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Informations aux associations aquariophiles
de l'Union Européenne

Chers amis aquariophiles

À la suite d'une conférence-débat organisée par VetEffect le 28 octobre 2025, à laquelle j'ai participé au nom de la Fédération Française d'Aquariophilie, j'ai reçu, au début du mois d'avril 2026, un compte rendu des échanges.

La surprise a été de constater que l'un des partenaires de cette organisation est notamment Eurogroup for Animals, association animaliste qui a des entrées auprès du Parlement européen.

Très peu d'associations d'éleveurs étaient représentées lors de cette conférence. Les questions qui ont été posées au cours des débats ne figurent évidemment pas dans le compte rendu. (Voir document : « Compte rendu Schrijver »).

À la suite de la réception de ce compte rendu, nous avons écrit à Monsieur Remco Schrijver, qui nous a répondu. Comme on pouvait s'y attendre, cette réponse renvoie vers la Commission européenne. (Voir document : « Échange Schrijver »).

Étant donné que nous avons déjà eu plusieurs échanges avec la Commission européenne sur d'autres sujets, nous avons décidé de déposer une plainte auprès du Médiateur de l'Union européenne à Strasbourg. (Voir document : « plainte.pdf »).

Si vous le souhaitez, il pourrait être opportun que chaque association dépose également une plainte auprès du Médiateur.

Pour la suite, nous envisageons de faire signer un manifeste par chacune de nos associations adhérentes, voire par chaque adhérent individuellement.

Avec toutes mes amitiés aquariophiles ;

Pour FédéAqua
Philippe Ancelot
Président



Dunkerque le 13 mai 2026

Philippe ANCELOT

Président

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Information for aquarium societies
in the European Union

Dear fellow aquarists,

Following a conference and debate organized by VetEffect on October 28, 2025, which I attended on behalf of the French Aquarium Society (Fédération Française d'Aquariophilie). I received a report in early April 2026.

Surprisingly, one of the partners of this organization is Eurogroup for Animals, an animal rights association with connections in the European Parliament. Very few breeders associations were present at this conference. The questions that were asked are, of course, not included in the report. See document "Schrijver Report."

After receiving the report, we wrote to Mr. Remco Schrijver, who replied. Naturally, the reply refers us to the European Commission. See document "Schrijver Exchange."

Given that we have already corresponded with the European Commission on other matters, we have decided to file a complaint with the European Ombudsman in Strasbourg.

See document "complaint.pdf." If you wish, I think it would be advisable for each association to file a complaint with the mediator. Going forward, we plan to have each of our member associations, or even each individual member, sign a manifesto.

Pour FédéAqua
Philippe Ancelot
Président

Destinataires : Recipients :

France :

Killi Club de France – Communauté Internationale pour les Labyrinthidés – International Betta Splendens Club – Association France Cichlid – Association France Vivipares et toutes associations locales ou régionales affiliées FédéAqua.

Allemagne : Verband Deutscher Vereine für Aquariun und Terrarienkunde - Deutsche Gesellschaft für Herpetologie und Terrarienkunde - Deutsche Killifisch Gemeinschaft – Internationales Kuratorium Guppy-Hochzucht - Internationale Gemeinschaft für Labyrinthfische - Deutsche Cichliden-Gesellschaft - Deutsche Gesellschaft für Lebendgebärende Zahnkarpfen.

Autriche :

Osterreichischer Verband für Vivaristik und Ökologie.

Belgique :

Belgische Cichliden Vereniging - Belgische Bond voor Aquarien en Terrariumhouders - Interclub d'Aquariophilie de d'Ichtyologie francophone - Association Killiphile Francophone de Belgique.

Bulgarie :

Killifish Association Bulgaria.

Scandinavie :

Poecilia Scandinavia - Scandinavian Killifish Association - Nordiska Cikhidsällskapet.

Espagne :

Spanish Killifish Association - Asociación Española de Cíclidos - Association Españolas de Acuaristas - Association Aragonaise d'Aquariophilie et d'Ichtyologie.

Italie :

Associazione Acquariofili Italiani - Associazione Italiana Killifish - Associazione Italiana Guppy - Associazione Italiana Betta.

