

Global Problems Need Global Solutions

“Rolling out an electronic permit system [within CITES] would have an immediate, positive benefit in driving down the illegal trade. It hasn’t been done to-date because too many countries want to maintain plausible deniability about the abuses of the legal trade and the laundering of illegal items the paper system allows.”

Transnational Crime Investigator, 2019.





Active For Animals

The President
The White House,
1600 Pennsylvania Avenue, N.W., Washington, DC 20500.

May 8, 2023

Implementing CITES Electronic Permitting To Tackle Illegal Trade In Wild Species

Dear Mr. President,

The international trade in wild species is regulated by CITES, the Convention on International Trade in Endangered Species of Wild Flora and Fauna, which was agreed in Washington in 1973 and which now has 184 signatory parties. **All African countries, with the exception of South Sudan, are signatories to the CITES convention.**

The illegal wildlife trade is considered the fourth-largest transnational crime, estimated to be worth between USD\$100 – 250 BILLION per year, according to the World Customs Organization Illicit Trade Report. This not only threatens many species with extinction, **but it also robs African countries of much needed export revenues.**

A significant contributor to the illegal trade is the fact that the CITES permit system is still overwhelmingly stuck in the paper-based world of the 1970s. The CITES permit system is the cornerstone of keeping the trade in over 39,000 endangered species legal and sustainable. **Without a trustworthy, verifiable and reliable permit system, CITES cannot achieve its objectives and the traceability of the trade is severely undermined.**

Only 16 countries to date have implemented a modern, electronic permit system. As an American, I am delighted that the United States is one of the CITES signatory countries to have implemented a modern permit system. Because most countries still use the paper-based system, for which remote permit verification is impossible, the illegal trade makes extensive use of fake and fraudulent permits to launder illegal items into legal supply chains.

With this letter, my request is that the U.S. government considers covering the cost of implementing the CITES electronic permit system throughout continental Africa. **Currently only 3 countries in continental Africa** (DRC, Uganda and Mozambique) have CITES electronic permits. South Africa launched an eCITES system on the 1st of April 2023, though this has yet to be formally announced by the CITES.

In a CITES news article, published during the CITES CoP19 in Panama in November 2022, the CITES Secretary-General Ivonne Higuero discussed how digitalization will curb illicit trade by facilitating the exchange of electronic permits and information across borders, increasing transparency and preventing the use of fraudulent permits. This can be done quickly and cost-effectively thanks to a collaboration between UNCTAD and CITES to develop a modern electronic permit system, the **eCITES BaseSolution**, which is available for immediate adoption.

The **implementation cost is USD\$150,000 per country** and ongoing support costs are currently USD\$40,000 pa (which will drop USD\$10,000 pa once more countries adopt the system). Moving to electronic permits not only tackles the illegal trade, but it also reduces permit processing times and because the **eCITES BaseSolution** can be easily integrated with the ASYCUDA customs system, it also streamlines customs procedures and enables

automated risk flagging for inspections. The CITES member countries adopted a decision (19.150) at the latest Conference of the Parties to urge all parties to the convention to implement electronic permit systems **and for developing countries to ask donor countries for financial assistance.**

On behalf of **Active for Animals**, a charity based in the U.S.A. and our collaborative partner, **Nature Needs More**, based in Australia, I have written to current U.S. Ambassadors based in continental Africa (please see Appendix 1). **Our request is that the U.S. Government, via USAid, covers the cost of implementing the eCITES BaseSolution in all remaining 49 CITES signatory countries in continental Africa.**

So just how much would this cost for these 49 countries?

Initial implementation, training and support & hosting for 12 months: 49 x US\$150,000 = US\$7,350,000

Add another 2 years of support & hosting (until we reach an economy of scale when it will be much cheaper) 49 x US\$40,000 x 2 = US\$3,920,000

Total: US\$11,270,000

While this figure is not insignificant, I personally compare this cost to the price of just one New York apartment to gauge how cost effective this project is when it comes to tackling the fraudulent trade in endangered species. I am reminded of a 2013 comment made by President Obama, "An issue that's inseparable from Africa's identity and prosperity [is] its wildlife."; I agree with this statement. I also acknowledge your personal commitment to this issue, Mr. President, given Treasury Secretary Janet Yellen's recent announced of a new joint U.S. – South African task force on wildlife trafficking to "follow the money" from poaching and then work to seize proceeds from any illegal sales.

