseas. Some have been carried out on a few taxa, e.g. Queen Conch in Martinique and Guadeloupe (Theile, 2001), clams species in New Caledonia (Raymakers et al., 2003) and live Primates in French Guyana (Fialho, 2016), or on the application of CITES in specific areas, including French Guiana (Leduc, 1986; Duplaix, 2001), Martinique and Guadeloupe (Le Serrec, 1987), French Polynesia (Le Serrec, 1989a), New Caledonia (Le Serrec, 1989b) or Saint Martin and Saint Barthélemy (Anon., 1998). In 2006, WWF France compiled information related to the application of CITES in French overseas, and made an assessment of international trade (legal and illegal) species listed in the CITES Appendices from or to these FO (Ringuet et al., 2006, not published). Hence, no updated synthesis work on the CITES-listed species in trade related to the FO has been carried out to date.

According to data reported, CITES Parties traded with France overseas, imports of CITES-listed species into the France outermost regions (3,517,727 specimens, 2,295,404 kg and 722 m<sup>3</sup>) between 2008 and 2017 exceeded considerably those into the France overseas countries and territories (134,177 specimens, 1,497 kg) with live orchids from Thailand being the main commodities for both territories. Queen Conch meat was another main commodity imported from Jamaica into the France outermost regions<sup>51</sup>.

In contrast, (re-)exports from the France outermost regions (2,068 kg and six specimens, all re-exports) were much less compared to those from the France overseas countries and territories (114,873 specimens and 1,226 kg). For the (re-)exports from the France overseas countries and territories, more than 90% also originated in the territories, mainly Small Giant Clams from French Polynesia.

Between 2008 and 2017, France overseas were implicated in a total of 217 seizure records reported by France in the EU-TWIX database, most of which were related to the France outermost regions (193 seizure records). These were mainly seizures in metropolitan France on import from these territories, seizures in the France outermost regions on import and internal seizures. Among the various species involved, Queen Conch was the main species seized. Illegal shipments related to the France Overseas Countries and Territories (24 seizure records) were mainly seized in metropolitan France on import from these territories and raw corals were the main commodity type. Although other EU Member States did not report many seizures related to France overseas, those related to France Overseas Countries and Territories were all related to corals. The seizures reported by the USA on import from the territories involved mainly stony corals, fire corals and Queen Conch.

Both CITES trade data and seizure data suggest that Queen Conch is a very important species for France overseas especially for Martinique, Guadeloupe and Saint Martin, all in the Caribbean, confirming a previous study (Prada et al., 2017) indicating demand for Queen Conch meat in the region. France reported 41 seizure records involving 22,282 specimens and 3,117 kg of Queen Conch specimens related to France overseas between 2008 and 2017, which included internal seizures and seizures on the high seas<sup>52</sup>.

51 - Martinique and Guadeloupe imported, for commercial purposes, 1747 t of Queen Conch from 1994 to 2003, mainly from Jamaica (86% of total imports) (Ringuet et al. 2006, not published).

52 - Recent seizures of Queen conch were reported by the French customs, confirming the continuous demand for this commodity: 877 kg were seized in November 2019 off the coast of Martinique and 130 kg were seized at Fort-de-France (Martinique) in December 2019.



# 5. CONCLUSION





# CONCLUSION

Illegal trade in wild animals and plants, and closely interlinked offences such as poaching remain serious threats to wildlife. Being one of the largest economies in the EU, France plays a crucial role in legal and illegal wildlife trade in the EU which is known to be a major destination market and trade hub for wildlife. This study aimed to provide an assessment of the current state of France's legal and illegal trade in CITES-listed species in order to enable decision-makers to prioritise actions to halt the devastating impact of wildlife crime and ensure wildlife trade is sustainable, legal and traceable.

The findings of this study confirmed that France was one of the major EU importer and (re-)exporter of CITES-listed species between 2008 and 2017; importer and re-exporter of plants, reptile products, importer of corals, Queen Conch meat and medicinal leeches, and (re-)exporter of sturgeons and paddlefish specimens and of bird products. It was also suggested that the seizures of CITES-listed species seemed to have increased over time in France. Of the various CITES-listed species seized, the seizure data indicated that law enforcement efforts went into elephant ivory and specimens illegally traded internally and on import, and possibly less on plant commodities and/or those (re-)exported from France.

