



Stolen Wildlife V

The EU's role as destination for wildlife traffickers – an update

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Glossary

CB	Captive bred
CBD	Convention on Biological Diversity
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CMS	Convention on the Conservation of Migratory Species of Wild Animals
CoP	Conference of the Parties
DoJ	Department of Justice (United States)
DWC	Department of Wildlife Conservation (Sri Lanka)
HWA	Humane World for Animals
EU	European Union
EUDR	EU Deforestation Regulation
EUROPOL	European Union Agency for Law Enforcement Cooperation
F1	First generation born in captivity, from wild-caught parents
ICMBio	Instituto Chico Mendes de Conservação da Biodiversidade (Brazil)
IFAW	International Fund for Animal Welfare
IUCN	International Union for the Conservation of Nature
LCES	Law for the Conservation of Endangered Species of Wild Fauna and Flora
OFB	Office Français de la Biodiversité
PROFEPA	Procuraduría Federal de Protección al Ambiente (Mexico)
SEMARNAT	Secretaría de Medio Ambiente y Recursos Naturales (Mexico)
TFEU	Treaty on the Functioning of the European Union
UNODC	United Nations Office on Drugs and Crime
UNTOC	UN Convention against Transnational Organized Crime
WARPA	Wildlife Preservation and Protection Act (Thailand)
WCS	Wildlife Conservation Society
WPA	Wildlife Protection Act

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1. Summary

'It is not okay to steal a country's wildlife just because it is not listed under CITES, yet this is a serious blind spot in the current approach, with the trafficking of species that are not listed under CITES being disregarded by most destination States.'

John Scanlon AO, former Secretary General of CITES (2010-2018) and Chair of the Global Initiative to End Wildlife Crime, May 2025

The European Union is one of the biggest importers of wildlife, including illegally sourced species. Only a very small fraction of the species in trade are actually covered by international and/or EU legislation. However, many species in trade, which are protected in non-EU countries under domestic legislation, have nonetheless been captured and exported in violation of the country of origin's national laws. The lack of EU legislation prohibiting imports of such illegally obtained wildlife undermines the conservation efforts of range States. The present report is the fifth edition of the "Stolen Wildlife" series. It gives many examples of the trade in such illegally sourced wildlife in the EU.

Chapter 2 provides an introduction and illustrates the global scope of the problem. It shows how the EU is a main hub and destination for stolen wildlife from different continents. The wildlife being trafficked is not restricted to reptiles and amphibians: increasingly, ornamental fish, and invertebrates are also being affected by this form of wildlife crime, which has rightly been characterised as 'biopiracy' by several countries of origin.

In Chapters 3 to 7, case studies are given from 17 countries from five geographic regions. Several countries already featured as case studies in earlier editions of the Stolen Wildlife series – and the present report provides an update. Other countries feature as case studies for the first time, which highlights the variety of countries targeted by traffickers. Moreover, the case of an endangered butterfly from North Macedonia demonstrates that the smuggling of illegally sourced animals is not limited to the trade in exotic pets, but is also driven by collectors of rare dead insects.

These chapters also include some examples of nationally protected species that are already listed in CITES Appendix III. The weak enforcement of the rules for illegally obtained Appendix III specimens underlines why this status is insufficient to deter animal smugglers. Indeed, while those specimens, if illegally obtained, can be seized at the EU border, there are no

penalties for selling or possessing them once they have entered the EU market.

Chapter 8 provides an overview of recent measures taken by countries of origin to further protect their nationally protected species. These include seizures and arrests, the request for inclusion of species in CITES Appendix III or proposals for the next meeting of the CITES Conference of the Parties at the end of 2025 for the inclusion of targeted species in CITES Appendix II (global trade restrictions) or I (global commercial trade ban).

Chapter 9 analyses the current legal landscape for wildlife trade in non-CITES species both in the EU and third countries (i.e. Australia, Canada and the US). The brief analysis serves to highlight legislative gaps, which facilitate the illegal trade, while also providing feasible policy solutions. Furthermore, this chapter also serves as a critical analysis of the outcomes of the recently published European Commission's feasibility study on the criminalisation of the trade in illegally sourced wildlife (TRINOMICS 2025).

Chapter 10 provides conclusions and recommendations, calling on the EU to not only support CITES proposals submitted by range States, but also requesting trade restrictions or even bans to support national protection measures. The EU must move forward from words to deeds by committing to closing the loopholes in the current EU Wildlife Trade Regulations by delivering supplementary legislation to halt the trade in wildlife, which has been stolen from other parts of the world to be placed on the EU market. The revised EU Action Plan against Wildlife Trafficking provides an ideal opportunity to address this legal loophole and initiate the development of legislation, which makes it a criminal offence to trade in wildlife species that are protected in their country of origin. This would ultimately benefit the European consumers, providing greater certainty that an animal they are buying has been sourced legally and that they are not otherwise complicit in illegal trade.

2. Introduction

Across different regions, a particular group of consumers is constantly on the lookout for unusual wildlife, including non-CITES species that are rarely found on the international market – either because they are rare in the wild, or because they are nationally protected in their country of origin and therefore cannot be legally exported (e.g., Altherr et al. 2019; Frank & Wilcove 2019; Janssen & Krishnasamy 2018). The issue of trafficking protected native wildlife in violation of national legislation has been highlighted by many reports and peer-reviewed papers (e.g., Chekunov et al. 2024; Heinrich et al. 2022; Janssen & Shepherd 2019).

A low-risk, high-profit business model

With the exception of very few countries (e.g. the USA with its “Lacey Act”), most importing countries lack legislation that criminalises the import, possession or sale of illegally sourced non-CITES wildlife. Consequently, this unlawful trade increasingly appeals to traffickers for its high rewards and low risk (EUROPOL 2025). Janssen & Leupen (2019) consider the free trade in nationally protected non-CITES species, smuggled from range states, as one of the most significant challenges in the illegal reptile trade today. It is, therefore, not surprising that the latest World Wildlife Crime Report underlined the importance of a *“systematic collation and sharing of seizure data for species not covered by CITES”* (UNODC 2024). Moreover, the lack of adequate legal protection for species sourced in contravention of domestic laws in countries of origin hinders international judicial cooperation: trafficking, when detected on animal welfare or health grounds, only constitutes an administrative offence.

The role of the EU as hub and destination

The European Union (EU) is not only source, destination and transit hub for endemic wildlife trafficking (EUROPOL 2025), but the role of European citizens as clients or even traffickers for stolen wildlife is alarming. For instance, Janssen & de Silva (2019) identified Europe as a key destination for illegally sourced live reptiles from Sri Lanka, where no exports of native wildlife are permitted. They noted: *“Of the 14 countries documented to be selling Sri Lankan reptiles, only three were non-European”*.

In recent years, the EU has come under increasing pressure to address the legislative gaps that prevent the prosecution of traders importing and selling illegally sourced wild animals, unless they are protected under CITES or the EU Wildlife Trade Regulations. Several experts called for a far-reaching reform of the EU wildlife trade legislation (e.g. Cardoso et al. 2024, Bosire 2022).

New trends in the business

This report is the fifth edition of the “Stolen Wildlife” series. Since 2014, these reports have documented the flourishing trade in species that are nationally protected in their country of origin, but not at the international level. The initial focus was reptiles (Altherr 2014), but the range of species documented has broadened considerably since then: amphibians, ornamental fish and invertebrates are also targeted to meet an increasing demand for new and rare species from those trading in or collecting exotic pets (See “Stolen Wildlife” II-IV: Altherr et al. 2016, 2022; Altherr & Lameter 2020b). Indeed, recent scientific papers and seizures confirm that **biopiracy for the exotic pet trade increasingly includes invertebrates**, such as tarantulas (Rivera et al. 2024; Law 2019; Ribbit 2017). Invertebrates are also being poached for insect collections (e.g. Doma 2024).

This form of wildlife crime is highly dynamic, with new species regularly entering the trade. For instance, the Lopburi bent-toed gecko from Thailand was recorded in the European pet trade for the first time in Spring 2025 (see Chapter 6.4.). The present report provides many new cases from Latin America, Africa, Europe, Asia and Oceania (Chapters 3 to 7). Even species that are regularly bred in captivity are not necessarily safe from ongoing illegal captures from the wild: wild-caught animals may still be in demand for their ‘pure DNA’ (Byrne 2025) and to prevent genetic inbreeding (e.g., Ampil 2024; Drumheller et al. 2016).

In the light of increasing evidence of the EU’s role as a hub and destination, and in the context of the implementation of the revised EU Action Plan against Wildlife Trafficking, the European Commission commissioned a study on the *“need for, added value of, and feasibility of criminalising all trade in illegally sourced wildlife across the EU”* in 2023. The outcomes thereof are summarised in Chapter 9.5.

European Union as destination

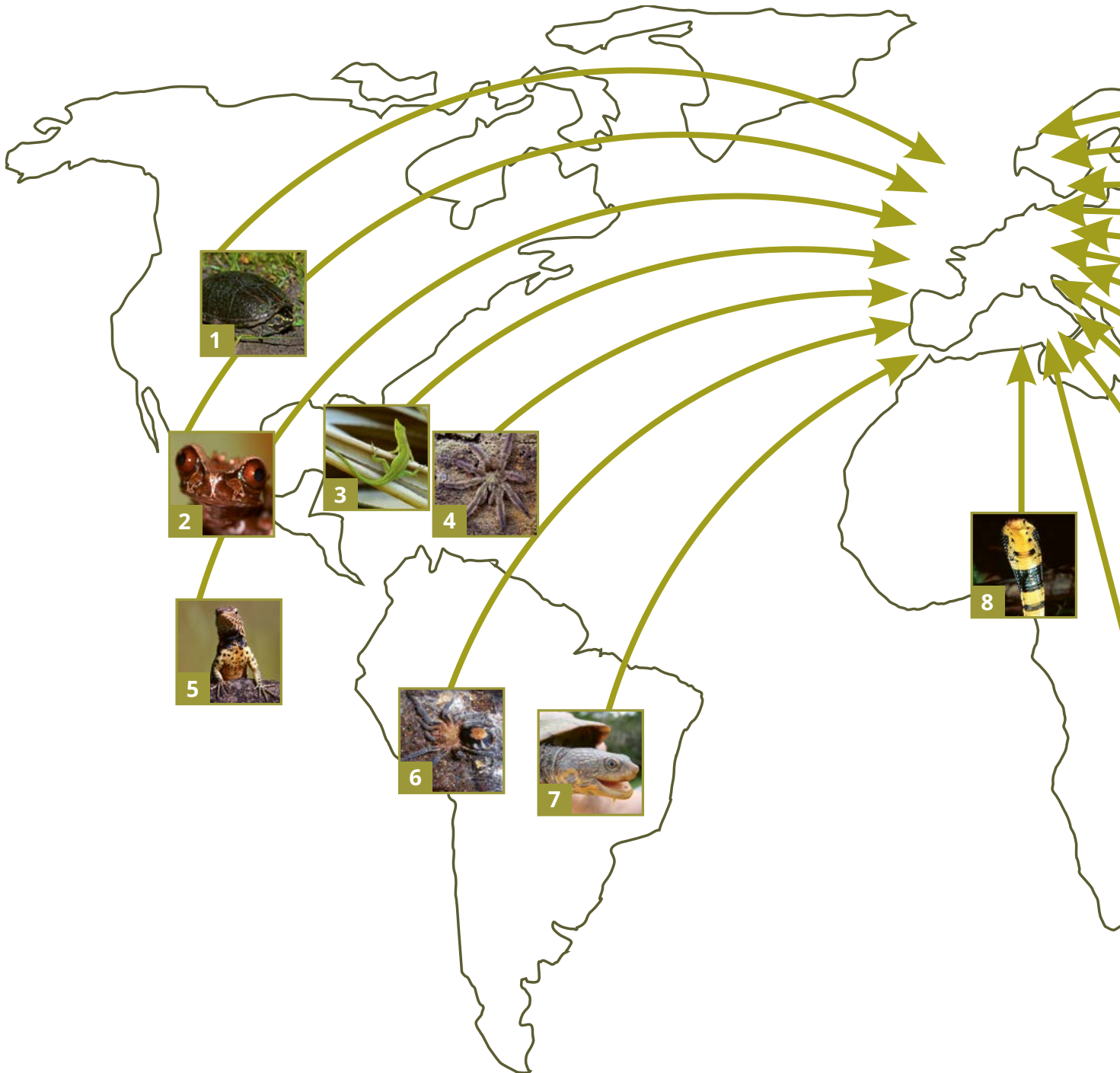
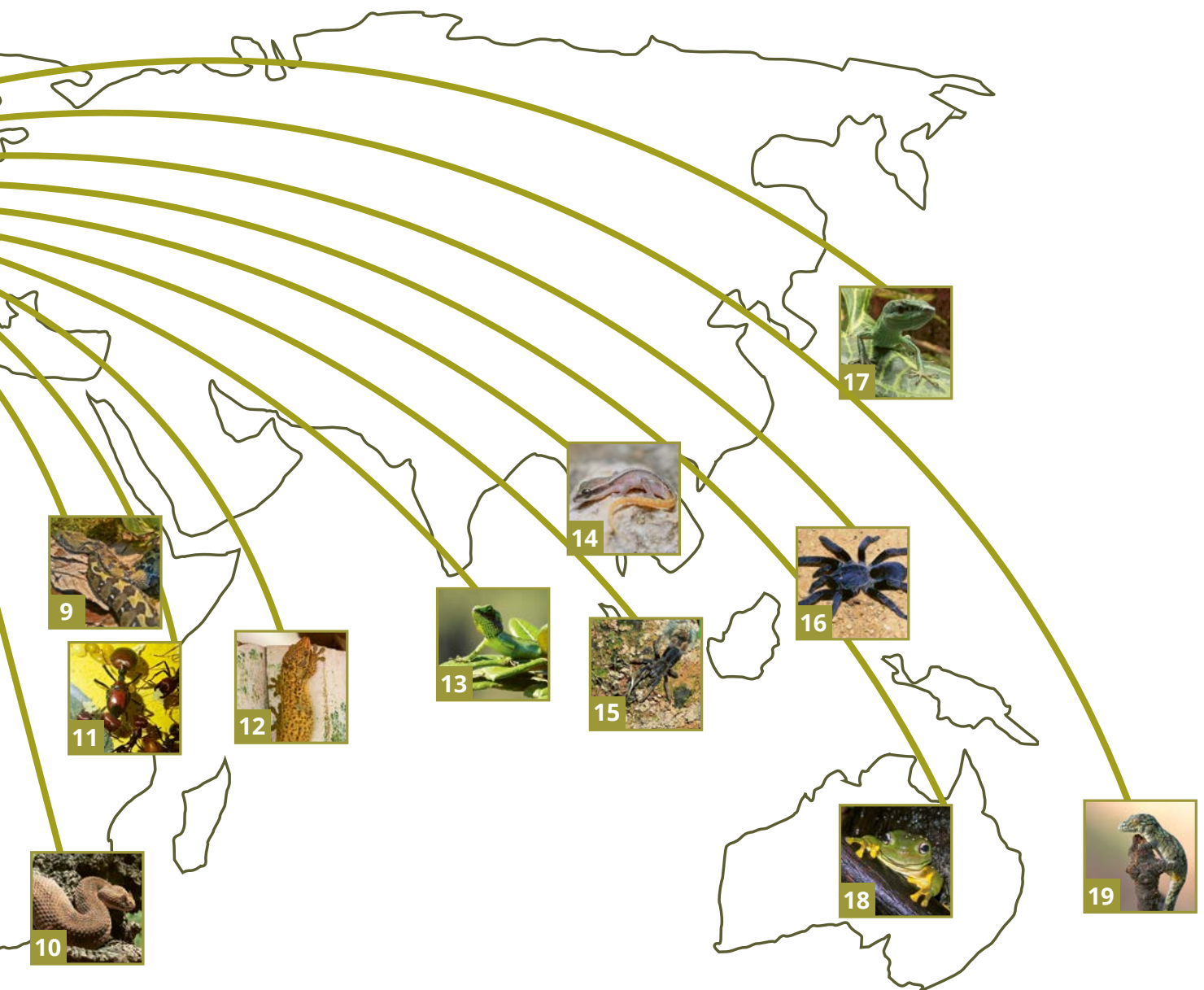


