WILD ANIMALS

Not Pets

the case for an EU Positive List

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#WildAnimalsNotPets

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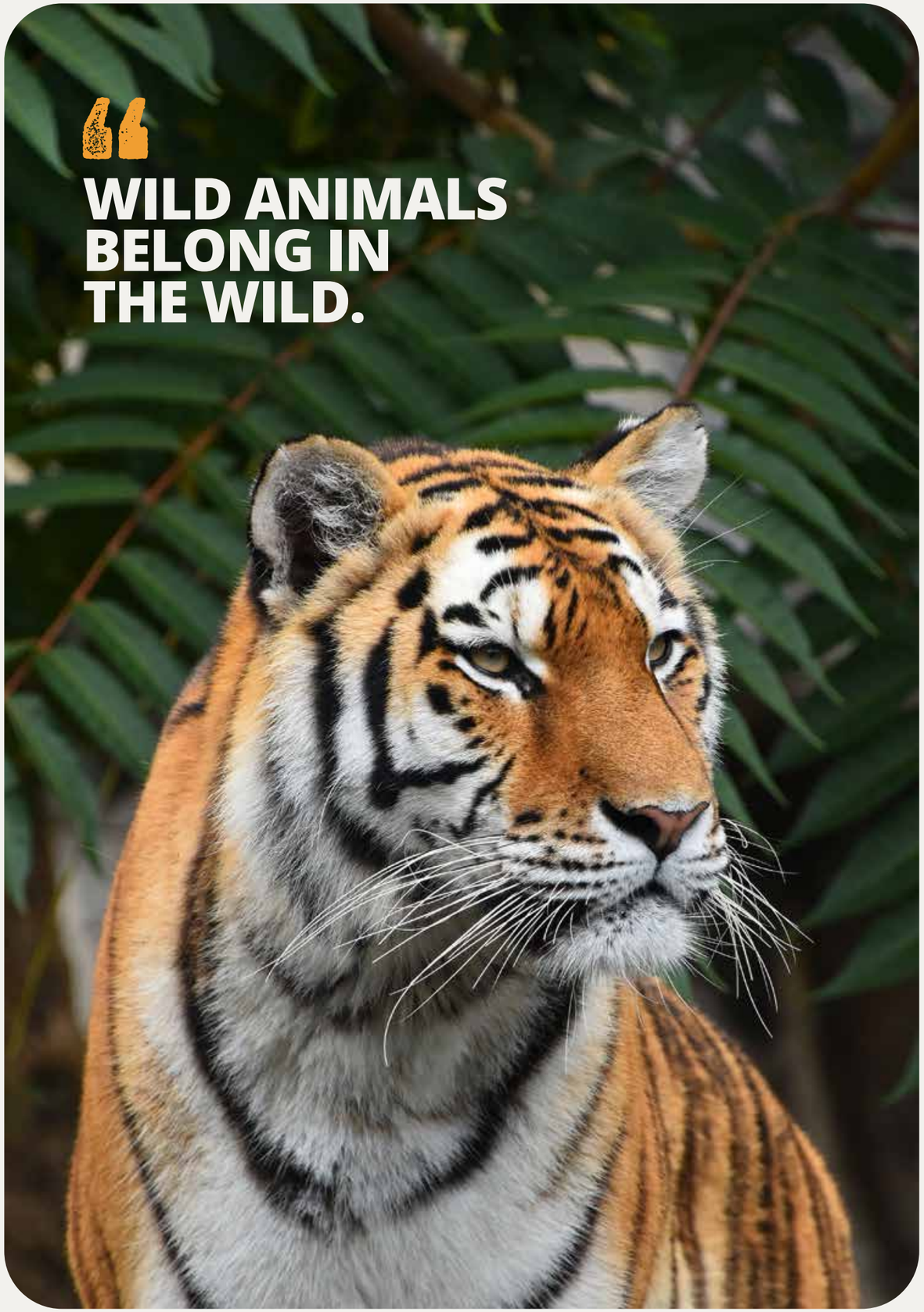


“WILD ANIMALS BELONG IN THE WILD.

Foreword

This report and the accompanying dashboards reflect the deep commitment of Animal Advocacy and Protection (AAP), as a leading European animal welfare organisation, to the introduction of a Positive List. This would define the animals that may be kept as pets, and in doing so, help regulate the problematic trade in wild animals being kept as pets. We view this as an important step towards ending the suffering of captive wild animals in Europe. Europe is, regrettably, a hotspot for the wild animal pet trade. On the surface, this may not appear problematic, however, it poses a range of very serious challenges

Wild animals belong in the wild. The wild capture and captive breeding of these animals has not only a detrimental impact on their welfare, raising serious ethical concerns, but it also poses risks to public health and global biodiversity. The Organisation for Economic Co-operation and Development (OECD) states that over half of the world’s economic value generation – around 38.7 trillion Euros of GDP – is moderately or highly dependent on nature and ecosystem services, so by compromising biodiversity, we are also jeopardising our economy.[1]

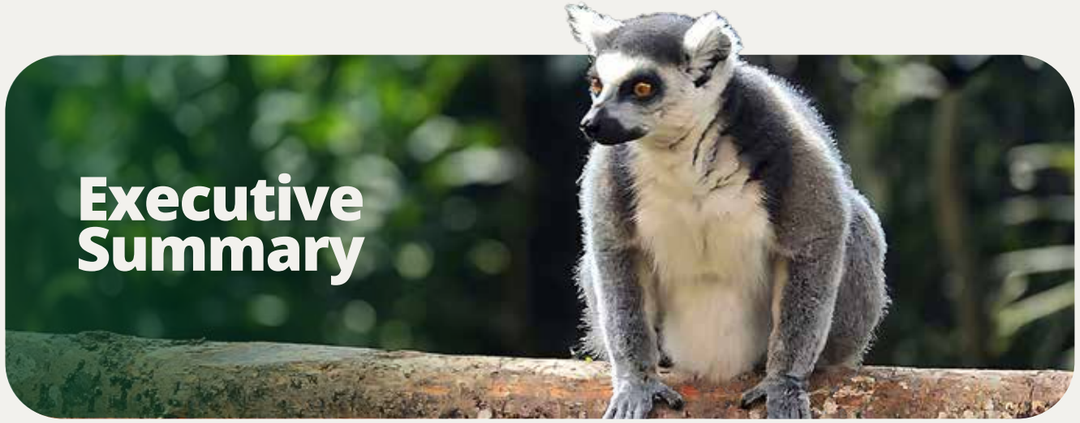
While the COVID-19 pandemic drew global attention to the dangers of zoonotic diseases, it has not led to a decrease in the trade of wild animals. Every year, millions are still being traded in Europe to be kept as pets, often in heartbreaking conditions. Despite the increasing availability of information on wildlife trafficking offences, wild animal (or “exotic”) pet ownership, and zoonotic disease outbreaks, a full picture remains elusive. Significant inconsistencies in reporting practices, enforcement capacity, and surveillance coverage across Member States hinder comprehensive assessment and response. Many cases likely go unrecorded or unreported, and data on non-traditional species remains sparse. These gaps not only limit the ability to monitor trends and emerging risks effectively but also weaken the foundation for coordinated EU-level policy action.

At AAP, we have dedicated our lives to caring for captive wild animals that have ended up in the European pet trade, and to treating the serious illnesses and behavioural problems from which they suffer. Our wish is to see regulation that determines which animals can safely be kept as pets, and for the EU to show positive leadership for positive change.

In short, our challenge to policymakers is to put rescue centres out of business. Between 2001 and 2021 alone, we took in over 900 animals that were illegally traded in Europe, and we are seeing these numbers, as well as rescue requests, increase every year. Help us eliminate the need to rescue animals in the first place.

We invite everyone reading this report to sign our petition for an EU Positive List. We thank all those who have joined our campaign so far, with special thanks to Niels Fuglsang MEP, President of the Intergroup on the Welfare and Conservation of Animals, and Manuela Ripa MEP, Rapporteur for the Welfare of Dogs and Cats and Their Traceability. We also thank our colleagues at Eurogroup for Animals for the collaboration on this issue.

1 Biodiversity | OECDBiodiversity | OECD, accessed May 29, 2025, https://www.oecd.org/en/topics/sub-issues/biodiversity.html



Executive Summary

This report is published to coincide with the launch of Animal Advocacy and Protection's (AAP) ***#WildAnimalsNotPets*** campaign. It is accompanied by a dashboards of the state of play across Europe hosted on the AAP website, the snapshot of which is in annex[2]. It makes the case for an EU-wide Positive List of animals that are allowed to be kept as pets and calls for this to be introduced into EU legislation in the current Commission mandate.

A Positive List is a science-based policy instrument that defines, in a legally binding manner, the animal species permitted for private ownership. It proactively excludes any animal that could carry significant risks to human health, biodiversity, and animal welfare.

The COVID-19 pandemic served as a critical wake-up call for Europe, exposing the vulnerability of our healthcare systems and the risks to public health. The debate around the origins of the disease was a reminder of just how dangerous zoonotic diseases can. While strong containment measures were adopted to mitigate the pandemic's impact, the consequences were far reaching. From the lives lost to the severe economic downturn, its effects are still felt today. As Professor Caroline Buckee of Harvard University warns, "another pandemic will happen. It's just a matter of time."

The call to action made in this report aims to ensure that the next pandemic is not because of a zoonotic disease transmission resulting from Europe's unregulated wild animal trade. Research has already identified 70 different "exotic" pet related zoonotic diseases in the EU[3]. Also, between 2015 and 2019, AAP rescued captive wild animals that were susceptible to over 120 zoonotic viruses, bacteria and parasites.[4]

According to a number of provisions with the European Treaties, the EU is obligated to prepare for and prevent cross-border health threats. One such threat is the wild animal pet trade, which involves millions of animals being trafficked, legally traded and kept each year in stressful and unsuitable conditions. This is a known driver of zoonotic disease risk. Many examples of zoonotic disease transmissions exist in Europe. This includes the recent news headlines of racoons native to North and Central America, spreading a parasite that can cause neurological and ocular diseases in humans being found on the continent, with young children being most at risk.[5] This is a cross-border issue demanding coordinated EU action.

