

BREAKING POINT:

Solving the European Wildlife Rescue Crisis



EARS
EUROPEAN ALLIANCE OF RESCUE CENTRES
AND SANCTUARIES

**EUROGROUP
FOR ANIMALS**



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DEFINITIONS

Below are a set of definitions for the purposes of this paper (we acknowledge some of the definitions may not apply in other situations):

Rescue centre: A facility that provides care for rescued, confiscated or surrendered wild animals with the intention of moving them back to the wild or to a lifetime care facility as soon as possible.

Sanctuary: A facility that provides lifetime care for rescued, confiscated or surrendered wildlife.

Zoo: An establishment which maintains a collection of wild animals, typically in a park or gardens, for study, conservation, or display to the public*.

Seizure: The process of taking custody of an animal

while legal proceedings take place against the owner.

Confiscation: The legal transfer of ownership of an animal to the government or other third party, by the authorities.

Surrender: The voluntary handing over of an animal to the authorities or rescue facility.

EARS Partner: A rescue centre or sanctuary for wild animals that belongs to the European Alliance of Rescue Centres and Sanctuaries (EARS).

*The EU Zoos Directive has its own specific definition for what a zoo is: "... all permanent establishments where animals of wild species are kept for exhibition to the public for 7 or more days a year, with the exception of circuses, pet shops and establishments which Member States exempt from the requirements of this Directive ...".

1. INTRODUCTION



“Improve care of seized or confiscated live animals ...”

Across Europe there is and has been for many years a significant demand for facilities able to house seized, confiscated and surrendered wild animals. These animals come from a variety of sources including illegal trade, circuses, substandard zoos, private ownership and laboratories. Rescue centers, sanctuaries and many zoos in Europe - hereafter referred to as ‘rescue facilities’ in this document - play a critical role in ensuring the welfare of these animals and supporting enforcement efforts in cases of illegal trade or animal neglect and abuse.

With a view to ensuring that:

“Facilities are available in all Member States for temporary care of seized or confiscated live specimens, and mechanisms are in place for long-term rehoming, where necessary.”

As well as providing housing, veterinary care and rehabilitation for the animals in question, many rescue facilities are also involved in ‘on-the-ground’ handling of animals during seizure and/or confiscations as well as their subsequent translocation, often across national borders. In addition, many rescue facilities work proactively to identify cases of illegal trade and animal suffering, enabling the authorities to take enforcement action.

However, the demand for housing of rescued and confiscated wild animals is overtaking the available capacity. There are simply not enough spaces for the animals that need them and the problem is particularly bad for certain taxa of animals and in certain parts of Europe. With this shortage of capacity it is essential that everything is done to make the best use of the rescue facilities that currently operate in Europe.

The important role played by rescue facilities in the fight against illegal wildlife trade and exploitation is clear. Indeed this has been highlighted in the EU Action Plan against Wildlife Trafficking¹, which sets out a specific action (Action 19) to:

Despite this and the important work carried out by the wildlife rescue community there is currently considerable variation between EU Member States in how wild animal rescue facilities are supported and how regulations pertaining to animal management, including health and transport, are implemented. This makes the already difficult job of rescue facilities even more challenging - a situation that must be

promptly addressed given the increasing pressure being placed on such facilities.

An improved approach is needed, one in which EU Member States are more consistent in how they support and work with wildlife rescue facilities in their countries and in which cross-border solutions are found wherever possible for the proper housing of rescued wild animals.

This white paper aims to provide an overview of the current demand for wild animal housing in Europe along with the challenges faced by rescue facilities in trying to meet this demand. Solutions to these challenges will be suggested including the creation of National Action Plans for wildlife rescue in which government and rescue facilities work together to ensure the best possible care and management of seized, confiscated and unwanted wild animals.

¹http://ec.europa.eu/environment/cites/pdf/WAP_EN_WEB.PDF



2. SUPPLY & DEMAND FOR HOUSING OF RESCUED EXOTIC ANIMALS

Housing for seized, confiscated or surrendered wild animals is severely limited in Europe.

Finding rescue facilities that have the adequate housing and expertise needed to appropriately care for rescued wild animals is a significant challenge for the authorities and other stakeholders; finding such facilities with available space to take new animals is often impossible.

