



WORKING PAPER

FACILITATION PANEL (FALP)

FOURTEENTH MEETING

Montréal, 20 to 24 April 2026

Agenda Item 3: Amendments to Annex 9 — *Facilitation*

**THE EVOLUTION OF ICAO PROVISIONS TO COMBAT WILDLIFE TRAFFICKING
IN THE AVIATION SECTOR**

(Presented by France)

SUMMARY

Wildlife trafficking remains one of the largest international illicit trade activities. This working paper provides an overview of the work undertaken by France to combat wildlife trafficking in the aviation sector. Based on the progress made in the implementation support and the need to further advance the aviation community's role on this subject, this working paper proposes to raise the existing Recommended Practice 8.47 on wildlife trafficking, found in Annex 9 — *Facilitation*, to Standards and proposes new Recommended Practices 8.xx and 8.xx.

Action by the FAL Panel:

The FAL Panel is invited to consider the proposals described in this paper and agree that Annex 9 be amended, as set out in the Appendix.

1. INTRODUCTION

1.1 The Third edition of the World Wildlife Crime Report published in 2024² includes over 140,000 wildlife seizures reported to have taken place between 2015–2021. Two key messages of this report are that:

- a) Wildlife Trafficking persists worldwide despite two decades of concerted action at international and national levels—more rapid and measurable progress could be achieved if interventions were informed by stronger scientific evidence.
- b) Wildlife crime is interconnected with the activities of large and powerful organized crime groups operating in some of the most fragile and diverse ecosystems from the Amazon to the Golden Triangle—addressing wildlife trafficking in these circumstances requires a broader strategy to address organized crime as a whole.

¹ French version provided by France.

² <https://www.unodc.org/unodc/en/data-and-analysis/wildlife.html>

1.2 Wildlife Trafficking is one of the largest international illicit trade activities. By 2016, environmental crime had grown into a multi-billion-dollar industry, worth between \$91 and \$258 billion annually, with wildlife crime specifically making up \$7 to \$23 billion of the total³.

1.3 In addition of illegal funds, Wildlife Trafficking endangers species and hampers global nature-based tourism and trade. Within the past decade, wildlife trafficking incidents were recorded at airports in at least 136 countries in almost every region of the globe.

1.4 Regarding public health issues, by multiplying contacts between wildlife and humans, illegal trafficking increases the risk of pathogen transmission between species, a major public health issue. Over 60%⁴ of all emerging infectious diseases worldwide are of zoonotic origin and Zoonoses are responsible for the most recent pandemics in modern history, including HIV, Ebola, SARS, MERS and, most recently, COVID-19.

1.5 Transnational criminal groups are increasingly exploiting the interconnected air transport system to pursue illegal traffic of wildlife. While States have the primary responsibility for identifying, apprehending and prosecuting traffickers, it is recognized that aviation workers (in passenger or cargo activities) can play an important role in preventing wildlife trafficking.

1.6 The Sustainable Development Goal No. 15 (SDG15) of the UN General Assembly sets a target of “taking urgent action to end poaching and trafficking of protected species of flora and fauna and addressing both demand and supply of illegal wildlife products”. The International Air Transport Association (IATA) and the Airports Council International (ACI) strive to work in cooperation with other industry partners, conservation organizations and civil society, regulatory bodies, and enforcement agencies to contribute to meet this target.

1.7 In addition, in 2016 the ACI and other industry partners signed the ‘United for Wildlife Transport Taskforce Buckingham Palace Declaration’ by the Royal Foundation of the Duke and Duchess of Cambridge, and IATA adopted in his 72nd Annual General Meeting a Resolution on the Illegal Trade in Wildlife which provides a clear and unequivocal statement of the airlines’ position.

1.8 In 2019, during the 40th Session of the ICAO Assembly, the Airports Council International (ACI) and the International Air Transport Association (IATA) presented their respective efforts against wildlife trafficking⁵.