Beyond public health, the trade raises serious animal welfare concerns, as wild species kept in domestic settings frequently suffer from unmet behavioural, psychological and physiological needs and with high risks of neglect, abandonment.

These animals, whether wild-caught or captive-bred, are not suited to private ownership. Having them kept as pets also threatens ecosystems when they end up being released or escape. This further contributes to already severe biodiversity loss. If these non-native animals are introduced to Europe, they can disrupt ecosystems, spread pathogens, and impact agriculture. An example of this is the deadly fungal pathogen chytrid fungus that was introduced to Europe, as a result of the amphibian pet trade. The fungus is a major cause of the devastating decline in numbers of frogs, toads, newts and salamanders in Europe and there is no known effective measure for controlling the disease. The lineage which has caused such devastation can be traced back to East Asia.[6]

The EU already spends an estimated €12 billion annually managing invasive alien species, many linked to this trade.[7] Taking stock of the biodiversity crisis, the EU's commitment to a One Health approach, and in light of the recent appointment of the first-ever Commissioner for Health and Animal Welfare with a clear mandate to "modernise animal welfare, including on the import of exotic animals", it is now time for action.[8]

2. www.en.aap.eu
3. A Review of Captive Exotic Animal-Linked Zoonoses, Emerging Disease Foundation, accessed May 29, 2025, http://emergentdisease.org/assets/documents/A_review_of_captive_exotic_animal-linked_zoonoses.pdf.
4. AAP, Infected and Undetected, Zoonoses and Exotic Pets in the EU, June 2021; https://www.aap.nl/wp-content/uploads/2021/08/2021_InfectedUndetected.pdf
5. AAP, Infected and Undetected, Zoonoses and Exotic Pets in the EU, June 2021; https://www.aap.nl/wp-content/uploads/2021/08/2021_InfectedUndetected.pdf 2024.https://www.euronews.com/health/2024/07/30/first-cases-of-raccoon-intestinal-worms-found-in-belgium
6. Euronews, "First Cases of Raccoon Intestinal Worms Found in Belgium," July 30, 2024, https://www.euronews.com/health/2024/07/30/first-cases-of-raccoon-intestinal-worms-found-in-belgium
7. wwww.ec.europa.eu/commission/presscorner/detail/en/ip_13_818
8. BBC News, "Origins of amphibian-killing fungus uncovered" May 11, 2018, www.bbc.com/news/science-environment-44075687

This report identifies three main challenges to Europe:

The suffering of wild animals in domestic settings

The spread of zoonotic diseases

The damage caused by invasive species

Each of these issues, if left unaddressed, undermines a number of the EU's stated objectives under the EU Treaties. This includes its ambition to build a strong European Health Union, and its global leadership on biodiversity, animal welfare, and sustainability.

The adoption of a legally binding Positive List would provide a coherent and evidence-based regulatory solution to these challenges. A Positive List enables Member States to take preventative action by clearly identifying which wild animal species may be kept as pets, and proactively restricting all others based on rigorous, science-based risk assessments. This approach ensures consistency across the EU, reduces enforcement burdens, and supports a more effective, harmonised response to public health, animal welfare, and biodiversity threats. Importantly, a harmonised EU approach would close existing legislative gaps, reduce enforcement burdens, and avoid the legal fragmentation currently seen across Member States. Furthermore, it would address the unfair competition between pet businesses through market harmonisation.

The data presented on our dashboards shows why action is urgently needed. Available data shows only part of the picture, due to widespread underreporting of the impacts of both legal and illegal wild animal pet trade, including zoonotic disease transmission. However, it still reveals the severe nature of the problem and the high level of fragmentation across Member States. The fact that over 3,600 cases of illegal wildlife trade (including pets) were identified from 2022-2023 should be alarming to us all.

Although some EU Member States have taken action, a patchwork of rules and guidelines exists across the EU-27. So far, eight EU Member States (Belgium, Croatia, Cyprus, Italy, Lithuania, Luxembourg, Malta and the Netherlands) have implemented a version of a Positive List. Four others (Finland, France, Slovenia and Spain) already have a legal basis in law for a Positive List. However, the inconsistent approach has resulted in different lists and contributes to further market fragmentation.

At the international level, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) offers an important global framework. But the numbers in our dashboards show CITES alone is not enough. According to our findings, around 70% of species traded in the EU are not CITES-listed. This means they are therefore largely unprotected and unmonitored. Europe should set a strong example by taking the lead in addressing the trade in wild animal being kept as pets, complementing its global leadership on climate action and biodiversity conservation.

Policy recommendations

Sign the petition!

1.

Establish an EU-wide Positive List of animal species permitted to be kept as pets.

Given the calls from the Council and the Parliament for an EU Positive List and the support it has received from citizens across the EU-27, it is imperative that the Commission makes a legislative proposal for a Positive List. To protect public health, safeguard animal welfare, and preserve biodiversity, the EU should adopt a legally binding Positive List that specifies which species may be kept as pets. Ongoing and prospective legislative revisions, including but not limited to the welfare of cats and dogs and the Animal Health Law in 2026, present important moments to consider how best to address the risks associated with the wild animal pet trade. These discussions could lay the groundwork for a more harmonised, forward-looking EU approach to animal welfare policy; one that would include a Positive List.

2.

Design a Positive List to deliver clear outcomes across four strategic areas.

Animal welfare:

Permit only species that can demonstrably thrive in domestic environments, thereby reducing suffering, abandonment, and mortality.

Biodiversity protection:

Prevent the introduction and spread of invasive alien species that threaten ecosystems and agricultural stability.

Public health:

Minimise zoonotic disease risks in alignment with the EU's One Health approach.

Regulatory and market coherence:

Resolve current legislative fragmentation among Member States by establishing a harmonised EU-wide positive-list for enforcement and compliance. In doing so, address the market fragmentation.

3.

Take action within the current EU mandate.

This is an opportune moment for the first-ever Commissioner of Health and Animal Welfare to take a forward-looking and impactful step towards strengthening animal welfare policy in the EU.

4.

Prioritise action based on the EU's Treaty commitments, the Commission's political priorities and the European Council's Strategic Agenda.

This includes fully taking into consideration the EU's Treaty commitments under Article 114 TFEU, to ensure the functioning of the internal market and high levels of protection, and Articles 21 TEU and 191 TFEU, on the preservation and protection of global biodiversity and ecosystems. This includes ensuring consistency with the Commission's Political Guidelines on preserving biodiversity, achieving a healthier future and green diplomacy, as well as with the Council's Strategic Agenda on biodiversity, health cooperation and living up to our values at a global level. In addition, this includes the complete fulfilment of the Commissioners' obligations to step up the Commission's work on preventative healthcare, disease prevention and continuing to strengthen the EU's 'One Health' approach to public health.

5.

Ensure appropriate financial support in the next Multiannual Financial Framework (MFF) (2028–2034).

Preventive action and enforcement of a Positive List must be underpinned by adequate EU-level funding. Opportunities for integration within the next MFF should be explored across both dedicated instruments and existing funding streams aligned with biodiversity and public health goals. Relevant mechanisms include:

- LIFE Programme – Nature & Biodiversity
- EU4Health
- Integrated Border Management Fund / Internal Security Fund (ISF)
- Horizon Europe – Cluster 6: Food, Bioeconomy, Natural Resources, Agriculture and Environment
- Customs Control Equipment Instrument (supporting wildlife inspections at EU borders)
- Digital Europe Programme (e.g. for blockchain-based traceability tools)

Introduction

The keeping of wild animals as pets (also known as exotic pets) has become an increasingly prominent issue across the EU, raising serious concerns around animal welfare, public health, and biodiversity.

To address this, support for the Positive List has steadily grown over the last decade. In 2022, both the European Parliament and Council called for an EU-wide positive list. In response, the European Commission commissioned a feasibility study in 2024, with results expected later this year.[9]

Political momentum began in 2015, when the Bern Convention recognised a Positive List as best practice for the prevention of ecological harm. In 2017, a European Parliament study highlighted a Positive List as an effective regulatory tool, and subsequent resolutions endorsed it as a solution to the unregulated exotic pet trade. The Parliament also advocated for the List at international forums such as the Convention on Biological Diversity (CBD) and CITES.

Civil society reinforced this push, as evidenced by the three petitions debated at the European Parliament, and the broad public support reflected during the Conference on the Future of Europe.[10] In 2022, nineteen Member States backed a joint position paper urging EU legislation, prompting the Commission to launch a feasibility study. A Positive List was also included in the EU's 2022–2027 Action Plan Against Wildlife Trafficking and endorsed by the Parliament's ENVI Committee as essential for harmonised animal welfare and biodiversity protection.

This report and its accompanying dashboards aim to inform the development of an evidence-based, EU Positive List. The dashboard presents relevant data sets related to wild animal pet ownership and trade.

The scope of this initiative includes both the legal and illegal trade of wild animals, with a specific focus on the pet trade. Legal trade often involves species poorly suited for a life in captivity. Both legal and illegal trade contributes further to the exploitation of wildlife, undermining conservation efforts.

The dashboards also track regulatory progress across Member States in this context, indicating which countries have already implemented a Positive List, which are in the process of developing one, and the role each Member State plays in the trade of wild animals for pet keeping. By addressing both trade dynamics and regulatory disparities, this campaign highlights the limitations of existing frameworks and builds the case for harmonised EU action through the adoption of a Positive List. This would be a preventative measure to allow only those species that pose minimal risk to the animal itself, to people and to the environment.

9. ENV/2023/OP/0017, Study on the Need for, Added Value of, and Feasibility of (Lot 1) Introducing a 'Positive List of Pets' across the EU and Criminalising all Trade in Illegally Sourced Wildlife across the EU (2 Lots).

10. Conference on the Future of Europe, European Union, archived April 17, 2023, https://wayback.archive-it.org/12090/20230417172132/https://futureu.europa.eu/en.

The need for an EU-wide harmonised approach

Regulating the ownership and trade of pets across the EU presents several persistent and interlinked challenges. A primary issue is the lack of (consistent) legislation identifying species that are suitable for private ownership. Currently, each Member State maintains its own rules, ranging from no restrictions — open systems that allow most species unless explicitly banned — to more preventative models like a Positive List that permit only pre-approved animals. This variation creates a fragmented regulatory landscape that allows wild animals to be legally traded and kept in one country, while being restricted or banned in another.