Fig. 1: Examples of trafficking of nationally protected species to Europe

- 1. United States of America:** Three-striped mud turtles
Kinosternon baurii (see Chapter 8.1.)
- 2. Mexico:** Crowned tree frog, *Triprion spinosus*
(see Chapter 3.1.)
- 3. Cuba:** Cuban green anole, *Anolis porcatius* (see Chapter 3.2.)
- 4. St. Vincent & The Grenadines:** Caribbean diamond tarantula,
Tapinauchenius rasti (see Chapter 3.3.)
- 5. Galapagos Islands (Ecuador):** Galápagos lava lizard,
Microlophus albemarlensis (see Chapter 3.4.)
- 6. Bolivia:** Bolivian dwarf beauty tarantula, *Cyriocosmus perezmilei* (see Chapter 3.5.)
- 7. Brazil:** Tuberculate toadhead turtle, *Mesoclemmys tuberculata*
(see Chapter 3.6.)
- 8. Cameroon:** Forest cobra, *Naja melanoleuca* (see Chapter 8.1.)
- 9. Ethiopia:** Ethiopian mountain adder, *Bitis parviocula*
(see Chapter 4.1.)
- 10. South Africa:** Horned adder, *Bitis caudalis* (see Chapter 4.2.)



- 11. Kenya:** Giant African harvester ant, *Messor cephalotes* (see Chapter 8.1.)
- 12. Seychelles:** Seychelles bronze gecko, *Ailuronyx seychellensis* (see Chapter 4.3.)
- 13. Sri Lanka:** Black-cheek lizard, *Calotes nigrilabris* (see Chapter 6.1)
- 14. Thailand:** Sam Roi Yot leaf-toed gecko, *Dixonius kaweesaki* (see Chapter 6.4.)

- 15. Malaysia:** Malaysian purple-femur tarantula, *Coremiocnemis hoggi* (see Chapter 6.2.)
- 16. The Philippines:** Palawan blue dwarf tarantula, *Phlogiellus johnreylazoi* (see Chapter 6.3.)
- 17. Japan:** Sakishima grass lizard, *Takydromus dorsalis* (see Chapter 6.5.)
- 18. Australia:** Magnificent tree frog, *Litoria splendida* (see Chapter 7.1.)
- 19. New Caledonia (France):** Western chameleon gecko, *Eurydactylodes occidentalis* (see Chapter 5.2.)



3. Case Studies Americas

3.1. Mexico

National legislation: The “Norma oficial Mexicana NoM-059” identifies and lists threatened native species and populations, (SEMARNAT 2010, slightly amended in 2019). In accordance with Art. 420 of the código penal (criminal code), the capture of and commercial activity with wild animals and plants, which are endemic, in danger of extinction, threatened, rare or subject to special protection, is prohibited without proper permit. Legal commercial exports for species covered by NoM-059 are exceptional and limited to few species and specimens.

Illegal trade: Mexico featured as a case study in the first three editions of Stolen Wildlife. Several recent seizures and arrests clearly demonstrate that the illegal trade is still ongoing.

Mud turtles (*Kinosternon* spp.) were the most frequently confiscated live reptiles between 2014 and 2023 (Cantú & Sánchez 2024; FAW 2024). These turtles were only added to the CITES Appendices at the end of 2022, which means that seizures in the years before relate to their national conservation status.

In February 2025, the Mexican enforcement authority PROFEPA seized two suitcases at the international

airport in Mexico City that contained 121 turtles and 16 frogs, (Gobierno de Mexico 2025a), among them several non-CITES species, such as **Meso-American sliders (*Trachemys venusta*) and crowned tree frogs (*Triprrion spinosus*)**. The shipment was destined for Japan. However, there was strong evidence that a Mexican national with links to Spain had been at the helm of this smuggling operation. Indeed, in May 2025 PROFEPA arrested the suspect at the airport with 299 reptiles, including 24 **alligator lizards (*Barisia* sp.)**, 20 **spiny lizards (*Sceloporus* sp.)**, 10 **helmeted lizards (*Corytophanes* sp.)**, and 26 **knob-scaled lizards (*Xenosaurus* sp.)** being found in his luggage (Gobierno de Mexico 2025b). In June 2025, a seizure of more than 3,400 alive *Trachemys venusta* followed (Gobierno de Mexico 2025c). These confiscated species are also regularly traded in Europe (Altherr et al. 2020); see also Fig. 2 to 5.

The question of legal origin also arises for other species that are endemic to Mexico. For instance, **Texas indigo snakes (*Drymarchon melanurus*)**, labelled as “pure Yucatan”, have been offered for €3,500 to 5,000 / pair. Another trader also indirectly indicated the wild-caught origin of the species (Fig. 6).

Moreover, several rattlesnakes native or even endemic to Mexico, have been found on sale in Europe (Fig. 7), including **Tlaloc's rattlesnake (*Crotalus tlaloci*)** – a species that was only first described in 2014, with

no exports permitted (Cantu 2025). For CITES CoP20, Mexico has submitted a proposal to include all rattlesnakes (*Crotalus* spp. and *Sistrurus* spp.) in App. II (CITES CoP20 Prop. 25).



Fig. 2: *Trachemys venusta*, 22 animals in stock. Website of a German pet shop, July 2025.

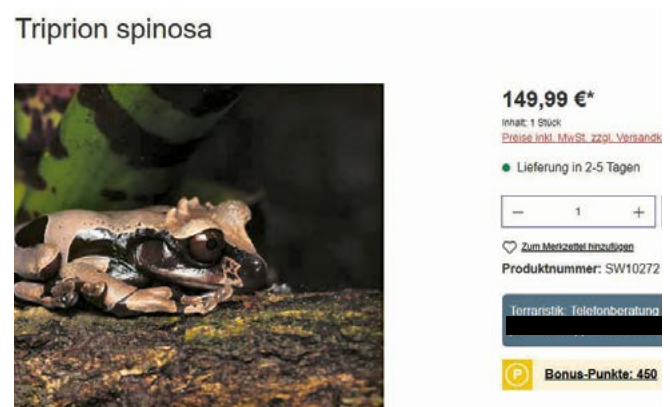


Fig. 3: *Triprion spinosus*, price 149 €. Website of a German pet shop, July 2025.

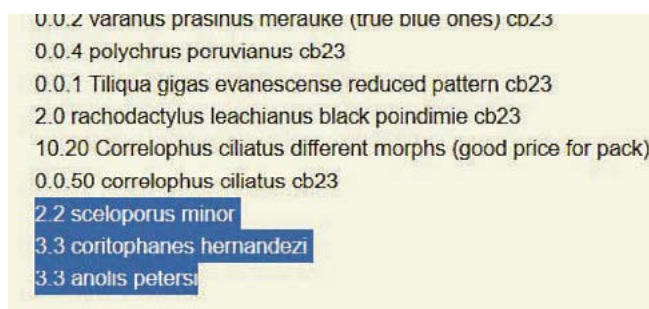


Fig. 4: Adult pairs of *Sceloporus minor* and *Corytophanes hernandezii*, both endemic to Mexico, and *Anolis petersii*, native to Mexico. Trader from Spain, Feb 2024, offered for reptile fairs in "Hamm or Houten", terraristik.com.



Fig. 5: Four adult specimens of *Xenosaurus newmanorum*, endemic to Mexico. Trader from Germany, Aug 2023, terraristik.com.



Fig. 6: Adult pairs of *Drymarchon melanurus*, with Yucatan locality – in contrast to some other animals not labelled as "CB". Trader from Spain, Feb 2024, terraristik.com.

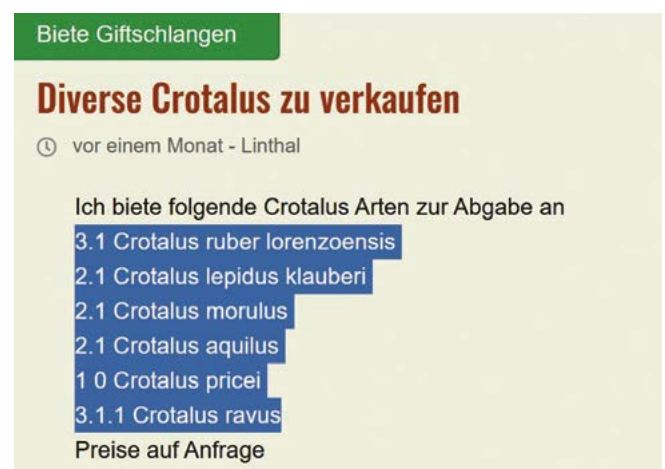


Fig. 7: Several *Crotalus* species, either endemic (such as *C. aquilus*, *C. morulus*, *C. ravus*) or native to Mexico. Trader from Switzerland, June 2025, terraristik.com.

3.2. Cuba



National legislation: Via Resolution No. 160/11 Cuba protects threatened native species at the national level which have a special role for its national biological diversity. Annex I lists species that are listed in CITES App. I, protected by the CMS or classified in Cuba's national Red List (González et al. 2012) as Endangered or Critically Endangered. The capture or export of Annex I species is only authorised for scientific purposes.

Illegal trade: Data on seizures in Cuba are scarce (IFAW 2024), but the country was a case study in our Stolen

Wildlife Reports III (Altherr & Lameter 2020a) and IV (Altherr et al. 2022).

In view of substantial trade in its nationally protected species, Cuba requested the CITES App. III listing of 24 endemic lizards in 2019. Nevertheless, despite being strictly nationally protected and now on CITES App. III, several species are still offered in the European pet market, e.g. *Anolis baracoae*, *A. equestris*, *A. porcus*, *Chamaeleolis barbatus*, and *Ch. guamuhaya* (see Fig. 8 & 9). Animals are sold for several hundred Euros per pair, while prices in Canada even reach up to US\$2,700, such as *A. equestris potior*, although exports from Cuba are not legal.

Moreover, other endemic species which are not yet listed under CITES App. III, but protected under national law, are also on sale in Europe, such as the **Cuban green anole** (*A. porcatatus*) and the **West Cuban anole** (*Anolis bartschi*) – see Fig. 10 & 11.

The case of Cuba illustrates that an Appendix III listing alone is not sufficient to stop the trade in nationally protected species, as the sale and possession of animals within the EU are not illegal under the terms of the current EU legislation.

PHILODRYAS BOIGA PHYLLOMEDUSA ANOLIS DRYMARCHON

PREMIUM

vor 3 Monaten - Castellon

HOUTEN FEBRUARY / HAMM MARCH

3.3 Anolis transversalis
3.3 Anolis equestris equestris
13.20 Anolis equestris potior
3.3 Pseudocalotes kakhienensis

Fig. 8: Larger number of endemic *Anolis equestris*, listed in CITES App. III. Spanish trader, Dec 2024, offered for reptile trade fairs in Houten (Netherlands) and Hamm (Germany), terraristik.com.

