



FROM USE TO SUSTAINABILITY: RETHINKING THE MANAGEMENT OF WILD ANIMALS

Recommendations on [CBD/SBSTTA/28/5](#) :
Draft Global Guidance on Sustainable Wildlife Management

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SUMMARY AND RECOMMENDATIONS

The draft guidance provides a strong foundation for sustainable wildlife management under the Convention on Biological Diversity and for advancing more coherent, inclusive and equitable approaches to wildlife governance.

As SBSTTA-28 considers its recommendation to COP17, strengthening provisions on ecological limits, precaution, species recovery, animal welfare, disease risk and coexistence would help ensure the guidance delivers truly sustainable wildlife management that supports ecosystem resilience, species conservation and recovery, human wellbeing and animal welfare in practice, and the implementation of the relevant goals and targets under the Kunming-Montreal Global Biodiversity Framework.

In line with these priorities, the World Federation for Animals and the Born Free Foundation urges governments and stakeholders engaged in discussing the global guidance at SBSTTA-28 to consider:

1. **Ecological limits, recovery and thresholds as the foundation of sustainability;**
2. **Precaution, uncertainty and cumulative impacts as core decision principles;**
3. **System integrity, traceability, animal welfare and health safeguards;**
4. **Coexistence, equity and transition to non-extractive and low-conflict systems.**

OVERVIEW

Under Agenda Item 6, SBSTTA-28 is invited to review the draft global guidance on sustainable wildlife management and prepare a recommendation for consideration by COP17. If adopted, the guidance is intended to support implementation of the Convention on Biological Diversity and the **Kunming-Montreal Global Biodiversity Framework (KMGBF)** through its integration into national biodiversity strategies and action plans (NBSAPs), wildlife policies, legal frameworks and other relevant sectoral and cross-sectoral instruments.

It is also relevant to and potentially supportive for implementation under other multilateral environmental agreements, including the **Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)**, the **Convention on the Conservation of Migratory Species of Wild Animals (CMS)**, and the **Ramsar Convention on Wetlands**, particularly in relation to sustainable use, trade regulation and species conservation, including migratory species.

Why it matters

The draft guidance (CBD/SBSTTA/28/5) is an important step in implementing [decision 16/15](#) and advancing **KMGBF Targets 4, 5, 6, 9, 10, 22 and 23**. It provides a framework for species conservation and recovery, and for the sustainable, safe and legal use, harvesting and trade of wild species in ways that support biodiversity, ecosystem integrity, human well-being and livelihoods.

The draft guidance reflects the mandate of decision 16/15 by emphasizing inclusive and participatory decision-making, multiple systems of knowledge and recognition of rights, and equitable distribution of costs and benefits. It also contains valuable provisions on ecological sustainability, precaution, policy coherence, One Health, human-wildlife coexistence, monitoring, transparency and adaptive management.

As SBSTTA prepares its recommendation to COP17, there is an opportunity to further strengthen the guidance by embedding ecological limits, precaution in the face of uncertainty, cumulative impact governance, and safeguards against systemic risks in wildlife use systems, alongside explicit consideration of human and animal health and welfare risks.

KEY OPPORTUNITIES FOR STRENGTHENING THE GUIDANCE

1. Ecological limits, recovery and thresholds as the foundation of sustainability.

The guidance should explicitly establish that sustainability is conditional upon ecological integrity, resilience and species recovery, rather than simply regulated use. Sustainability should not be presumed where use is authorised or managed; instead, it should be understood as a set of strict ecological and ethical conditions that can only be met where wildlife populations and ecosystems are demonstrably capable of long-term recovery and persistence.

Suggested improvements:

- Define sustainability as bounded by ecological limits and population viability thresholds (including, where appropriate, minimum viable population thresholds) and ecosystem recovery objectives, ensuring that wildlife use is only permitted where populations remain capable of long-term recovery and persistence ;
- Elevate avoidance of irreversible biodiversity loss as the highest priority;
- Explicitly include recovery of depleted, declining and threatened species (KMGBF Target 4) as a core objective, not an optional outcome.

Amendments to the guidance:

→ **Section IV (Principles) / Table 1 (Principles and approaches informing the global guidance on sustainable wildlife management):** Clarify that ecological sustainability requires maintaining ecosystem function and biodiversity above critical thresholds, while prioritising species and ecosystem recovery over maintaining the status quo.. Wildlife use should be explicitly subordinated to measurable ecological thresholds, population viability (including minimum viable population thresholds where appropriate), and recovery targets.

→ **Section VII (Actions for implementation of sustainable wildlife management):** Introduce precautionary “no-go conditions” where populations are at risk of falling below recovery or viability thresholds, ensuring management intervention occurs before populations decline to levels that compromise recovery or long-term persistence.

2. Precaution, uncertainty and cumulative impacts as core decision principles.

Precaution and cumulative impacts are present but not operationalised consistently across the guidance. Where significant uncertainty exists regarding ecological, health, welfare and other cumulative impacts, wildlife use should not proceed unless there is sufficient evidence that risks can be effectively managed and that conservation outcomes and biodiversity recovery targets will not be compromised.