This fragmentation of regulation undermines enforcement efforts and creates loopholes to be exploited by malicious actors. Such gaps allow these animals to move freely within the internal market. This not only fuels illegal trade but puts countries with stronger protections at an economic and enforcement disadvantage.

Critically, these weaknesses in legislation pose a triple threat, namely to animal welfare, biodiversity, and public health. Unregulated and poorly regulated trade enables the keeping of species with complex physiological, behavioural, and psychological needs that cannot be met in domestic settings, leading to severe welfare issues. At the same time, wild animal species traded as pets can carry zoonotic diseases such as salmonella, lyssavirus, or West Nile virus, posing significant and sometimes under-assessed risks to public health.

Another key concern is the lack and inconsistency of zoonotic disease surveillance across the EU. Most of the available data on zoonoses comes from agricultural testing, focusing on livestock such as poultry, cattle, and pigs. These datasets, largely compiled by the European Food Safety Authority (EFSA), are valuable but not designed to monitor disease risks linked to wild animals traded as pets. As a result, diseases that can be transmitted from captive wild animals to humans remain under-reported or entirely undetected.

Such a consequential gap in public health preparedness, with the possibility for animal-to-animal transmission and, subsequently, animal-to-human infection, remaining largely unexamined for wild animal pet species. Without routine testing across a wider spectrum of animals, including reptiles, amphibians, birds, and mammals commonly kept as pets, emerging zoonotic threats may go unnoticed until outbreaks occur. The current frameworks still fall short in monitoring wild animal pet species that could serve as reservoirs or vectors for novel pathogens.

This is also true for trade. Existing monitoring systems often capture only a fraction of the trade, usually focusing on CITES-listed or Invasive Alien Species (IAS)-listed species and neglecting the vast number of non-listed species in circulation as a result.[11] This leaves significant knowledge gaps in understanding the true scale and nature of the wild animal pet trade, and the impacts it has on species conservation efforts. The data that does exist indicates that the wildlife pet trade contributes to animal suffering, wildlife population decline, introduction of invasive species and the spread of wildlife diseases.

Data inconsistencies hinder the ability to track the internal dynamics of the pet trade, such as unregulated breeding within the EU and differences in market demand across Member States. Some Member States are more involved in trade than others suggesting different levels of consumer demand and market size, factors not accounted for in EU-level trade reporting. Without standardised, transparent reporting mechanisms for all wild animal species in trade, regulatory bodies cannot make informed decisions, assess internal market distortions, or evaluate public and ecological risks accurately.

Given these challenges, an EU-wide Positive List would serve as an effective tool to close these regulatory gaps. Such a system would reduce enforcement burdens, enhance data comparability, and align with the objectives of the EU Single Market. Moreover, it would support a more transparent and coherent approach to tracking and managing wildlife trade, enable better public health protections through improved disease surveillance, and contribute to stronger outcomes for animal welfare and biodiversity across Member States.

11. Animals listed as IAS are in principle prohibited to be traded within the EU. So if trade is detected, it would constitute illegal trade.

Stepping forward with a ‘Paws’itive List:

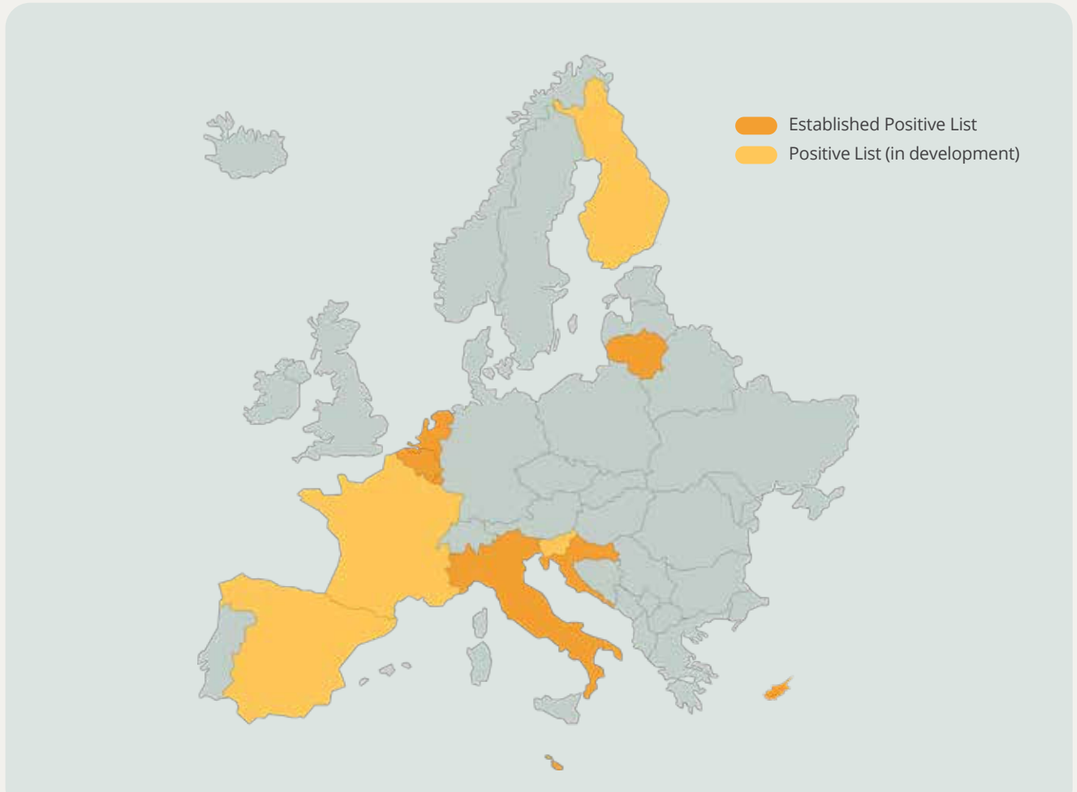
Which countries lead the pack?

The situation across Europe remains fragmented. While some Member States have implemented Positive List systems, gaps in enforcement, data collection, and disease surveillance jeopardise animal welfare, biodiversity, and public health. Additionally, variations in the animals covered by the Positive List result in inconsistencies within the EU Single Market.

Eight countries — Belgium, Croatia, Cyprus, Italy, the Netherlands, Lithuania, Luxembourg, and Malta — have established a variation of Positive List systems, with enforceable species lists. Four more — Finland, France, Spain, and Slovenia — have adopted the Positive List concept in law but still need to develop their lists.

The accompanying dashboards offer an overview of available data, including the capacity of rescue centres, species traded legally and illegally, and zoonotic disease risks, such as salmonella, lyssavirus, and West Nile virus (WNV). This data highlights the need for a unified EU approach to address enforcement challenges and the lack of accurate information, making it difficult to respond effectively.

In 2023, Italy reported the highest number of WNV cases, with 225 animal outbreaks, closely linked to 336 human infections and 29 deaths. Other countries, including France (43 human cases), Hungary (29), and smaller numbers in Spain, Germany, and Cyprus, reported WNV outbreaks, reflecting the growing spread of the disease. However, disease surveillance varies across countries and the risk coming specifically from wild animals kept as pets remains poorly monitored, as testing efforts focus primarily on agricultural species.



While we cannot say for certain the origin of the zoonotic disease outbreaks, we know that wild animals kept as pets are carriers of these diseases, and they are traded in high numbers.

In the case of wild animal pets taken in by AAP, zoonotic diseases have been detected, and we know that the transfer risk was very real. AAP studies[12] have shown that testing the exotic pets we rescued from 2016-2021 in our ten EU Member States, 13.7% carried one or more potentially dangerous zoonoses. Among the rescued exotic stray animals, which are believed to be escaped or released pets, the prevalence of zoonoses was 50%.

These discrepancies in surveillance efforts reflect systemic issues. Traditional livestock species, such as cattle and poultry, are prioritised, while testing and monitoring of exotic pets is inconsistent or absent in many Member States. The lack of harmonised testing protocols and data collection frameworks for exotic species limits the EU’s ability to assess animal-to-animal and animal-to-human transmission risks, presenting a significant public health concern.

The data suggests that a Positive List legislation needs to be coupled with a focus on enforcement. While we see some countries with a Positive List - such as Italy - report low offenses against wildlife, we also see some countries - such as Belgium - that do have a Positive List still report challenges on wild animal pet trade.[13] Data from the Successful Wildlife Crime Prosecution in Europe (SWiPE) project highlights wildlife-related offences, including animal cruelty, illegal wildlife trade, and smuggling (including CITES violations). Between 2016 and 2020, Hungary reported the highest number of offences (175), followed by Spain (119). On the lower end, Italy and Poland reported 43 and eight offences, respectively. [14]

The data points paint a murky picture and highlight the need for integrated surveillance systems for human, animal, and environmental health to prevent and respond to cross-sectoral threats.

EU-level coordination is essential to close enforcement gaps, improve data collection, and support Member States in advancing wildlife protection policies. Such actions are critical for the EU to fulfil its obligations and priorities.

12. AAP, Infected and Undetected, Zoonoses and Exotic Pets in the EU, June 2021; https://www.aap.nl/wp-content/uploads/2021/08/2021_InfectedUndetected.pdf
13. SWiPE Project, SWIPE European Summary Report 2023, https://stopwildlifecrime.eu/wp-content/uploads/2023/08/SWIPE-European-Summary-Report_2023.pdf
14. We recognise the limitations in accurately capturing the illegal trade data due to the illicit nature of the trade.

Animal welfare in the EU: state of play

Animal welfare has long been a matter of public concern and legal focus within the EU. The EU has taken significant steps to acknowledge and embed animal welfare into its policymaking. Article 13 of the TFEU enshrines the recognition of animals as sentient beings. It obliges the EU and its Member States to pay full regard to animal welfare when formulating and implementing policies in areas such as agriculture, transport, and research. While this article establishes a moral and legal foundation, its implementation remains uneven. This is particularly the case for the private ownership of animals.

Regulation (EU) 2016/429, known as the 'Animal Health Law', focuses on disease prevention, control, and animal movements within the EU. However, despite the well-established disease risks, it does not establish welfare standards for species that are traded and kept as pets.