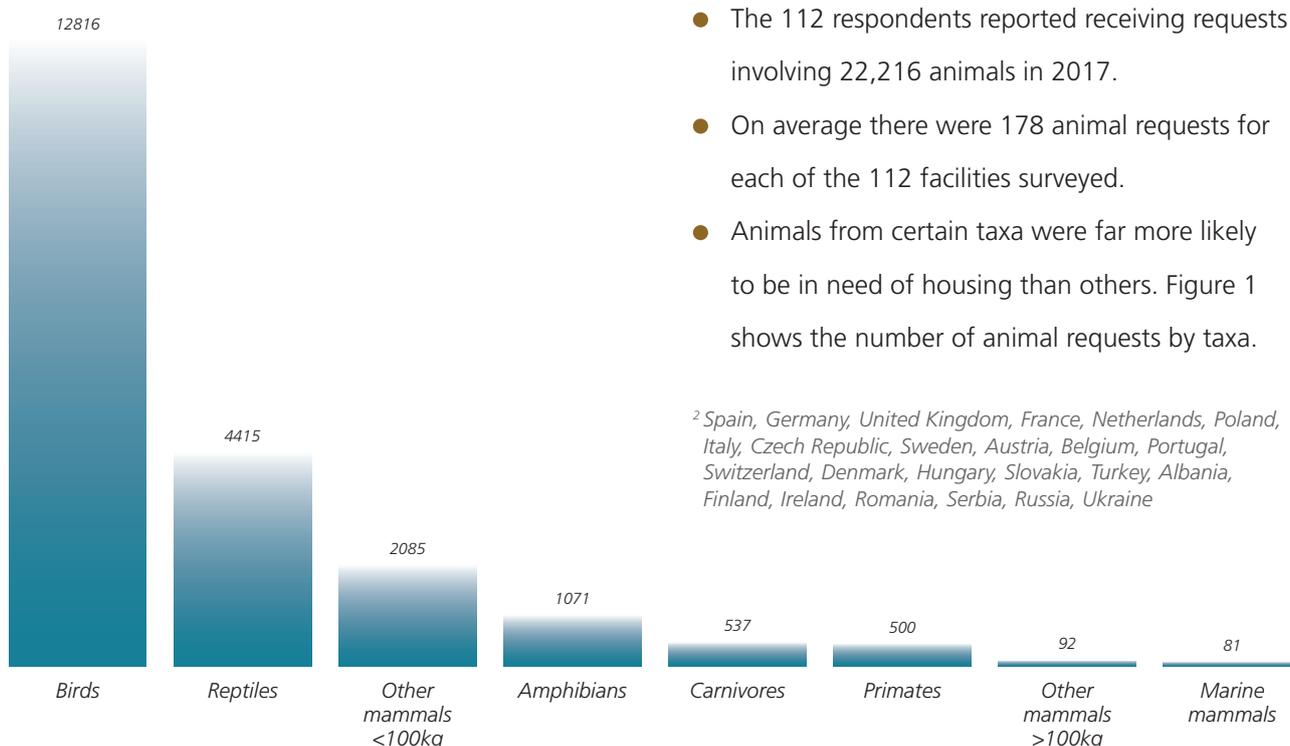
To try to gauge the extent of the problem, the European Alliance of Rescue Centres and Sanctuaries (EARS) and AAP Animal Advocacy and Protection (AAP) undertook an online survey of 112 rescue

facilities, including rescue centres, sanctuaries and zoos. The survey was sent to:

- All rescue centres and sanctuaries known to both EARS and AAP through existing contacts and, where necessary, additional research.
- All Members of the European Association of Zoos and Aquaria (EAZA) via the EAZA Executive office.

These facilities, located in 24 countries², were asked to provide information about the scale and nature of the rescue work they did in 2017. Below are the key findings from the survey:

- The 112 respondents reported receiving requests involving 22,216 animals in 2017.
- On average there were 178 animal requests for each of the 112 facilities surveyed.
- Animals from certain taxa were far more likely to be in need of housing than others. Figure 1 shows the number of animal requests by taxa.



² Spain, Germany, United Kingdom, France, Netherlands, Poland, Italy, Czech Republic, Sweden, Austria, Belgium, Portugal, Switzerland, Denmark, Hungary, Slovakia, Turkey, Albania, Finland, Ireland, Romania, Serbia, Russia, Ukraine

Fig.1. Total number of reported animals requests received by rescue facilities in 25 countries in 2017.



The above data is likely to underrepresent the total number of animals that were in need of housing in 2017, for two reasons:

1. Not all rescue facilities in Europe receiving requests to house wild animals completed the survey.
2. Many of the facilities completing the survey only kept records of animals they accepted so data for 'refused' animals is not included in many cases.

Following on from the above, the number of facilities with the expertise and enclosures to care for the above taxa are as follows:

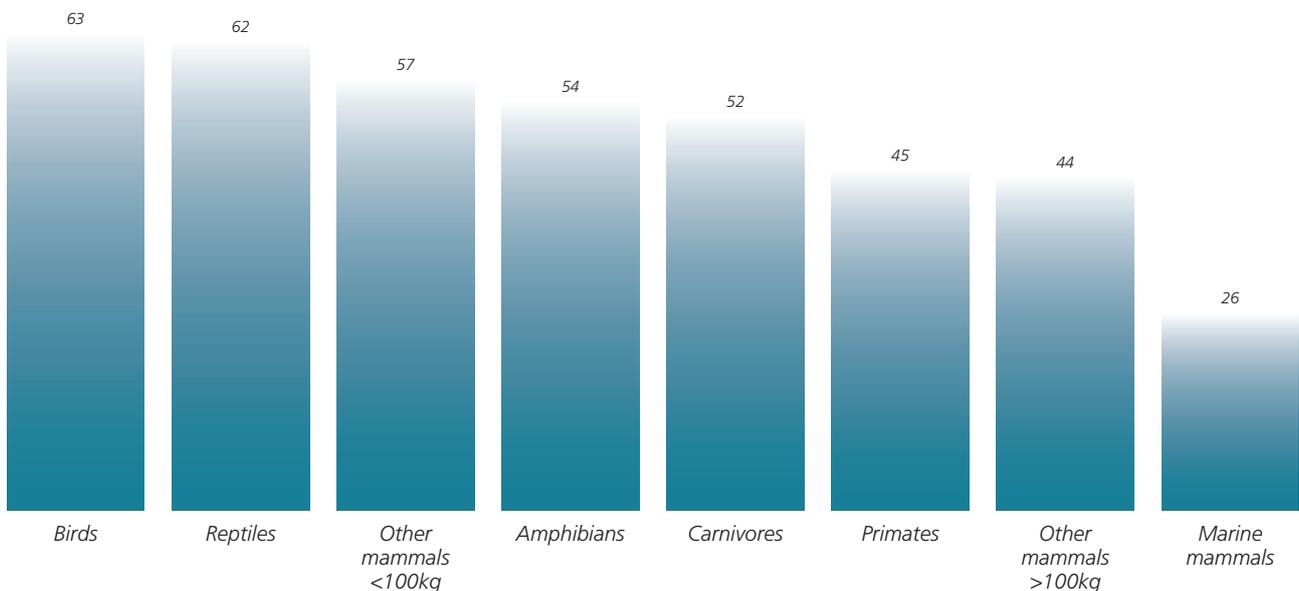


Fig.2. Number of facilities that can house the different animal taxa.

This provides us with a clearer picture of the situation with regards to certain species. For example – only 63 of the 112 respondents were able to accept birds, yet there were over 12,000 birds reported by the respondents to be in need of housing in 2017.

As noted earlier we know that many facilities do not keep a record of animal requests that are refused. However, most facilities do refuse animals and we were able to gather feedback from respondents as to the primary reason for refusal:

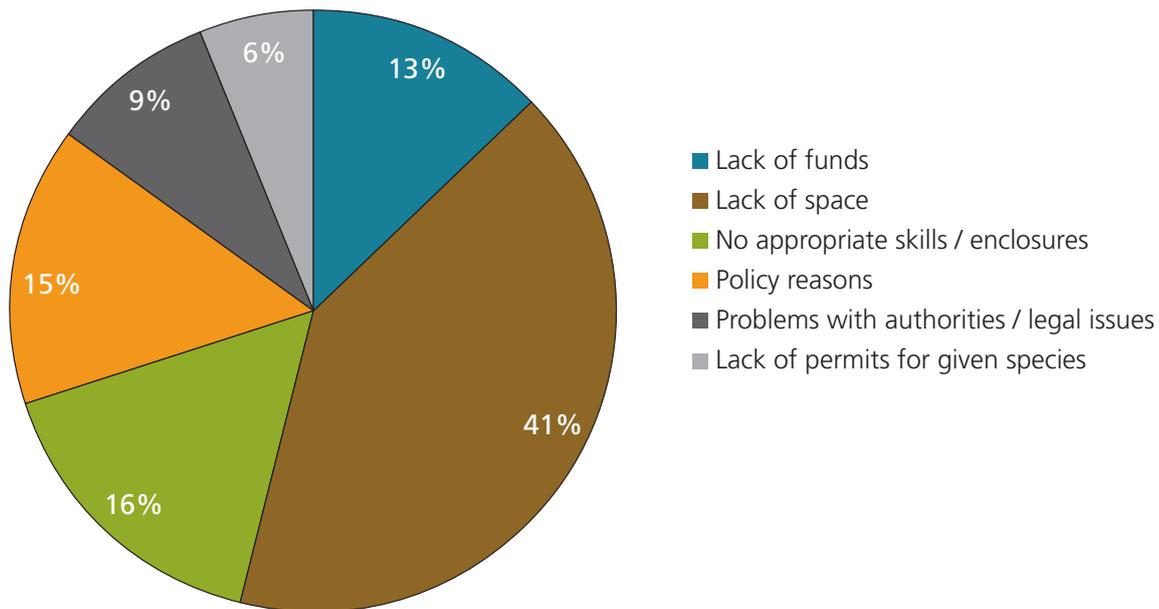


Fig. 3: Primary reasons given by respondents for refusing animals.





As can be seen, lack of space is clearly the biggest reason for rescue facilities refusing animals. In addition, 'lack of funds' accounts for 13% of the responses and it can be assumed that lacks of funds is often the main reason for lack of space.