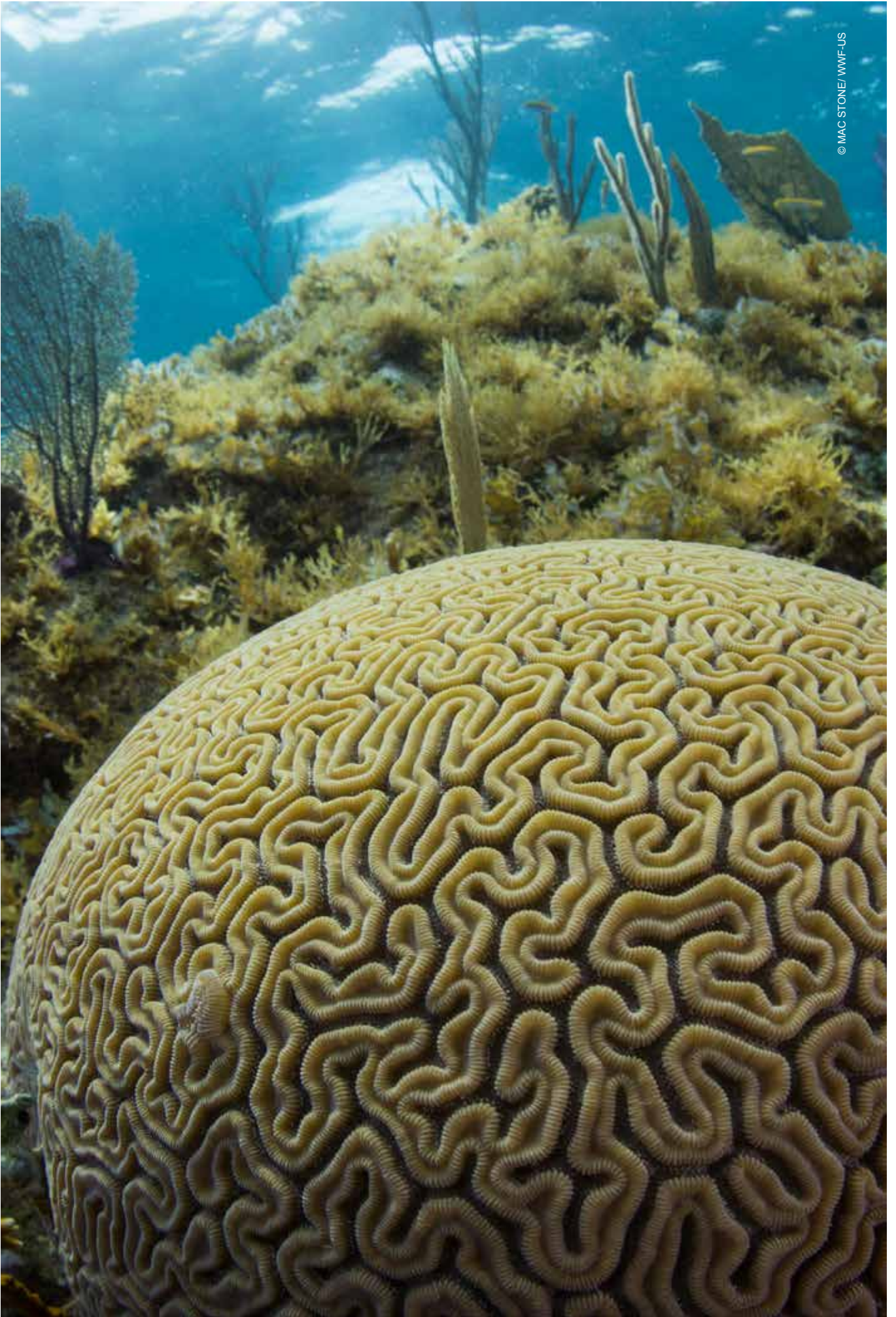
The data also indicated that seizures mainly took place in private houses and airports in France, especially Paris-Charles de Gaulle Airport. Being one of the busiest hub airports in the EU, additional resources could be dedicated for law enforcement at Paris-Charles de Gaulle Airport. In addition, while less seizure records related to mail centres and maritime ports do not necessarily mean insufficient law enforcement, more screening of postal and maritime freight would be warranted due to the recent rise of e-commerce and the high volume of products potentially transported in containerised cargo.

While France has already collaborated regionally, nationally and internationally on CITES permit procedures, scientific advice and law enforcement, inter-/intra- agency co-operation among different competent authorities at local and national level could be further strengthened to halt the devastating impact of wildlife crime. France's CITES Implementation Report for 2015-2017 indicated France uses risk assessment and criminal intelligence for law enforcement to some extent, it could be further strengthened. Continuous and further information sharing and communication among enforcement authorities and fisheries authorities should be continued, for example, to address poaching and illegal trade in glass eels, for which involvement of organised crime has been indicated. While it is beyond the scope of this study, more research and monitoring of criminal prosecutions and court actions against CITES related offences would be beneficial in order to examine whether sanctions are proportionate and have a sufficient deterrent effect.

In addition, best practices on preventing, monitoring, tracking, and combating illegal wildlife trade need to be regularly examined, scaled up and shared through monitoring and training as demand for certain commodities, trends in illegal trade and traffickers' modus operandi could change constantly. While this study focused on the analysis of data between 2008 and 2017, new trends have been observed. According to the OCLAESP, lion and white tiger cubs as well as leopards are of particular interest for traffickers for the last two years; for example at least two lion cubs and a white Tiger cub were seized in France in 2018 and 2019 (Anon., 2018b; 2019b; French Customs; 2018). In addition, further research would be needed to better understand wild meat demand in France and the EU and trade in those entering the EU.