Pays-Bas :

Nederlandse Bond Aqua Terra - Killifish Nederland - Nederlandse Cichliden Vereniging - Poecilia Netherlands - Labyrinthvis Werkgroep.

Pologne :

Polska Grupa Akwarystów - Polskie Stowarzyszenie Miłośników Pielęgnic.

Portugal :

Associação Portuguesa de Killifilia.

République Tchèque :

Unie Akvaristu České Republiky - Czech Killifish Association - Klub Cichlid CZ - Český labyrintkář.

Si vous avez connaissance d'autres organisations ne figurant pas dans les destinataires, merci de leur transférer ce message et de nous faire parvenir leurs coordonnées (ffa@fedeaqua.org)
Tous nos remerciements.

If you are aware of any other organizations not listed among the recipients, please forward this message to them and send us their contact details (ffa@fedeaqua.org).
Thank you very much.



Event Summary Report

Reframing the exotic pet trade in Europe: developing effective science-based demand reduction interventions

Ref: ENV/2023/OP/0020

October 28, 2025

Produced for:



In partnership with:

**EUROGROUP
FOR
ANIMALS**

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1. Introduction

1.1. Introduction

This Event Summary Report is an outcome of the project: 'Reframing the exotic pet trade in Europe: developing effective science-based demand reduction interventions' (ENV/2023/OP/0020). The project aims to identify and test effective strategies to reframe demand for exotic pets in the EU, and is planned to be completed with publication of the final report in Q1 2026. The workshop was designed to gather insights on enablers, barriers and future perspectives to be used for the preparation of the final report.

1.2. The workshop

The workshop was held Tuesday, October 28 in Brussels, as a hybrid event. In total, the workshop gathered 122 participants, including 80 online attendees and 42 in-person participants, representing a broad range of stakeholder perspectives from competent authorities, NGOs, academia, and industry and sector associations across the EU. The programme is attached as Annex 1.

The event was opened with welcome remarks by Ms Monika Hencsey, Director for Green Diplomacy & Multilateralism at DG Environment, European Commission. The introductory statements highlighted the importance of cross-sectoral collaboration in addressing the challenges associated with the trade and keeping of exotic pets, and the role of behavioural and policy interventions in promoting more sustainable and responsible practices.

The workshop was structured with first a plenary presentation of the findings, after which the persons attending in-person were divided into three breakout groups, representing a mix of stakeholders, to discuss the three main themes of the day: 1) Trade, 2) Consumer Insights, and 3) Recommendations and Future Perspectives. The three groups discussed each topic for about 20 minutes in alternate order so that each group had discussed each topic at the end of the day. For the same topics, the persons on-line were divided into two groups, and they were exposed to questions to answer on-line on the same three themes as the in-person groups, followed by some open discussion. The persons on-line were invited to respond to questions about the three main themes that were also discussed in the in-person groups, and invited for discussion.

The interim results as presented and key insights from the in-person and on-line sessions are presented in the chapter 2.

2. Presentation of interim results

2.1. Plenary presentations of interim results

Recommendations and key interventions; Nynke Tromp, Affiliated researcher with the department of Human-Centered Design, Faculty of Industrial Design Engineering, TUDelft

Nynke Tromp explained the project's approach: systemic design research and reframing. After introducing the extensive research (for instance, a 100+ stakeholder interviews and surveys (e.g., with the pet industry representatives, NGO's, zoos etc), reptile and amphibian keeper interviews and surveys, trade database analyses, a social media scan, literature research), underlying the identified key phenomena that describe key dynamics in trade, recommendations were shared.

Next, five key interventions were detailed: A social media campaign, growing a coalition, a product-based market, digital registry and information platform and conservation programs. The key interventions target different consumer groups (e.g., potential keepers, novice keepers, expert keepers) and different responsible consumer behaviors that together drive systemic change toward more sustainable trade in the reptiles and amphibians in the EU.