Available For hamm or houten show

PREMIUM

vor 3 Wochen - Madrid

1.3.1 varanus reisingeri young
1.1 anolis baracoae blue adult
1.1 anolis baracoae green baby size
1.1 anolis equestris potior
1.1 anolis guamuhaya
2.2 anolis barbatus (1 male adult, rest juvenile)
3.1 anolis sp red throat

Fig. 9: Several Cuban endemic lizards, covered by CITES App. III. Spanish trader, Feb 2023, offered for Hamm and Houten, terraristik.com.

Verkaufe Echsen

Anolis porcatatus, Grüner Kuba-Anolis

Es sind mehrere adulte Nachzucht-Paare aus 2024 abzugeben, große und kräftige Tiere.

vor 3 Monaten

8753 Balatonmagyaród

Fig. 10: Several adult pairs of *Anolis porcatatus*, endemic to Cuba and nationally protected, marked as captive-bred. Trader from Hungary, Apr 2025, terraristik.com.

0.0.2 Sphaerodactylus nigropunctatus ocujal 23CB
1.0 Sphaerodactylus argus, adult
0.0.2 Sphaerodactylus rosaurae 23CB
1.0.2 Eurydactylodes vieillardii 23CB
1.0.3 Eurydactylodes agricolae 23CB
1.0 Anolis bartschi, adult
1.0 Rhacodactylus leachianus- Nu Ami 22CB
0.1 Rhacodactylus leachianus- Nu Ami adult

Fig. 11: Adult *Anolis bartschi*, nationally protected in Cuba. German trader, Dec 2023, for the reptile fair in Hamm (Germany), terraristik.com.

3.3. St. Vincent and the Grenadines



National legislation: Native reptiles have significant protection under the Wildlife Protection Act (WPA, Act 16 of 1987, amended by Act 42 of 1988, Act 16 of 1991) which only allows capture and export under a permit. Invertebrates are excluded from the WPA. However, the habitat of some targeted endemic species is in a protected area regulated under the Forest Resource Conservation Act of 1992, where hunting and harvesting wildlife are illegal.

Tapinauchenius rasti

Artikelnummer: 2140

75,00 €

inkl. MwSt., zzgl. Versand

Lieferzeit: 3-5 Tag(e)

Fig. 12: *Tapinauchenius rasti*, for 75 €/animal. Website of a German pet shop, July 2025.

Illegal trade: Although no permit was ever issued to collect or export **Union Island geckos (*Gonatodes daudini*)** for commercial purposes, a flourishing trade in illegally sourced animals has been documented, with Europe being the main market (Shepherd et al. 2019). In 2019, the Critically Endangered species was listed in CITES App. I.

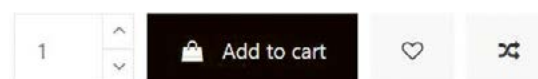
Illegal trade is not restricted to reptiles: the **Caribbean diamond tarantula (*Tapinauchenius rasti*)** is illegally caught in a protected area in its sole range state (Rivera et al. 2024). The species was only scientifically described in 2018, but had already entered the pet trade in the EU and the USA since at least 2015 (see Fig. 12 & 13).

Rivera et al. (2024) also raise concerns about the potential increase in wild specimen acquisition if demand shifts, given limited resources for monitoring and enforcing wildlife trade laws.

Tapinauchenius rasti L3/4 (1,5cm)

€12.50

Tax included Lowest price within 30 days before promotion: €12.50



Quantity	Unit discount
3	5%

Fig. 13: *Tapinauchenius rasti*, Website of a pet shop in Poland, July 2025.

3.4. Ecuador



National legislation: In 1959, the Galápagos archipelago was declared Ecuador's first National Park, with ca. 97 % of the terrestrial surface of the archipelago being strictly protected (Government of Ecuador 2024). According to the "Law of the Special Regime for the Province of Galápagos" (Official Supplementary Register No. 520, published on 11 June 2015), the **capture of wildlife in the Galápagos Islands is strictly prohibited and considered a serious environmental offense**. Such actions may be punishable under Article 247 of Ecuador's Criminal Code, which addresses

crimes against protected species and ecosystems (Gentile et al. 2013, Ecuador 2022).

Illegal trade: Some reptiles endemic to the Galápagos Islands have been listed under CITES since 1975, e.g. the Galápagos giant tortoise (*Chelonoidis niger*) on App. I, the Galápagos land and marine iguanas (*Conolophus* spp. and *Amblyrhynchus* spp.) on App. II. However, illegal trade is flourishing via Uganda mostly to Asia, but also to Europe, North America and African countries (Auliya et al. 2025). Based on Ecuadorian law, all of the Galapagos iguanas in trade have either been illegally obtained or are the offspring of illegally obtained founder stocks. In May 2025, Ecuador therefore requested all Parties to refrain from issuing export or import permits (CITES Notification No. 2025/063). Ecuador has also proposed an uplisting of

Galápagos land and marine iguanas from App. II to I for the CITES CoP20 (Prop. 22 & 23).

Other endemic species are only protected on a national level, such as the **Galápagos lava lizard (*Microlophus albemarlensis*)** and the **Santa Cruz lava lizard (*Microlophus indefatigabilis*)**. Despite being nationally protected in its sole range state, *M. albemarlensis* has been regularly recorded in the European pet trade at least since 2017, when animals were offered for close to €700 (Altherr et al. 2020). Traders from, for example, Spain, Czech Republic and Ukraine refer to the reptile trade shows in Hamm (Germany) and Houten (Netherlands) for handover of animals (see Figures 14 & 15). Moreover, in April 2025, for the first time a trader from Germany indicated that he may have *M. indefatigabilis* for sale.

Offer from Bion Terrarium Center for Hamm (14.12.2024)

PREMIUM

vor 2 Wochen - Kiev

"Hello, we can offer you for Hamm (December 14) following species:

0.0.10 Red-banded spiny-tailed lizard/ *Uromastix dispar flavifasciata* (cb BION 2024) - €350 each

2.0 Ornate spiny-tailed lizard/ *Uromastix ornata* (cb BION 2024) - €350 each

0.0.5 Ornate spiny-tailed lizard/ *Uromastix ornata* (cb BION 2024) - €300 each

0.0.10 Galápagos Lava lizard/ *Microlophus albemarlensis* (cb BION 2024) - €300 each

2.0 Baia Blue Rock Lizard/ *Petrosaurus thalassinus* (cb BION

Fig. 14: Ten unsexed *Microlophus albemarlensis*, endemic to the Galápagos Islands, labeled as “cb”. Ukrainian trader for the reptile fair in Hamm (Germany), Oct 2024, www.terrartistik.com.

Available for Houten or Hamm sept

PREMIUM

vor 2 Jahren - Madrid

1.1 *Nephurus asper* banded

0.0.5 *tiliqua nigrolutea* lowland

0.2 *Nephurus asper*

0.0.10 *Nephurus Levis*

0.0.5 *Nephurus wheeleri* cinctus

0.0.2 *egernia stockesi*

0.0.1 *egernia epsisolus*

0.0.1 *egernia depressa*

0.0.2 *egernia stockesi* badia

0.0.3 *anolis barbatus*

2.1 *underwoorsario husbandi* albino

2.3.2 *underwoorsario husbandi*

0.0.10 *pareodura pictus* (amel, het amel, stripe, etc)

0.0.5 *leachianus gtx*

0.0.4 *leachianus nu* Ana high pink

0.5 females *leachianus mt koghis* het melanistic troeger

0.0.3 *r.leachianus red bar troeger* medium quality

0.0.5 *microlophus albemarlensis*

Fig. 15: Five unsexed *M. albemarlensis*. Spanish trader for reptile fairs in Hamm and Houten, Nov 2022, www.terrartistik.com.

3.5. Bolivia



National legislation: In response to growing international attention to its wildlife trade practices, Bolivia stepped up its wildlife protection efforts and enacted a ban on the export of all wildlife in 1986 (Verheij 2019). In 2023, it strengthened these measures through the Andean Condor Law (Ley N° 1525), which amended the Penal Code to punish the unlawful “capture, possession, acquisition, transport, storage, introduction into or extraction from the country, or export” of any wild fauna or flora, with penalties of up to eight years’ imprisonment.

Illegal trade: Despite significant efforts, international demand continues to drive illegal trade in Bolivia's nationally protected wildlife (e.g. Cárdenas 2024). Reptiles are the second largest animal group recorded in seizures (IFAW 2024).

Moreover, experts have sounded the alarm about the illegal trafficking of invertebrates from Bolivia, which is home to 33-50 species of tarantulas (Guerra-Serrudo et al. 2023; Bioamazon Project 2022). For the CITES CoP20, Bolivia has submitted a proposal for the



Fig. 16: Adult *Hapalotremus albipes*, endemic to Bolivia. Trader from UK, March 2020, offer at Facebook.

inclusion of 15 tarantula species in App. II (Prop. 38), including the **Bolivian white leg tarantula** (*Hapalotremus albipes*) and the **Bolivian dwarf beauty tarantula** (*Cyriocosmus perezmilesi*) – see Chapter 8.3. Both species are endemic to Bolivia, but are regularly available for sale on the European pet market (Figures 16 & 17). Captive breeding of both species is successful at some level. However, in view of a clear preference of the market for adult individuals and in the absence of authorised breeding centers within the country, Bolivia's proposal highlights the ongoing illegal supply of animals caught in the wild.



Fig. 17: Female adults of *Cyriocosmus perezmilesi*, endemic to Bolivia, offer for quantity discount from 3 animals. Website of a trader from Poland, specialised in spiders, June 2025.

3.6. Brazil



National legislation: According to Art. 29 of the Brazilian Environmental Crimes Law (Lei de Crimes Ambientais 9605/98), "killing, chasing, hunting, capturing or using specimens of wild animals, ... without proper permission, license or authorization from the authorities" is a crime.

Illegal trade: Brazil was featured as a case study in Stolen Wildlife II, III and IV. However, illegal trade is still ongoing, with new species being placed on the European market:

In 2015, the **Bruno's casque-headed frog** (*Nyctimantis [Aparashpenodon] brunoi*) became popular for its highly toxic venom that is 25 times more toxic than the venom of deadly venomous Brazilian pitvipers (Jared et al. 2015). Since that time, the species, endemic to southeastern Brazil, has made headlines (Coghlan 2015; Höbel-Allißen 2015) and only recently showed up in the European exotic pet trade (see Figure 18). Its absence in surveys conducted in 2017 and 2018 (Altherr et al. 2020) indicates that the origin of those animals that are presently on sale is illegal.

Adult specimens of freshwater turtles endemic to Brazil are regularly found on sale in Europe, such as the **tuberculate toadhead turtle** (*Mesoclemmys tuberculata*) – in trade often under its former name *Batrachemys tuberculatus*) – see Fig. 19 – and the **Maximilian's snake-headed turtle** (*Hydromedusa maximiliani*).

Tarantulas are regularly smuggled out of Brazil to supply the international pet trade (Fukushima et al. 2020; Caldas et al. 2018). Characterised by remarkable coloured abdominal patterns and a very restricted

geographic range in Brazil, **arboreal tarantulas of the genus *Typhochlaena*** have become increasingly requested (Fukushima et al. 2020). At present, five species of these small arboreal tarantulas have been recognised, of which four were only scientifically described in 2012 (Bertani 2012). At least three species are presently found on sale in Europe: due to its spectacular, turquoise-metallic look the **Brazilian jewel tarantula (*T. seladonia*)**, classified as Endangered on the Brazilian Red List (ICMBio 2022), is the most commonly sold species and has been found on sale for between €79-500 (see Figures 20 & 21). Furthermore, the **redrump jewel tarantula (*T. curumim*)**, classified as Critically Endangered on the Brazilian Red List (ICMBio 2022), and the **pink punk jewel tarantula (*T. costae*)** are also on offer in the European pet trade.

Only recently, an unknown colour pattern, named "*Typhochlaena* sp. *Raposa*", was sold for €1,200 for a single female (see Figure 21). *Typhochlaena amma* and *T. paschoali* were also found on price lists for the European market, at least in 2013 (Aranas Brasilenas 2013).

The **yellow neon goby (*Elacatinus figaro*)**, a species classified as Vulnerable on Brazil's national list of threatened fish species, is one of dozens of nationally protected fish species that are nevertheless commonly sold within Brazil and illegally exported for the international aquarium trade (de Gurjão & da Cruz Lotufo 2018). While several European pet shops have been explicitly offering captive-bred yellow neon gobies, others fail to provide information on sourcing.

4.4 Gonyosoma oxycephalum Borneo CB23

0.0.2 Hynobius nebulosus

3.3 Aparasphenodon bruno

0.0.30 Pachymedusa dactylicolor CB23

2.2 Litoria splendida

0.0.20 Litoria splendida CB23

Fig. 18: Three adult pairs of *Aparasphenodon bruno* on sale for reptile fairs in Hamm (Germany) and Houten (Netherlands). Spanish trader, Dec 2023, terraristik.com.



TYPHOCHLAENA SELADONIA
(BRASILLEN)

€79,00

Fig. 20: *Typhochlaena seladonia*, with Brazil as origin. Website of a German pet trader, Nov 2024.

HAMM / HOUTEN MARCH

3.3 Batrachemys tuberculatus Breeding group

1.5 Hydromedusa maximiliani Breeding group

3.7 Mesoclemmys vanderhaege Breeding group

6.5 Acanthochelys pallidipectoris Breeding group

0.0.300 Acanthochelys spixii CB24

0.0.60 Acanthochelys spixii Double scutes CB23

0.0.100 Hydromedusa tectifera CB24

Fig. 19: Three adult pairs of *Mesoclemmys tuberculata* and six adult *Hydromedusa maximiliani* on sale for reptile fairs in Hamm and Houten. Spanish trader, Feb 2024, terraristik.comfairs in Hamm and Houten, Nov 2022, www.terraristik.com.