The results of this analysis have led to the formulation of recommendations aimed at combatting illegal wildlife trade in terms of training, enforcement procedures, seizure reporting, awareness and additional research in France.





Brain coral



# 6. RECOMMENDATIONS





Kui Buri National Park, in Prachuap Khiri Khan Province, Thailand

# RECOMMENDATIONS

	RECOMMENDATIONS	RELEVANT STAKEHOLDERS
1	<p><b>RESOURCES AND WORK EFFICIENCY</b></p> <ul style="list-style-type: none"> <li>• <b>Allocate sufficient resources for training, development of implementation tools</b>, purchase of new technical equipment for implementation, monitoring/enforcement and e-permitting, especially for some priority locations e.g. Paris-Charles de Gaulle Airport and Chilly-Mazarin mail centre.</li> </ul>	<ul style="list-style-type: none"> <li>- CITES Management,</li> <li>- Scientific and Enforcement Authorities</li> </ul>
2	<p><b>PERMITS &amp; LEGISLATION</b></p> <ul style="list-style-type: none"> <li>• <b>Continue conducting thorough examination of imports</b>, exports and re-export permits to ensure the legality of specimens entering France.</li> <li>• <b>Given the large volume of CITES applications and limited resources</b>, a risk-based approach could be taken into consideration by identifying high-risk species/countries combinations for France using findings of this report as well as other relevant sources.</li> <li>• <b>Continue gaining most up-to-date information regarding CITES</b> implementation issues e.g. NDFs, legal acquisition findings and captive breeding issues.</li> <li>• <b>Enhance attention paid by French public authorities</b> (including law enforcement authorities) to updating the national legislation after amendments made to the EU or international rules governing trade in CITES-listed species (e.g. arrêté of 2007 on caviar labelling).</li> </ul>	<p>CITES Management and Scientific Authorities</p>
3	<p><b>LAW ENFORCEMENT</b></p> <ul style="list-style-type: none"> <li>• <b>Increase efforts in liaising/sharing with other EU enforcement agencies</b> that have experience in dealing with certain commodities in illegal trade. Best practices, useful training techniques for officers and protocols/guidelines for profiling and searching shipments should be shared among relevant agencies (through EU-TWIX for instance).</li> </ul>	<p>Enforcement authorities (national, local)</p>
4	<p><b>TRAINING</b></p> <ul style="list-style-type: none"> <li>• <b>Provide regular training to staff of Management, Scientific, Enforcement Authorities</b>, specifically Customs officers, at points of entry into France, and to all other enforcement staff dealing with CITES, such as national police officers.</li> <li>• <b>These training opportunities should be based on best practices in France</b> and from other EU Member States</li> </ul>	<ul style="list-style-type: none"> <li>- CITES Management,</li> <li>- Scientific,</li> <li>- Enforcement Authorities (e.g. Customs officers),</li> <li>- Police officers</li> </ul>
5	<p><b>NATIONAL COOPERATION</b></p> <ul style="list-style-type: none"> <li>• <b>Co-operation, co-ordination and communication between all CITES authorities in France</b>, including prosecutors, at all relevant institutional and policy levels, and national and regional levels (including France Overseas) should be given a higher priority in France to strengthen their operational work.</li> <li>• <b>Regarding the steering committee announced through the 2018 Biodiversity Plan</b> and led jointly by the minister in charge of the Environment and the minister in charge of Customs <ul style="list-style-type: none"> <li>- Communication should be strengthened, and outputs of this committee should be widely shared;</li> <li>- Setting up mechanisms to allow for regular inter-agency co-ordination and information exchange.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- CITES Management,</li> <li>- Scientific and Enforcement Authorities (including local authorities),</li> <li>- Prosecutors</li> </ul>
6	<p><b>INTERNATIONAL COOPERATION</b></p> <ul style="list-style-type: none"> <li>• <b>Joint operations with key countries of export</b> and destination should be developed, as well as participation in any upcoming INTERPOL and Europol operations. e.g. North African countries as key exporters for live reptiles.</li> </ul>	<p>CITES Enforcement Authorities</p>