Intervention evaluations with scenarios; Ellis van den Hende, Assistant Professor of Innovation Acceptance and Consumer Research at the Faculty of Industrial Design Engineering, TUDelft

Ellis van den Hende presented the results of scenario evaluations of three pilot interventions were shared. From the five key interventions, a subset was evaluated with consumers: the Social media campaign intervention as short-term intervention and two versions of the Product-based market intervention as mid-term and long-term interventions.

Using a controlled experimental set-up, about 2400 consumers across four Member States had read a scenario text and evaluated the likelihood of responsible consumer behaviors to occur in impulse purchase situations with and without implementations of the interventions. Moreover, they evaluated how the social media session and the markets described in the scenarios stimulated responsible keeping.

Key insights from social media intervention; Davide Rigoni, Co-founder and managing partner of Sapience

Davide Rigoni presented the results of the testing of the social media campaign conducted across four Member States: Czechia, Germany, Spain, and the Netherlands. The campaign was evaluated with over 4,000 consumers in these countries within a controlled survey environment. Participants were shown a mock-up Instagram feed, and their eye movements were recorded using eye-tracking technology.

Consumers were exposed to the video advertisement either within the social media feed or as a standalone video. Follow-up survey questions explored the impact of the video ad on attention, interest, and engagement, as well as shifts in perceptions and attitudes toward keeping exotic pets - particularly reptiles and amphibians. Three different message framings were tested:

- One focusing on personal costs and effort,
- One emphasizing animal welfare, and
- One highlighting the legal and health consequences of keeping reptiles and amphibians.

It was shown that the social media campaign did attract attention, generated interest, and was able to shift perception and attitudes towards exotic pets. More detailed insights and main findings were presented during the session.

2.2 Introductions for Breakout groups and on-line sessions

As introduction to the Breakout groups (in person sessions) and for the on-line sessions, the three main topic areas were introduced, which began with three short presentations:

- Trade insights: Boyd Leupen, Wildlife Trade Specialist at Monitor Conservation Research Society
- Quantitative consumer insights (profiles and motivations): Tim Geleyn, Senior Researcher at Sapience
- Growing a coalition: Nynke Tromp, Affiliated researcher with the department of Human-Centered Design, Faculty of Industrial Design Engineering, TUDelft

The presentations were the following:

Trade insights

Boyd Leupen presented the findings of the early stages of the project, which aimed to determine the scale and scope of the exotic pet trade involving the European Union (EU), identify key focus countries for further study, and highlight existing data gaps. The work combined analysis of multiple trade databases, both public and obtained through official requests, with a comprehensive literature review.

Results showed that available trade data are heavily skewed toward CITES-listed species, leaving significant gaps for non-CITES species that dominate the exotic pet market. The CITES Trade Database revealed that reptiles are the most heavily traded taxonomic group, with more than five million individuals imported into the EU between 2003 and 2022. Around half of these were wild-caught and half captive-bred, with a recent trend toward captive breeding.

Comparative analysis of CITES, EUROSTAT, and TRACES data showed that total reptile trade volumes are far higher than reflected in CITES records alone, up to four times higher for imports and twenty times higher for exports. However, lack of species-level information and inconsistencies between datasets limit the ability to assess sustainability and legality.

Species-specific studies (including ExoPet, BfN ProWildlife, and LEMIS data) identified close to 1,600 reptile species in trade in Germany alone, and more than 1,000 species in trade between the EU and US, the majority being non-CITES species. The EU remains a net importer of reptiles, with imports primarily wild-sourced and exports mostly captive-bred.

Seizure analyses using EU-TWIX and WiTIS datasets underscored the difficulty of measuring illegal trade. Official figures likely capture only a small fraction of actual trafficking.

Key focus countries identified for further investigation include Czechia, Germany, Spain, and the Netherlands. Overall, the EU is a major global hub for the reptile trade, but current monitoring systems offer only a partial picture. The study highlights the need for improved, species-level data collection and stronger monitoring mechanisms to inform effective policy and conservation action.

Quantitative consumer insights

Tim Geleyn presented the findings from the quantitative consumer research conducted with 4,000 participants across four Member States (Czechia, Germany, Spain, and the Netherlands). The 12-minute online survey collected new data on consumer attitudes and profiles related to exotic pet ownership, as well as motivations to keep exotic pets, focusing specifically on reptiles and amphibians.