Verkaufe Spinnen und Skorpione

Biete für Hamm males females

1.0 *Typhochlaena seladonia* adult 130€

1.0 Y.sooretama 25€

0.1 adult *Typhochlaena* Raposa 1200€

8.5 Fresh adult Iridopelma sp Rosa -110€ per pair

0.1 Theraphosidae sp Oscar 1.5-2ca 200€...

vor 3 Wochen

40211 Dusseldorf

Fig. 21: *Typhochlaena seladonia* and adult *T. sp. Raposa*, both endemic to Brazil. German trader, Nov 2024, terraristik.com.



4. Case Studies Africa

4.1. Ethiopia

National legislation: Since 1957, the Penal Code of Ethiopia has prohibited the exploitation of the country's natural resources, including wild animals. In 2005, this law was replaced by the Criminal Code of Ethiopia. In addition to exploitation, the 2005 law prohibits the possession, collection, transport and export of endemic animals).

Illegal trade: Live reptiles are illegally exported to Europe, Middle East and Asia (Tessema 2017). For example, despite strict national protection, the endemic **Ethiopian mountain adder (*Bitis parviocula*)** has been available in the international pet trade since at least 2001, when it was first recorded for sale in the United States (Wittenberg et al. 2015). During a six-month-survey on the exotic pet trade in Europe, 24 individuals were recorded (Altherr et al. 2020). Recent screenshots confirm the ongoing international trade in this species, with traders from Czech Republic, France, The Netherlands, Sweden, Switzerland and

the USA involved, for prices of €1,200-4,000 per animal (see figures 22–25).

Many animals on sale are marked as “captive bred”, however, in the absence of legal exports these animals can be assumed to be offspring of illegally acquired breeding stocks. Thus far, no official offers for the **Bale Mountains adder (*Bitis harennna*)** have been recorded, but photos of some *B. parviocula* in trade indicate they might be mislabelled *B. harennna*.

With its proposal for a CITES Appendix I listing at CoP20 (Prop. 24) Ethiopia aims to combat the illegal trade in *B. parviocula*, classified by IUCN as Endangered (Spawls 2021), and the even rarer *B. harennna* (see Chapter 8.3.).

Altherr et al. (2020) also recorded **Parker's worm snakes (*Myriopholis parkeri*)** in the EU pet trade, a species that is also endemic to Ethiopia, which also raises doubts about the legality of the animals' origin.

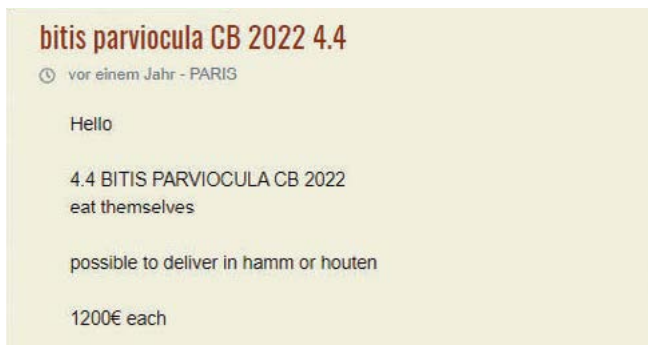


Fig. 22: Four pairs of *Bitis parviocula*, endemic to Ethiopia. Trader from France, July 2022, terraristik.com.

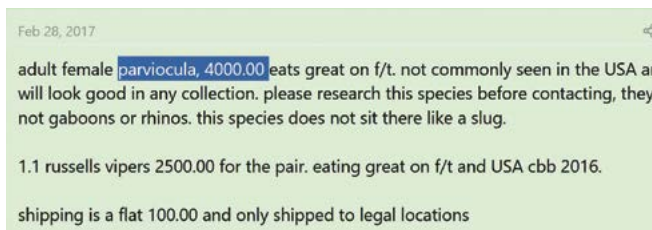


Fig. 24: Adult female *Bitis parviocula*, for US\$4,000. US trader, Feb 2017, Faunaclassifieds.com.

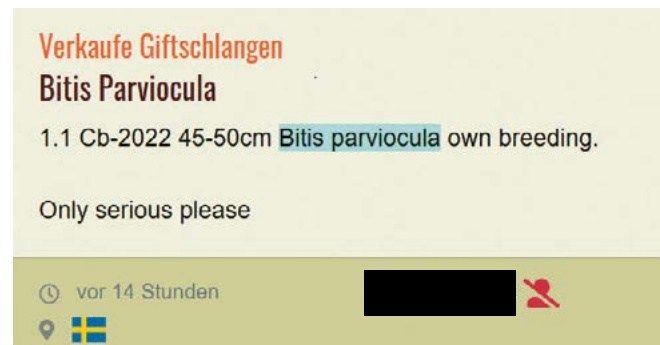


Fig. 23: *B. parviocula*, labeled as “cb”, offered for the reptile fair in Hamm (Germany). Trader from Sweden, Feb 2025, terraristik.com.



Fig. 25: Adult female *B. parviocula*, labeled as “cb”. Trader from The Netherlands, Feb 2023, terraristik.com.

4.2. South Africa



National legislation: The capture of native wild animals in South Africa requires a permit, which may be issued by the relevant province in line with its provincial Nature Conservation Ordinance or Act. At a national level, the National Environmental Management Biodiversity Act (NEMBA) of 2004 specifies which species are protected from hunting, capture and export. However, fragmented, outdated and varying legislation within provinces or states is hampering authorities in their ability to prove illegal activities (Shivambu et al. 2024; Pinnock 2018).

Illegal trade: As already documented in “Stolen Wildlife” III and IV, South Africa’s fauna is regularly targeted by wildlife traffickers to be sold in the international pet trade, including many venomous snakes. Heim (2025) reported the sale of snakes that were illegally collected in areas of South Africa, despite local export prohibitions, e.g. **horned adders** (*Bitis caudalis*).

Other species on sale are endemic to South Africa, such as the **southern adder** (*Bitis armata*), classified as Vulnerable (Maritz & Turner 2022), and the **red adder** (*Bitis rubida*) (see Fig. 26-28).

For several other species that are not endemic, but native to South Africa, traders in Europe indicate their origin by naming specific localities. Especially for **ring-necked spitting cobra** (*Hemachatus haemachatus*) and **dwarf adders** (e.g. *Bitis cornuta*, *B. atropos* and *B. caudalis*), e.g. Elim, Limpopo, Kokstad, Lekkersing, Namaqua, Newcastle, Ruimte, Springbok, and Sutherland (e.g., Fig. 26-29).

Seizures in Europe confirm an ongoing illegal supply of wildlife. For instance, customs officers in Austria seized 87 reptiles and two scorpions native to South Africa in 2023 (BmF 2023).

Bitis spp	
1.1	Bitis cornuta Namaquered cb 15 breeding pair
1.1	Bitis cornuta Namaqua red cb 17
1.2	Bitis cornuta RED cb 19
0.1	Bitis cornuta Springbok cb 19
0.1	Bitis cornuta Bogenfels cb 19
1.2	Bitis armata cb 20
1.1	Bitis cornuta Springbok cb 20
2.2	Bitis cornuta Namaqua Red cb 20
1.3	Bitis cornuta Bogensfeld cb 20
1.2	Bitis armata cb 21
2.2	Bitis cornuta Springbok cb 21
1.1	Bitis cornuta Lekkersing cb 21

Fig. 26: Several adult *Bitis cornuta* referring to several localities in South Africa and for *B. armata*, endemic to South Africa, for sale at reptile fair in Prague (CZ) or Houten (NL). Trader from Slovakia, 2022, terraristik.com.

For Hamm or Snakeday Houten	
vor einem Monat - Kerzers	
Hello	
For Hamm or Snakeday Houten	
2.1	Bitis cornuta Springbok cb 2023
0.0.2	Crotalus pyrrhus TA Mountains cb 2023
1.0	Bitis caudalis Springbok cb 2018 adult
1.1	Bitis rubida Sutherland adult
0.1	Bitis armata Elim cb 2018 adult

Fig. 27: Four different *Bitis* species with localities in South Africa. Trader from Switzerland, Feb 2024, terraristik.com.

Bitis, Atheris for Hamm Expo in September	
vor 4 Tagen - Kirchheim/Neckar	
For Hamm Expo in september:	
0,1	Bitis rubida cb21 450€
0,1	Bitis cornuta cb 19 (South africa) 450€
1,1	Bitis caudalis cb23 (Rosh Pinah Namibia) 700€
0,2	Atheris squamigera cb23 (price see attached pic)
All animals feeding perfect on mice.	
Delivery to Hamm Expo in september possible or pick at	

Fig. 28: Females of *Bitis rubida*, endemic to Western Cape Province in South Africa, and *B. cornuta* from South Africa. German trader, Aug 2024, terraristika.com.

Giftschlangen , Heloderma suspectum cinctum	
vor 3 Wochen - Ludwigshafen	
Wegen Bestandsauflösung gebe ich folgende Tiere ab :	
1.0	Bitis caudalis , Ruimte , adult
0.1	Bitis caudalis , Keetmanshoop, adult
1.2	Bitis atropos , Limpopo , 1.1 adult
1.1	Heloderma suspectum cinctum, adult

Fig. 29: Adult *Bitis caudalis* and *Bitis atropos* on sale, referring to localities in South Africa (Limpopo, Ruimte). German trader, June 2025, terraristika.com.

4.3. Seychelles



National legislation: While the Seychelles have established protected areas, national legislation with regard to the capture of species is unspecific (Bunberry et al. 2021). In response to evidence of international trade in native threatened reptile species, the Seychelles amended their Wild Fauna and Flora Bill in 2020, prohibiting the capture, possession or trade of several endemic threatened species, including bronze geckos (*Ailuronyx* spp.) (Bunbury 2022, Magnan 2021).

Illegal trade: The **giant bronze gecko** (*Ailuronyx trachygaster*) is point-endemic to the Praslin National Park on the island of Praslin, with an estimated area of occupancy of 4 km² and is classified as Critically Endangered on the IUCN Red List (Bunberry et al. 2021). The species has been recorded in the European pet trade since December 2017, when it was offered for sale at the Terraristika in Hamm, Germany, as “the new Ferrari for terraria” for €5,000 per animal (Altherr et al. 2020). It has been praised by reptile traders as “the world’s rarest gecko” (Broghammer 2023) and is a prime target for wildlife traffickers (Global Organised Crime Index 2023). According to the IUCN Red List, demand for the international exotic pet trade is a main threat to the species; the trade has „escalated rapidly” since 2017 (Bunbury et al. 2021) – see also Figures 30 & 31 (even marking specimens openly as F1, i.e. offspring of wild-caught parents). Specimens have been re-exported from Europe to the US, labelled as “captive-bred” (see Figure 32).

While *A. trachygaster* is the most-sold bronze gecko species in the European pet trade, our online screenings also recorded the other two species, the **dwarf bronze gecko (*A. tachyscopaeus*)** and the **Seychelles bronze gecko (*A. seychellensis*)** – see Figures 33 & 34.

1,1 very high end ciliatus Lilly - non Lilly RED
3,3 Ailuronyx tr. adults
 3,3 Chahoua pine island adult
 Auriculatus breeding groups:
 1,2 reticulated super red
 1,1 striped super stripe red on red
 1,3 striped super stripes

Fig. 30: Three adult pairs of *Ailuronyx trachygaster*. Trader from Italy, Nov 2023, terraristik.com.

In August 2024, the genus of *Ailuronyx* spp. was included in CITES Appendix III at the request of the Seychelles (CITES 2024).

Tausche Geckos
Captive bred geckos for trade
 Offering:
 1.1 R. leachianus (Yate) young bonded adults
 1.1 R. leachianus (F2 Mt. Dore) subadult
 1.1 A. **trachygaster** (F1) young bonded adults
 1.0 N. grayii subadult...

vor einem Monat L. 
 3XXXX Niedersachsen 

Fig. 31: Adult pair of *A. trachygaster*, marked as “F1”. Trader from Germany, June 2025, terraristik.com.

Home > Forums > Reptile & Amphibian - Classifieds > Lizards For Sale/Wanted > Geckos >

For Sale 1.1 cb. Seychelles Giant Bronze Geckos. *Ailuronyx trachygaster*.

Member 
 Joined: Feb 14, 2009
 Messages: 531
 Reaction score: 2
 Points: 18
 Location: Pahrump, NV.

Jul 1, 2018

1.1 cb. Seychelles Giant Bronze Geckos. *Ailuronyx trachygaster*. Extremely Rare - Stunning Flawless, Vigorous and Healthy - Bonded young adult Breeding Pair! (female recently laid an egg). This is a rare opportunity as this species will likely never be legally imported into USA again. Serious Inquiries only, Partial trades possibly considered....For Particulars, more pics or to order... mssg to WHYTEARK@GMAIL.COM. \$12,000 pair..

Attachments



Fig. 32: Pair of *A. trachygaster*, labeled as “cb”, priced at US\$12,000, with a hidden hint to the problems of legal origin. US trader, July 2018, faunaclassifieds.com.

Different reptiles for Hamm this saturday.

vor 2 Stunden -

All animals is CB:

0.0.2 Blaesodactylus sakalava
 1.0 Chondrodactylus angulifer angulifer
 1.0 Diplodactylus furcosus
 2.0 Diplodactylus vittatus
 1.1 Lucasium damaeum
 0.0.1 (poss 0.1) Woodworthia brunnea “Big form”
 1.1 Eublepharis macularius fasciolatus F1
 0.1 Rhacodactylus auriculatus “F1, Mt. Koghi”
 2.0 Pseudoceramodactylus khobarensis
0.1 Ailuronyx tachyscopaeus

Fig. 33: Adult female *A. tachyscopaeus*. Trader from Denmark, Sep 2024, terraristik.com.

