



TRADE AND CONSUMPTION OF BUSHMEAT IN THE EUROPEAN UNION

Need for better knowledge and enforcement

There are no official estimates of the trade and consumption of bushmeat in the European Union. Sociological drivers behind this trade are understudied. In consequence, a lack of data impedes the development of appropriate public policies.

Legal aspects

All meat entering the European Union in order to be commercialised in shops or restaurants must meet animal health and public health requirements. Meat may only be imported from EU-approved countries and EU-approved establishments. Every consignment must be certified by the competent authority of the third country, according to the EU requirements that are summarised in the appropriate certificate model. Upon arrival, every consignment must be submitted for veterinary import controls at the border inspection post. Once checked and approved, the products may be commercialised in the EU and must comply with the general rules concerning labelling, conservation, traceability etc. These conditions also apply to wild game (farm-raised wild animals) meat. However, with regard to wild game meat, the measures provided for in the sanitary legislation shall be without prejudice to the CITES legislation. The illegal importation of meat may occur via cargo or passengers.



With regards to CITES-listed species, their sale and consumption as bushmeat are not explicitly covered by international or European legal instruments. A reference could then be made to general provisions such as article 8 of CITES Regulation EC 338/97, which states that '(...) *the purchase, offer to purchase, display to the public for commercial purposes, use for commercial gain and sale, keeping for sale, offering for sale or transporting of sale of specimens of the species listed in Annex A shall be prohibited.* It is therefore prohibited for consumers and shops to buy and trade in any bushmeat originating from endangered species such as primates, pangolins or crocodiles. Mutatis mutandis prohibitions referred to for Annex A species shall also apply to specimens of Annex B listed species. The bushmeat trade in specimens listed in Annex B could then fall under the scope of this provision as well.

TAKE NOTE: REPTILE MEAT CAN BE IMPORTED LEGALLY

According to CITES convention, the importation of meat from ranched CITES-listed reptiles such as crocodiles, turtles or snakes is legal if the necessary CITES documents are provided. Besides CITES requirements, the importation of reptile meat from third countries should also comply with public health requirements. From March 2020, these criteria will be harmonised at EU level. The European Union is not a major producer of reptile meat, but imports have been increasing over the years. Belgium is a major importer of reptile meat and specific sanitary criteria apply for the meat of the American alligator, Australian freshwater crocodile, Nile crocodile or Australian saltwater crocodile.



Such infringements shall be subject to a sanction according to article 14. In Belgium, article 5 of the 1981 CITES Act applies: either the imposition of an administrative fine or a criminal fine (imprisonment for 6 months up to 5 years and/or criminal sanction of €26 (€208 with the application of additional fine surcharges) up to €50,000 (€400,000 with additional fine surcharges).

The scale of the trade and consumption of illegal bushmeat in the European Union

There are no official figures on the sale and consumption of illegal bushmeat in Belgium or in the European Union. Research to enhance better understanding of this phenomenon (the role of bushmeat in the diets and livelihoods of diaspora communities) and of the supply commodity chain is largely lacking. This has already been pointed out by the European Food Safety Authority in its assessment on the risk of transmission of Ebola through bushmeat (2014).

No overall value data is available for the bushmeat trade in the European Union, but research has demonstrated that the price of bushmeat purchased in Europe is up to ten times higher than the price applicable in the country of origin.

There is no data on whether parts of the bushmeat trade in Europe participate in an organised crime network. A lack of knowledge in relation to the whole chain marketing supply (from source countries to Europe), as well as pathways used to transport meat in the Europe Union, means there is no clear answer.

It is sociologically hypothesised that diaspora communities continue to import and eat bushmeat as a way to reconnect with their country of origin, both as a delicacy and as a socio-economic code.

With regard to African bushmeat, some investigation has been made by journalists and scientists in Brussels (Matonge, 2017-2018).

Investigations have suggested the following:

- **Shop owners have clear knowledge that bushmeat is illegal;**
- **Mistrust is often generated when looking for bushmeat;**
- **It is hypothesised that trade occurs via an ordering system;**
- **Meat is not necessarily available in the shop, but more often hidden in another place;**
- **Poor knowledge of the species sold (e.g. a monkey being sold as an antelope, a cow being sold as a buffalo).**

Monkey pox virus DNA was discovered in 3 samples.

<https://www.vrt.be/vrtnws/nl/2018/10/03/pano-bushmeat>

Recommendations

- **Collect data in relation to the sale and consumption of bushmeat in order to gain a comprehensive understanding of the illegal importation of meat from third countries, including bushmeat, into the European Union.**

In order to do so:

- **Carry out a study to estimate the sale and consumption of bushmeat in the European Union. Include sociological components and trade route investigations in order to allow for a better understanding of the patterns of bushmeat consumption from third countries within the European Union.**
- **Carry out a study assessing the risks to public health and animal health linked to the consumption of bushmeat in the European Union.**
- **Strengthen enforcement controls in shops and other selling points. Impose proportionate sanctioning upon traders and consumers.**
- **Increase awareness of the diaspora communities that:**
 - **Trade in bushmeat, except for the legal importation of ranched specimens, is illegal and the consumption of such meat is not compatible with national or European policies;**
 - **Trade in bushmeat is often not sustainable as it leads to defaunation and contributes to poverty in source countries;**
 - **They have a central role to play to change consumption behaviour and should take responsibility by facilitating awareness-raising campaigns and enforcement efforts.**

References

Agence fédérale pour la Sécurité de la Chaîne alimentaire. Circulaire relative à la mise sur le marché de viande de crocodile. 2018; accessed on Nov 12 2019. Référence PCCB/S3/1535520.

COMMISSION IMPLEMENTING REGULATION (EU) 2019/627 of 15 March 2019 laying down uniform practical arrangements for the performance of official controls on products of animal origin intended for human consumption in accordance with Regulation (EU) 2017/625 of the European Parliament and of the Council and amending Commission Regulation (EC) No 2074/2005 as regards official controls [2019] OJ L131/51.

Commission Implementing Regulation (EU) 2019/628 of 8 April 2019 concerning model official certificates for certain animals and goods and amending Regulation (EC) No 2074/2005 and Implementing Regulation (EU) 2016/759 as regards these model certificates [2019] OJ L131/101.

Draft Commission regulation (EU) amending Regulation (EC) No 2073/2005 as regards Salmonella in reptile meat. SANTE/11310/2018. D060702/03. (POOL/G4/2018/11310/11310-EN.docx).

European Food Safety Authority. 2007. Scientific opinion of the Panel on Biological Hazards: public health risks involved in the human consumption of reptile meat; accessed on 2019 Nov 12. <http://www.efsa.europa.eu>.

European Food Safety Authority. 2014. An update on the risk assessment of the Ebola virus (EBOV) via the food chain; accessed on Nov 12 2019. <https://www.efsa.europa.eu>.

This fact sheet is part of a set of a series of six covering the trade in exotic animal species. They are focused on illegal importation of meat into the European Union (including bushmeat) and the legal or illegal trade in reptiles and amphibians. They were developed on a collaborative way between the FPS Health and a group of experts. They were issued during the "Towards a sustainable wildlife trade" One World One Health recommendations event organized on 3 and 4 December 2019 by the FPS Health and the Belgian Biodiversity Platform.



Biodiversity.be



federal public service
HEALTH, FOOD CHAIN SAFETY
AND ENVIRONMENT