The fact that 49 of the CITES signatory countries in continental Africa use the 1970 paper-permits results in the legal and illegal trade being so intertwined that they are functionally inseparable. A USAid donation of less than US\$12 million over the next two years could finally decouple the legal and illegal trade, significantly contributing to the success of the new joint U.S. – South African task force on wildlife trafficking.

We would also welcome a meeting with the designated official, to answer any questions about this very cost-effective and pragmatic solution. In the meantime, I have attached a document outlining the **eCITES Asycuda Base Solution.**

Thank you for your consideration.

Yours sincerely,

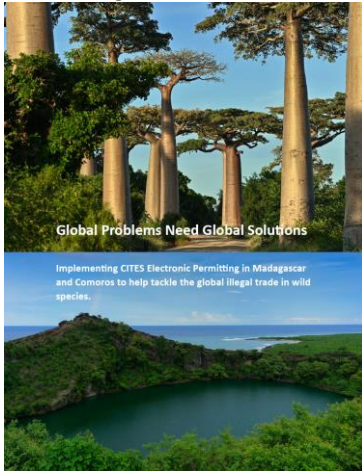
Mr James Dunton Founder,
Active for Animals Inc.
c: +1 (213) 494 4215
james.dunton@activeforanimals.org
www.activeforanimals.org

Dr Lynn Johnson Founder
Nature Needs More Ltd.
m: +61 4 18 124 660
lynn@natureneedsmore.org
www.natureneedsmore.org

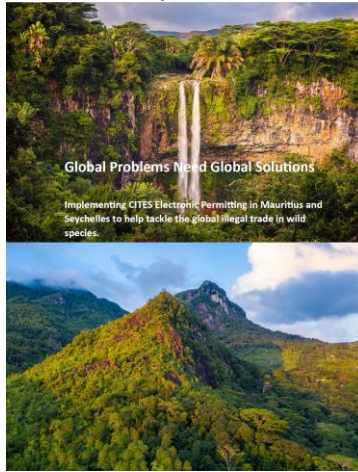


Appendix 1: U.S. Ambassadors to Continental Africa Contacted To-Date

Ambassador Claire A. Pierangelo
U.S. Ambassador to
Madagascar and Comoros



Ambassador Henry V. Jardine
U.S. Ambassador to Mauritius and
Seychelles



Ambassador Tulinabo S. Mushingi
U.S. Ambassador to Angola and São
Tomé & Príncipe



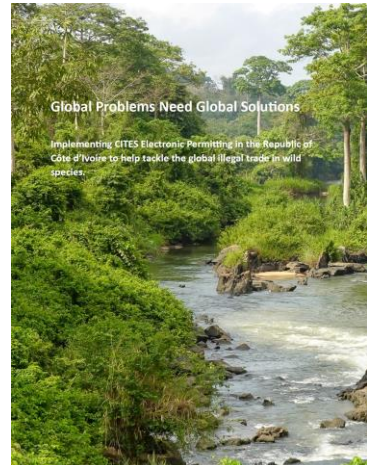
Ambassador Michael Raynor
U.S. Ambassador to Senegal and
Guinea-Bissau



Ambassador Larry E. André, Jr
U.S. Ambassador to Somalia



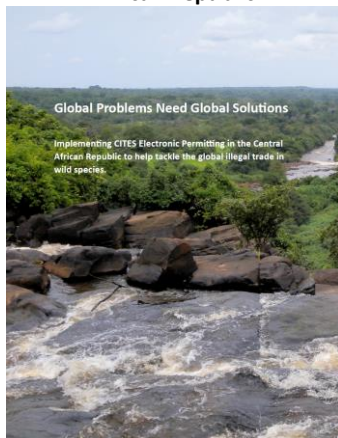
Ambassador Jessica Davis Ba
U.S. Ambassador to the Republic of
Côte d'Ivoire