Despite this legislative groundwork, no EU-wide Positive List exists for determining which species are suitable to be kept as pets. The suitability of an animal to be kept as a pet should be the same for all countries and the risks of a fragmented approach clearly outweigh any possible advantages. This absence of harmonised criteria has allowed for the proliferation of wild animal species in the pet trade, with significant implications for animal welfare, biodiversity, and public health. An EU-wide approach would be logical as well as proportionate and in line with the EU's principle of subsidiarity.

Commitments

The European Commission's 2024–2029 political priorities detail the EU's commitment to environmental sustainability, both domestically and globally. Under the "Quality of Life" priority, the Commission pledges to "build a competitive and resilient agriculture and food system and safeguard biodiversity" and to "adapt and prepare for a changing climate". This includes presenting a Vision for Agriculture and Food to ensure long-term competitiveness and sustainability. It also includes meeting international biodiversity commitments, such as those in the Kunming-Montreal Agreement, and developing a European climate adaptation plan to support Member States with preparedness and planning.

The Commission's Political Guidelines emphasise the importance of preserving biodiversity, achieving a healthier future, and promoting green diplomacy. The European Council's Strategic Agenda clearly indicatessEurope's need for biodiversity protection, health cooperation, and upholding EU values on a global scale. Collectively, these frameworks mandate that the EU's actions during the current 2024 – 2029 term, prioritise environmental sustainability, ensuring that climate action and biodiversity protection remain integral to the Union's internal and external policies.

As outlined in his mission letter from Commission President von der Leyen, Commissioner Várhelyi is tasked with advancing a comprehensive One Health approach that recognises the interconnectedness of human, animal, and environmental health. He holds specific responsibility for animal welfare, a critical dimension in safeguarding biodiversity and preventing the emergence and spread of zoonotic diseases. The importance of this integrated approach has been underscored in recent years and is essential to building a resilient European Health Union. The Commissioner is also expected to step up the EU's work on preventive health, promoting disease prevention across the life course and reducing the burden of non-communicable diseases. These efforts complement broader public health and environmental goals, including tackling the drivers of biodiversity loss and improving the EU's preparedness against cross-border health threats.

Past and ongoing **legislative efforts**

The concept of a Positive List is not new in EU political discourse. Over the past decade, the European Parliament has increasingly voiced support for such an initiative. In 2017, a Parliament-commissioned study on EU animal welfare policy supported the Positive List approach, citing its benefits in ensuring consistent and science-based regulation. The Parliament has also adopted several resolutions urging the European Commission to develop a Positive List for pets, particularly in the context of international biodiversity and wildlife trade discussions.

These efforts culminated in a joint presentation to the European Parliament's Committee on Petitions (PETI) in May 2022, which showcased widespread public and NGO support.

In the same year, the Conference on the Future of Europe cited a Positive List as one of the five most endorsed ideas in its "Other Ideas" category, reflecting a strong support from EU citizens. Furthermore, a position paper advocating for a Positive List, submitted by Cyprus and co-signed by Lithuania, Luxembourg, and Malta, was presented to the AGRIFISH Council in May 2022. It gained the support of nineteen Member States, showing a majority of support for a Positive List.

The European Commission recently commissioned a feasibility study to assess the need for, added value of, and practical implementation of, a Positive List at EU level. The scope of this assessment, as outlined in stakeholder recommendations, should go beyond the current mandate under the EU Action Plan Against Wildlife Trafficking. It should include an impact assessment examining various policy options, stakeholder engagement, and comparative risk analysis against alternative approaches such as Negative List or voluntary self-regulation.

> **OVER THE PAST DECADE, THE EUROPEAN PARLIAMENT HAS INCREASINGLY VOICED SUPPORT FOR A POSITIVE LIST.**

Animal welfare, biodiversity and public health risks linked to the wild pet trade

Wild animals kept as pets frequently escape or are intentionally released, often due to their unsuitability for being kept in captivity. This behaviour has led to numerous invasions by non-native species across the EU. Released animals can survive and establish breeding populations, disrupting local ecosystems. Common examples include raccoons, coatis, and slider turtles. In many cases, these species outcompete native fauna, alter food webs, and degrade habitats.

Beyond invasive risks, non-native wild animals kept as pets can act as carriers of novel pathogens. Amphibians imported as pets, for instance, have contributed to the spread of Batrachochytrium dendrobatidis, the chytrid fungus, which has devastated amphibian population globally. The introduction of non-native parasites and viruses via the pet trade is an under-monitored but increasingly documented phenomenon, with tangible and significant consequences for native wildlife, public health and ecosystems.

Non-native species may continue to pose risks to public health long after their introduction to European ecosystems. In 2024, decades after the introduction of the racoon to Europe, six cases of raccoon roundworm were reported in Belgium. The biggest risk group for the disease are young children aged between 1-4 years old, as they tend to put foreign objects or soil in their mouths.

> **THE EU, AS A SIGNIFICANT MARKET FOR THESE SPECIES, HAS A RESPONSIBILITY TO MITIGATE THIS PRESSURE BY REGULATING DEMAND.**

It has since been identified in France, Germany, Luxembourg and the Netherlands. The racoon is native to North and Central America, but the population of the species is increasing at a rapid pace with any credible opportunity to contain its growth quickly dwindling.

However, the very worst effect of zoonoses must be reflected upon through tangible, historical reference points in order to determine the level of risk that the EU is needlessly exposing itself to without a coherent and legally binding Positive List. In 1918, the H1N1 influenza pandemic, originating from birds, crossed into humans and killed tens of millions of people within months. In less than a year, the virus circled the globe in three explosive waves, infecting an estimated 500 million people, about one-third of the world's population at the time. This is one of the more extreme examples of dangerous disease transmission of this nature can become. However, it is commonly accepted that the next pandemic is a matter of "when" not "if", and there is no predicting its severity. Policymakers must therefore act proactively, not reactively.

Without a Positive List, centres such as AAP receive more rescue requests than they can accommodate. This excess indicates the systemic failure to control the ownership and abandonment of wild animals that are not suitable to be kept as pets. Rescues and sanctuaries are doing their best to accommodate the growing number of wild animals

Images of animals taken in by AAP

so that they do not end up on the streets or euthanised, compounding ecological and ethical concerns.

The wild animal pet trade drives unsustainable wildlife harvesting in source countries. Species are often removed from ecosystems without regulation or monitoring, contributing to population declines, limiting genetic variation, and even local extinctions. The EU, as a significant market for these species, has a responsibility to mitigate this pressure by regulating demand.

The role of wild animals kept and traded as pets in zoonotic disease transmission is increasingly recognised, with the AAP dashboards choosing to focus on three pathogens that stand out in the current wild "exotic" animal trade in a European context.

Salmonella remains one of the most reported zoonoses in humans across the EU. While foodborne transmission is dominant, the trade of wild animals for pet keeping is a well-established vector. Handling these animals, or touching surfaces these animals have interacted with, can lead to salmonellosis infection and outbreaks - children, pregnant individuals, people over the age of 65 and people with compromised immune systems are at greatest risk. Despite this known risk, and health agencies advising to not interact with wild animals, they are still widely available in EU markets for pet keeping.

According to the 2023 EU One Health Zoonoses Report, Salmonella continues to be the most frequently reported cause of foodborne outbreaks. However, the risks posed by live animal carriers, including pet reptiles and amphibians, are underreported and underregulated, compounding health hazards. The U.S.A. and Canada, for example, that have similar exotic pet markets as the E.U., frequently report disease outbreaks related to exotic pet keeping. This most likely indicates that even if we don't have conclusive data for Europe, there is a similar correlation in the EU. [15]

These viruses pose a significant threat, especially when animals are smuggled or trafficked outside of legal quarantine and monitoring systems. Improperly vaccinated or untested captive wild mammals present a latent risk of reintroducing these viruses into regions that are currently disease-free.

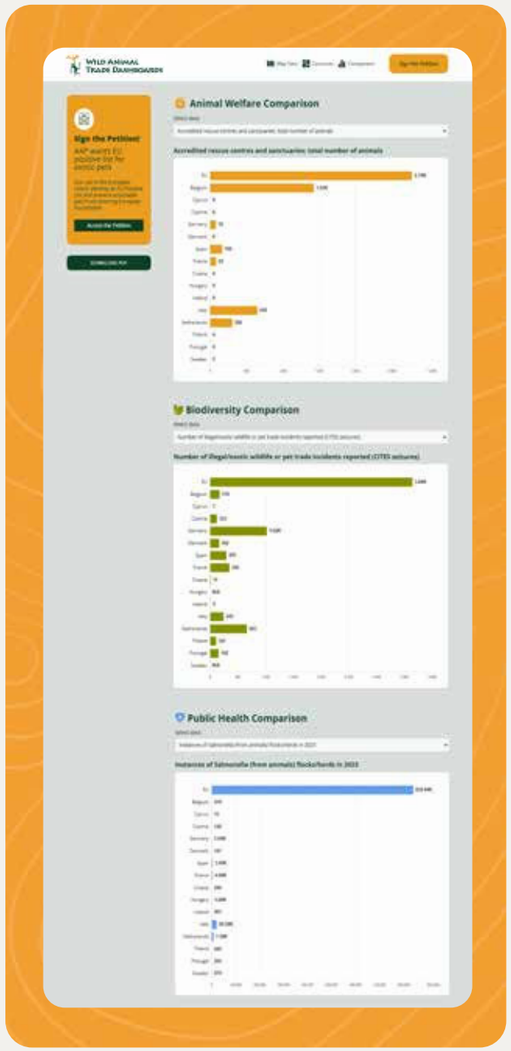
The 2023 zoonoses report also noted the West Nile virus as being one of the most severe zoonotic diseases in terms of hospitalisation and case fatality rates. Although the West Nile virus is primarily transmitted through mosquitoes, the movement of exotic birds, small mammals, and even reptiles, can potentially play a role in local virus dynamics by acting as amplification hosts or facilitating vector contact.

15. Government of Canada, "Public Health Notices Archive," accessed May 29, 2025, https://www.canada.ca/en/public-health/services/public-health-notices/archive.html

Dashboard analysis
and trade transparency gaps

A key finding from recent data reviews, including reports on EU SWiPE data, EU-TWIX, as well as ESFA, Member State reports and CITES trade data, is the inconsistency in data collection and standardised reporting standards between EU countries.