	RECOMMENDATIONS	RELEVANT STAKEHOLDERS
7	<h3>AIRPORTS</h3> <ul style="list-style-type: none"> <li>• <b>Dedicate additional resources to combatting the illegal wildlife trade in Paris-Charles de Gaulle Airport</b> and engage with the private sector to ensure that aviation personnel are aware of the risks of illegal wildlife trade.</li> </ul>	<ul style="list-style-type: none"> <li>- CITES Enforcement Authorities,</li> <li>- Air transport sector companies</li> </ul>
8	<h3>POSTAL AND MARITIME SHIPMENTS</h3> <ul style="list-style-type: none"> <li>• <b>Increase wildlife customs</b> screening of postal mail shipments and for sea freight.</li> <li>• <b>Engage with the private sector to ensure that relevant personnel</b> (e.g. those in charge of shipping and handling) are aware of the issue of wildlife trafficking and channels for reporting suspicious shipments for enforcement action.</li> </ul>	<ul style="list-style-type: none"> <li>- CITES Enforcement Authorities,</li> <li>- Private sector</li> </ul>
9	<h3>TRENDS</h3> <ul style="list-style-type: none"> <li>• <b>Continue monitoring wildlife trade trends in France and in the EU</b> and strengthen analysis of seizures data. Methodologies and data from such monitoring activities should be made publicly available for future reference.</li> </ul>	<ul style="list-style-type: none"> <li>- CITES Management and Enforcement Authorities,</li> <li>- Research institutes,</li> <li>- NGOs and other relevant stakeholders</li> </ul>
10	<h3>UNDERTAKE/CONTINUE TO CONDUCT PHYSICAL/ONLINE WILDLIFE MARKET SURVEYS</h3> <ul style="list-style-type: none"> <li>• <b>To understand better trade dynamics</b> and to understand demand for wildlife and their products in France. Initiatives to change consumer behaviour should also be developed further where needed. Key priorities should include: <ul style="list-style-type: none"> <li>- Conduct further research to better understand the extent of and the demand for wild meat in France and in the EU and develop and implement actions accordingly to cope with the wild meat trade.</li> <li>- Conduct further research to monitor illegal trade in elephant ivory and to assess how trade dynamics change over time due to stricter domestic measures governing elephant ivory trade.</li> <li>- Conduct caviar market surveys to determine the scale of the domestic market, including the purchasing of samples for DNA/isotope analysis to ascertain whether information provided on the caviar labels match actual source and origin.</li> <li>- Conduct assessments of the scale and nature of trade in wildlife commodities sold via online marketplaces in France.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- CITES Management and Enforcement Authorities,</li> <li>- Research Institutes,</li> <li>- NGOs and other relevant stakeholders</li> </ul>
11	<h3>IMPROVED REPORTING</h3> <ul style="list-style-type: none"> <li>• <b>Report seizures to EU-TWIX as detailed as possible considering information for some data seems to be missing in recent years.</b> Regular training/guidance should be provided to staff who are in charge of reporting for high-quality and consistency of the data.</li> </ul>	<ul style="list-style-type: none"> <li>- CITES Management and Enforcement Authorities</li> </ul>
12	<h3>AWARENESS RAISING</h3> <p><b>Increase awareness among consumers, passengers</b> (air, maritime, etc.), shippers and their staff regarding rules for purchasing and consuming products containing CITES-listed species, and their transportation across borders. Careful attention should be given urgently to transportation of wild meat considering its potential health risks.</p> <p><b>Collaboration with companies</b> (airlines, maritime companies, etc.), ports and airports and courier companies would be useful to disseminate such information to passengers and consumers.</p> <p><b>Continue communicating</b>, with companies whose supply chains or activities involves CITES specimens, on obligations and evolutions of the convention.</p>	<ul style="list-style-type: none"> <li>- CITES Management and Enforcement Authorities,</li> <li>- Research Institutes,</li> <li>- NGOs and other relevant stakeholders</li> </ul>