4.2 Heloderma suspectum cinctum Proven
 2.2 Anolis bombiceps
 1.1 Anolis scypheus
 3.3 Anolis transversalis
 1.1 Polychrus peruvianus Breeding pair
1.0 Ailuronyx seychellensis

Fig. 34: Adult male of *A. seychellensis*. Trader from Spain, Sep 2022, terraristik.com.



5. Case Studies Europe

5.1. North Macedonia

National legislation: As a species classified as Critically Endangered (van Swaay et al. 2009), the **Macedonian grayling (*Pseudochazara cingovskii*)** has been included on the national list of protected species under the National Law of Environmental Protection since 2011. Capture and export of this butterfly species for commercial purposes are prohibited, and collection for scientific purposes is only legal under a given permit.

Illegal trade: The Macedonian grayling is a butterfly exclusively found in a small area in North Macedonia. Despite national protection, the species is illegally collected and traded, and shipments are often declared as “decorative objects” (Doma 2024; Verovnik & Micevski 2012). Specimens are sold in Europe for €18-50, with traders from Belgium, Germany, Ireland, Poland, Spain, and UK involved (see Fig. 35 and 36). Isotope analysis showed that the butterflies offered on the European market include those caught after the implementation of the ban in 2011 (Doma 2024).



Fig. 35: *Pseudochazara cingovskii*, noting Poland as origin. Trader from Ireland, Nov 2024, offer at eBay.ie.

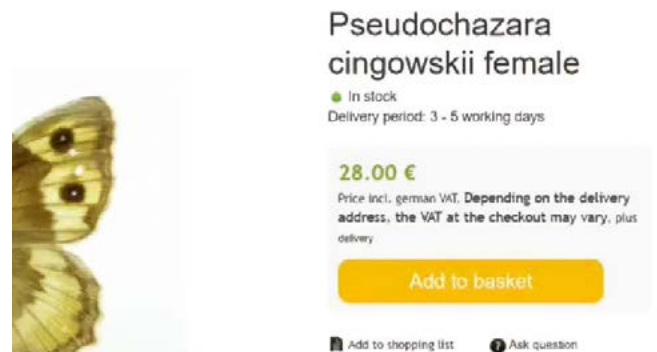


Fig. 36: Female *Pseudochazara cingovskii*. Website of a German trader, July 2023.

5.2. France (New Caledonia)



New Caledonia, an overseas special collectivity of France in the southwest Pacific Ocean, is called “the smallest single biodiversity hotspot in the world” (IUCN 2012), with more than 90 % of its lizards being endemic and 66 % of them being threatened (OFB 2024).

National legislation: All endemic terrestrial reptiles of New Caledonia are legally protected under Code de l’environnement de la Province Nord (Délibération No. 306-2008/APN) and under Code de l’environnement de la Province Sud (Délibération No. 25-2009/APS).

Illegal trade: Collection by poachers is causing an increasing pressure on native lizards (OFB 2024; see also “Stolen Wildlife III” (Altherr & Lameter 2020a)). Smugglers particularly target geckos for the international pet trade, even if they are classified in the IUCN Red List as “Endangered”, e.g. the **Néhoué River mossy gecko** (*Mniarogekko jalu*), the **western chameleon gecko** (*Eurydactylodes occidentalis*) and the **Sauvage’s Bavayia** (*Bavayia sauvagii*), or as “Vulnerable”, such as the **crested gecko** (*Correlophus ciliatus*) (Sadlier et al. 2021a-d). Species on sale also include e.g. the **robust forest Bavayia** (*Bavayia robusta*), **Vileillard’s chameleon gecko** (*Eurydactylodes vieillardii*) and **Bauer’s chameleon gecko** (*Eurydactylodes agricolae*) (see Fig. 37 & 38).

Many online advertisements for New Caledonian geckos in Europe refer to specific localities, such as “Rivière Nehouae”, “Ile Art”, “Nuu Ana”, “Pindai”, “Mt Dore”, “Mt Koghis”, or “Pine Island” (see Fig. 38-40). Some of the geckos are openly offered as “F1”, marking offspring of parental animals illegally caught in the wild (see Fig. 38 & 39).

READY TO BREED EURO EURYDACTYLODES!!!!!!!!!!!!

PREMIUM

vor 40 Minuten - [redacted]

Last call for hamm. Ready to breed this season.

1.1 occidentalis 600€
4.8 vieillardii 3200€
20.20 Agricolae 9000€

Fig. 37: Large numbers of adult *Eurydactylodes* sp., with prices. Trader from Spain, March 23, terraristik.com.

Hello Together, Mniarogekko chahoua Pure Pine Island females availabl

PREMIUM

2 years ago - [redacted] (Ruhr)

Hello Together,
Mniarogekko chahoua Pure Pine Island females available F1-F3.
CB May to June. Picture 1-6. [redacted]
0.1 Mniarogekko jalu F1 available Pure Ile Art Locality CB May

Fig. 38: Adult *Mniarogekko jalu* (“F1”) and *M. chahoua* (some marked as “F1”) from different localities. German trader, Apr 21, terraristik.com.

Hamm, Houten, Nijmegen, Ziva Exotica, Antwerpen, Madrid,

[redacted] - 4d - [redacted]

1.1 Rhacodactylus auriculatus F1 Mt. Koghis French Line cb'21
0.0.2 Rhacodactylus leachianus Nu Ami cb'23
0.0.5 Mniarogekko chahoua Pine Island cb'23
oskroba x Juschka & budy winarto x Juschka
0.0.2 Mniarogekko jalu Ile Art cb'23
0.0.8 Eurydactylodes occidentalis F2 Plage de Poe cb'23
1.4 Bavayia cyclura cb'21/22
1.0.2 Bavayia robusta F1 Mt. Koghis cb'21/23
0.0.4 Bavayia borealis F1 Riviere Nehoué cb'23
0.0.1 Bavayia sauvagii F1 Mt. Koghis cb'23

Fig. 39: Broad range of New Caledonian geckos; with *Rhacodactylus auriculatus*, *Bavayia borealis*, *B. robusta*, and *B. sauvagii* marked as “F1”. German trader, Nov 2023, Facebook group.

Offer Lizards [redacted] 07.09.23 D

3.5 Eurydactylodes occidentalis € 2000,-
3.4.4 Rhacodactylus auriculatus adults € 1900,-
0.0.3 Correlophus ciliatus LillyWhite € 600,- (2× Red, 1x Tricolor)
9.9 Correlophus ciliatus adults € 1800,-
1.1 Mniarogekko chahoua ML € 600,-
4.3 Mniarogekko chahoua PI adults € 2450,- (Red/Green/Pink)
1.1 Rhacodactylus leachianus Nu Ami € 2200,-/pair 2021
0.1 Rhacodactylus leachianus Pine Island € 1200,- 2021

Fig. 40: Adult pairs of several endemic geckos, with noted localities. ML = mainland locality, PI = Pine Island. Trader from the Netherlands, Sep 23, enimalia.com.



6. Case Studies Asia

6.1. Sri Lanka

National legislation: In accordance with the Fauna and Flora Protection Ordinance of Sri Lanka of 1964 (amended in 1993), native reptiles and other wildlife are strictly protected against capture and export for commercial purposes.

Illegal trade: Sri Lanka is a well-known destination for wildlife smugglers (Wickramasinghe 2024, see also Stolen Wildlife reports I (Altherr 2014) and III (Altherr & Lameter 2020a)). In response to the ongoing illegal trade, in 2019 Sri Lanka successfully proposed the inclusion of several agamid lizards in CITES App. I and App. II with a zero quota for wild-caught specimens at CITES CoP18. However, at that time, the EU opposed a proposal for the App. I listing of the **black-cheek lizard** (*Calotes nigrilabris*) and **Pethiyagoda's crestless lizard** (*C. pethiyagodai*), which are both classified as Endangered (Jayasekara et al. 2021; Amarasinghe et al. 2021). In response, Sri Lanka requested the App. III listing of all seven endemic *Calotes* species via CITES Notification 2020/068, which came into force

in February 2021. However, poaching incidents are ongoing, as, for example, indicated by the recent adverts from a Spanish trader for large numbers of *C. pethiyagodai* and *C. nigrilabris*, as adults and offspring (see Fig. 41).

Other species currently traded in Europe, which are nationally protected in Sri Lanka but not CITES-listed, include the **northern Sri Lanka gecko** (*Cyrtodactylus yakhuna*), the **spotted bow-finger gecko** (*Cyrtodactylus triedrus*), the **Wiegmann's agama** (*Otocryptis wiegmanni*), the **Ceylon pit viper** (*Craspedocephalus* [= *Trimeresurus*] *trigonocephalus*), and the **Sri Lanka cat snake** (*Boiga ceylonensis*), all species are endemic to Sri Lanka (see Fig. 42-44). Some are also offered in Canada as imported "captive-bred" (CB) animals from Europe (see Fig. 43).

It is noted that poaching is not limited to reptiles, but also targets invertebrates as illustrated by two recent seizures in Sri Lanka (see Chapter 8.1).

Both blue line (Female missing a little tail)

2.2 Calotes pethiyagodai CBB25

1.1 Calotes pethiyagodai CBB25 Very special colour

3.5 Calotes pethiyagodai Breeding group

7.12 Calotes nigrilabris CBB25

1.1 Calotes nigrilabris CBB25 Red Stripe

1.1 Calotes nigrilabris CBB25 Red Stripe & High white banded

2.4 Calotes nigrilabris Breeding group High banded & Red banded stripe

1.1 Calotes jerdoni

10.0 Calotes mystaceus

2.2 Anolis transversalis

Fig. 41: Large numbers of *Calotes pethiyagodai* and *C. nigrilabris* (adults and offspring), on sale for the reptile fair in Hamm (Germany). Spanish trader, May 2025, terraristik.com.

NON-CITES Costs include EU to me(Toronto), USA export is extra -(includes USFW inspection, paperwork and shipping PER buyer)

Boxes up to 19 x 10 x 8" = \$230USD

20 x 15 x 9" = \$245USD

19 x 14 x 13" = \$266USD

26 x 20 x 10" = \$339USD

30 x 16 x 10" = \$323USD

Cheaper shipping option to USA possible for 2 heads or less, but longer transit time.

****Canadians, please note costs will be different (even if converted) due to different courier fees involved. Do not base off this list***

-Photos are all stock image from me or the breeder. A few off google-

5,5 Geckoella yakhuna \$1,500/ pair

x,x Geckoella nebulosa \$550/ pair

0,0,1 Oedura fimbria babies \$565/each

0,0,x Oedura monilis \$135/each

5 Lepidophyma smithi \$400/ each

Fig. 43: Five pairs of adult *Cyrtodactylus yakhuna*, offered as "CB" export from Europe. Website of a Canadian trader, July 2023.

Verkaufe Geckos September HAMM .

Geckos for HAMM

- 0.0.X Hemidactylus imbricatus CB24
- 1.1 Geckoella (Cyrtodactylus) yakhuna CB23
- 2.0 Geckoella (Cyrtodactylus) triedrus CB23
- 0.0.2 Geckoella (Cyrtodactylus) deccanensis CB24...

vor einem Monat

Fig. 42: *Cyrtodactylus yakhuna* and *C. triedrus* on sale for the reptile fair in Hamm (Germany). Trader from Afghanistan, July 2024, terraristik.com.

Boiga ~ Drymarchon ~ Anolis ~ Spilotes ~ Gonyosoma

PREMIUM

vor 21 Stunden - Castellon

HAMM

- 8.8 Anolis cristatellus
- 4.4 Anolis roquet summus Morne Rouge
- 1.1 Anolis roquet roquet La Cherry
- 3.3 Anolis allogus
- 1.1 Anolis grahami
- 1.1 Anolis bahorucoensis
- 2.4 Anolis marmoratus Black dots
- 0.0.20 Anolis allisoni
- 5.5 Otocryptis wiegmanni
- 0.0.6 Polychrus peruvianus

Fig. 44: Five pairs of adult *Otocryptis wiegmanni*, on sale for the reptile fair in Hamm (Germany). Spanish trader, Dec 2023, terraristik.com.

6.2. Malaysia



National legislation: The First Schedule of Peninsular Malaysia's Wildlife Conservation Act (WCA) 716 of 2010 lists species of "protected wildlife", the Second Schedule species of "totally protected wildlife". Hunting, taking, keeping, carrying, importing, exporting or re-exporting species in the First Schedule is only allowed under licence; for Second Schedule species such activities are only permitted under special permits.

The states of Sarawak and Sabah in Malaysian Borneo have their own wildlife legislation. In Sarawak, the Wild Life Protection Ordinance 1998 and in Sabah, the Wildlife Conservation Enactment 1997 classify species as either "totally protected" (subject to the strictest permit requirements) or "protected" (allowed under licence).

Illegal trade: Illegal trade in reptiles is substantial and some illegally collected reptiles are laundered through "reptile farms" or other facilities, and labelled as captive-bred (cb) prior to marketing (Idris 2019). However, poaching of wildlife is not limited to vertebrates.

In 2019, a **new tarantula species with blue legs** (*Birupes simoroxigorum*), endemic to Sarawak, Malaysia, was exported to Europe without the appropriate export permits (Law 2019). The species is presently marketed for €30-90 (see Fig. 45).

The **Malaysian purple-femur tarantula (*Coremiocnemis hoggi*)** is limited to a small area in Peninsular Malaysia's highland and this genus is protected under the WCA's First Schedule. The wild population has plummeted due to poaching for the international pet trade, with collectors destroying microhabitats (Ribbit 2017). Traders in Europe praise these species as "very rare offerings" and occasionally animals are openly offered as "F1" generation, i.e. offspring of wild-caught parents (see Fig. 46-47).