Some Member States maintain monitoring systems and detailed veterinary records, while others have almost no available data. These discrepancies reflect serious structural gaps in EU-level monitoring, making it difficult to:



Assess internal market distortions

Evaluate zoonotic or ecological risks accurately

Trace unregulated or illegal animal movement

Ensure animal welfare standards are applied consistently

Moreover, current EU systems like TRACES primarily track CITES-listed or Animal Health Law-covered species, leaving many traded wild animals, such as those not listed under any regulatory framework, largely unmonitored. This regulatory blind spot results in a fragmented and misleading understanding of the actual pet trade landscape.

The absence of standardised reporting requirements, coupled with the free legal movement of goods within the single market, allows for the untracked and unregulated trade of potentially dangerous species. [16]

16. Within this legal context, animals are considered as goods. However, we do not see them as such and implore the EU to reflect this in concrete, legally binding legislation.

Conclusion

The scale and complexity of the wild animal pet trade in the European Union, and its associated ecological, health, and ethical consequences, make it clear that EU-wide action is needed. Without an EU-wide Positive List, the threats to our society and biodiversity posed by the wild animal pet trade will continue – as will the contradictions with the EU Treaty obligations on public health and internal market harmonisation.

As our report has shown, an EU Positive List represents a powerful and pragmatic solution. This approach shifts the regulatory burden by clearly defining the species that are deemed suitable to be kept as pets, based on risk assessments, which could encompass public safety, ecological impact, and animal welfare criteria. Countries such as Belgium, Luxembourg, Lithuania, and the Netherlands have already implemented national Positive Lists, providing strong evidence that this approach simplifies enforcement, improves welfare, and reduces ecological and health risks. However, isolated national initiatives are no substitute for a unified EU approach. This is particularly the case given that the EU is a single market and there are no border checks within the Schengen area.

The need for coordinated EU action is further underscored by the EU's own commitments to global biodiversity and its One Health policy on public health, as well as its leading role in international agreements such as CBD and CITES. The EU has repeatedly voiced support for preventive, ecosystem-based approaches, but it must now deliver on these promises through legislative action.

In her 2024 mission letter to the Commissioner-designate for Health and Animal Welfare Olivér Várhelyi, Commission President Ursula von der Leyen specifically stated: "building upon the existing animal welfare legislation, you will modernise the rules on animal welfare, including on the import of exotic animals, standards while addressing sustainability, ethical, scientific and economic considerations, and citizens' expectations." Having the first Commissioner responsible for animal welfare offers the ideal moment to make this important legislative step for positive change.

While the call for an EU-wide Positive List has gained momentum, it is time to translate the various public and EU institutional references into legislative action. Our dashboards illustrates, through evidence, the urgency in acting in this Commission mandate. Countries where a Positive List does not exist, such as Germany, remain hotspots for the wild animal pet trade. They also show the importance of a Positive List being coupled with the necessary focus on enforcement and implementation. The dashboards reveals gaps in monitoring and underscores the inadequacy of the current patchwork approach for Europe's single market and for public safety.

Our dashboards also shows the importance of complementing a Positive List with the necessary funding in implementation. This is why it is crucial that an EU Positive List legislation is complemented with the appropriate EU budget allocation.

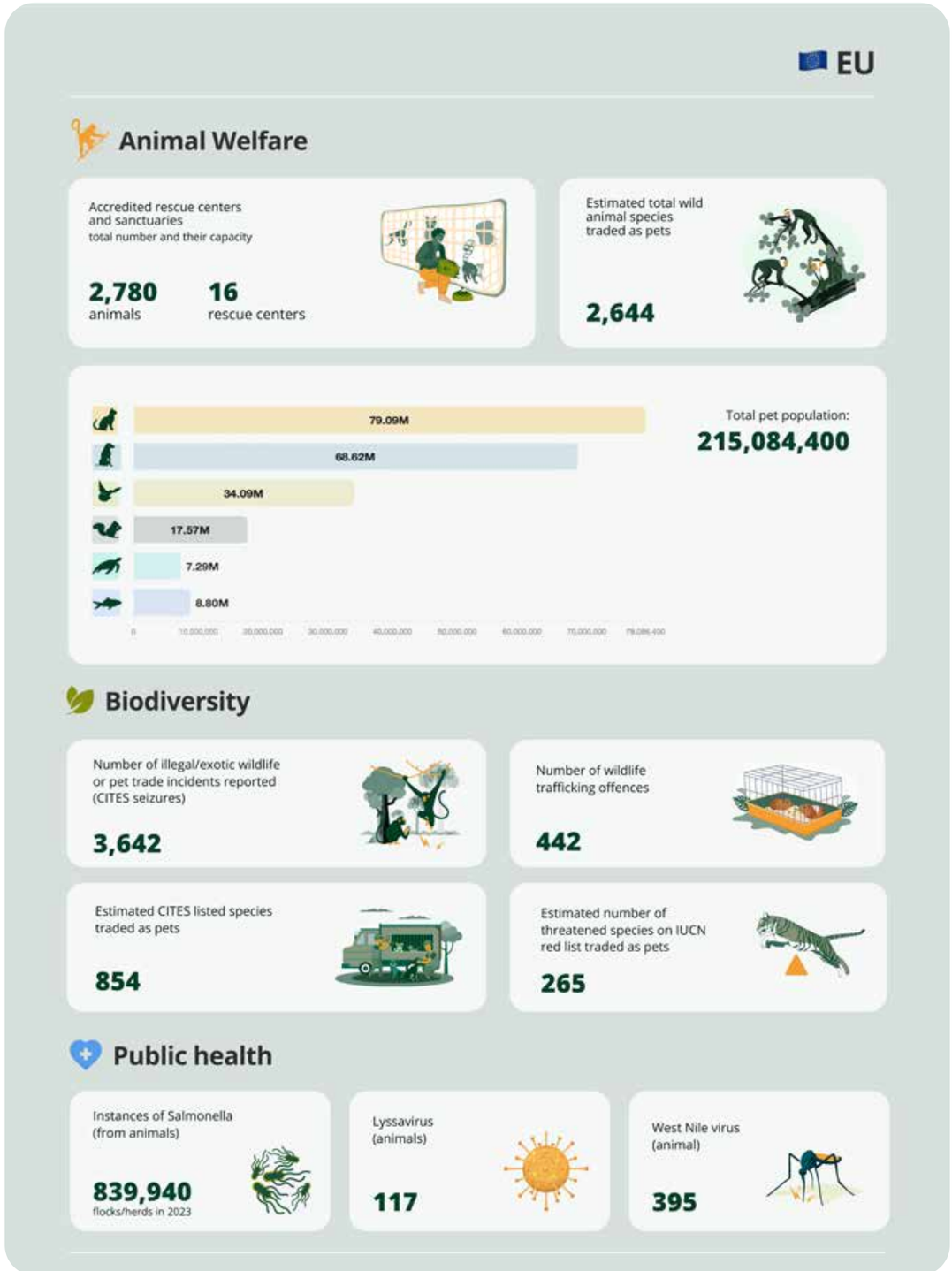
The need to account for the prevention and monitoring needs in EU policies and budget is clear. Without a standardised EU-wide monitoring system, policymakers are left navigating blind spots that prevent effective risk mitigation. The dashboards not only exposes these shortcomings but also acts as a strategic tool for advocacy, transparency, and policymaking, underscoring the urgent need for reform and harmonisation.

The European Commission must now propose regulation establishing a harmonised Positive List for pet species across the EU, grounded in One Health principles and supported by transparent, standardised trade monitoring systems. Now is the time to act.

ANNEX

Dashboards presenting the wild animal trade in Europe

#WildAnimalsNotPets



Belgium

Animal Welfare

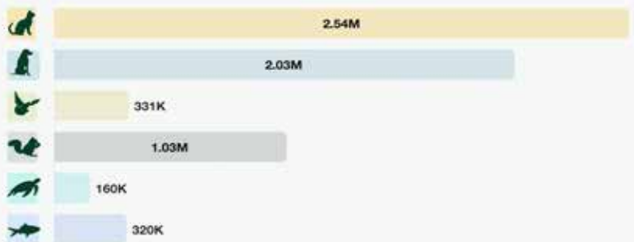
Accredited rescue centers and sanctuaries
total number and their capacity

1,427 animals

2 rescue centers

Estimated total wild animal species traded as pets

N/A



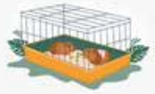
Total pet population:
6,402,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

170

Number of wildlife trafficking offences



N/A

Estimated CITES listed species traded as pets

51

Estimated number of threatened species on IUCN red list traded as pets

18

Public health

Instances of Salmonella (from animals)

579
flocks/herds in 2023

Lyssavirus (animals)

0

West Nile virus (animal)

No data

Cyprus

Animal Welfare

Accredited rescue centers and sanctuaries
total number and their capacity

0 animals

0 rescue centers

Estimated total wild animal species traded as pets

N/A

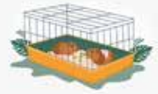
No pet population data available for this country.