	RECOMMANDATIONS (EN FRANÇAIS)	PARTIES PRENANTES
1	<p><b>RESSOURCES ET EFFICACITÉ DU TRAVAIL</b></p> <ul style="list-style-type: none"> <li>• <b>Allouer des ressources suffisantes</b> pour la formation, le développement d'outils, l'achat de nouveaux équipements techniques, le suivi/contrôle et les permis électroniques, en particulier pour certains lieux prioritaires tels que l'aéroport de Paris-Charles de Gaulle et le centre de courrier situé à Chilly-Mazarin.</li> </ul>	<ul style="list-style-type: none"> <li>- Autorité de gestion CITES,</li> <li>- Autorité scientifique CITES,</li> <li>- Organes de contrôle chargés de l'application de la CITES</li> </ul>
2	<p><b>PERMIS &amp; LÉGISLATION</b></p> <ul style="list-style-type: none"> <li>• <b>Poursuivre l'examen approfondi des permis d'importation, d'exportation et de réexportation</b> pour s'assurer de la légalité des spécimens entrant en France.</li> <li>• Du fait du volume élevé de demandes CITES et des ressources limitées, <b>une approche fondée sur l'analyse des risques pourrait être envisagée, en identifiant les combinaisons espèces/pays à haut risque pour la France</b>, sur la base des conclusions de ce rapport ainsi que d'autres sources pertinentes.</li> <li>• <b>Continuer à obtenir les informations les plus récentes concernant les questions de mise en œuvre de la CITES</b>, telles que les avis de commerce non préjudiciable, les avis d'acquisition légale et les questions relatives à l'élevage en captivité, etc.</li> <li>• <b>Renforcer l'attention portée par les autorités publiques françaises (y compris les autorités chargées de l'application des lois) à la mise à jour de la législation nationale</b> suite aux modifications pouvant être apportées aux règles européennes ou internationales régissant le commerce des espèces inscrites à la CITES (par exemple, l'arrêté de 2007 sur l'étiquetage du caviar).</li> </ul>	<ul style="list-style-type: none"> <li>- Autorité de gestion CITES,</li> <li>- Autorité scientifique CITES</li> </ul>
3	<p><b>APPLICATION DES LOIS</b></p> <ul style="list-style-type: none"> <li>• <b>Accroître les efforts de mise en relation/partage avec d'autres agences de l'UE</b> chargées de l'application des lois qui ont de l'expérience dans le traitement de certaines marchandises dans le cadre du commerce illégal. Les meilleures pratiques, les techniques de formation utiles aux agents et les protocoles/lignes directrices pour le ciblage et le contrôle des cargaisons devraient être partagés entre les organismes concernés (via EU-TWIX par exemple).</li> </ul>	<p>Organes chargés de l'application des lois (nationales, locales)</p>
4	<p><b>FORMATION</b></p> <ul style="list-style-type: none"> <li>• <b>Former régulièrement le personnel des autorités de gestion, scientifiques et d'application de la loi</b>, en particulier les agents des douanes, aux points d'entrée en France, ainsi que tous les agents chargés de l'application de la CITES, tels que les agents de la police nationale.</li> <li>• <b>Ces formations devraient permettre de diffuser les meilleures pratiques</b> identifiées en France et dans d'autres États membres de l'UE.</li> </ul>	<ul style="list-style-type: none"> <li>- Autorité de gestion CITES,</li> <li>- Autorité scientifique CITES,</li> <li>- Organes de contrôle chargés de l'application de la CITES (douaniers par ex.),</li> <li>- Agents chargés de l'application des lois</li> </ul>
5	<p><b>COOPÉRATION NATIONALE</b></p> <ul style="list-style-type: none"> <li>• <b>D'avantage de priorité devrait être donnée à la coopération, la coordination et la communication entre toutes les autorités CITES en France</b>, y compris les procureurs, à tous les niveaux institutionnels et politiques pertinents, aux niveaux national et régional (y compris avec les outre-mer françaises), afin de renforcer leur travail opérationnel.</li> <li>• <b>Concernant le comité de pilotage annoncé par le Plan Biodiversité adopté en 2018</b> (Action 59) et dirigé conjointement par le ministre en charge de l'environnement et le ministre en charge des douanes: <ul style="list-style-type: none"> <li>-La communication devrait être renforcée et les résultats de ce comité devraient être largement diffusés ;</li> <li>-Des mécanismes devraient être mis en place pour permettre une coordination accrue et des échanges d'informations réguliers entre les différents organes de contrôle chargés de l'application de la CITES.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Autorité de gestion CITES,</li> <li>- Autorité scientifique CITES,</li> <li>- Organes de contrôle chargés de l'application de la CITES (dont les autorités locales), procureurs</li> </ul>
6	<p><b>COOPÉRATION INTERNATIONALE</b></p> <ul style="list-style-type: none"> <li>• <b>Des opérations conjointes devraient être développées avec les principaux pays d'exportation et de destination</b>, ainsi que la participation à toute opération future d'INTERPOL ou organisée au niveau européen (Europol, EMPACT, etc.), par exemple avec les pays d'Afrique du Nord en tant qu'exportateurs clés de reptiles vivants.</li> </ul>	<p>Organes de contrôle chargés de l'application de la CITES</p>