The study mapped the proportions of keepers, potential keepers, and rejecters, revealing notable differences between countries. It also showed that keepers and potential keepers tend to be younger than the general population, and highlighted the central role of social media in shaping interest in and engagement with exotic pet content.

To explore the motivations behind exotic pet keeping, both explicit (self-reported) and implicit (association-based) measures were used. Results showed that fascination for nature and a sense of duty and commitment to animal well-being are key motivators for keeping reptiles and amphibians. At the same time, many consumers perceive these animals as requiring less time, care, and cost than common pets - an important insight that may help explain impulse buying in this market.

These findings provided the behavioural foundation for developing the recommendations and intervention concepts presented in the later stages of the project.

The concept of the group discussions aimed to develop the idea of a test to be taken at some stage prior to purchase, e.g. a responsible keeper Quiz/ Test. One of the in depth surveys asked: "Would you be willing to take a test to assess your readiness to become a keeper - after the survey". Responding "yes" required commitment from the

respondents as they were under the impression they would actually take a test (though they did not) - 75% of potential keepers said they would.

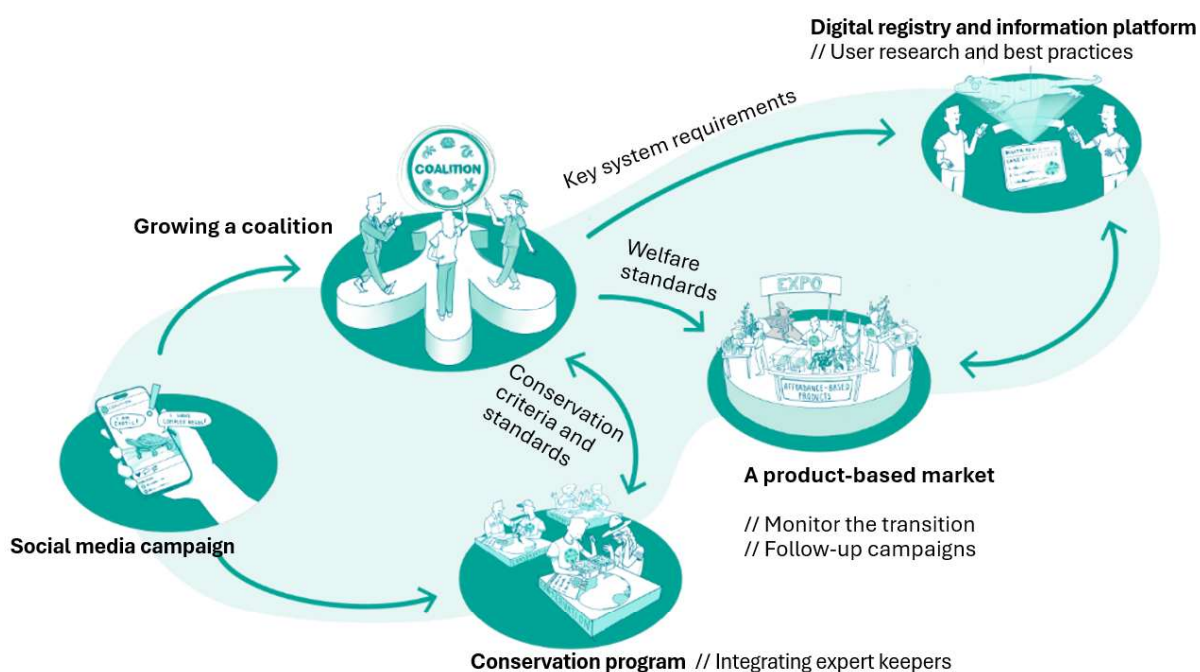
The workshop therefore discussed how this test could be designed as part of a reframing strategy.

Growing a coalition

Nynke Tromp explained that the session was primarily set-up to organise a dialogue around “the coalition” as a concept, and inquire what motivations different stakeholders have to become part of the coalition.