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

1

Number of wildlife trafficking offences



N/A

Estimated CITES listed species traded as pets

28

Estimated number of threatened species on IUCN red list traded as pets

8

Public health

Instances of Salmonella (from animals)

33
flocks/herds in 2023

Lyssavirus (animals)

1

West Nile virus (animal)

5

Czechia

Animal Welfare

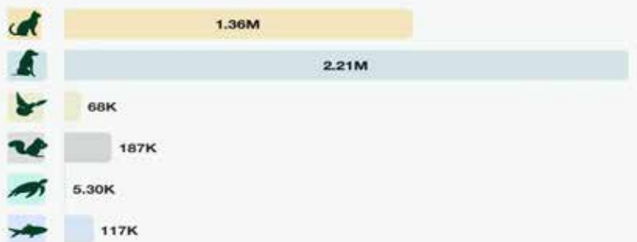
Accredited rescue centers and sanctuaries
total number and their capacity

0 animals

0 rescue centers

Estimated total wild animal species traded as pets

N/A



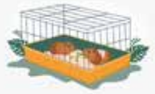
Total pet population:
3,949,300

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

123

Number of wildlife trafficking offences



N/A

Estimated CITES listed species traded as pets

200

Estimated number of threatened species on IUCN red list traded as pets

43

Public health

Instances of Salmonella (from animals)

128
flocks/herds in 2023

Lyssavirus (animals)

0

West Nile virus (animal)

No data

Germany

Animal Welfare

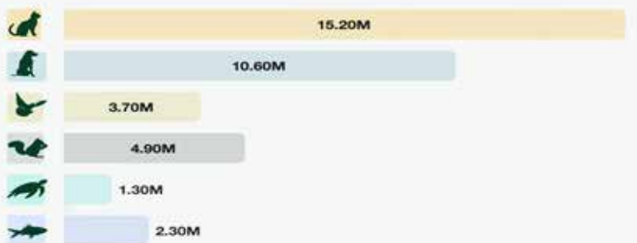
Accredited rescue centers and sanctuaries
total number and their capacity

78 animals

3 rescue centers

Estimated total wild animal species traded as pets

2,177



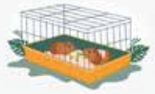
Total pet population:
38,000,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

1,021

Number of wildlife trafficking offences



N/A

Estimated CITES listed species traded as pets

387

Estimated number of threatened species on IUCN red list traded as pets

110

Public health

Instances of Salmonella (from animals)

1,038
flocks/herds in 2023

Lyssavirus (animals)

13

West Nile virus (animal)

33

Denmark

Animal Welfare

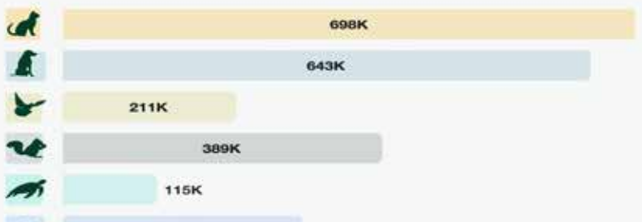
Accredited rescue centers and sanctuaries
total number and their capacity

0 animals

0 rescue centers

Estimated total wild animal species traded as pets

N/A



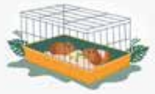
Total pet population:
2,348,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

162

Number of wildlife trafficking offences



N/A

Estimated CITES listed species traded as pets

72

Estimated number of threatened species on IUCN red list traded as pets

29

Public health

Instances of Salmonella (from animals)

147
flocks/herds in 2023

Lyssavirus (animals)

0

West Nile virus (animal)

N/A

Spain

Animal Welfare

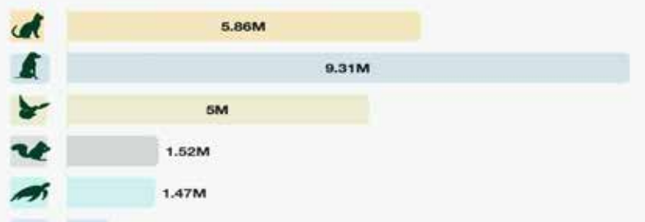
Accredited rescue centers and sanctuaries
total number and their capacity

166 animals

2 rescue centers

Estimated total wild animal species traded as pets

N/A



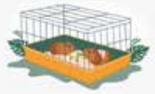
Total pet population:
23,856,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

293

Number of wildlife trafficking offences



119

Estimated CITES listed species traded as pets

175

Estimated number of threatened species on IUCN red list traded as pets

49

Public health

Instances of Salmonella (from animals)

3,449
flocks/herds in 2023

Lyssavirus (animals)

1

West Nile virus (animal)

57

France

Animal Welfare

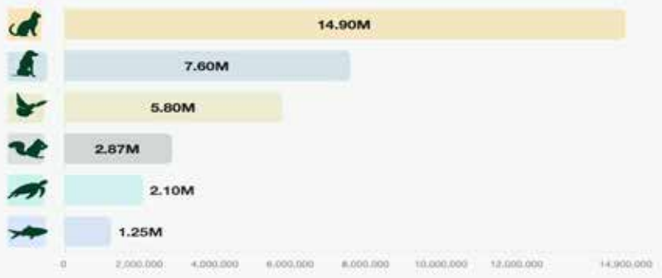
Accredited rescue centers and sanctuaries
total number and their capacity

82 animals

1 rescue centers

Estimated total wild animal species traded as pets

N/A



Total pet population:
34,522,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

346

Number of wildlife trafficking offences

N/A

Estimated CITES listed species traded as pets

200

Estimated number of threatened species on IUCN red list traded as pets

53

Public health

Instances of Salmonella (from animals)

4,075
flocks/herds in 2023

Lyssavirus (animals)

4

West Nile virus (animal)

46

Croatia

Animal Welfare

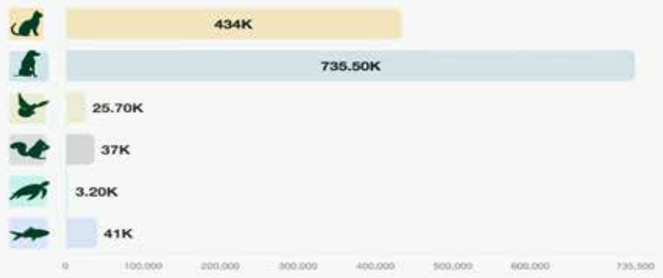
Accredited rescue centers and sanctuaries
total number and their capacity

0 animals

0 rescue centers

Estimated total wild animal species traded as pets

N/A



Total pet population:
1,276,400

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

11

Number of wildlife trafficking offences

97

Estimated CITES listed species traded as pets

7

Estimated number of threatened species on IUCN red list traded as pets

4

Public health

Instances of Salmonella (from animals)

246
flocks/herds in 2023

Lyssavirus (animals)

N/A

West Nile virus (animal)

N/A

Hungary

Animal Welfare

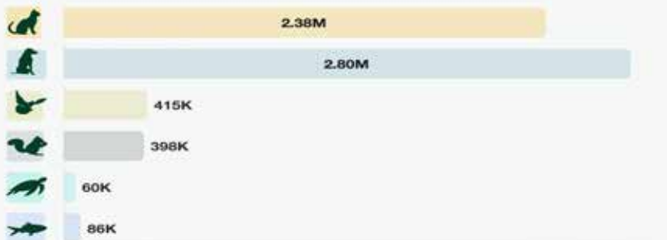
Accredited rescue centers and sanctuaries
total number and their capacity

0 animals

0 rescue centers

Estimated total wild animal species traded as pets

N/A



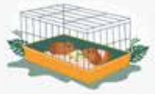
Total pet population:
6,139,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

N/A

Number of wildlife trafficking offences



175

Estimated CITES listed species traded as pets

79

Estimated number of threatened species on IUCN red list traded as pets

13

Public health

Instances of Salmonella (from animals)

1,204
flocks/herds in 2023

Lyssavirus (animals)

34

West Nile virus (animal)

29

Ireland

Animal Welfare

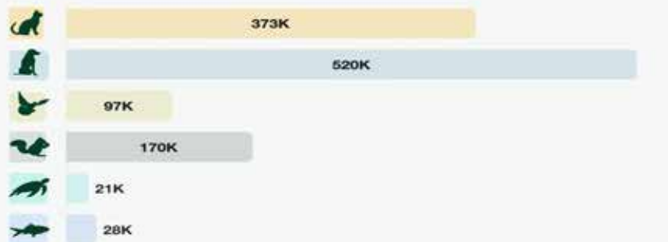
Accredited rescue centers and sanctuaries
total number and their capacity

0 animals

0 rescue centers

Estimated total wild animal species traded as pets

N/A



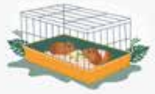
Total pet population:
1,209,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

5

Number of wildlife trafficking offences



N/A

Estimated CITES listed species traded as pets

30

Estimated number of threatened species on IUCN red list traded as pets

9

Public health

Instances of Salmonella (from animals)

261
flocks/herds in 2023

Lyssavirus (animals)

0

West Nile virus (animal)

0

Italy

Animal Welfare

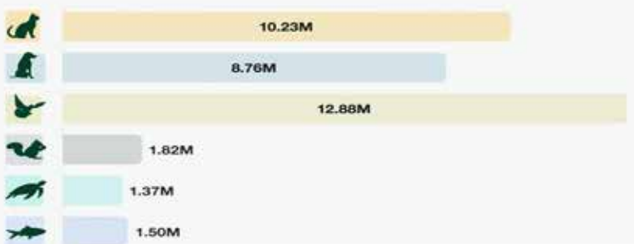
Accredited rescue centers and sanctuaries
total number and their capacity

650 animals

2 rescue centers

Estimated total wild animal species traded as pets

N/A



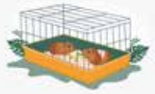
Total pet population:
36,547,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

243

Number of wildlife trafficking offences



43

Estimated CITES listed species traded as pets

94

Estimated number of threatened species on IUCN red list traded as pets

34

Public health

Instances of Salmonella (from animals)

20,586
flocks/herds in 2023

Lyssavirus (animals)

0

West Nile virus (animal)

225

Netherlands

Animal Welfare

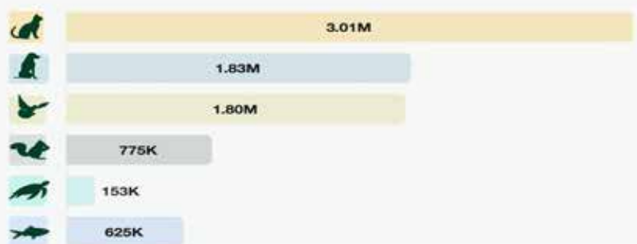
Accredited rescue centers and sanctuaries
total number and their capacity

306 animals

3 rescue centers

Estimated total wild animal species traded as pets

N/A



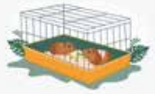
Total pet population:
7,822,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

663

Number of wildlife trafficking offences



N/A

Estimated CITES listed species traded as pets

234

Estimated number of threatened species on IUCN red list traded as pets

61

Public health

Instances of Salmonella (from animals)

7,593
flocks/herds in 2023

Lyssavirus (animals)

1

West Nile virus (animal)