Ambassador Eugene S. Young
U.S. Ambassador to the Republic of
the Congo



Ambassador Patricia A. Mahoney
U.S. Ambassador to the Central
African Republic



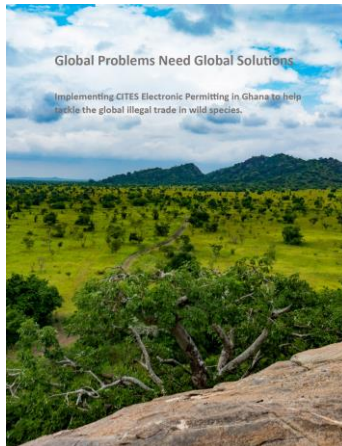
Ambassador Sharon L. Cromer
U.S. Ambassador to The Gambia



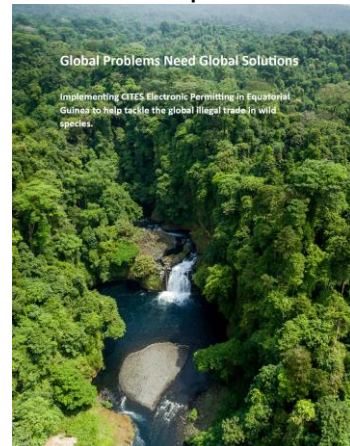
Ambassador Troy Fitrell
U.S. Ambassador to Guinea



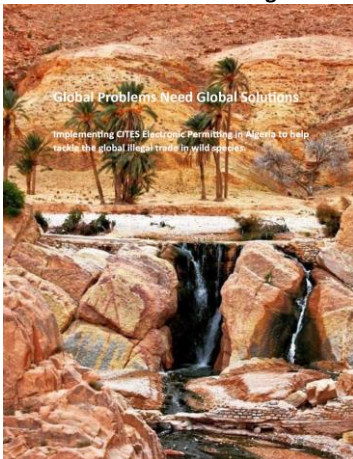
Ambassador Virginia E. Palmer
U.S. Ambassador to Ghana



Ambassador David R. Gilmour
Ambassador to Equatorial Guinea



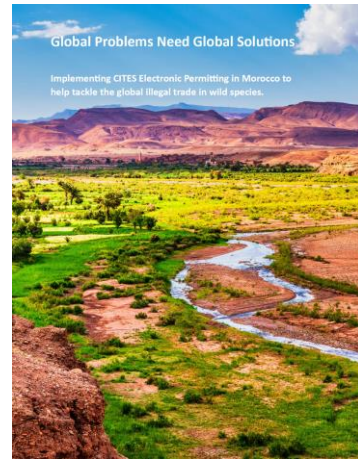
Ambassador Elizabeth Moore Aubin
U.S. Ambassador to Algeria



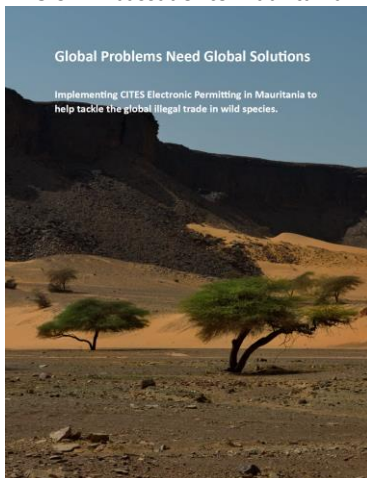
Ambassador Maria E. Brewer
U.S. Ambassador to Lesotho



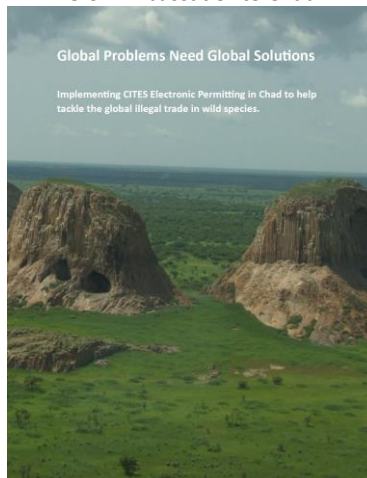
Ambassador Puneet Talwar
U.S. Ambassador to Morocco



