# Open Letter to the World Health Organization and the UN Environment Programme

EPL initially received copies of this letter from colleagues who had been asked to join as signatories. The attached appears to be the final version, as posted online by various signatory organisations. It is reproduced intact, apart from adjusting a few typographical errors and the addition of footnotes (replacing internet links) to aid those who read the paper form of this journal. Ed.

Dear Dr Tedros Adhanom Ghebreyesus<sup>1</sup> and Ms Inger Andersen,<sup>2</sup>

# 1. COVID-19: Holistic, equitable solutions are required to improve human and planetary health and reduce zoonotic pandemic risks

We, the undersigned individuals and organisations, commend the work the UN is doing to tackle the COVID-19 disease pandemic and its socio-economic consequences. The recently released UN Framework for the immediate socio-economic response to COVID-19 outlines the importance of shared responsibility and integration. However, more action is required, particularly on the environmental front. Urgent, far-reaching steps must be taken to reduce zoonotic pandemic risks and secure a better future not only for humans but also for nature, which underpins the health and wellbeing of all humanity. It is vital that any actions taken are appropriate and lead to socially just outcomes which contribute to – not detract from – the development of economically resilient livelihoods for those hundreds of millions of the world's most vulnerable who depend on wild resources for their survival.

COVID-19 is inflicting unprecedented social and economic costs on countries and communities, with the poor and vulnerable hardest hit. The virus's suspected links with a Chinese "wet market" has led to calls to ban wet markets and restrict or end the trade and consumption – for medicines or food – of wildlife. However, indiscriminate bans and restrictions risk being inequitable and ineffective. Wet markets, wildlife trade and consumption, and disease risks are all complex subjects. Wet markets (not all of which sell wild meat) provide invaluable food security; billions of people worldwide trade or consume wild meat and rely on wildlife use for livelihoods, while diseases are transmitted from livestock as well as wildlife.

There is an urgent need to tackle wildlife trade that is illegal, unsustainable or carries major risks to human health, biodiversity or animal welfare. Certain high-risk activities may rightfully necessitate targeted and/or time-bound bans, or severe restrictions (and rigorous enforcement), but it is vital that any such action is specific, appropriate, and equitable. If those targeted bans or severe restrictions are implemented, they should be accompanied by the meaningful provision of suitable alternative livelihoods for people affected. Furthermore, long-term success will require a holistic approach, including tackling issues like land conversion and industrial agriculture, which are major drivers of pandemic risk as well as biodiversity loss. Any actions must be undertaken in a targeted and socially just manner with due regard for human rights.

We recommend that the WHO and UNEP use their individual and collective expertise to

 Work with the appropriate experts to identify areas and activities where wildlife trade and/or use poses high risks to zoonotic disease transmission, biodiversity conservation or welfare, and strengthen or develop tailored, locally appropriate strategies, with suitably improved regulation and enforcement, along the entire supply chain to reduce those risks;

- 2. Initiate a coordinated response to the risks of pandemic emergence and biodiversity loss through the UN Environmental Management Group to raise intergovernmental awareness of the important role biodiversity plays in underpinning human health, the health risks associated with habitat destruction, and the value of sustainable use of biological resources (in line with Article 1 of the Convention on Biological Diversity (CBD) and guided by its 2004 Addis Ababa Principles);
- 3. Build partnerships across WHO, UNEP and other key stakeholders including IUCN, FAO and WTO, to explore how health considerations could be better aligned with trade regulations within the CITES framework, in clear recognition that biodiversity loss, unregulated trade and human health are inextricably linked;
- 4. Effectively engage with the CBD's ongoing process to develop the post-2020 Global Biodiversity Framework and associated Strategy for Resource Mobilization to ensure biodiversity is valued, conserved, restored and wisely used;
- 5. Support science- and human-rights-based, equitable approaches to conservation, in order to achieve the Sustainable Development Goals, and deliver comprehensive improvements to both human and planetary health.