This basic question was asked to all participants, but the first round of the session was fully dedicated to this question. Subsequently the session contained two rounds: a) identification of different roles that the coalition can play within the system to transfer to a more sustainable system and b) the barriers and enablers that people could identify for these roles.

The possible roles of the coalition were presented as illustrated in the figure below:



3. Insights from the day

3.1. Summaries of breakout sessions

Trade

During the discussion, participants agreed that having up-to-date and comprehensive data on traders and keepers is crucial to improving traceability, transparency, and accountability across the wildlife trade chain. Such data were seen as key to enabling evidence-based decision-making, supporting scientific assessments, and facilitating more efficient CITES listing processes. It was noted that better data would also help identify trade trends, assess population risks, and guide awareness campaigns, while strengthening enforcement and preventing illegal or unsustainable trade. Conversely, the lack of reliable data was widely recognised as a major barrier, leading to

uninformed policy decisions, ineffective enforcement, resource misallocation, and reduced transparency. Participants highlighted that gaps in data collection encourage reliance on assumptions rather than evidence, hinder communication efforts, and contribute to fragmented systems and the normalisation of keeping unsuitable species. Several under-used data sources were identified, including TRACES, customs and seizure records, national import/export statistics, market-level data, and registration systems. To address these gaps, participants proposed measures such as listing relevant species in Annex D of EC Regulation 338/97, improving and harmonising TRACES, mandating species-level data collection, and developing a centralised European wildlife trade database. Other suggestions included digitalising import data, introducing importer self-declarations of legality, promoting voluntary transparency among breeders, and carrying out regular national inventories. Capacity building was also emphasised, with calls for enhanced training, support for range countries, and a model private-sector database to standardise reporting. Finally, the group noted that breeding statistics are often poorly maintained by umbrella organisations and that there is a need to clarify the definition of a commercial breeder across taxa.

Quantitative consumer insights

During the discussion group on quantitative consumer insights, participants explored how a potential aptitude test for animal keepers could be designed, promoted, and implemented, and what its outputs should be. Through a discussion on feasibility and impact, the group identified several high-impact, high-feasibility “quick wins.” It was agreed that the test could be hosted across multiple platforms—such as points of sale, fairs, or online environments—using QR codes to engage potential keepers at key decision-making moments. Promotion should be highly targeted, focusing on individuals actively considering acquiring an animal, with messaging strategies informed by previous survey insights. Participants strongly supported the idea that the tool should be developed or endorsed by an official body, ideally the EU or national authorities, to ensure credibility and public trust. In terms of outputs, the group proposed a layered skills framework outlining species-specific knowledge requirements and accounting for complex ownership contexts, potentially culminating in a certificate of competence and commitment to responsible ownership. Other ideas discussed included a formal pledge for lifelong animal care and large-scale awareness campaigns, though these were seen as impactful but less feasible at present.

Growing a coalition

During the discussion on growing a coalition, participants agreed that success would depend on a clear, shared purpose and well-defined goals, supported by a legitimate mandate to act. It was emphasised that the coalition’s values must be made explicit, as some stakeholders were more motivated by conservation aims than by animal welfare. Participants stressed that the coalition should be both science-based and open, providing space for differing perspectives and recognising the value of practical experience alongside scientific evidence. While disagreements were seen as acceptable, the focus should remain on shared areas of agreement. The group highlighted the need for the coalition to be practical and action-oriented—driving collaboration, joint projects, and sharing insights on what works in practice—while taking incremental steps toward long-term goals. A key motivation identified was the opportunity to exchange and integrate knowledge across sectors, helping to understand and address unsustainable practices. Additional roles for the coalition were proposed, including monitoring and evaluating transitions in the product-based market, facilitating communication with keepers and potential keepers, and enabling dialogue between organisations involved in conservation and trade. Participants also discussed potential barriers and enablers for these roles, noting that while not all were fully explored, building trust, maintaining openness, and ensuring tangible outcomes would be critical to sustaining engagement and progress.