Similarly, the **trapdoor spider (*Liphistius malayanus*)** is endemic to western-central Peninsular Malaysia and, while not yet formally classified in the IUCN Red

List, it was considered by an IUCN analysis as Endangered (IUCN 2022). The species is nationally protected under the First Schedule of the WCA 716 (2010). However, it has been intensively poached to satisfy the demand of the international pet trade and local populations have already declined (Ribbit 2017). According to hobbyists, "almost all *Liphistius* species that were brought into the hobby are wild caught" (Arachnobords 2024). Adult females of *L. malayanus* have been found on sale in Europe and the US (labelled as "wild-caught") for ~ €80 and US\$100 per animal, respectively (see Fig. 47-48).

Offers for Weinstadt 03/05/25 (no shipping) - females & males

Females:

- 0.1 *Birupes simoroxigorum* , adult : 90€
- 0.2 *Caribena laeta* , adult : 40€
- 0.1 *Coremiocnemis* sp Sarawak , adult : 70€
- 0.1 *Pamphobeteus aff petersi* , 6cm BL : 90€...

vor einem Monat

59263 Houplin Ancoisne

Fig. 45: Adult female of *Birupes simoroxigorum*, for trade event in Weinstadt, Germany. French trader, May 2025, terraristik.com.

Ch. cyaneopubescens 4. zv. = 14€

C. cyaneus 1. zv. = 24€

!!! COREMIOCNEMIS HOGGI (F1 gen.) 3. zv. = 50€ !!!

!!! COREMIOCNEMIS sp. FRASERS HILL 1. zv. = 88€ - FIRST CAPTIVE BREED IN THE WORLD !!!

C. SCHMARDAE 2.-3. zv. = 14€

C. aueri 4. zv. = 15€

C. LEETZI 1. zv. = 12€

C. perezilesi 4. zv. = 14€

Fig. 46: Nationally protected *Coremiocnemis hoggi*, labeled as "F1", and an unspecified *Coremiocnemis* species with locality in Malaysia, offered as "first captive breed in the world". Czech trader, Aug 2025, terraristik.com.

Biete Spinnen und Skorpione

BLACK FRIDAY! SPECIAL OFFER: Spiders for Hamm show in March 03/2025

vor 3 Monaten - Prague

I can do special offer for Hamm show:

- 0,0,20 *Coremiocnemis hoggi* 1.Fh - 300€
- 0,0,40 *Coremiocnemis hoggi* 1.Fh - 480€
- 0,0,60 *Coremiocnemis hoggi* 1.Fh - 600€
- 0,1 *Coremiocnemis hoggi* adult 90€
- 4x *Liphistius malayanus* adult female 1x 80€, 4x 220€
- 0,0,5 *Liphistius ornatus* 3. - 4. Fh 1x 18€, 5x 75€
- 0,1 *Heterothele gabonensis* 40€
- 0,0,3 *Heterothele gabonensis* 5.Fh 10€ each
- 0,1 *Ornithoctoninae* sp. Kbal Spean adult 100€

Fig. 47: Four adult females of *Liphistius malayanus*, for the reptile trade fair in Hamm (Germany). Czech trader, Feb 2025, terraristik.com.

Black Armored Trapdoor Spiders (*Liphistius* Cf. *Jarujien/malayanus*)

Trapdoor Spiders Subadult
(2 available)

\$100.00

Inquire to Buy

Origin: Wild Caught

Diet:

Fig. 48: Two sub-adult *L. malayanus*, marked as wild-caught. US trader, May 2025, morphmarket.com.

6.3. The Philippines



National legislation: The Wildlife Act of 2001 (Republic Act No. 9147) provides legal protection from trade to all native and non-native species in the Philippines. Capture and export of wild species are only allowed under a permit.

ORPHNAECUS PHILIPPINUS „PHILIPPINE TANGERINE TARANTULA“

€13,50

inkl. 19 % MwSt. zzgl. Versandkosten
10 vorrätig

Fig. 49: Offer for *O. philippinus* (10 individuals in stock), Website of a trader from Germany, June 2025.

Illegal trade: Despite the existing national regulatory safeguards, covert illegal wildlife trade is widespread (Heinrich et al. 2022, 2021; Sy 2018; Canlas et al. 2017). The Philippines already featured as a case study in the Stolen Wildlife reports II & IV (Altherr et al. 2016, 2022) with a focus on reptiles.

A new study by Raymundo et al. (2025) now shines a light on the illegal capture and export of live tarantulas, especially those that are endemic and highly localised in distribution. This includes the **mayon tarantula** (*Orphnaecus pellitus*), endemic to the Luzon Islands, the **Philippine orange tarantula** (*Selenobrachys* [= *Orphnaecus*] *philippinus*), endemic to Negros Island (see Fig. 49), the **Palawan blue dwarf tarantula** (*Phlogiellus johnreylazoi*) and a new, not yet described species from Panay Island, offered as "*Orphnaecus* sp. – **Blue Panay**". These species are also available in the European pet trade (see Fig. 50).

ORPHNAECUS SP. BLUE PANAY

€15,00

inkl. 19 % MwSt. zzgl. Versandkosten
1 vorrätig

Fig. 50: *Orphnaecus* sp. "blue Panay". Website of a trader from Germany, June 2025.

6.4. Thailand



National legislation: According to Section 23 of the Wild Animal Preservation and Protection Act (WARPA) of 1992, amended in 2019, the export of native wild animals that are on a list of protected species (e.g. 13 species of *Cyrtodactylus*) is only legal under a permit. Section 36 prohibits harvesting in protected areas.

The export of live snakes was prohibited from 1999 to April 2025 (Wipatayotin 2025).

Illegal trade: Published reports on trade in illegally sourced wildlife from Thailand have thus far focused on CITES-listed species (e.g. Panter & White 2020, Todd 2011). However, other native species are also increasingly being smuggled out of the country (Siriwat et al. 2019).

For instance, the **Sam Roi Yot leaf-toed gecko** (*Dixonius kaweesaki*) described only in 2017 and classified by IUCN as Critically Endangered (Cota et al. 2018), is increasingly being found in the exotic pet trade (see Fig. 51). The species is micro-endemic to Khao Sam Roi Yot National Park and all captures are illegal. Similarly, online offers for the **Vogel's pit viper** (*Trimeresurus vogeli*) with Khao Yai National Park as reported

locality also indicate that the origin of these snakes or their founder stock is illegal (see Fig 52).

For several species their recent Red List classification as Critically Endangered, Endangered or Vulnerable makes the issuance of permits for legal export highly unlikely, although they are not yet explicitly listed in WARPA. For example, the **Phuket bent-toed gecko** (*Cyrtodactylus phuketensis*) (see Fig. 53), described in 2012, is micro-endemic to Phuket Island and classified as Endangered since 2018 (Sumontha et al. 2018).

The **Saraburi bent-toed gecko** (*Cyrtodactylus chanhomae*) (see Fig. 53) and the point-endemic **Lauhachinda's Cave Gecko** (*Gekko lauhachindai*) are both classified as Critically Endangered, due to a distribution area of around or even less than 10 km

(Sumontha 2018; Sumontha & Cota 2018). The two species were recorded in the European pet trade for the first time in 2018 (Altherr et al. 2020).

The micro-endemic **starry tokay gecko** (*Gekko pradapdao*), not yet assessed by the IUCN Red List, was only described in 2021 and appeared on the European pet trade market shortly afterwards. Online ads in other jurisdictions, such as the US, seem to suggest that the EU is being used to 'launder' specimens of this species and circumvent the Lacey Act. Similarly, the **Lopburi bent-toed gecko** (*Cyrtodactylus panitvongi*), micro-endemic to a cave, was only described in September 2024 and has been available in Europe since at least April 2025 (see Fig. 54).



Fig. 51: Four adult pairs of *Dixonius kaweesaki*, point-endemic to the Sam Roi Yot National Park. Trader from Germany, Apr 2024, terraristik.com.



Fig. 52: Pair of adult *Trimeresurus vogeli*, with reference to Khao Yai National Park. German trader, Apr 2024, terraristik.com.

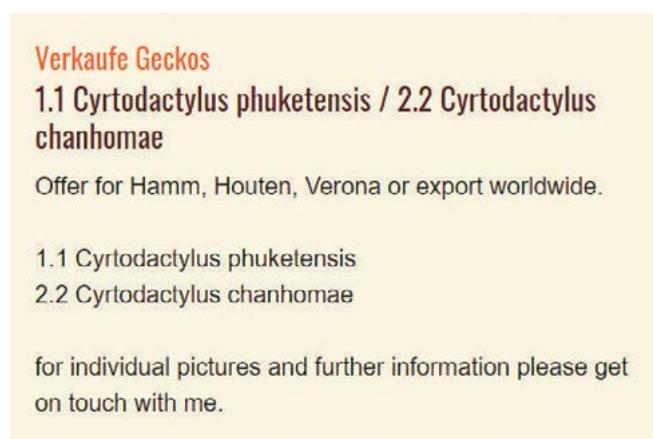


Fig. 53: Adult pairs of *Cyrtodactylus phuketensis* and *C. chanhomae* on sale for reptile fairs in Germany, Netherlands and Italy or global export. German trader, Apr 2024. terraristik.com.



Fig. 54: First recorded offer for *Cyrtodactylus panitvongi* in Europe. Trader from Germany, May 25, terraristik.com.

6.5. Japan



National legislation: Japan has no general national protection status for its native wildlife but several species are protected as a “national natural monument” under the Law for the Protection of Cultural Properties (Act No. 214 of May 1950) or under the Law for the Conservation of Endangered Species of Wild Fauna and Flora (LCES, Act. No. 75 of 5 June 1992).

Illegal trade: Several nationally protected species from Japan have been documented in the international pet trade (Janssen & Shepherd 2019) – see also “Stolen Wildlife” I and III (Altherr 2024, Altherr & Lameter 2020a). Trade as exotic pets was identified as a particular threat to a wide-range of endemic reptiles

and amphibians from the Nansei Islands (TRAFFIC 2018).

In reaction to ongoing poaching Japan in 2020, for the first time, submitted the request to the CITES Secretariat to list six endemic gecko species of the genus *Goniurosaurus* and the Anderson’s newt (*Echinotriton andersoni*) in CITES Appendix III (Ministry of the Environment 2021).

Although nationally protected by LCES and classified as Endangered (Kidera & Ota 2017a), the **Miyako grass lizard (*Takydromus toyamai*)** is increasingly being found on sale abroad, with Europe being a main market (Janssen & Shepherd 2019). We recorded the species on the European market for the first time in 2018 (Altherr et al. 2020).

The **Sakishima grass lizard (*Takydromus dorsalis*)** is endemic to Japan’s Yaeyama Islands. While it is not covered by specific national legislation most of its range corresponds to the Iriomote Ishigaki National Park (Kidera & Ota 2017b) and captures would be illegal. The species, classified as Endangered (Kidera & Ota 2017b), is nonetheless regularly found on sale in Europe (see Fig. 55).

Even species, which are protected as national monuments and already listed in CITES App. III, are still found on sale in Europe, e.g. *Goniurosaurus orientalis*, *G. yamashinae* and *G. toyamai* (see Fig. 56).

2.2 *Anolis mestrei*
 1.1 *Anolis sagrei* Red
 2.0 *Anolis semilineatus*
 1.1 *Chamaeleolis barbatus* Red Throat
 1.1 *Chlamydosaurus kingii*
 1.1 *Crotaphytus collaris* Wichita Mountains
 0.0.2 *Ctenosaura pectinata* Pied High White
 0.4.X *Laemancus longipes*
 2.4.X *Takydromus dorsalis*
 4.4 *Thamnophis eques cuitzeoensis*

Fig. 55: Adult animals and unknown number of offspring of *Takydromus dorsalis* on sale for the reptile fair in Houten (Netherlands). Trader from The Netherlands, May 2025, terraristik.com.

Eublepharis & Goniurosaurus for Houten

🕒 vor 2 Wochen - Budapest

I have offsprings from the last year:

0,4 *E. macularius afghanicus*

0,3 *E. macularius montanus*

1,1 *E. angramainyu* "Ilam"

1,3 *G. orientalis*

3,3 *G. yamashinae*

3,3 *G. toyamai*

Fig. 56: *Goniurosaurus orientalis*, *G. yamashinae* and *G. toyamai* (all listed in CITES App. III) on sale for the reptile fair in Houten, The Netherlands. Trader from Hungary, May 2025, terraristik.com.



7. Case Studies Oceania

Australia

National legislation: The export of live native mammals, birds, reptiles and amphibians for commercial purposes is prohibited (DOE 2024) in accordance with the Environment Protection and Biodiversity Conservation Act 1999, which came into force in July 2000 and replaced the Wildlife Protection Act 1982 that prohibited the export of native wildlife without a permit.

Illegal trade: Australia's unique herpetofauna is a well-known target for animal smugglers, who satisfy a persistent demand in both Europe and Asia for Australia's protected species as exotic pets (e.g. Chekunov et al. 2024; Brown et al. 2023; Altherr et al. 2019) – see also Stolen Wildlife I, II and III (Altherr 2014, Altherr et al. 2016, Altherr & Lameter 2020). For instance, the **Kimberley death adder** (*Acanthophis cryptamydros*), a species endemic to NW Australia, only described in 2015 and classified as Vulnerable (Cogger et al. 2017), has been on sale in the European pet trade since at least 2018, which indicates illegal capture and export (Altherr & Lameter 2020a).

Media reports confirm the ongoing illegal trade. At the turn of 2023/2024, for example, more than 250 lizards and snakes were confiscated and four people arrested (Stonehouse 2024). In January 2025, six rare snakes with an estimated potential street value of up

to AUD 50,000 each were seized in Queensland and were returned to the wild (Byrne 2025).