	RECOMMANDATIONS (EN FRANÇAIS)	PARTIES PRENANTES
7	<p><b>AÉROPORTS</b></p> <ul style="list-style-type: none"> <li>• <b>Allouer des ressources supplémentaires à la lutte contre le commerce illégal d'espèces sauvages à l'aéroport de Paris-Charles de Gaulle</b> et à la mobilisation du secteur privé pour s'assurer que le personnel du secteur aérien est conscient des risques liés au commerce illégal d'espèces sauvages.</li> </ul>	<ul style="list-style-type: none"> <li>- Organes de contrôle chargés de l'application de la CITES,</li> <li>- Entreprises du secteur aérien</li> </ul>
8	<p><b>MARCHANDISES TRANSPORTÉES PAR VOIE AÉRIENNE, MARITIME ET PAR COURRIER/COLIS</b></p> <ul style="list-style-type: none"> <li>• <b>Renforcer le contrôle/ciblage douanier sur les envois postaux et le fret maritime</b>, pour répondre à l'essor du commerce en ligne et au volume important de produits potentiellement transportés dans des conteneurs.</li> <li>• <b>Mobiliser le secteur privé pour s'assurer que le personnel concerné</b> (par ex., les agents en charge des commandes et de la manutention) <b>est conscient des enjeux</b> liés au commerce illégal d'espèces sauvages et des moyens de signaler les cargaisons suspectes en vue de l'intervention des agents en charge de l'application des lois.</li> </ul>	<ul style="list-style-type: none"> <li>- Organes de contrôle chargés de l'application de la CITES,</li> <li>- Secteur privé</li> </ul>
9	<p><b>TENDANCES</b></p> <ul style="list-style-type: none"> <li>• <b>Poursuivre le suivi des tendances</b> du commerce des espèces sauvages en France et dans l'UE et <b>renforcer l'analyse des données relatives aux saisies</b>. Les méthodologies et les données issues de ces activités de surveillance devraient être publiques pour permettre une consultation ultérieure.</li> </ul>	<ul style="list-style-type: none"> <li>- Autorité de gestion CITES,</li> <li>- Autorité scientifique CITES,</li> <li>- Centres de recherche, ONG,</li> <li>- Autres parties prenantes pertinentes</li> </ul>
10	<p><b>ENTREPRENDRE/CONTINUER À MENER DES ÉTUDES DE MARCHÉS PHYSIQUES/EN LIGNE SUR LA FAUNE ET LA FLORE SAUVAGES</b></p> <ul style="list-style-type: none"> <li>• <b>Pour mieux comprendre la dynamique des échanges</b> et la demande d'espèces sauvages et de leurs produits en France. Les initiatives visant à faire changer les comportements de consommation devraient également être davantage développées si nécessaire. Les priorités clés devraient inclure: <ul style="list-style-type: none"> <li>- Mener des recherches supplémentaires afin de mieux comprendre l'ampleur et la demande de viande d'espèces sauvages en France, et développer et mettre en œuvre des actions pour limiter le commerce illégal de viande d'espèces sauvages.</li> <li>- Mener des recherches supplémentaires pour réaliser un suivi du commerce illégal d'ivoire d'éléphant et des éventuelles changements de dynamique du commerce au fil du temps en raison du durcissement des mesures nationales régissant le commerce d'ivoire d'éléphant.</li> <li>- Réaliser des études de marché sur le caviar pour déterminer l'ampleur du marché intérieur, y compris l'achat d'échantillons pour la réalisation d'analyses d'ADN/ des isotopes afin de vérifier si les informations fournies sur les étiquettes du caviar correspondent à la source et à l'origine réelles.</li> <li>- évaluer l'ampleur et la nature du commerce des espèces sauvages réalisé via les plateformes de vente en ligne en France.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Autorité de gestion CITES, chargés de l'application de la CITES,</li> <li>- Centres de recherche, ONG,</li> <li>- Autres parties prenantes pertinentes</li> </ul>
11	<p><b>RAPPORTAGE DES DONNÉES SUR LE COMMERCE ILLÉGAL</b></p> <ul style="list-style-type: none"> <li>• <b>Rapporter les saisies dans EU-TWIX de la manière la plus détaillée possible</b>, puisque certaines saisies ou informations sur ces saisies semblent ne pas avoir été rapportées au cours des dernières années. Une formation/des lignes directrices devraient être fournies régulièrement au personnel chargé de réaliser le rapportage pour assurer la qualité et la cohérence des données.</li> </ul>	<ul style="list-style-type: none"> <li>- Autorité de gestion CITES,</li> <li>- Organes de contrôle chargés de l'application de la CITES</li> </ul>
12	<p><b>SENSIBILISATION</b></p> <ul style="list-style-type: none"> <li>• <b>Sensibiliser les consommateurs, les passagers (aériens, maritimes, etc.), les entreprises de transport et leur personnel sur les règles d'achat et de consommation des produits contenant des espèces inscrites à la CITES</b>, ainsi que sur les modalités de leur transport international. Une attention particulière doit être accordée au transport de viande d'espèces sauvages, compte tenu des potentiels risques sanitaires associés.</li> <li>• <b>La collaboration avec les compagnies (aériennes, maritimes, etc.)</b> les ports et aéroports et les entreprises de transport de courrier/colis sera nécessaire pour diffuser ces informations aux passagers et aux consommateurs.</li> <li>• <b>Maintenir la communication, avec les entreprises</b> dont les chaînes d'approvisionnement ou les activités intègrent des spécimens CITES, sur les obligations et évolutions de la convention.</li> </ul>	<ul style="list-style-type: none"> <li>- Autorité de gestion CITES,</li> <li>- Organes de contrôle chargés de l'application de la CITES,</li> <li>- Centres de recherche, ONG,</li> <li>- Autres parties prenantes pertinentes</li> </ul>

# 7. REFERENCES AND ANNEX







Rhino in long grass



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# ANNEX

## Selection of wildlife seizures reported in EU-TWIX and implicating France between 2008 and 2017

Source: EU-TWIX data, TRAFFIC's reports to the European Commission "Overview of important seizures in the European Union" for the years 2011 to 2018, and French customs' press releases.