1.9 In July 2021, at the 12th meeting of the ICAO Facilitation Panel, ACI and IATA invited the Panel to consider the adoption of a new Recommended Practice in the Annex 9 — *Facilitation* to the Convention on International Civil Aviation to ensure that procedures are in place to combat wildlife trafficking, including reporting systems and relevant competent authorities’ points of contact for airport and aircraft operators.

1.10 The Panel unanimously endorsed the proposal as presented⁶. Amendment 29 to Annex 9 was then adopted by the Council at the Ninth Meeting of its 225th Session on 9 March 2022. Thus, the Recommended Practice 8.51 invites the Contracting States to put in place procedures to combat wildlife and to set up clear reporting systems and relevant competent authorities’ points of contact for airport and airline operators.

³ <https://c4ads.org/reports/in-plane-sight/>

⁴ Global trends in emerging infectious diseases Nature Vol 451

⁵ A40-WP/199_Prevention of illegal wildlife trafficking via commercial aviation; A40-WP/488_Airports’ efforts against wildlife trafficking

⁶ FALP/12-WP/25_Collaborative approach in the fight against wildlife trafficking

1.11 In October 2022, during the 41st Session of the ICAO Assembly on an ACI and IATA's proposal, Resolution 41-17, *Consolidated statement of continuing ICAO policies related to facilitation* in which the Assembly urges Member States to establish among all involved stakeholders an efficient information-sharing and collaboration system in the prevention of wildlife trafficking⁷. This provision has been raised during the 42nd Session of the ICAO Assembly in October 2025.

2. DISCUSSION

Illegal imports of wild meat in travellers' luggage

2.1 Thousands of tonnes of bushmeat are estimated to be smuggled into Europe each year, both for personal use and commercial trade. Bushmeat trafficking not only impacts wildlife populations in source countries but there are also proven risks of infectious disease spillover. European authorities should do more to tackle this illegal trade.

2.2 For example, over the past five years, French customs have seized an average of 23 tonnes of illegal meat annually, including 600 kg from wild species such as monkey, pangolin, and bat. However, this is likely an underestimation due to identification challenges of CITES species.

2.3 In France efforts to combat the illegal importation of wild meat in travellers' luggage have intensified. Through these initiatives, France seeks to mitigate health, conservation, and security risks associated with the illegal wild meat trade, while enhancing public awareness and efficient regulatory frameworks. A multidisciplinary interministerial working group on illegal wild meat in travellers' luggage was established in 2023 with the aim of developing an action plan. A significant focus is on increasing passenger awareness and target controls, strengthening cooperation with source countries, refining regulations, including at the European Union (EU) level, and experimenting with new control methods.

2.4 An awareness raising campaign among travellers was also developed in 2024 at Lyon - St. Exupéry airport with exhibitions, videos, and multilingual posters. Partnerships with airlines, airport managers, environmental organizations, and other government bodies have been key.

2.5 Studies at Paris - Charles de Gaulle Airport have highlighted an increase in wild meat imports linked to expanded air traffic. Efforts are underway to quantify traffic by species, trace origins, and assess pathogen risks. Regulatory changes are also being pursued, aiming at appropriately sanctioning private person in the event of infringements, and at putting in place a simplified and effective legal regime to ban meat imports by passengers at the EU level, in particular by working on the exceptions that are currently too numerous and prove counterproductive.

2.6 In spring 2024, the French CAA and Customs have met airlines transporting passengers from high-risk countries to evaluate their practices and share awareness materials, such as posters and videos for display at departure stations. Following these exchanges, some carriers immediately made a link to the French customs website.

2.7 France also succeeded to innovatively introduce specific species protection clauses, including on wild meat, in bilateral air services agreements with some third countries notably in Africa. Future steps are coordinated efforts aiming to enhance enforcement, awareness, and collaboration in the fight against illegal species trade will also be broadened in the future to more airlines and countries.