The reasons for our recommendations are set out in Annex A, below the signatory list. Three hundred of the signatories (160 organisational signatories and 140 individual signatories) are shown below – more are on online and will continue to be collected:

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- 5. Ambrosius A. Community Forest Kavango West, Namibia
- 6. Anabeb Conservancy Kunene, Namibia
- 7. Asocaiman, Colombia
- 8. Association of Fish and Wildlife Agencies, USA
- 9. Association OKANI, Cameroon
- 10. Aube Nouvelle pour la Femme et le Développement (ANFD), Democratic Republic of the Congo
- 11. Balepye Community, South Africa
- 12. Botswana Wildlife Producers Association (BWPA), Botswana
- 13. Cameroon Youth Biodiversity Network, Cameroon
- 14. CAMPFIRE Association, Zimbabwe
- 15. CIC International Council for Game and Wildlife Conservation, US/International
- 16. Climate Change Coalition Group, Zimbabwe
- 17. COMFAUNA (Comunidad de Manejo de Fauna Silvestre en Amazonía y América Latina), Latin America
- 18. Conservation Alliance International, Ghana
- 19. Conservation Alliance Sierra Leone, Sierra Leone
- 20. Conservation Frontlines Foundation, USA/South Africa
- 21. Conservation Outcomes, South Africa
- 22. Conservation Through Public Health, Uganda
- 23. Conservation Visions, Canada
- 24. Creative Conservation Solutions, Australia
- 25. Cuma Community Forest Kavango West, Namibia
- 26. Custodians of Professional Hunting and Conservation-SA, South Africa
- 27. Dallas Safari Club, USA
- 28. Earthmind, Switzerland
- 29. Eco Ranger Group, South Africa
- 30. EcoHealth Alliance, USA

- 31. Ecolife Expeditions, South Africa
- 32. Ehirovipuka Conservancy Kunene Region, Namibia
- 33. Endangered Wildlife Trust, South Africa
- 34. Environmental Conservation Trust of Uganda (ECOTRUST), Uganda
- 35. Environmental Foundation for Africa, Sierra Leone
- 36. Epupa Conservancy Kunene, Namibia
- 37. Erongo Regional Conservancy Association (North West), Namibia
- 38. Etanga Conservancy Kunene, Namibia
- 39. European Federation for Hunting and Conservation (FACE), Belgium
- 40. European Sustainable Use Group, UK
- 41. Farm Africa, UK/International
- 42. Fondation Camerounaise de la Terre Vivante (FCTV), Cameroon
- 43. Frankfurt Zoological Society, Germany/International
- 44. FundAmazonia, Peru
- 45. Fur Institute of Canada (FIC), Canada
- 46. Game Ranchers Forum, South Africa
- 47. Gcwatjinga Community Forest Kavango West, Namibia
- 48. Gender CC Women for Climate Justice, South Africa
- 49. Geo Wild Consult, South Africa
- 50. George Mukoya Conservancy Kavango East, Namibia
- 51. Giraffe Conservation Foundation, Namibia/International
- 52. Gonarezhou Conservation Trust, Zimbabwe
- 53. Greenhood Nepal, Nepal
- 54. Guide Outfitting Association of British Columbia, Canada
- 55. Hans Kanyinga Community Forest Kavango West, Namibia
- 56. Houston Safari Club, USA
- 57. Huab Conservancy (Kunene Region), Namibia
- 58. Integrated Rural Development and Nature Conservation (IRDNC), Namibia
- Interdisciplinary Centre for Conservation Science and Oxford Martin Programme on the Illegal Wildlife Trade, UK
- 60. International Fur Federation, UK/International
- 61. Ipumbu Ya Tshilongo (North Central), Namibia
- 62. IUCN Group Sustainable Use and Management of Ecosystems (SUME), International
- 63. IUCN SSC Bear Specialist Group, International
- 64. IUCN SSC Caprinae Specialist Group, International
- 65. IUCN SSC-CEESP Sustainable Use and Livelihoods Specialist Group (SULi), International
- 66. IUCN Wildlife Health Specialist Group, International
- 67. Wildlife Producers Association of Zambia, Zambia
- 68. IWMC World Conservation Trust, Switzerland/International
- 69. Jamma International, UK/International
- 70. Japan Falconiformes Center, Japan
- 71. Kahenge Community Forest Kavango West, Namibia
- 72. Kapinga Kabwalye Community Forest Kavango West, Namibia
- 73. Kasungu Wildlife Conservation for Community Development, Malawi
- 74. Katope Community Forest Kavango West, Namibia
- 75. Keystone Foundation, India
- 76. Kunene Regional Communal Conservancy Association (KRCCA), Namibia
- 77. Kunene River Conservancy, Kunene, Namibia
- 78. Likwaterera Community Forest Kavango West, Namibia
- 79. Lion Landscapes, Kenya
- 80. Mahenye Community Committee, Zimbabwe
- 81. Malagasy Youth Biodiversity Network, Madagascar