YEAR	COUNTRY OF DEPARTURE	TRANSIT COUNTRY	DESTINATION COUNTRY	NUMBER OF SPECIMENS	UNITS	TYPE OF SPECIMEN	
2008	CAMEROON	FRANCE	BELGIUM	57.83	m3	Sawn wood	
	MARTINIQUE (FRANCE)	-	FRANCE	45	Kg	Derivatives	
	FRANCE	-	BELGIUM	109	-	Live	
2009	INDONESIA	-	FRANCE	13	-	Skin	
	GUADELOUPE (FRANCE)	-	FRANCE	48	-	Corals	
	FRANCE	-	UNITED KINGDOM	50	Kg	Medicine	
2010	HUNGARY	-	FRANCE	136.75	Kg	Caviar	S
	MALI	FRANCE	JAPAN	150	-	Live	
	BENIN	FRANCE	CHINA	57	-	Ivory carvings	
2011	HONG KONG	FRANCE	UNITED KINGDOM	120	-	Medicine	
	(INTERNAL)	(INTERNAL)	FRANCE	74	-	Ivory carvings	
2012	TUNISIA	ITALY	FRANCE	57	-	Live	
	CAPE VERDE	-	FRANCE	1	-	Live	
	FRANCE	-	SWITZERLAND	3	-	Live	
2013	PORTUGAL	-	FRANCE	82	Kg	Carvings	
	TOGO	FRANCE	CHINA	18.5	Kg	Scales	
	CHINA	FRANCE	UNITED KINGDOM	360	-	Medicine	

SPECIES	DETAILS
<i>Afromosia Pericopsis elata</i>	Listed in App. II, Annex B; Found in sea freight.
Stony corals <i>Scleractinia</i> spp.	Listed in App. II, Annex B; Found in postal parcels; Detected following random controls at an airport;
Red-billed Leiothrix <i>Leiothrix lutea</i>	Listed in App. II, Annex B; Found in a vehicle.
Indian python <i>Python molurus molurus</i>	Listed in App. I, Annex A; Found in express or postal parcels.
Stony corals <i>Scleractinia</i> spp.	Listed in App. II, Annex B; Found in postal parcels.
Costus root <i>Saussurea costus</i>	Listed in App. I, Annex A; Found in sea freight.
Turgeons and paddlefish <i>Acipenseriformes</i> spp.	Listed in App. I/II, Annex A/B; Found in a vehicle; Seizures of caviar identifying France as the country of destination and reported in EU-TWIX for 2010 amounted to approx. 226.2 kg.
Tortoises <i>Testudinidae</i> spp.	Listed in App. I/II, Annex A/B; Found in airfreight.
African elephant <i>Loxodonta africana</i>	Listed in App. I/II, Annex A/B; Found in personal luggage at an airport; 36 seizure records involving ivory and identifying France as the country of transit or destination were reported in EU-TWIX in 2010.
Orchids <i>Orchidaceae</i> spp.	Listed in App. I/II, Annex A/B; Found in personal luggage at an airport.
African elephant <i>Loxodonta africana</i>	Listed in App. I/II, Annex A/B; Seized at a market/shop, following intelligence-based action by French authorities.
Spur-thighed Tortoises <i>Testudo graeca</i>	Listed in App. II, Annex A; Specimens of wild origin; Detected following random control at maritime port; One of at least 20 seizures at Italian ports and airports involving live specimens of this species exported from North Africa (Tunisia, Morocco and Algeria) in 2012.
Green monkey <i>Chlorocebus sabaues</i>	Listed in App. I, Annex A; Specimen of wild origin; Detected following intelligence/ investigation work; Seized at a French maritime port.
Ambon King-Parrot <i>Alisterus amboinensis</i>	Listed in App. II, Annex B; Accompanying CITES document was falsified.
African elephant <i>Loxodonta africana</i>	Listed in App. I/II, Annex A/B; Found in a vehicle; Seizures of African elephant's ivory identifying France as the country of transit or of destination and reported in EU-TWIX for 2013 amounted to 147 specimens and approx. 211 kg.
Pangolins <i>Manidae</i> spp.	Listed in App. II, Annex B; Found in a personal luggage at a French airport.
Costus root <i>Saussurea costus</i>	Listed in App. I, Annex A; Found in a personal luggage at a UK airport.