N/A

Poland

Animal Welfare

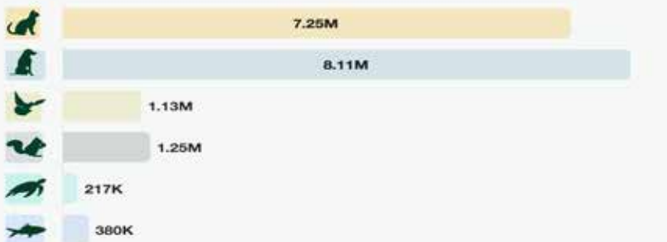
Accredited rescue centers and sanctuaries
total number and their capacity

0 animals

0 rescue centers

Estimated total wild animal species traded as pets

N/A



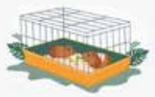
Total pet population:
18,336,600

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

107

Number of wildlife trafficking offences



8

Estimated CITES listed species traded as pets

82

Estimated number of threatened species on IUCN red list traded as pets

26

Public health

Instances of Salmonella (from animals)

445
flocks/herds in 2023

Lyssavirus (animals)

24

West Nile virus (animal)

N/A

Portugal

Animal Welfare

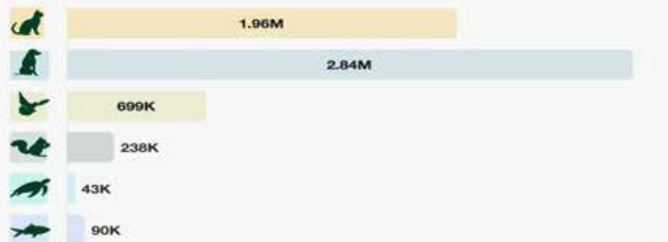
Accredited rescue centers and sanctuaries
total number and their capacity

0 animals

0 rescue centers

Estimated total wild animal species traded as pets

N/A



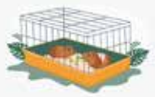
Total pet population:
5,867,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

152

Number of wildlife trafficking offences



N/A

Estimated CITES listed species traded as pets

102

Estimated number of threatened species on IUCN red list traded as pets

36

Public health

Instances of Salmonella (from animals)

252
flocks/herds in 2023

Lyssavirus (animals)

0

West Nile virus (animal)

5

Sweden

Animal Welfare

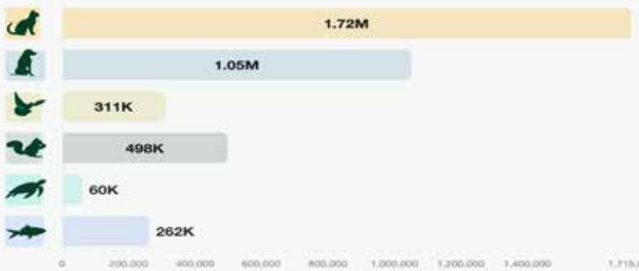
Accredited rescue centers and sanctuaries
total number and their capacity

0 animals

0 rescue centers

Estimated total wild animal species traded as pets

N/A



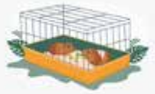
Total pet population:
3,897,000

Biodiversity

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

N/A

Number of wildlife trafficking offences



N/A

Estimated CITES listed species traded as pets

51

Estimated number of threatened species on IUCN red list traded as pets

22

Public health

Instances of Salmonella (from animals)

274
flocks/herds in 2023

Lyssavirus (animals)

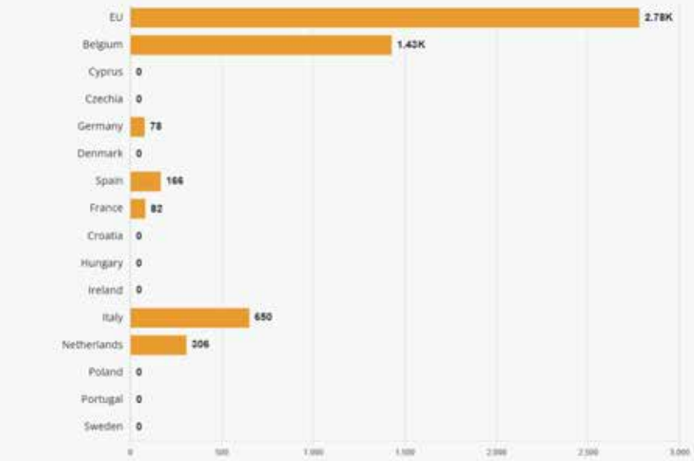
0

West Nile virus (animal)

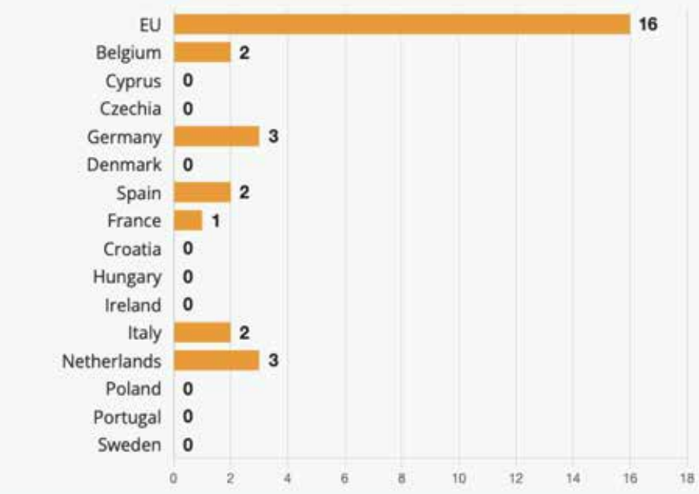
0

Animal Welfare Comparison

Accredited rescue centres and sanctuaries: total number of animals

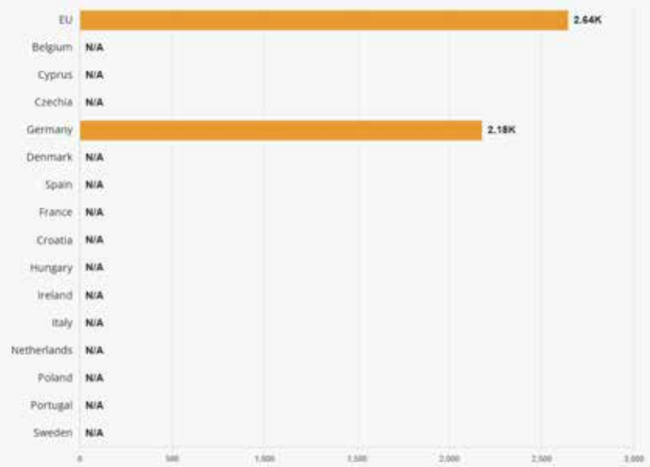


Accredited rescue centres and sanctuaries: locations

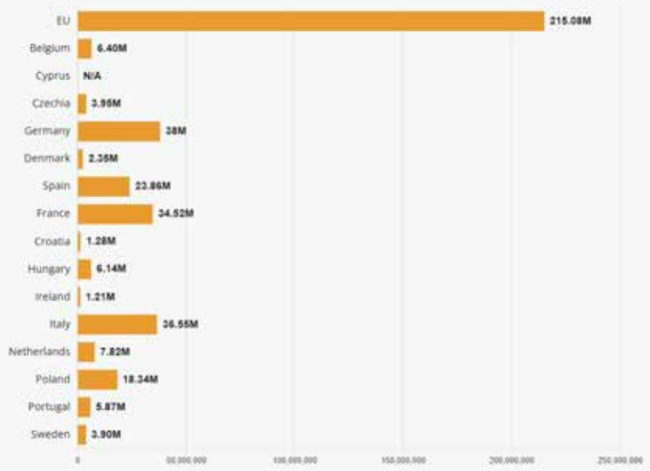


Animal Welfare Comparison

Estimated total wild animal species traded as pets

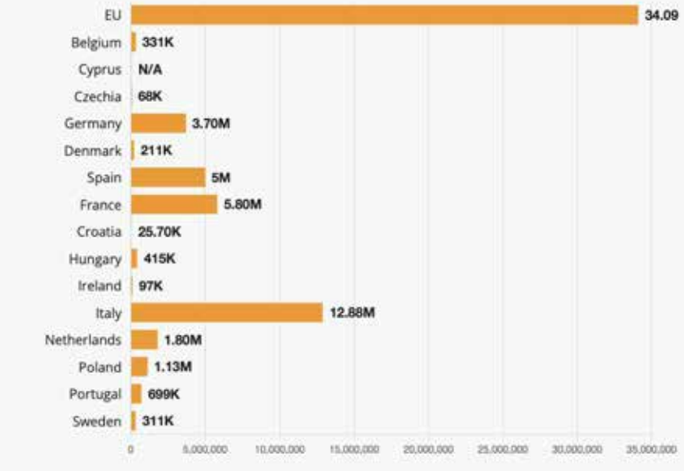


Pet population (total 2021)

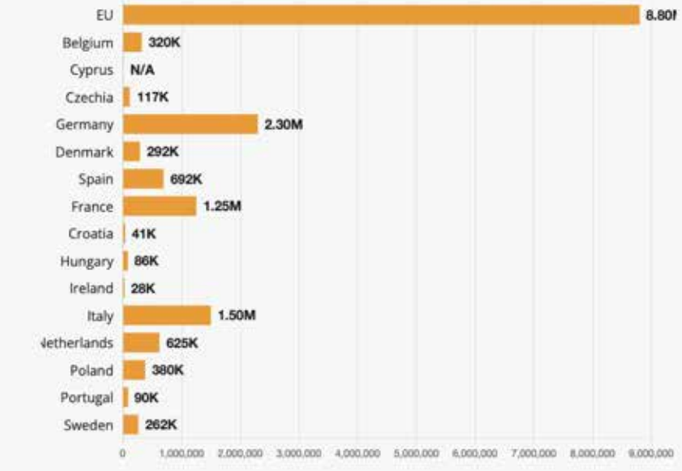


Animal Welfare Comparison

Pet population - Ornamental birds

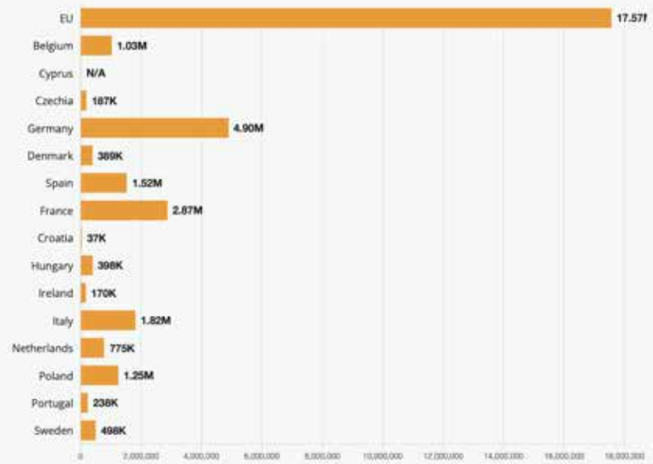


Pet population - Aquaria (e.g., fishes)