In addition to the data collected in the survey we have detailed information from AAP's rescue facilities showing the total number of requests for housing of animals received between 2001 and 2018. Importantly the data also shows the number of animals actually accepted each year. As can be seen from the graph below, there is a significant difference between the number of requests and the number of animals that AAP could actually accept. The graph also illustrates the general increase in the total number of requests received by AAP over the period in question:

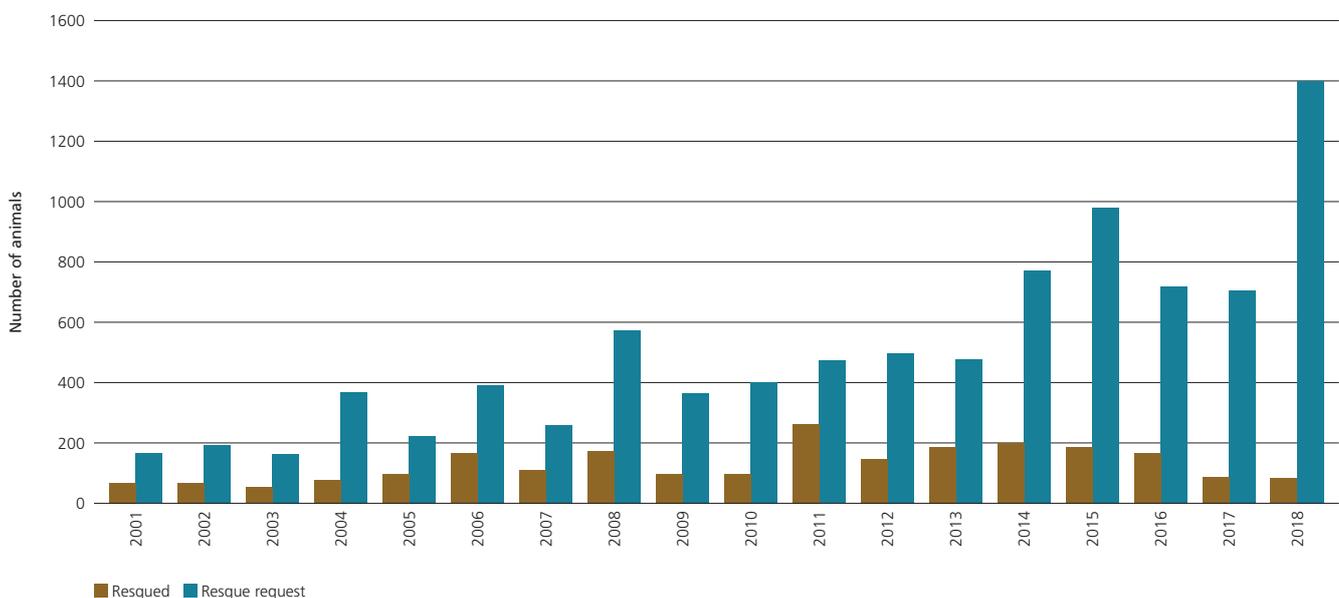


Fig 4. Number of rescue requests received vs. accepted at AAP rescue facilities, 2001-2018. In 2017 and 2018 the number of rescued animals was lower than normal due to exceptionally low outflow, consequence of the issues presented in this paper.



3. RECENT TRENDS AFFECTING DEMAND FOR HOUSING OF RESCUED WILD ANIMALS

As showed by the above presented data, the current demand for housing of wild animals is not being met. While the lack of overall capacity of rescue facilities in Europe is the main reason for this – there are too many animals and not enough facilities – there are a number of factors that may have increased demand for housing over recent years.

3.1 Illegal trade in wildlife

Increased attention to the scourge of global wildlife trafficking in recent years has led to an increase in confiscations of illegally traded specimens, also of live animals³. The Convention on the International Trade in Endangered Species (CITES) establishes that

seized or confiscated live animals should be placed in a suitable location that guarantees the welfare of the animals and prevents them from re-entering the illegal circuit⁴. This has probably contributed to increase the requests from enforcement authorities for rescue centres to take in confiscated fauna.

3.2 The Zoos Directive (Council Directive 1999/22/EC of 29 March 1999)

The Zoos Directive was introduced in the EU in 1999 to strengthen the role of zoos in the conservation of biodiversity. Where zoos are found to be in non-compliance there are a range of options open to the competent authorities and where adequate improvements can not be made the last resort is

closure. The total number of closures that have taken place as a result of the Zoos Directive is not known. However, in a recent evaluation of the Zoos Directive⁵, carried out by the European Commission, in which 14 Member States were assessed, 16 zoo closures, including both complete and partial closures, were reported between 2011 and 2016: two in Belgium, “around” nine in Germany, three in Bulgaria and two in Italy. These closures represent a significant number of animals in need of placement and it is likely that more zoos have been closed in the same period in other Member States not included in the evaluation.



While commenting on the progress made under the Zoos Directive the evaluation report stated that while zoos have made significant progress in key areas:

“Progress in relation to keeping animals under appropriate conditions, preventing the escape of animals, keeping up-to-date records, research and training has been less complete.”

The inability of some zoos to keep animals under appropriate conditions suggests more closures are possible in the future with the resultant increased pressures on rescue facilities. Importantly, the Zoos Directive evaluation report highlights that resource shortages may prevent Member States from improving or closing substandard zoos and, if closed, from ensuring that animals are relocated under appropriate conditions. Where the standard of a non-compliant zoo can be improved to ensure that the zoo meets the licensing conditions, the competent authorities should encourage such improvements, as provided for in Art. 4 of the EU Zoos Directive, before resorting to the closure of the zoo or a part thereof. By doing this, instead of becoming a source of animals in need of relocation in case of closure, zoos with improved standards may potentially become rescue facilities for animals from other sources.