2014	MADAGASCAR	FRANCE	LAO	170	-	Live	
	MOZAMBIQUE AND NIGERIA	FRANCE	LAO	30.56	Kg	Worked ivory	
	CENTRAL AFRICAN REPUBLIC	-	FRANCE	57	Kg	Meat	
	USA	-	FRANCE	62,700	-	Tablets	
	SENEGAL	-	FRANCE	2	-	Horns	South
2015	MADAGASCAR	FRANCE	CHINA	18,688	-	Whole	
	NEW CALEDONIA (FRANCE)	-	FRANCE	198		Corals	
	UNITED KINGDOM	FRANCE	HONG KONG	120	Kg	Live	
2016	SPAIN	FRANCE	NETHERLANDS	11.5	Kg	Horns	
				5	-		
	GUINEA	FRANCE	VIETNAM	2,007	-	Whole	
	MEXICO	FRANCE	HONG KONG	396	-	Whole	Cactus (11 species) <i>Aztekium ritzschii</i>
	GUINEA	FRANCE	CHINA	6	-	Teeth	
	ANGOLA	FRANCE	VIETNAM	142.48	Kg	Ivory pieces	
	BRAZIL	FRANCE	UNITED ARAB EMIRATES	1200	-	Extract	
2017	CUBA	FRANCE	ITALY	111.56	Kg	Shell	
	HAITI	FRANCE	VIETNAM	4960	-	Scales	
	USA	-	FRANCE	900	-	Teeth	
	CAMEROON	FRANCE	HONG KONG	64	-	Live	

Radiated Tortoise <i>Astrochelys radiata</i>	Listed in App. I, Annex A; Detected through targeting of air freight based on a risk assessment; Discovered in the double bottom of six parcels containing sea cucumbers.
African elephant <i>Loxodonta africana</i>	Listed in App. I/II, Annex A/B; Two seizures of 25.22 kg and 5.34 kg of sculptures, combs and bracelets made of ivory found in express freight; Targeted at an airport based on a risk assessment.
Primate – Species unknown	Listed in App. I/II, Annex A/B; Detected following random controls at airports; Meat seized from the baggage of nationals from the Central African Republic arriving at French airports. Other similar seizures involving mammal meat (various species) detected in the baggage of passengers arriving in France from Cameroon, Congo and Gabon.
Cape Aloe <i>Aloe ferox</i>	Listed in App. II, Annex B; Found in multiple postal parcels; Detected following random controls at an airport; Similar seizures reported by Austria and the UK in 2014.
Eastern White Rhinoceros <i>Cerathotrium simum simum</i>	Listed in App. I/II, Annex A/B; Detected at an airport following a random control; Found in a personal luggage.
Seahorses <i>Hippocampus</i> spp.	Listed in App. II, Annex B; Detected at a French airport; Transported in a commercial shipment; 8 seizure records involving 19,029 seahorses and identifying France as the country of transit or destination were reported in EU-TWIX in 2015.
Corals and Sea anemones <i>Anthozoa</i> sp.	Listed in App. I/II, Annex A/B; Detected at an airport in a commercial shipment.
European eels <i>Anguilla anguilla</i>	Listed in App. II, Annex B; Detected at an airport; The first seizure of live European eels involving France was reported in EU-TWIX in 2014.
Black Rhinoceros <i>Diceros bicornis</i>	Listed in App. I, Annex A; The origin of the specimens is Botswana; Detected following random control on a vehicle.
Seahorses <i>Hippocampus</i> spp.	Listed in App. II, Annex B; Detected in postal parcels as a result of targeting based on risk assessment.
(including Hatchet Cactus <i>Pelecyphora aselliformis</i> , Aztec Cactus <i>Cholla</i> and Chautle Living-rock Cactus <i>Ariocarpus fissuratus</i> )	Listed in App. I/II, Annex A/B; Detected in 4 commercial shipments and followed by the seizure of 4 other commercial shipments on the same route, a week after, in a French airport.
Lion <i>Panthera leo</i>	Listed in App. I/II, Annex A/B; Detected at an airport following random control; Transported in personal luggage.
African elephant <i>Loxodonta africana</i>	Listed in App. I/II, Annex A/B; Detected at a French airport following random control; Transported in six personal suitcases; 36 seizure records involving 995 specimens and approx. 440 kg of ivory and identifying France as the country of transit or destination were reported in EU-TWIX in 2016.
Sturgeons <i>Acipenseriformes</i> spp.	Listed in App. II, Annex B; Detected at an airport following random control; Transported in freight.
Queen conch <i>Strombus gigas</i>	Listed in App. II, Annex B; Detected at a French airport.
Hawksbill Turtle <i>Eretmochelys imbricata</i>	Listed in App. I, Annex A; Detected at an airport following random control; Transported in freight.
Sharks <i>Elasmobranchii</i> spp.	Listed in App. II, Annex B; Detected at a French mail center.
Scorpion <i>Pandinus dictator</i>	Listed in App. II, Annex B; Detected at a French airport.



# FRANCE ON THE PODIUM OF WILDLIFE TRADERS IN THE EUROPEAN UNION



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