- 82. Marienfluss Conservancy Kunene, Namibia
- 83. Masoka CAMPFIRE Association, Zimbabwe
- 84. Masoka Community, Zimbabwe
- 85. Maurisi Nekaro Conservancy Kavango East, Namibia
- 86. Mbeyo Community Forest Kavango West, Namibia
- 87. Mbire Rural District Council, Zimbabwe
- 88. Muduva Nyangana Conservancy (Kavango East), Namibia
- 89. Namibia Nature Foundation (NNF), Namibia
- 90. Namibian Chamber of Environment, Namibia
- 91. Namibian Association of CBNRM Support Organisations (NACSO), Namibia
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- 95. Norwegian Pet Trade Association, Norway
- 96. Okandundumba Conservancy Kunene, Namibia
- 97. Okanguati Conservancy Kunene, Namibia
- 98. Okatjandjakozomenje Conservancy Kunene, Namibia
- 99. Okondjombo Conservancy Kunene, Namibia
- 100. Okongoro Conservancy Kunene, Namibia
- 101. Ombazu Conservancy Kunene, Namibia
- 102. Ombombo masitu Conservancy Kunene, Namibia
- 103. Ombujokanguindi Conservancy Kunene, Namibia
- 104. Ongongo Conservancy Kunene, Namibia
- 105. Ornamental Fish International (OFI), The Netherlands
- 106. Orupembe Conservancy Kunene, Namibia
- 107. Orupupa Conservancy Kunene, Namibia
- 108. Otjambangu Conservancy Kunene, Namibia
- 109. Otji West Conservancy Kunene, Namibia
- 110. Otjikondavirongo Conservancy Kunene, Namibia
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- 112. Otjimboyo Conservancy (Erongo Region), Namibia
- 113. Otjindjerese Conservancy Kunene, Namibia
- 114. Otjitanda Conservancy Kunene, Namibia
- 115. Otjombande Conservancy Kunene, Namibia
- 116. Otuzemba Conservancy Kunene, Namibia
- 117. Ozondundu Conservancy Kunene, Namibia
- 118. People for Pangolins, International
- 119. Puros Conservancy Kunene, Namibia
- 120. Resource Africa South Africa, South Africa
- 121. Resource Africa UK, UK
- 122. Ruaha Carnivore Project, Tanzania
- 123. Safari Club International Foundation, USA
- 124. Sanitatis Conservancy Kunene, Namibia
- 125. Save the Rhino Trust Namibia, Namibia
- 126. Sesfontein Conservancy Kunene, Namibia
- 127. Sheya Shuushona Conservancy (North Central Regions), Namibia
- 128. Sidinda Community Committee, Zimbabwe
- 129. Sikunga Conservancy (Zambezi Region), Namibia
- 130. Sorris Sorris Conservancy (Southern Kunene), Namibia
- 131. South African Hunters and Game Conservation Association, South Africa
- 132. South African Wingshooters Association, South Africa
- 133. South African Youth Biodiversity Network, South Africa

- 134. South Asia Reptile Conservation Alliance, International
- 135. Southern African Wildlife Management Association, South Africa
- 136. Stellenbosch University, South Africa
- 137. Support for Women in Agriculture and Environment (SWAGEN), Uganda
- 138. Sustainable Users Network (SUN), UK
- 139. Tanzania Natural Resources Forum (TNRF), Tanzania
- 140. The Conservation Coalition Botswana (TCCB), Botswana
- 141. The Development Institute, Ghana
- 142. The Game Rangers Association of Africa (GRAA), South Africa
- 143. The Wildlife Society, USA
- 144. Torra Conservancy Kunene South, Namibia
- 145. Tsiseb Conservancy (Erongo Region), Namibia
- 146. Uibasen Conservancy (Southern Kunene), Namibia
- 147. Uukwaludhi Conservancy (North Central Regions), Namibia
- 148. Wild Africa Conservation, Niger
- 149. Wild Sheep Foundation, USA
- 150. Wildlife & Environment Society of Southern Africa, South Africa
- 151. Wildlife Environmental Society of Malawi, Malawi
- 152. Wildlife Producers Association, South Africa
- 153. Wildlife Producers Association of Zambia, Zambia
- 154. Wildlife Ranching South Africa, South Africa
- 155. WILDOCEANS, South Africa
- 156. Women Environmental Programme (WEP), Nigeria
- 157. Women in Conservation (Kunene Region), Namibia
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# 2. Annex A