³ D’Cruze N, Macdonald DW (2016) A review of global trends in CITES live wildlife confiscations. *Nature Conservation* 15: 47–63. doi: 10.3897/natureconservation.15.10005

⁴ <https://www.cites.org/sites/default/files/document/E-Res-17-08.pdf>

⁵ <http://ec.europa.eu/environment/nature/legislation/refitzoosdirective/pdf/SWD%20Zoos%20Directive%20Evaluation.pdf>



3.3 Bans of wild animals in circuses

Over the last decade there has been increasing opposition to the use of animals in entertainment, particularly to wild animals in circuses. This is reflected in the national legislation of 24 EU Member States who have already adopted restrictions or bans on the use of either all, or exclusively wild, animals in circuses. In addition, hundreds of European municipalities have decided to stop authorizing such public entertainment in their cities.

The number of animals from closed circuses that are in need of housing is likely to be significant. Eurogroup for Animals has reported⁶ a total of

300 circuses across Europe that currently use wild animals. The exact number of animals in these circuses is not known for every country but data does exist for Germany (over 560 animals), Portugal (over 750 animals) and Italy (over 580 animals). Of these animals, there are species that would be particularly difficult to rehome, including elephants, hippopotami and hundreds of big cats.

In addition to the closure of circuses there has been a general trend against the private ownership of many wild animals such as primates, bears and big cats, with many confiscations taking place across several countries in Europe over the past decade or more.

⁶ http://www.eurogroupforanimals.org/wp-content/uploads/E4A-Circus_Report-Digital-OK-v2.pdf

4. BARRIERS TO THE EFFECTIVE OPERATION OF RESCUE FACILITIES

The increased priority given to the fight against illegal wildlife trade, the closure of sub-standard zoos and the phasing out of wild animals in circuses and private ownership in Europe is to be welcomed. However, the challenge of finding alternative housing for many of the animals involved cannot be underestimated and has placed further demands on an already stretched rescue community.

Demand for housing of wild animals is outstripping supply. It is therefore essential that the work of rescue facilities operating in Europe is supported cooperatively and properly by governments and that barriers to their effective and efficient operation are removed. This section outlines some of the current barriers faced by rescue facilities, many of which can be dealt with through a consistent and co-ordinated approach by governments and at the EU level.

4.1 Enforcement of legislation

When a decision is made to seize and or confiscate an animal, it is important that all efforts are made to ensure that the operation is successful and

conducted according to due process, to avoid eventually having to return the animal to the owner on procedural grounds and all the wasted resources this entails. A common problem in this regard is a lack of knowledge amongst enforcement authorities with regards to the relevant legislation that must be applied when seizing an animal. Officials are often not aware of what options are open to them especially in Member States where confiscations of live animals are not very common. Depending on the animals involved and the country in question, there are a number of different pieces of legislation that could be applied to seize an animal, including CITES, BALAI, 'dangerous animal' laws, protection of endangered and native fauna and animal welfare laws. Despite this, on occasions not all actions that can be taken against the offender are taken. This can sometimes result in an animal being returned to an owner when in fact it should not be.

For example, in Spain (2017) a caracal was seized after the owner was reported to be walking it around on a leash in public. In the first instance the authorities opened a file for contraband.





However, when the owner subsequently produced the documents of legal origin, the animal had to be returned - despite the owner not having a zoo permit or a license for a dangerous animal, both of which would also have been grounds to seize the animal and begin court proceedings to confiscate.

Also in Spain (2017) a Squirrel monkey was seized during a drug-related operation. When the rescue facility that received the animal made a request to transport the animal to a lifetime care facility, the judge informed the owner and his lawyer about it and they requested that the animal be returned. The judge initially agreed to this request since the animal had not been object of any impeachment. It was only when the rescue facility informed the judge of the various pieces of legislation that would make return of the animal to the owner impossible (lack of a zoo permit, no license for dangerous animals, lack of legal origin documents, animal abuse) that the judge refused to return the animal.

In Italy problems have been reported by an EARS Partner in cases where animals have been seized for mistreatment/animal welfare reasons. Such findings are rarely upheld later in court as the judges involved do not have the information needed to make an animal welfare assessment and so the animals are usually returned.

If rescue facilities are to assist the authorities in the care of seized animals, expending valuable resources while doing so, all efforts need to be made by the authorities to ensure that prosecutions are successful and the animals involved are eventually confiscated.

4.2 Failure to plan

Another common problem reported by rescue facilities is the lack of notice given before bringing an animal to a rescue facility. When authorities carry out a seizure or confiscation, it is not uncommon for the seizure to take place and *only then* for them to start looking for a rescue facility. This can lead to animals having to stay where they are even after an enforcement action has taken place. For example, a Barbary macaque in Germany was seized due to animal welfare concerns and because the enclosure was not compliant with the German minimum requirements . However, as the enforcement authorities only started looking for a rescue solution after seizing the animal, they had to leave the animal in deposit with the owner, which in turn poses a risk of it disappearing.