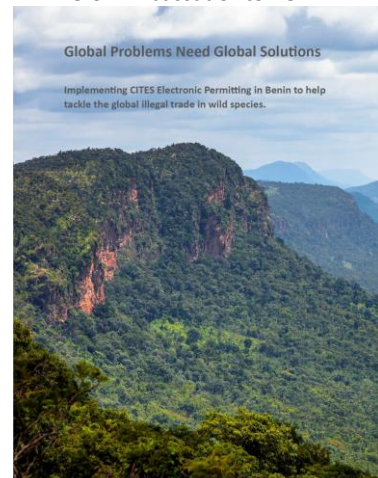
Ambassador Cynthia Kiersch
U.S. Ambassador to Mauritania



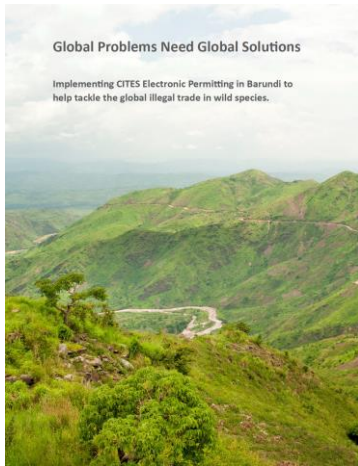
Ambassador Alexander Laskaris
U.S. Ambassador to Chad



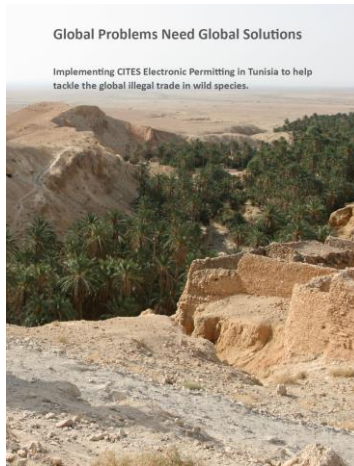
Ambassador Brian W. Shukan
U.S. Ambassador to Benin



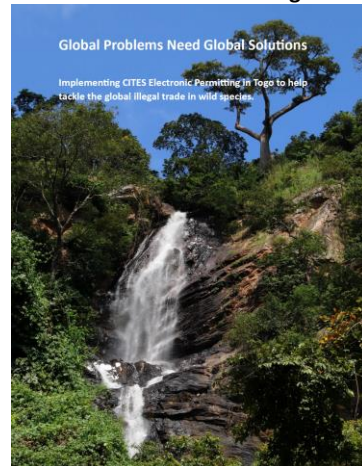
**Ambassador Melanie Harris Higgins
U.S. Ambassador to Barundi**



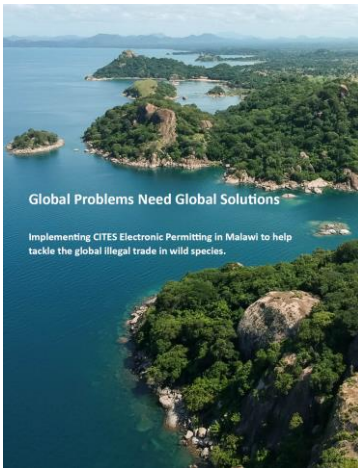
**Ambassador Joey R. Hood
U.S. Ambassador to Tunisia**



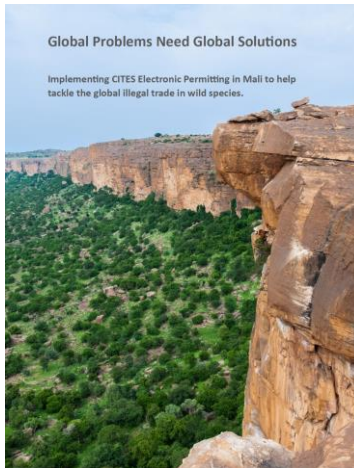
**Ambassador Elizabeth Fitzsimmons
U.S. Ambassador to Togo**