### 2.1. Pandemic Risk Reduction Measures Must Not Exacerbate Poverty and Inequality

Since its inception, the WHO has defined health as "a state of complete physical, mental and social well-being".<sup>3</sup> Health is inextricably linked to nature, which underpins our physical and mental wellbeing, and to poverty. The COVID-19 pandemic is far more than an immediate health crisis: it is also unleashing unprecedented economic<sup>4</sup> and social chaos. It is currently estimated to be costing the global economy US \$1 trillion in 2020 alone,<sup>5</sup> with the International Labour Organization predicting cutbacks equivalent to nearly 200 million full-time workers in just three months.<sup>6</sup> Marginalised and vulnerable communities are likely to bear the brunt of these impacts, with UNDP warning that nearly half the jobs in Africa could be lost.<sup>8</sup> Worldwide, nearly half a billion more people could be pushed into poverty, with the crisis disproportionately affecting women, leading to wide-ranging social impacts including human rights abuses.<sup>9</sup> Over half the global population could be living in poverty after the pandemic, with particularly severe impacts in sub-Saharan Africa, North Africa and the Middle East.

As the COVID-19 crisis will deepen poverty and damage health, potentially for generations, it is unconscionable that measures aimed at preventing future pandemics should compound this by further disadvantaging the world's most vulnerable people, for instance through indiscriminate bans on food markets, or unnecessary restrictions on wildlife trade. Millions of poorer households, especially in rural areas, are particularly dependent upon using wild resources for livelihoods and as insurance against economic shocks, whilst in urban areas millions more rely upon affordable produce from wet markets for food security.<sup>10</sup> Over a billion people worldwide, including indigenous peoples and local communities (IPLCs), rely on using and trading wildlife, by selling and consuming wild meat, fish, insects and plants, extracting timber and forest products, and many other activities. Many of these activities are legal, regulated and essential for livelihoods, and pose no significant threat to human health or biodiversity – indeed, when well regulated, wildlife trade can actually be beneficial for conservation. Indiscriminate restrictions risk unnecessarily exacerbating poverty and inequality without commensurate benefits.

#### 2.2. Wildlife Trade Must be Addressed in a Targeted, Tailored and Effective Way

Wildlife trade, particularly in "wet markets", has become a central part of the discourse around COVID-19, and it has been suggested that banning wet markets, and banning or severely restricting wildlife trade and consumption, could reduce future pandemic risks. However, these are complex topics. Wet markets underpin the informal food systems on which millions of urban and rural people depend. They sell a range of fresh produce: fruit and vegetables, fish, livestock and, sometimes, wildlife. Wildlife trade and consumption encompasses a wide variety of species, both common and rare, and a vast array of uses including food, medicines, clothing, textiles, pets and ornaments. Its drivers and dynamics are complex and varied. Even if wildlife trade bans were just focused on food, it is important to note that zoonotic diseases also emerge from domestic species. Focusing on Asian markets also ignores the fact that billions of people, in both the Global North and South, consume wild meat from both common and "exotic" species. Furthermore, current proposals to ban all wildlife trade undermine both the spirit and efficacy of the Convention on International Trade in Endangered Species (CITES), which seeks to regulate trade for the benefit of species conservation and enable trade that is legal, sustainable, and supportive of conservation and human livelihoods. It would be more productive for the WHO, UNEP and other stakeholders to work with CITES to align human health considerations with the objectives of the Convention.