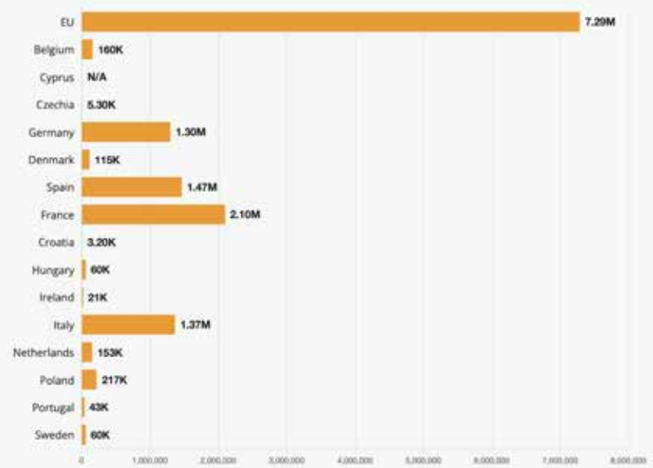


Animal Welfare Comparison

Pet population - Small mammals

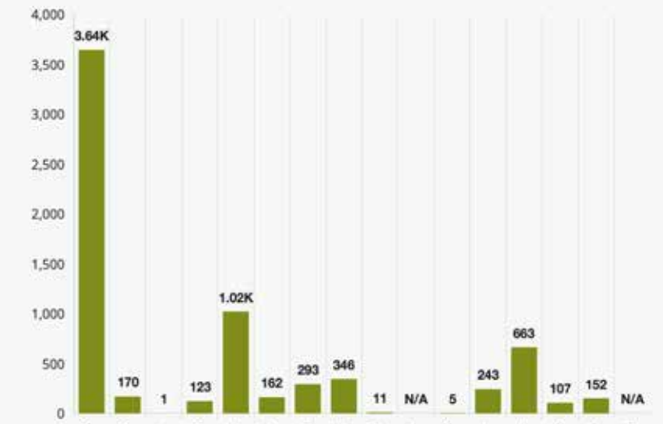


Pet population - Terraria (e.g., reptiles)

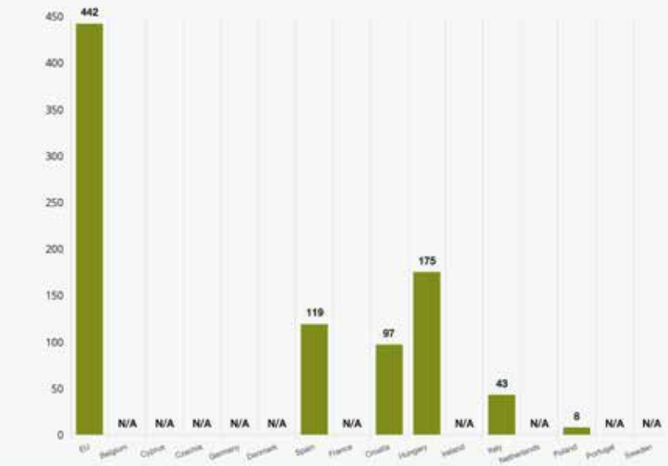


Biodiversity Comparison

Number of illegal/exotic wildlife or pet trade incidents reported (CITES seizures)

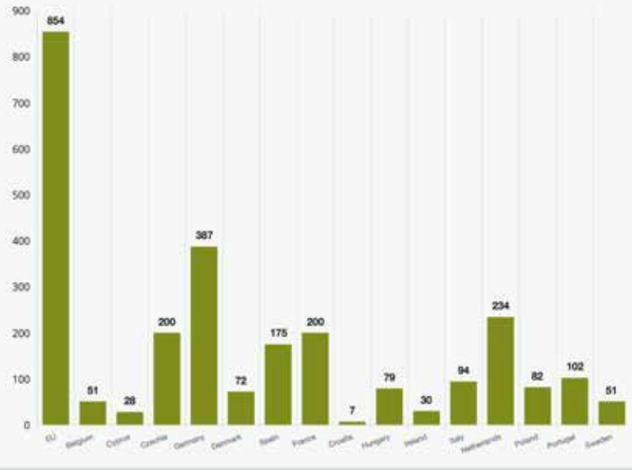


Number of wildlife trafficking offences (animal cruelty, illegal wildlife trade/ smuggling/CITES violation, illegal taking/capturing/collecting of live species, and illegal possession.)

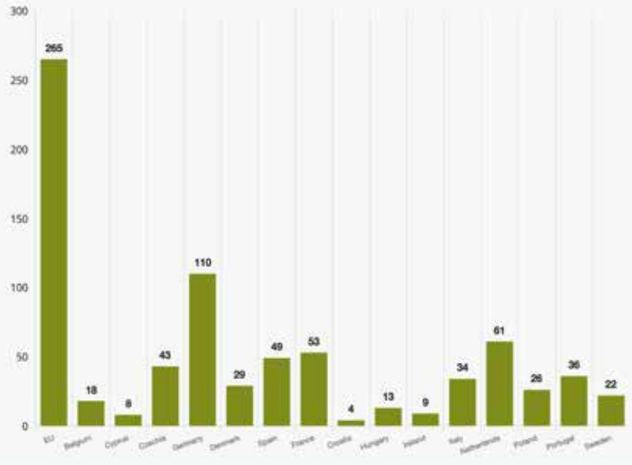


Biodiversity Comparison

Estimated CITES listed species traded as pets

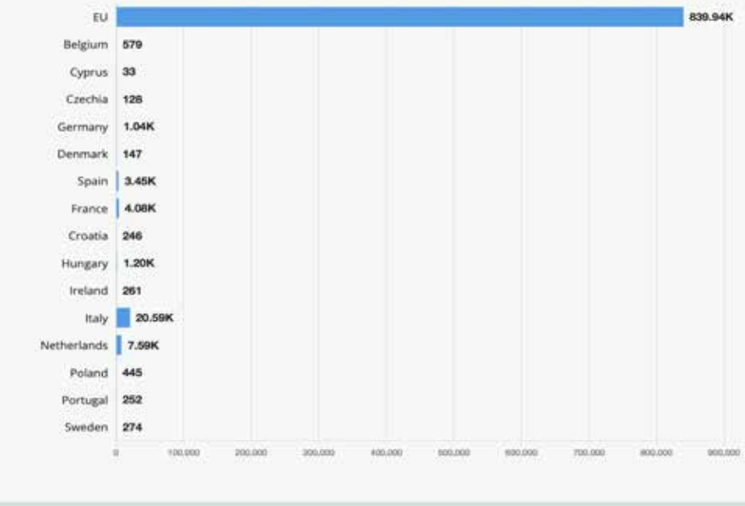


Estimated number of threatened species on IUCN red list traded as pets

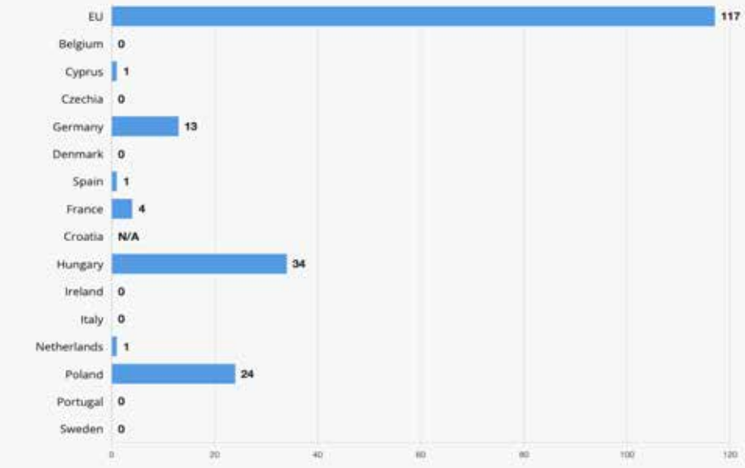


Public Health Comparison

Instances of Salmonella (from animals) flocks/herds in 2023

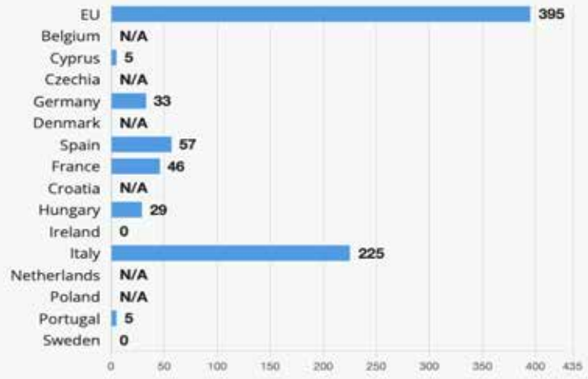


Lyssavirus (animals)



Public Health Comparison

West Nile virus (animals)

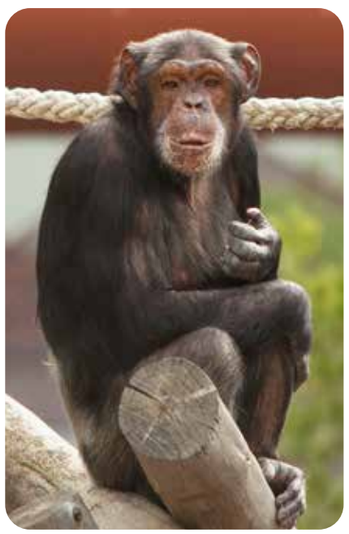


Data Source:
AAP data, Survey of the Veterinary Profession in Europe 2023, FEDIAF data set, CITES data, Wild animals in EU Circuses, 2021BSP 2024 data set, TBC, EUROPOL data set, IUCN Red list, Zoonetic data, Criminal conviction data
















CAUTION

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