⁷ A41-WP/144_Supporting effective mechanisms to fight wildlife trafficking; ICAO Document 10184

Awareness training

2.8 Industry has developed some materials, for example IATA has produced guidance material and videos that aim to assist airlines in raising awareness of wildlife trafficking issues with staff and passengers. ACI has also published a collection of best practice cases from selected airports which present how what action can be undertaken to combat wildlife trafficking. It is also to be found for free materials for training on the website of the USAID Reducing Opportunities for Unlawful Transport of Endangered Species (ROUTES)⁸,

2.9 The aviation sector can play an important role in curbing this transnational crime, by raising awareness of their staff and passengers on the issue; promoting a strong security culture to effectively identify and report suspicious activities without burdening existing protocols; and, supporting enforcement agencies which need to share intelligence and information between agencies as well as with industry.

Lack of information

2.10 Whilst there is systemic organised smuggling, there is also no doubt that many passengers bring in prohibited items for their own use and are not aware about the rules of the countries of destination. These facts are confirmed by the customs authorities during the seizures made at airports.

2.11 Along the lines of what is laid down in safety, security, or health regulations, it appears necessary to inform passengers of the regulations applicable to imports of food, plants, or derived products. The aim is not to put responsibility on the airline but rather on the passenger informing him as early as possible of his obligations to make him responsible.

2.12 Initiatives by airlines have shown that there are several key moments when the passenger could be informed of the applicable import regulations either through digital information or before departure during check-in.

Information-sharing

2.13 Information related to the nature, scale, and consequences of the illegal transport of wildlife is scarce. To go further in the fight against wildlife trafficking, the information collected by Contracting States through Recommendation 8.47 should be shared. A sharing mechanism should be implemented within each Contracting States and ideally between Contracting States.

3. RECOMMENDATIONS

3.1 The FAL Panel is invited to:

- a) note the information in this working paper;
- b) consider the appropriateness of elevating and modifying Recommended Practice 8.47 to a Standard (as referenced in the Appendix); and
- c) consider new Recommended Practices 8.xx and 8.xx (as referenced in the Appendix).

⁸ <https://routespartnership.org/>

APPENDIX A

8.47 ~~Recommended Practice~~ — Contracting States ~~should~~ shall take measures to ensure that procedures are in place to combat wildlife trafficking, including clear reporting systems, efficient information sharing and collaboration system and relevant competent authorities' points of contact for airport, and airline operators and cargo freight forwarders.

8.xx Recommended Practice — Each Contracting States should ensure that airport, aircraft operator and cargo freight forwarder's personnel in direct contact with the travelling public or cargo are provided with awareness training on wildlife trafficking.

8.xx Recommended Practice — Each Contracting State should make arrangements to enable all aircraft operators to make available to passengers, sufficiently in advance of departure, information concerning the prohibited products requirements of the countries of destination.

APPENDIX B
NEW or REVISED SARP PROPOSAL: AMENDMENT 30 ANNEX 9, CHAPTER 8,
[STANDARD/RECOMMENDED PRACTICE]

IMPACT ASSESSMENT

1. What is the problem that this proposal is designed to address?

<i>Please include specific details</i> Combat wildlife trafficking to prevent the use of commercial aviation activities.

2. What alternatives to SARPs were considered to solve the problem?

None	Circular	Manual	Policy	<i>Other (please explain)</i>
		X		

3a. What is the impact of this proposal on a **State**?