Without prior planning, the need to find housing 'post-seizure' becomes urgent and so rescue facilities are forced to take animals that they are not well placed to receive; or worse, still the animals go to



facilities not equipped to provide them with proper care. Wherever possible (and it may not be possible in cases of illegal trade) authorities should co-ordinate in advance with rescue facilities and ensure a place is ready for the animal before the seizure or confiscation takes place. This also provides the rescue facilities with the opportunity to offer their expertise and assistance to the authorities with regards handling and transport of the animals. One such example can be found in Spain, where police planned a drug-related operation but suspected a primate might be kept at the location as well and requested assistance from AAP. The police provided general information which would help AAP prepare for the rescue without revealing details about the operation, which needed to remain confidential.

4.3 Transport of animals

Should the seizure or confiscation be successful the next issue is the transportation of the animal to the rescue facility. This can be a major challenge, especially if the animal is being moved from one country to another, sometimes overland across multiple borders. There are a range of processes and regulations that need to be followed in order for an animal to be transported within the European Union. Unfortunately, Member States' interpretations of these processes vary widely, which can lead to confusion and protracted delays.

Examples include:

Invasive Alien Species included in the List of Species of Union Concern (see info box)

Some Member States will allow the transport of these species to rescue centres under certain conditions while others will not. This is due to

the lack of a harmonized interpretation of the EU Regulation 1143/2014 on invasive alien species.

Implementation of the Invasive Species Regulation has also led to additional pressures, with rescue centres being expected to take in specimens of invasive species. For example, regulations in Belgium



INFO BOX 1: INVASIVE ALIEN SPECIES

Invasive Alien Species (IAS) are animals and plants that are introduced accidentally or deliberately into a natural environment where they are not normally found, with serious negative consequences for their new environment. [Regulation \(EU\) 1143/2014 on invasive alien species](#) (the IAS Regulation) entered into force on 1 January 2015, fulfilling Action 16 of [Target 5 of the EU 2020 Biodiversity Strategy](#). The core of the IAS Regulation is the [list of Invasive Alien Species of Union concern](#) (the Union list).

The IAS Regulation provides for a set of measures to be taken across the EU in relation to invasive alien species included on the Union list. Three distinct types of measures are envisaged, which follow an internationally agreed hierarchical approach to combatting IAS:

PREVENTION: a number of robust measures aimed at preventing the intentional or unintentional introduction of IAS of Union concern into the EU.

EARLY DETECTION AND RAPID ERADICATION: Member States must put in place a surveillance system to detect the presence of IAS of Union concern as early as possible and take rapid eradication measures to prevent them from establishing.

MANAGEMENT: some IAS of Union concern are already established in certain Member States. Concerted management lethal or non-lethal action, proportionate to the impact on the environment and appropriate to the specific Member States' circumstances, is needed to prevent them from spreading any further and to minimize the harm they cause.

stipulate that invasive species can be taken to rescue centres. This brings with it significant additional costs for the rescue centre and, where they cannot find a suitable outplacement facility, potential risks for the reputation of the rescue centres, with euthanasia being the only other option. The decision to direct members of the public to rescue centres was made



without consultation and no additional funding has been provided by the authorities to help rescue centres carry out this work.

In some cases, animals belonging to species included on the invasive species list are just too numerous for rescue centres to deal with. One EARS Partner has reported a huge increase in the number of slider turtles being brought to their facility. They are now having to turn them away as they no longer have space to take more animals.

INFO BOX 2: CITES

CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) is an international agreement between States, also known as Parties to the Convention. Its aim is to ensure that international trade in specimens of wild animals and plants does not threaten their survival.

CITES works by subjecting international trade in specimens of selected endangered species to certain controls. All import, export, re-export and introduction from the sea of species covered by the Convention has to be authorized through a licensing system. Each Party to the Convention must designate one or more Management Authorities in charge of administering that licensing system and one or more Scientific Authorities to advise them on the effects of trade on the status of the species. The species covered by CITES are listed in [three Appendices](#), according to the degree of protection they need. (For additional information on the number and type of species covered by the Convention click [here](#).)



CITES (see info box)

Some Member States do not issue CITES paperwork for animals moved within the EU– not even Appendix I species – while others insist on this paperwork before permitting an animal to enter. For example animals transported from Germany to AAP in the Netherlands never have accompanying CITES paperwork, as the authorities do not deem the exchange to be commercial. On the other hand, Spain and the Netherlands do issue CITES certificates in these situations. Furthermore other Member States (Belgium, Greece or Italy) do not issue CITES certificates if the animal has been confiscated or does not have any proof of legal origin. Consistent implementation of CITES regulations would greatly help rescue centres in planning and preparing for the transport of animals in Europe.



BALAI (see info box)

Some Member States do not allow the transfer of animals from BALAI-registered facilities to non-BALAI-registered facilities unless it's within the same Member State, while others accept them as long as the animals enter the country through a BALAI facility.