3.2. Summaries of on-line sessions

The discussion and Slido survey results showed strong consensus on the need to improve the sustainability and legality of the exotic pet trade. Across sessions, participants ranked improving trade data and transparency (e.g., through TRACES and CITES) and enhancing identification and traceability across the trade chain as top priorities, followed by stricter legislation, better control of imports and domestic sales, and greater involvement of breeders and keeper associations. Participants agreed that EU-wide, digital, species-level trade data—including non-CITES

species—are essential to strengthen transparency and enforcement. When discussing how to reframe demand, participants mentioned in wordclouds targeted awareness, stronger legislation, breeder registration, positive lists, and proof-of-knowledge requirements, rather than relying solely on awareness campaigns. For beginner keepers, motivations to acquire exotic pets were considered to be centred on visual appeal, availability, affordability, and perceived ease of care, while experienced keepers were considered to be driven by rarity, biological features, and unique behaviours. The proposed “Are You a Responsible Keeper?” quiz was supported as a promising awareness tool, ideally hosted on social media, pet trade platforms, and official or government websites, with credible promotion by EU or national authorities, NGOs, breeder associations, and expert keepers. While some participants supported rewards for people that had completed the “Are You a Responsible Keeper?” quiz, such as certificates, discounts, or educational resources, others felt that responsible ownership contested such incentives. Social media was viewed as a highly effective tool to reduce illegal trade demand, with suggestions for short, engaging, and emotionally resonant content—such as memes, visuals, but also humour—while also noting potential risks of sparking curiosity and thus increasing demand. Messages highlighting animal welfare needs, human health risks, and the financial cost of responsible ownership were considered as most persuasive for changing behaviour. The most impactful and feasible interventions identified were social media campaigns and a digital registry and information platform, followed by conservation programmes and sustainable product-based markets. Participants viewed breeders and keepers as key contributors to best practice sharing, awareness raising, and care standards, and breeders organizations as crucial actors in data collection, research, communication, and conservation efforts. Questions what would motivate people to join a coalition reflected a shared commitment to animal welfare, sustainability, and species protection, with common ground found between conservationists, welfare advocates, and the trade community through a mutual passion for animals, nature, and combating illegal trade.

4. Closing remarks

The event was closed by Agata Sobiech, DG Environment CITES, Team Leader for Wildlife Trade, DG Environment at the European Commission; with reactions from the event itself. She stressed that this is part of the activities under the Action Plan. She recognised that several participants may have been expecting to hear at the session about awareness raising actions for CITES-listed species, kept as pets without permits, but this was never the idea. This is a project from the Parliament, and it is used as an opportunity to look at things differently. This was a chance to test what can work, and what does not, to experiment. She described the extensive consultations with stakeholders, and stressed that this is not a piece of legislation. She explained that the purpose of this project was to bring polarised stakeholders together, and is an opportunity for stakeholders to speak among themselves. This is what is missing, and this workshop has given a start for such a discussion that we hope to continue.

5. Next steps

How will these results be incorporated into the final Report

The study is to be finalised in Q4 2025, and the final report is planned to be published by the Commission in Q1 2026. The follow up from this project will depend on funding. One chapter in the final report, will include a discussion of the results based upon this workshop, including relevant elements of comments and questions, final evaluation survey and the discussion groups as follows:

- Comments and questions from the sessions have been collated and analysed. Open questions will be used to add clarifications in explanations in the final report.
- Comments related to the results and next steps will be incorporated where relevant to the discussion section of the recommendations.

- The information gathered on the evaluation Slido will be collated and analysed to understand how similar sessions on this topic should be run in the future, especially to indicate how coalitions can become more attractive and dialogue can be fostered. Relevant points relating to the Recommendations of the project will be incorporated into the discussion chapter in the final report.
- From the workshop open questions will be used to clarify the framing of the project, to ensure the full purpose is clear for all stakeholders, and open questions will also be used to better clarify, where it was lacking in workshop presentations, approaches, terms and explanations in the final report.