Despite Australia's strict export ban, Chekunov et al. (2024) identified 170 endemic herpetofauna (163 reptile and 7 amphibian) species in international trade, 33 of which had not been previously recorded in the international market.

In 2022, Australia requested the inclusion of 127 endemic lizard species in CITES App. III. However, international trade for the **border thick-tailed gecko** (*Uvidicolus sphyrurus*) and several species of ***Strophurus***, ***Nephrurus***, ***Egernia***, ***Tiliqua*** and ***Phyllurus*** continued, with large numbers of adult animals on sale (see Figures 57-58).

Other nationally protected Australian species in trade are not yet covered by CITES App. III, e.g. **ocellated velvet gecko** (*Oedura monilis*), **northern velvet gecko** (*Oedura castelnaui*), the **magnificent tree frog** (*Litoria splendida*), several species of **stone geckos** (*Diplodactylus* sp.), **Bynoe's gecko** (*Heteronotia binoei*) and **beaded gecko** (*Lucasium damaeum*) (see Figures 59-62).

Our recent screening on European online platforms revealed many species on offer that indicate ongoing

poaching events. In May 2025, we found a Czech trader offering “large quantities” of a broad variety of reptile species, among them – within the section marked as “WC” (wild-caught) – three different species that are endemic to Australia, including the **Mount Elliot broad-tailed gecko (*Phyllurus amnicola*)** (see Fig. 58).

In view of the ongoing illegal trade, Australia submitted proposals for CITES CoP20 to transfer *Ph. amnicola*

and the **ringed thin-tail gecko (*Ph. caudiannulatus*)** from App. III to App. II (see Chapter 8.3). The species is offered in Europe for ~ €500-800/animal and in North America for ~ USD 2,000/pair. Both species would even qualify for the CITES App. I.

It is noted that poaching is not limited to reptiles, but also targets invertebrates as illustrated by two recent seizures in Sri Lanka (see Chapter 8.1).

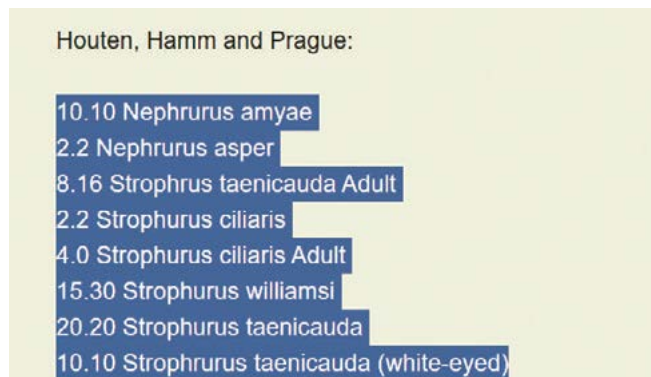


Fig. 57: Dozens of adult pairs of different *Strophurus* species, *Nephurus amya* and *N. asper*. Czech trader, Jan 2024, terraristik.com.

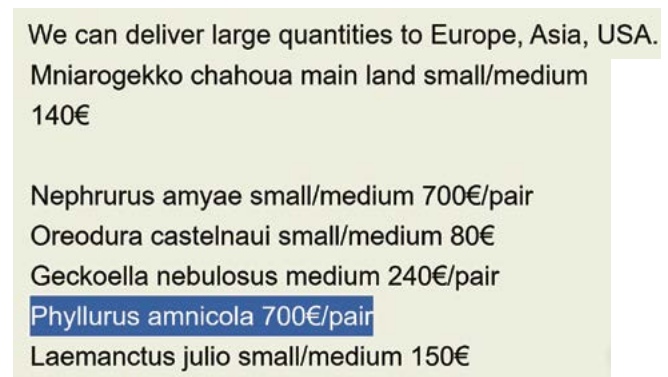


Fig. 58: Pairs of *Phyllurus amnicola* for €700/pair – “We can deliver large quantities”. Trader from Czech Republic, Jan 2025, terraristik.com.



Fig. 59: Adult *Oedura monilis* and *Oedura castelnaui*. German trader, June 2024, terraristik.com.

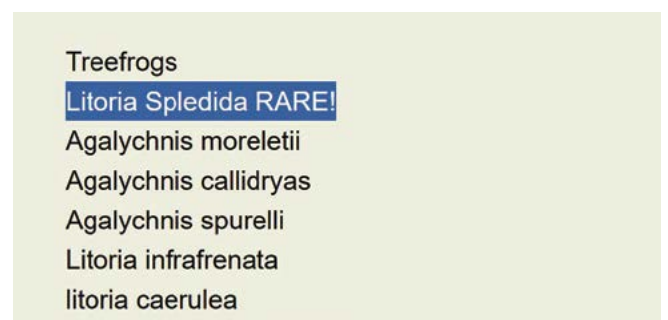


Fig. 60: Unknown number of *Litoria splendida*, highlighted as “rare”. Dutch amphibian trader, Feb 2024, terraristik.com.

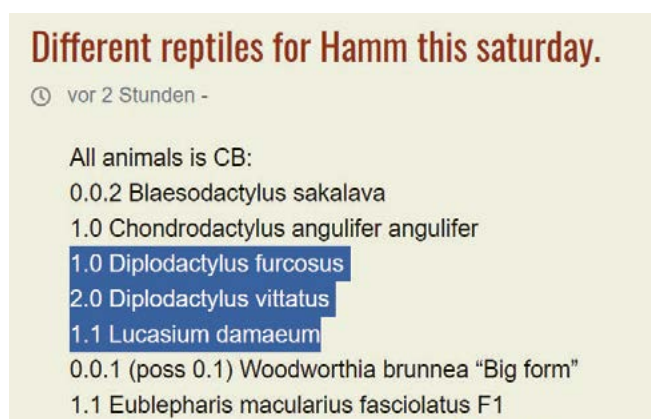


Fig. 61: Three different lizard species endemic to Australia (*Diplodactylus furcosus*, *D. vittatus* and *Lucasium damaeum*). Trader from Denmark, Sep 24, terraristik.com.



Fig. 62: Different lizards, all adult and endemic to Australia, either non-CITES (highlighted) or CITES App. III. RTB = “ready to breed”. Trader from Italy, 2021, terraristik.com.



8. Measures by Range States

8.1. National legislation and enforcement

When other countries allow the importation of species whose offtake and trade are prohibited in their country of origin, they facilitate and are complicit in wildlife trafficking. The following recent seizures and arrests in range states casts a spotlight on Europe's key role in this type of wildlife crime:

- In December 2020, customs seized 80 live cobras and vipers in **Cameroon** that were destined for Europe (AFP 2020).
- In January 2022, three Russian nationals were fined in **Sri Lanka** a record Rs8.5 Mio (~ €24,200) for illegally collecting 529 animals and hundreds of plants in protected areas (Sunday Times 2022).
- In June 2023, three **Kenyan** nationals were charged with attempting to smuggle giant harvester ants (*Messor cephalotes*) to China and France (Nyandoro 2023).
- In May 2024, a **US** citizen was sentenced to one year in prison and a \$10,000 fine after being found guilty of illegally exporting thousands of turtles over years to Germany and Hong Kong and passing them off as captive-bred on forged documents (US DoJ 2024a,b). At the center of his smuggling activities were three-striped mud turtles (*Kinosternon baurii*, see photo) and Florida mud turtles (*Kinosternon steindachneri*) (US DoJ 2024a). Both species were included in CITES App. II as late as the end of 2022.
- In August 2024, wildlife authorities in **Sri Lanka** arrested two Russian nationals with almost 200 endangered and endemic amphibians and reptiles in their luggage (DWC 2024a). The animals were likely destined to be sold at Europe's largest reptile fair in Hamm, Germany (Wickramasinghe 2024).
- In May 2024, authorities in **Sri Lanka** arrested two Italian nationals for catching 285 butterflies, dragonflies, beetles, and other insects in the Yaya National Park and attempting to smuggle them to Italy (Adaderana 2024; DWC 2024b). In September 2024, they were fined 60 million Sri Lankan rupees (US\$200,000) (Ng 2024).
- In February 2025, the **Kenyan** wildlife authorities arrested two Belgian nationals, with around 5,000 live queen ants, including *Messor cephalotes*, stored in test tubes (KWS 2025; Raman 2025). The giant harvester ant, lauded as "one of the most beautiful ant species in Africa", is highly sought-after in the European pet trade and queens are on sale for ~ €229 (Fourmiculture 2025).

- In May 2025, 284 live reptiles, which were destined for smuggling to Spain, were seized in **Honduras**: Among them 158 Honduran spiny lizards (*Sceloporus hondurensis*), nationally protected in their sole range state Honduras (Canal Ocho 2025).



- In May 2025, a **Mexican** citizen linked to Spain was arrested in Mexico city, with 299 reptiles – one third of them being nationally, but not CITES-protected species. The man had also organised a shipment seized in February 2025 (for details see Chapter 3.1.).
- In June 2025, more than 3,400 live Meso-American sliders (*Trachemys venusta*) were seized in **Mexico** (Gobierno de Mexico 2025c).

However, it must be assumed that such seizures and arrests are only the tip of the iceberg and the actual number of unrecorded cases is much higher.

8.2. Recent CITES Appendix III listings

- In March 2022, Australia formally requested a CITES Appendix III listing of more than 120 endemic lizard species (CITES Notification No. 2022/0219).
- In August 2024, by CITES Notification No. 2024/094 the Seychelles initiated an Appendix III listing of its endemic genus of bronze geckos (*Ailunoryx* spp.).
- In April 2025, the European Union proposed the inclusion of the Tenerife lizard (*Gallotia galloti*) in CITES Appendix III – a species endemic to the Spanish Canary Islands (European Commission 2025).



8.3. Listing proposals for CITES CoP20

- Prop. 19 by the Dominican Republic: Listing of Haitian giant galliwasp (*Caribicus warreni*) in App. I.
- Prop. 22 and Prop. 23 by Ecuador: Transfer of all Galapagos marine and land iguanas (*Amblyrhynchus* spp. and *Conolophus* spp.) from App. II to App. I.
- Prop. 24 by Ethiopia: Listing of Ethiopian mountain adder (*Bitis parviocula*) and Bale Mountains adder (*B. harena*) in App. I.
- Prop. 25 by Mexico: Inclusion of all rattlesnakes (*Crotalus* spp. and *Sistrurus* spp.) in App. II.
- Prop. 38 by Bolivia: Listing of 15 South American tarantula species in App. I.



9. Legal Solutions for the EU

9.1. Current legal framework and its limitations

The trade in protected species of wild fauna and flora is presently regulated in the European Union in the framework of Council Regulation (EC) No. 338/97 and its implementing Regulations. These Wildlife Trade Regulations set down the provisions for the import, (re)export and internal trade in the species listed in the legislation's four Annexes. This is also the legislation through which the provisions of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) are implemented in the EU.

The vast majority of species listed in the EU Wildlife Trade Regulations Annexes are those included under CITES. Some non-CITES species are also listed for consistency with legal protections for native species provided under the EU Nature Directives and the EU Regulation on Invasive Alien Species. However, only a small fraction of the species sold across Europe is covered by the EU Wildlife Trade Regulations. Currently, of all extant described species, only 10.5 % of amphibians, birds, mammals and reptiles are CITES-listed (Watters et al. 2022).

While CITES-listed species are protected in the EU, the current framework remains insufficient to prevent and combat wildlife trafficking. For example, new species

may only be added to the CITES Appendices every two to three years during the Conference of the Parties meetings (CoPs). During these meetings, the protection status of species can be upgraded, downgraded, or removed altogether.

The process of getting species listed on CITES is extremely protracted given the length of time between CoPs. The chances of listings are dependent also on sufficient scientific data on the species' conservation (something many countries lack due to inefficient data collection and resources) and its trade being available and/or accepted by a majority of Parties (adoption requires a two-thirds majority of those Parties voting). A species being proposed by a range state for greater protection in terms of international trade does not necessarily mean that it will be granted listing on CITES Appendices I (commercial international trade ban) or II (international trade restrictions) – as economic or political interests often impede the needed majorities to get these proposals approved.

While CITES remains an essential international tool, it alone is not sufficient to address illegal trade in all protected species, making complementary legislation necessary – particularly for species targeted by the extremely dynamic exotic pet trade and in jurisdictions with high trade volumes such as the EU.

9.2. Loopholes in the EU Wildlife Trade Framework

Despite EU citizens playing a significant role in buying and trafficking protected species, the current EU Wildlife Trade Regulations do not fully address this issue.

Most species that are nationally protected, but not listed under CITES, can still be legally imported, exported, kept and traded within the EU. EU consumers should be able to trust that any animal they purchase has been legally sourced, but at present, that assurance is lacking.

While range states can request the listing of their nationally protected species on CITES Appendix III without the consent of other Parties (Appendix III is a unilateral listing), current EU legislation neither prohibits nor imposes penalties for the sale, purchase, and ownership of illegally sourced animals listed on CITES Appendix III. Only illegal imports into or exports from the EU can be sanctioned. Since such illegally sourced animals are smuggled out of their country of origin, imports into the EU are generally neither declared nor recorded, and there are no sanctions for post-import activities.

Further, the list-based system used by CITES is ineffective for this problem as many countries have decided to nationally protect all of their native wildlife, making it impractical and burdensome to list individual species.

In short, aside from Malta (see Chapter 9.4), there are no sanctions or penalties in the EU for trading in domestically protected species taken in violation of the national legislation, which has allowed the EU to become a major hub for this criminal activity.

This illegal trade can have a devastating impact on animal populations and biodiversity elsewhere in the world, and it undermines the conservation and management efforts of range States. Native populations of wildlife are being decimated to meet the demand in Europe.