In other cases Member States will not allow the transfer of an animal of unknown origin (for example a stray Barbary macaque) to a Balai facility, believing it is not permitted. However it is stated within the Balai Directive that this is possible upon agreement between the two Member State authorities.

TRACES (see info box)

There are 'glitches' in the systems used to oversee the movement of animals in Europe – most notably with TRACES. Within the TRACES system there is

INFO BOX 3: BALAI

The [Balai Directive \(Article 4 of Council Directive 92/65/EEC\)](#) sets out the conditions for the import and export of various species of animals within the EU which are not covered by other legislation. It does not apply to domestic animals such as cattle, pigs, goats, sheep, horses, poultry and pets. The Balai Directive states that animals covered by this legislation can only be exported from premises which are either registered or approved by the authorities in the exporting country.

no certificate that can authorize the transport of an animal from an unregistered facility (i.e. a private owner) to a rescue facility – even when the facility is registered on the TRACES system. When a TRACES certificate is issued in such circumstances, many veterinary authorities consider it inappropriate since the certificate must be used to certify transport between registered and approved facilities.

INFO BOX 4: TRACES

TRACES is the European Commission's multilingual online management tool for all sanitary requirements on intra-EU trade and importation of animals, semen and embryo, food, feed and plants. Its main objective is to digitise the entire certification process and linked procedures, and is in line with the declaration of the Digital Agenda for Europe.

About 30,000 users from more than 80 countries worldwide are interconnected through TRACES, centralising all data, simplifying and accelerating the trading process.



EARS Partners have even reported two cases where they received animals with a TRACES certificate meant for imports from outside the EU – presumably to deal with the fact the animals came from non-registered facilities. While this might make sense from a practical point of view, it is not accurate and generates misleading data on the TRACES system. Improving the TRACES system to allow for animals originating from non-registered facilities (private owners, circuses, etc) would greatly help ensure the appropriate paperwork is issued during transport of rescued wild animals.

These are just some examples of the many problems encountered during seizure and transport of wild animals in Europe. It can take a huge amount of time and effort on the part of rescue facility staff to assist in the seizure and transport of animals – much of which would not be necessary if the processes

involved were consistently interpreted and applied by Member States.

4.4 Legal ownership and restrictions

Following the seizure of an animal legal proceedings will begin that may result in the animal being confiscated. This process can be lengthy, taking months and sometimes years to conclude. Following confiscation, the government may decide to transfer ownership to the facility. This enables the facility to manage and care for the animal as they see fit, with little or no involvement from the authorities. However, in some cases governments may insist, often for legal reasons, on retaining ownership throughout the animal's life, regardless of where the animal is housed. Indeed, this is often extended to offspring of the animals and their parts and derivatives after they have died. This can cause problems, particularly when

the government have legal restrictions on what the rescue facility can and can not do with the animals.

Such restrictions include prohibiting neutering, thereby risking further breeding or preventing social species from being housed in appropriate groups. It can also lead to an inefficient use of already limited enclosure space. This has happened to an EARS Partner in Italy when they were prevented from neutering tigers on the grounds that they were an endangered species. These were ex-circus tigers with no chance of being released to the wild or being used in any official breeding programme.

In some cases rescue centres that are open to the public have to ensure government-owned animals are not visible to the public. This can also lead to animals being housed separately in enclosures that may

not be as well suited to their needs. In some cases additional enclosures may need to be built away from public view.

Finally, where euthanasia is necessary for the sake of the animal's welfare, the process of getting authorization from the authorities can often be long and tortuous. This can lead to serious animal welfare problems, with animals left to suffer longer than necessary.

With the above in mind, there are clearly some benefits to rescue facilities having ownership of animals transferred to them. However, government funding is often only provided for government-owned animals and so rescue centres find themselves choosing between two equally unappealing scenarios – losing control or losing funding.



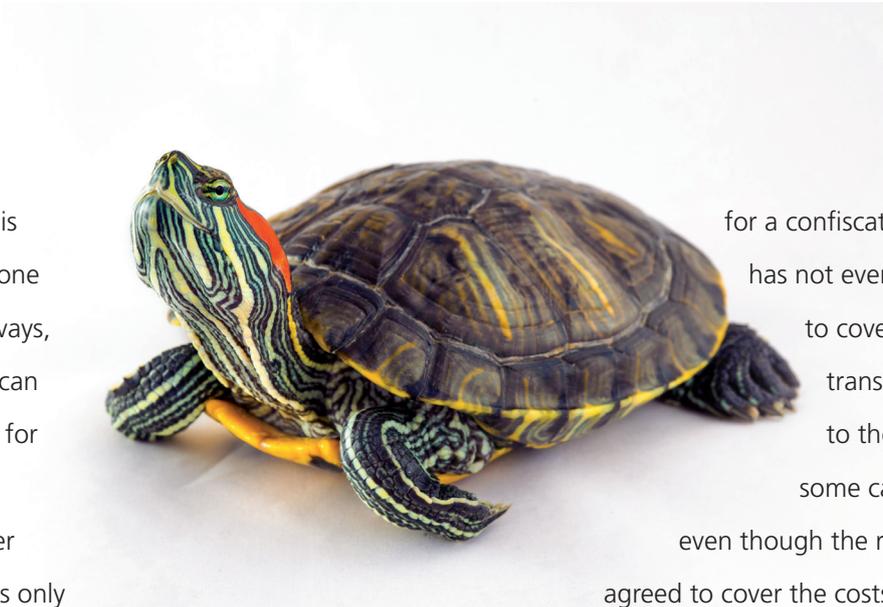
4.5 Funding of rescue centres and cost recovery