In particular, where wildlife use persists or is deemed necessary, welfare impacts should be considered across the full wildlife management chain, including capture, transport, confinement, trade and killing. Poor welfare can increase risks of pathogen emergence and spillover, contribute to morbidity and mortality that may increase offtake from wild populations to replace lost animals, and amplify pressures on already vulnerable species. Integrating animal welfare considerations therefore supports both biodiversity conservation and One Health objectives.

Suggested improvements:

- Reinforce that precaution requires avoiding actions that may compromise ecosystem integrity, species recovery, public health and animal welfare under conditions of uncertainty.
- Cumulative impacts should be systematically assessed across interacting drivers of biodiversity loss and pressure on wildlife populations, including legal and illegal trade, wildlife crime, habitat loss, degradation and fragmentation, climate change, pollution and invasive alien species, as well as their combined and long-term effects across spatial and temporal scales.

Amendments to the guidance:

→ **Section IV / Table 1:** Revise precaution to state that actions should not proceed where risks to ecosystems, welfare or health cannot be reliably assessed or managed.

→ **Section VII.A (Cross-cutting elements):** Require cumulative impact assessments across: spatial scales (local to global), temporal scales, interacting drivers (habitat loss, direct exploitation, climate change, pollution, invasive species).

→ **Table 2 (Safeguards for the sustainable management of wildlife):** Strengthen safeguards to ensure that interventions do not transfer ecological or social risks across systems or exacerbate cumulative pressures.

→ **Monitoring provisions:** Require cumulative pressure indicators and cross-sector reporting.

3. System integrity, traceability, animal welfare and health safeguards.

The guidance fails to adequately address systemic risks associated with wildlife use and trade systems.

Key risks to address:

- laundering of wild-sourced animals through captive systems;
- weak or inconsistent traceability in mixed-source supply chains;
- animal health and welfare impacts across capture, transport, confinement, breeding and killing;
- disease emergence and biosecurity risks at wild-captive interfaces;
- demand stimulation effects from captive wild animal systems.

Compliance with existing regulatory frameworks, while necessary, should not be regarded as sufficient demonstration of ecological sustainability, animal welfare and effective risk management. The limitations of existing regulatory and traceability systems must be considered and accounted for.

Amendments to the guidance:

→ **Section IV (Principles):** Add clarification that legal compliance does not automatically equate to sustainability.

→ **Table 2 (Safeguards - transparency and accountability):** Add a safeguard requiring transparent and verifiable documentation of wildlife origin and supply chains, independent verification where appropriate, assessment of risks associated with source misidentification, laundering of wild-sourced specimens through captive systems, market displacement effects, and consideration of animal welfare, biosecurity and public health risks throughout management, transport and trade systems. The guidance should also recognise persistent weaknesses in national implementation, including the failure in many countries to adequately address wildlife illegally removed from countries of origin before entering international trade.

→ **Section VII.A (Cross-cutting elements: policy coherence and cross-sectoral integration):** Require supply-chain integrity audits and separation/verification of wild vs captive origin claims.

4. Coexistence, equity and transition to non-extractive and low-conflict systems.

The draft includes important provisions on human-wildlife coexistence, management of human-wildlife conflict and non-extractive livelihood options. However, these elements should be prioritised as a strategic pathway for achieving true sustainable wildlife management.

Suggested improvements:

- Encourage investment in coexistence-based approaches that reduce conflict between people and wildlife while maintaining or restoring ecological integrity, consistent with T4 and T9;
- Position coexistence and non-lethal management as first-line approaches;
- Reinforce community-led conflict prevention, early warning systems and locally adapted mitigation measures;
- Strengthen transition pathways away from extractive use where ecological conditions allow, towards non-extractive wildlife economies, including equitable nature-based livelihoods and ecosystem service-based approaches that support wildlife conservation and the well-being of both people and animals. This could include community-based incentive and insurance mechanisms that compensate local communities for damage, losses and other costs associated with human-wildlife interactions, thereby strengthening support for long-term coexistence.

Amendments to the guidance:

→ **Section VII.D (Equity-related actions):** Strengthen language to prioritise non-lethal conflict prevention and mitigation, community-led coexistence approaches, restoration-based strategies reducing reliance on extractive use, development of non-extractive wildlife economies where ecologically and culturally appropriate.

→ **Add requirements for:** investment in early warning systems for human-wildlife conflict, integration of coexistence into spatial planning and restoration strategies, monitoring of social and ecological outcomes of conflict mitigation.



ABOUT

WORLD FEDERATION FOR ANIMALS

We are a federation of more than 70 NGOs working towards the recognition of animal welfare as an essential component of the sustainable development agenda. Our efforts focus on integrating animal welfare into international health, food, and environmental regimes, as well as trade and development finance rules.

We are accredited observers to the FAO Committee on Agriculture, the UN Environment Programme and to the UN Framework Convention on Climate Change, and we have Special Consultative Status with the UN Economic and Social Council. We are also members of GASL's Action Network on Animal Welfare and of the CFS' Civil Society and Indigenous Peoples' Mechanism.

www.wfa.org



BORN FREE FOUNDATION

Born Free's mission is to protect wild animals, natural habitats and functioning ecosystems in perpetuity and to end the exploitation of wild animals, whether free-living or in captivity. Our vision of a co-existent future is one where animals are respected for their own intrinsic value and for the critical roles they play within the natural world.

www.bornfree.org.uk