A recent study indicates that the EU is also among the main (re)exporters of live wild-caught non-CITES-listed reptile and amphibian species into the US, the largest trader of wildlife and wildlife products worldwide in terms of monetary value (Watters et al. 2022). The same study indicates that the US increasingly imports non-CITES species, with 3.6 times the number of non-CITES species compared with CITES-listed

species. 376 of these unlisted species face conversation threats. Since the trade in non-CITES species is not monitored in Europe, similar data are not available in the EU, but the case studies exposed by this report suggest an equally worrying trend, which is confirmed by recent EUROPOL reports (EUROPOL 2022, 2025).

Some traffickers prefer to collect animals during their breeding season, which enables them to offer “captive-bred” offspring shortly afterwards (Truscott 2025; Altherr et al. 2022). The EU Guidance on live animals bred in captivity under EU Wildlife Trade Regulations raises related concerns regarding the laundering of wild-caught animals as “captive-bred” and the use of illegally acquired animals in captive-breeding operations (EU Commission Notice 2022/C 306/02). Several experts, such as Janssen & Leupen (2019); Janssen & de Silva (2019); Auliya et al. (2016), even warn that the EU is being used to ‘launder’ animals illegally captured in their country of origin by re-exporting them to the US as ‘captive-bred’ in order to circumvent the US Lacey Act (see 9.3.).

9.3. Legislation in other countries

US Lacey Act

One of the first countries to extend criminal protection to non-CITES species was the US with what is commonly referred to as the Lacey Act. The law was amended in 1981 and 2008 to include a prohibition of wildlife taken in violation of any foreign law. The US Lacey Act consists of three key legal measures: criminalising illegal taking of wildlife in the country of origin, duty of care and import declarations.

The main criminal provision is expansive, covering almost all stages of trade: ***“it is unlawful for any person [...] to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce [...] any fish or wildlife taken, possessed, transported, or sold in violation of any law or regulation of any State or in violation of any foreign law [...]”*** Lacey Act, 16 U.S.C. § 3372.

Australia

In Australia, the Environment Protection and Biodiversity Conservation Act **prohibits importing a specimen contrary to the corresponding laws of a foreign country**. While the legislation does not criminalise all stages of trade like the Lacey Act, it does appear to prohibit the possession or progeny of such species.

Canada

The Wild Animal and Plant Protection and Regulation of International and Interprovincial Trade Act, Section 6(1) states ***“No person shall import into Canada any animal or plant that was taken, or any animal or plant, or any part or derivative of an animal or plant, that was possessed, distributed or transported in contravention of any law of any foreign state.”***

9.4. Existing EU Legislation on illegally sourced goods

EU Regulation on Cultural Goods

Regulation (EU) 2019/880 of the European Parliament and the Council of 17 April 2019 on the introduction and the import of cultural goods implements legal language similar to the US Lacey Act (see 9.4) but for the purposes of protecting foreign nations’ cultural artifacts. Article 3(1) states, *“The introduction of cultural goods referred to in Part A of the Annex which were removed from the territory of the country where they were created or discovered in breach of the laws and regulations of that country shall be prohibited”*.

An import licence or importer statement is required to import goods and the statement includes a signed declaration that the goods were created or discovered in compliance with the laws and regulations of the source country at the time of export. This statement requires the applicant assumes responsibility for the veracity of all statements and ensures they exercised due diligence. This is similar to the Lacey Act and it is this provision, under which traffickers are predominantly charged.

The implementation of this Regulation is of particular interest when considering the prohibition of the trade in illegally sourced wildlife, because it sets a roadmap for how these laws can work within a Member State’s legal and constitutional framework. It further provides useful examples on how to reduce the burden on enforcement authorities.

EU Deforestation Regulation

The EU Deforestation Regulation (EUDR), which replaces the current Timber Regulation and will be fully in effect by June 2026, requires traders importing certain products, such as wood from third countries, to carry out a risk assessment to establish if there is a risk associated with the products including violations of legislation of the country of origin. This also implements

a due diligence system similar to the US Lacey Act and the EU Regulation on Cultural Goods, thereby placing the burden primarily on importers and traders to ensure goods have been legally obtained.

Malta’s Trade in Species of Fauna and Flora Regulation

Within the EU, Malta has already taken a strong step towards tackling the illegal trade of nationally protected species. Under its 2004 Trade in Species of Fauna and Flora Regulation subsidiary legislation section 6(1), *“the import of any species which is protected at the country of origin even if it is not listed in the Annexes to the Principal Regulation, and even if that country of origin is not a party to the Convention, shall require an export authorisation from that country.”* (Leġislazzjoni Malta 2004)

The law is limited, only regulating the import and export point. Therefore, there is no longer a legal provision criminalising those actions (i.e. possession, buying, selling) if a nationally protected species is successfully smuggled past authorities and is traded within the country. However, it shows these laws can be compatible with national constitutions and criminal systems.

Council of Europe’s Convention on the Protection of the Environment through Criminal Law

Not only has the EU made very public statements on the need to address wildlife crime and set out obligations under the revised Action Plan against Wildlife Trafficking, but there is also the recent Council of Europe’s Convention on the Protection of the Environment through Criminal Law (2025). Under Article 10, the Convention requires Parties to *“take the necessary legislative or other measures for the prevention of the commission of any offence established in accordance with this Convention by any natural or legal person.”*

Of the offences included in the Convention, most forms of wildlife crime are included (Article 27). Paragraph 156 further clarifies that the offence can be committed in both economic and private activities and covers ALL protected fauna species. Article 28, on offences related to the unlawful trading in protected wild fauna or flora, concerns the sale or offering for sale protected wild fauna domestically and in transboundary trade. While paragraph 161 states that CITES may also be considered when interpreting the terms in the offence definition it does not state that ONLY CITES species are included in its protection.

9.5. Policy recommendations following the Commission's feasibility study

It is imperative that the EU addresses the lack of accurate wildlife trade data and closes the gaps in the legislative framework. Given that illegal trade is a complex issue requiring a multidisciplinary approach, there are a variety of areas the EU should implement reform.

- **Legislative reform:** supplementary legislation that prohibits the importation, transshipment, purchase, possession and sale of wildlife taken illegally in the country of harvest/origin;
- **Enforcement support:** increase support, training and resources for enforcement to reduce the administrative burden while increasing efficiency including limiting ports of entry;
- **Improving monitoring and reporting systems** to properly record species-specific data on all wildlife trade being imported, exported, and moved between Member States.
- **Reduce demand:** demand reduction campaigns based on consumer behaviour science should be launched in Europe to reduce demand for rare and/or endemic wildlife species.

Recommendations following the EU-commissioned Report on Criminalisation of Illegally Sourced Wildlife

In November of 2022, the Commission adopted the revised EU Action Plan against Wildlife Trafficking, which laid forth plans and strategies to guide future EU actions in combating wildlife trafficking through 2027. Of the four areas of priority, the second focuses on

strengthening the legal and policy frameworks, and under this area **objective 19 calls for exploring the need for, value of and feasibility of criminalising all trade in illegally sourced wildlife.** In order to implement this objective, a feasibility study was executed, whose results were published in July of 2025 (TRINOMICS 2025).

The feasibility study presented a variety of legislative options for regulating illegally sourced wildlife in the EU. **The most effective option listed to combat this illegal trade is a new Directive under Article 83(2) of the Treaty on the Functioning of the European Union (TFEU), which would prohibit and criminalise illegally sourced wildlife.**

While the study also provided six alternative policy options that do not require criminalisation, none present an effective solution and instead are clearly supplemental actions that would compliment and enhance the impact of proper regulation (i.e. designating limited ports of entry, improving monitoring systems, identifying high risk countries, and supporting international cooperation efforts).

While improving the EU's database systems to properly monitor all trade of wildlife into and out of the union is an important first step, it should not be used as a justification or reason to delay legislative action.

The EU has made a clear and public commitment to not only combat illegal wildlife trade, but to become a leader by setting the standards and expectations for the rest of the world to follow. **From the revised EU Action Plan against Wildlife Trafficking, to the Council of Europe Convention and consistent calls for action from the Parliament, the EU has a duty to take prompt and effective action.**



10. Conclusions and Recommendations

10.1. Conclusions

- This report highlights the global scope and dynamics of a particular form of illegal wildlife trade (see also Figure 1). Although smaller in volume in terms of individual specimens, it poses a high risk to biodiversity as targeted species are often rare and threatened.
- The many examples of species from a wide range of taxa and countries of origin are proof that the high demand from an affluent clientele fuels global illegal activities, which often go unpunished due to insufficient national and international laws.
- “Captive breeding” in advertisements for reptiles is not in itself proof of legal origin, as smugglers prefer to capture pregnant females so that they can offer their offspring for sale shortly afterwards. Furthermore, the origin is usually not verified anyway.

A global and increasing problem

- The latest wildlife crime report from the United Nations Office on Drugs and Crime (UNODC (2024) warns that wildlife crime statistics focusing on CITES species fall short of the mark. The present report highlights the often-overlooked part of smuggling of non-CITES species.

- The large number of examples in our report shows the highly dynamic nature of wildlife smuggling, which – always on the lookout for new rarities – even targets populations or species that have only just been scientifically described.
- The range of smuggled species is constantly growing – facilitated by globalisation, growing infrastructure and various online platforms that open up a global customer base for smugglers. For instance, the increasing popularity of invertebrates, such as spiders, scorpions, and ants, as exotic pets is also reflected in the rising number of documented cases of smuggling.
- The EU-commissioned study conducted by TRINOMICS found that non-CITES trade exceeds CITES-listed species and, more generally, the trade in non-CITES species is a significant proportion of all trade.

The EU’s central role

- The EU continues to be a central hub and destination for illegally sourced wildlife. Due to the lack of appropriate legislation, the EU is presently allowing the marketing of stolen wildlife to take place in the Union.
- EU residents are among the key smugglers, traders and clients for illegally sourced non-CITES species.

Their activities undermine the efforts of conservation-oriented range states to protect their native species and prevent EU consumers from being able to be confident that animals they may purchase were obtained legally.

- While the animals are offered and sold on the Internet in advance, the handover usually takes place at large reptile fairs, such as in Hamm or Houten.
- The loopholes in the existing EU Wildlife Trade Regulations, which are highlighted in the present report, also enable the laundering of protected, wild-caught reptiles that are falsely declared as captive-bred, e.g. for export to the US, aiming to circumvent the US Lacey Act.
- The lack of legal protection for species sourced in contravention of domestic laws in countries of origin hinders international judicial cooperation, as criminals operating in Europe can't be extradited to source countries.

Legal reform within the EU: necessary and feasible

- Prohibiting illegally-sourced wildlife from entering the EU market is not only legally feasible but has clear precedent in EU legislation regulating cultural goods (EU Regulation on Cultural Goods) and timber (EU Timber Regulation and EUDR) and, in Malta, wildlife. Relevant legislation also exists in Australia, Canada and the U.S.
- The listing of threatened and nationally protected species on CITES Appendix III does not prevent the sale, purchase, or keeping of illegally sourced animals, given that EU legislation only prohibits the import of Appendix III (Annex C) specimens without proper paperwork.
- While the listing of threatened species on the CITES Appendices I or II is presently the most effective way to protect species from overexploitation and poaching, it is a slow process that can be hampered by economic or political interests. Moreover, it relies on a list-based system that is impractical for regulating non-CITES species.
- Analysing the EU's current monitoring framework, TRINOMICS revealed significant limitations and inconsistencies in monitoring wildlife trade including a lack of species-specific data, inconsistent CITES reporting, not distinguishing between importers and exporters. These concerns were also raised by Cardoso et al. (2024) and a study commissioned by the German Government (Altherr et al. 2020).

- The EU must implement precautionary legal measures that respect and reflect the measures instituted by range states to protect the biodiversity within their own territory.
- As stated in the EU-commissioned report by TRINOMICS, a ban on illegally sourced wildlife would not require Member States to enforce foreign law or engage in extraterritoriality.
- A legal analysis by ClientEarth (2018) also found that legislation addressing this loophole at the EU level would not conflict with existing wildlife trade regulations, such as Council Regulation (EC) No. 338/97.

10.2. Recommendations

- Given its responsibility as a main market for the international exotic pet trade, the EU should support listing initiatives of source countries at CITES CoPs, while assisting range states in their efforts to protect their biodiversity.
- **The EU should adopt a prohibition on the importation, transshipment, purchase and sale of wildlife taken illegally in the country of harvest/origin.** This, under the form of a new Directive under Article 83(2) of the TFEU, would also prevent the laundering of illegal wildlife through legal channels and would allow for the criminalisation of these offences under the EU Environmental Crime Directive.
- **The registration and monitoring of all wildlife imports** at species level and including the number of individuals would be a pre-condition to be able to enforce such legislation. This was also a recommendation by the TRINOMICS study (2025).
- The EU and other importing countries need to **ensure that penalties for CITES Appendix III violations are not limited to the import**, but also cover possession, sale, and re-export.
- The EU should actively engage in the open-ended intergovernmental expert group on crimes that affect the environment, established under UNTOC, and **support the proposal for an additional protocol covering wildlife trafficking, recognising it as a global priority alongside trafficking of humans, arms and drugs.**
- In cooperation with various stakeholders, including NGOs and the private sector, demand reduction campaigns based on consumer behaviour science should be launched in Europe to **reduce demand for rare and/or endemic wildlife species.**

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In line with our organisational policies, we avoid using photographs of animals in captivity and instead only use images of animals in the wild. For this report, however, which focuses on the impact of the exotic pet trade, it has been unavoidable to use some photos of animals in captivity, particularly given that it concerns very rare species for which few images are available.

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