Once an animal is taken into care by a rescue facility, significant costs immediately begin to accrue. These costs include food, staff, medicine, veterinary care, construction, maintenance and heating. Where the animal has been placed at the facility by the authorities, it could perhaps be assumed that such costs would be covered by the State.

However, many governments provide no funding at all for the care of the animals they place at rescue facilities, as there is no budget allocated for it.

This leaves the government and local authorities dependent on rescue facilities that are able to take animals and cover the costs of the care themselves. In most cases this is not a sustainable solution and rescue centres find themselves having to refuse animals due to a lack of funding – either for care of animals or the creation of new enclosures.





Where funding is provided, it is done so in different ways, many of which can cause problems for rescue facilities.

In some Member States funding is only provided once a case has proceeded through the courts and the animal has been officially confiscated – but this can take a long time, often years, and in the meantime the rescue facility is left to cover the cost of the animal’s care. In other situations, a ‘one-off’ payment may be made, but this will not cover the lifetime care costs of the animal. Where funding is provided, it is often not adequate. The Italian government, for example, only covers costs associated with the direct care of animals. Costs for enclosure construction and general running costs are not covered.

The lack of funding for the care of confiscated animals extends even to the costs of transportation. EARS has recorded several cases where a government or local authority has requested housing

for a confiscated animal but has not even got the funding to cover the cost of the transfer of the animal to the rescue facility. In some cases, this happens even though the rescue facility has agreed to cover the costs of caring for the animal once at the facility. This can lead to decisions on the placement of animals being based on financial considerations (who will pay for it), rather than choosing the most appropriate facility for the welfare of the animal involved.

Many of the problems faced by rescue facilities in Europe are caused by a chronic lack of proper funding. This needs to be addressed urgently, and should begin with Member States developing a system of cost recovery for the work they do in dealing with illegally held wild animals. This is an issue that is currently being discussed within the CITES framework and a number of Member States have already developed good working models for cost-recovery.

5. RECOMMENDATIONS

The demand for rescue facilities able to house seized and confiscated wild animals is currently exceeding the available capacity. Those rescue facilities that are operating are doing so in difficult circumstances, with many receiving no government funding even for animals brought to them by the authorities.

Where government funding is provided, it is often not done so in a consistent way that ensures all of the costs incurred are reimbursed. In addition, there are a range of obstacles faced by rescue facilities on a day-to-day basis, including conditions being placed on the management of animals, inconsistent interpretation of rules pertaining to seizure and transport of animals, as well as unrealistic expectations placed on rescue facilities asked to take animals at short notice.



These are, however, problems that can be solved with a concerted and co-ordinated effort on the part of Member States and at EU level.

One mechanism by which this can be done is the development of clear, well-defined **National Action Plans** that set out how governments can manage confiscated wild animals while also working with and supporting rescue facilities in a fair and consistent way. CITES already encourages the development of National Action Plans for the management ('disposal') of confiscated animals in the CITES context. CITES Res. Conf. 17.8 urges CITES Management Authorities to:

"... develop action plans to deal with seized and confiscated live specimens consistent with the guidelines set out in Annex 3 of this Resolution."



We believe National Action Plans must deal with *all* seized, confiscated or surrendered wild animals – not just with those animals obtained through CITES implementation. Only by doing this, we can ensure a co-ordinated approach that enables the efficient and consistent management of rescued wildlife.

The development of action plans, unique to each country, would ensure full consideration is given to the national context and give recognition to the fact that there are legislative, cultural and practical differences from country to country. Nevertheless, it is essential that we have consistency across Europe

in how this issue is dealt with. There is therefore a need to have guidance at the EU level as to what elements should be included within National Action Plans and to offer clear guidance and clarification on the legislative and regulatory framework within which the management of seized, confiscated and surrendered wild animals operates.

We would also encourage Member States to share the systems and processes they already have in place – especially in terms of cost recovery and funding of rescue facilities.

Finally, the lack of funding for wildlife rescue underlies many of the problems highlighted in this document. While it is the responsibility of Member States to ensure **proper funding** and support for enforcement efforts and care for seized and confiscated wildlife, there is also clear justification for funds to be allocated at the EU

level and made available to Member States to ensure consistent and appropriate support is provided to rescue facilities right across Europe. The EU also has a clear role in supporting and promoting cross-border co-ordination for the housing of animals thereby ensuring animals are placed in the most appropriate facilities rather than just in those closest.







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