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Implementing this proposal will enhance civil aviation safety			X		
<i>Rationale:</i>					
Implementing this proposal will increase air navigation capacity and improve efficiency			X		
<i>Rationale:</i>					
Implementing this proposal will enhance global civil aviation security and facilitation (taking into account impact on human rights, health and privacy, if any)		X			
<i>Rationale:</i> Wildlife crime is interconnected with the activities of large and powerful organized crime groups operating in some of the most fragile and diverse ecosystems. Regarding public health issues, by multiplying contacts between wildlife and humans, illegal trafficking increases the risk of pathogen transmission between species, a major public health issue.					
Implementing this proposal will foster the development of a sound and economically-viable civil aviation system			X		
<i>Rationale:</i>					
Implementing this proposal will minimize the adverse environmental effects of civil aviation activities		X			

Rationale:

Wildlife crime is interconnected with the activities of large and powerful organized crime groups operating in some of the most fragile and diverse ecosystems.

3b. Do the benefits of this proposal justify the cost of its implementation?

Yes	No	Not sure	Not applicable
X			

4a. What is the impact of this proposal on **Industry**?

	<i>Strongly Agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly Disagree</i>
Implementing this proposal will enhance civil aviation safety			X		
<i>Rationale:</i>					
Implementing this proposal will increase air navigation capacity and improve efficiency			X		
<i>Rationale:</i>					
Implementing this proposal will enhance global civil aviation security and facilitation (taking into account impact on human rights, health and privacy, if any)		X			
<i>Rationale:</i> Airport and airlines are already engaged to combat wildlife trafficking. These proposals are an extension of IATA and ACI propositions.					
Implementing this proposal will foster the development of a sound and economically-viable civil aviation system					
<i>Rationale:</i>					
Implementing this proposal will minimize the adverse environmental effects of civil aviation activities		X			
<i>Rationale:</i> Airport and airlines are already engaged to combat wildlife trafficking. These proposals are an extension of IATA and ACI propositions.					

4b. Do the benefits of this proposal justify the cost of its implementation?

Yes	No	Not sure	Not applicable
X			

5. How long would it take for States and Industry to implement this proposal?

Already implemented	0-1 years	1-2 years	2-5 years	5-10 years	More than 10 years
			X		

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6. Financial implications of the proposal

The cost impact on States would include: Audit, Training assessment.
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The cost impact on the industry would include: Training.
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IMPLEMENTATION TASK LIST AND OUTLINE OF GUIDANCE MATERIAL

1. **IMPLEMENTATION TASK LIST**

1.1 **Essential steps to be followed by a State in order to implement proposed amendments¹**

[Combat wildlife trafficking]

1.1.1 For States that already [implement the SARP or take action on the TOPIC], no action is necessary. For those that do not, the essential steps are the following:

Legislation, regulations, policies, procedures, training, implementation, modification, supervision, assessment, compliance, gap analysis, consideration,

- a) identify established legislation, regulations and/or policies;
- b) gap analysis between established legislation, regulations, and/policies,
- c) decisions on whether to introduce new provision to align with ICAO guidance material;
- d) modification and/or development of provision;
- e) official adoptions of provisions;
- f) implementation of newly adopted provisions by applicable entities;
- g) modification of an oversight framework; and
- h) develop materials (guidance, handbook) to train oversight inspector;
- i) develop materials to assist industry to train their staff (curriculum);
- j) supervision by the State of provisions, as appropriate.

¹ Amendment of a format or clarification nature are not allowed in this Appendix.

2. STANDARDIZATION PROCESS

2.1 Effective date: [] [Month/Year]: to be completed by Secretariat

2.2 Applicability date: [] [Month/Year]: to be completed by Secretariat

3. SUPPORTING DOCUMENTATION:

3.1 ICAO documentation:

Title	Type	Publication date
	Manual/Other Guidance Material/Web page	

3.2 External documentation:

Title	External Organization	Publication date

4. IMPLEMENTATION ASSISTANCE TASKS

Type	Global	Regional
[Seminar/Symposium/Workshop/etc.]		

**5. UNIVERSAL SECURITY AUDIT PROGRAMME (USAP)
OR UNIVERSAL SAFETY OVERSIGHT PROGRAMME
(USOAP)**

5.1 [No] [additional] protocol questions required under USAP [USOAP].