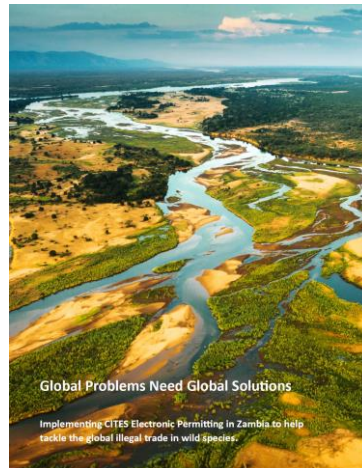
**Ambassador David Young
U.S. Ambassador to Malawi**



**Ambassador Rachna Korhonen
U.S. Ambassador to Mali**



**Ambassador Michael C. Gonzales
U.S. Ambassador to Zambia**



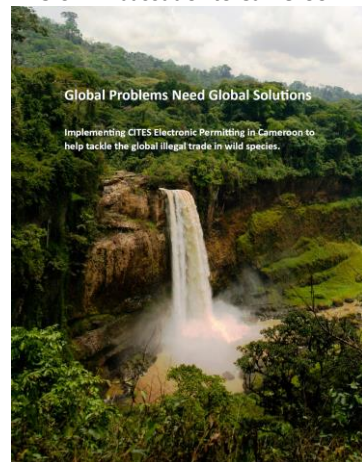
**Ambassador Richard Norland
United States Special Envoy for Libya**



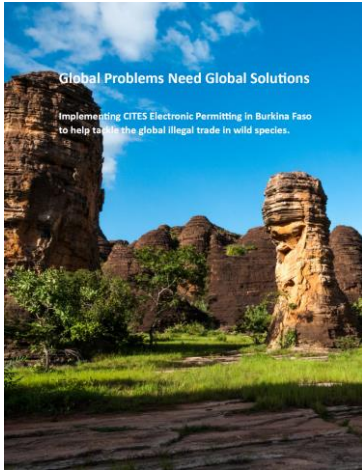
**Ambassador Jeanne Maloney
U.S. Ambassador to Eswatini**



**Ambassador Christopher J. Lamora
U.S. Ambassador to Cameroon**



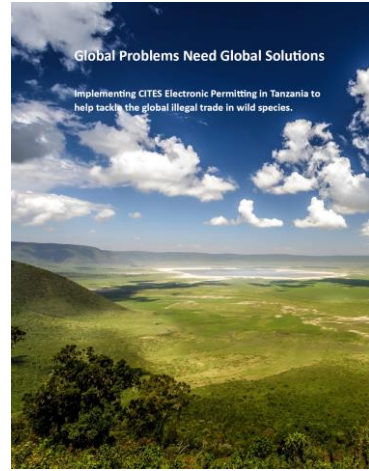
Ambassador Sandra E. Clark
U.S. Ambassador to Burkina Faso



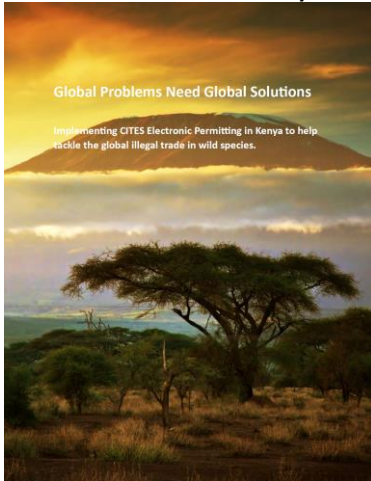
Ambassador Howard A. Van Vranken,
U.S. Ambassador to Botswana



Ambassador Michael A. Battle Sr.
U.S. Ambassador to Tanzania



Ambassador Meg Whitman
U.S. Ambassador to Kenya



Ambassador Randy Berry
U.S. Ambassador to Namibia