Suggestions that pandemics could be avoided by imposing a global ban on wildlife markets or indiscriminately restricting wildlife trade are simplistic and risk enormous unintended consequences, including criminalising and further impoverishing countless people. Externally-imposed bans can drive trade underground and enmesh it with other organised criminal activity, as occurred after the 2013–2016 Ebola outbreak. In that situation, regulations would become harder to enforce, with lower standards of hygiene and animal welfare, and higher likelihood of zoonotic disease outbreak. Furthermore, demand may remain if a legal supply is suddenly removed (especially if captive breeding is also banned, as some recommend), risking a rise in black market prices and increased incentives for poaching. This could accelerate the exploitation and extinction of species in the wild. The risks associated with indiscriminate trade restrictions highlight the need for targeted regulation and enforcement tailored to each specific situation, at the appropriate level. This will increase the likelihood of achieving desired outcomes for conservation, health and animal welfare, while reducing unintended consequences for people and wildlife.

#### 2.3. Holistic, Far-sighted Solutions are Required to Improve Human and Planetary Health

This pandemic is a wake-up call with regard to our destructive relationship with nature. Wildlife trade is only one of many factors that must be addressed to reduce zoonotic disease outbreaks, secure biodiversity and improve human and planetary health. Habitat destruction and industrial agriculture play key roles in increasing zoonotic disease transmission from wildlife to humans, as people and their livestock come into ever closer proximity to wild species and pathogens.<sup>11</sup> In addition to catastrophic ecological impacts, the destruction of nature, in conjunction with climate change, has long-term, devastating impacts on human physical and mental health.<sup>12</sup> The role of domestic species in zoonotic outbreaks such as pandemic influenza must also be considered. Disease risks and welfare in farmed-animal supply chains should also be examined robustly, with risk reduction strategies targeted at the highest-risk species, whether domestic or wild. More widely, holistic approaches should be developed which look beyond pandemics, such as limiting antibiotic use in livestock to reduce risks of antibiotic resistance, which poses a major danger to human health. Business as usual cannot continue, and the WHO and UNEP are well positioned to encourage governments and other agencies to fully recognise the interconnected nature of planetary and human health. There is a need for a "One Health" coordinated approach both across the UN, including the WHO, UNEP, UNDP and the FAO, and beyond with other relevant organisations including the World Organisation for Animal Health (OIE) and the World Trade Organization (WTO). This synergistic approach would help develop and deliver a better, more equitable future for humans and the ecosystems which underpin our society.

#### 2.4. Summary

The response to COVID-19 has demonstrated that transformational action is possible if governments and citizens are convinced that the risks of inaction outweigh the costs. We urgently need similar transformational action to safeguard nature, delivering critical long-term benefits for both human and planetary health as part of our response to COVID-19. Robust, long-lasting measures must be taken to safeguard and adequately fund

the protection of nature and invest in science- and rights-based conservation and restoration. Devastating as the COVID-19 pandemic is, recovery from this crisis provides an unparalleled moment to create a better and more sustainable future. We must change our relationship with nature and develop appropriate strategies to equitably and sustainably manage the biodiversity upon which so many livelihoods depend. Changes must be inclusive, well-considered and socially and economically just, and every care must be taken not to exacerbate poverty and amplify existing inequalities.

The sustainable and inclusive management of nature is recognised throughout the UN as a key element to achieving poverty reduction objectives and meeting the Sustainable Development Goals. Indiscriminate restrictions on wildlife trade will devastate livelihoods, cause major harm to human health and wellbeing and undermine human rights, without significant benefits for biodiversity or health. Strategic, equitable, coordinated and holistic approaches are more likely to reduce pandemic risks, achieve a better future for both human and planetary health, and should be a core component of future WHO/UNEP recommendations.

CC: Achim Steiner, Administrator UNDP

Elizabeth M. Mrema, Executive Secretary, Convention on Biological Diversity, CBD Qu Dongyu, Director General, Food and Agriculture Organization, FAO Ivonne Higuero, CITES Secretary General Grethel Aguilar, Acting Director General, IUCN Michelle Bachelet, UN Human Rights Commissioner David Boyd, UN Special Rapporteur on Human Rights and Environment David Nabarro, Special Envoy to WHO DG on COVID-19

#### **Additional References**

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#### Endnotes

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