Annex 1 – Workshop programme



HYBRID WORKSHOP



Reframing the exotic pet trade in Europe: presentation of results

28 October 2025 • 09:30 -13:30 CET

Royal Library of Belgium

Mont des Arts 28, 1000 Brussels



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Agenda

9:00 - 9:30 - Registration and welcome coffee at Consilium Room

9:30 - 9:45 - Welcome remarks

- Ms Monika Hencsey, Director for "Green Diplomacy & Multilateralism", DG Environment, European Commission.
 - Remco Schrijver, Founder and managing partner of VetEffect
-

9:45 - 10:45 - Presentation of the findings

- Recommendations and key interventions
 - Nynke Tromp, Affiliated researcher with the department of Human-Centered Design, Faculty of Industrial Design Engineering, TUDelft
 - Intervention evaluations with scenarios
 - Ellis van den Hende, Assistant Professor of Innovation Acceptance and Consumer Research at the Faculty of Industrial Design Engineering, TUDelft
 - Key insights from social media intervention
 - Davide Rigoni, Co-founder and managing partner of Sapience
-

10:45 - 11:00 - Coffee break

[LINK TO FOLLOW THE PLENARY ONLINE](#)



HYBRID WORKSHOP



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Agenda

11:00 - 11:30 - Presentations

- Trade data
 - Boyd Leupen, Wildlife Trade Specialist at Monitor Conservation Research Society
- Quantitative consumer insights (profiles and motivations)
 - Tim Geleyn, Senior Researcher at Sapience
- Growing a coalition
 - Nynke Tromp, Affiliated researcher with the department of Human-Centered Design, Faculty of Industrial Design Engineering, TUDelft

11:30 - 12:50 - Workshops

- ONLINE: Trade, Consumer insights, Recommendations & Future Perspectives
 - Remco Schrijver, Founder and managing partner of VetEffectT
- ONLINE: Trade, Consumer insights, Recommendations & Future Perspectives
 - Bente Schrijver, Business development executive at VetEffectT
- IN-PERSON: Trade, Consumer insights, Recommendations & Future Perspectives
 - Nick Clark, Eurogroup for Animals Wild Animals Programme Leader

12:50 - 13:10 - Workshop Summary

13:10 - 13:20 - Closing remarks

- Agata Sobiech, DG Environment CITES, Team Leader for Wildlife Trade, European Commission, DG Environment
- Remco Schrijver, Founder and managing partner of VetEffectT

13:20 - 14:00 - Light lunch



Monika Hencsey

Ms Monika Hencsey, Director for "Green Diplomacy & Multilateralism", DG Environment, European Commission.

Monika Hencsey is a Director in the European Commission's DG Environment, leading the "Green Diplomacy & Multilateralism" (DG ENV.F) directorate. She is also listed as an Acting Head of Unit in DG REGIO for the Outermost regions. Hencsey holds degrees from the Johns Hopkins University (SAIS) and the College of Europe. She previously held a Director position in DG REGIO.



Remco Schrijver

Founder and managing consultant at VetEffect

Remco Schrijver is a veterinarian and managing consultant at VetEffect, focusing on capacity building and technical assistance in animal health, welfare, conservation, and sustainable food systems. His experience also includes for the Central Veterinary Institute and government services in the Netherlands, contributing to disease research and policy advice. He has contributed to several project and study reports for international clients such as the European Commission and the Worldbank.



Nynke Tromp

Affiliated researcher with the department of Human-Centered Design, Faculty of Industrial Design Engineering, Delft University of Technology

Dr. Ir. Nynke Tromp is an advocate for social design and behaviour change. Her work focuses on using design to accelerate desired societal transitions, such as the protein shift and changes in mental healthcare. She leads stakeholder sessions to spur innovation and implement behavioral designs (products, services, programs) for change. With a background at the design agency Reframing Studio, her research, detailed in the books *Social Design* and *Designing for Society*, emphasizes practical value across diverse topics like organ donation, democracy, food, safety, and mental healthcare.



Ellis van den Hende

Assistant Professor of Innovation Acceptance and Consumer Research at the Faculty of Industrial Design Engineering, Delft University of Technology

Dr. Ir. Ellis van den Hende is assistant professor at the department of Design, Organisation and Strategy. Her primary research explores the intersection of storytelling and sustainable consumption. Specifically, she investigates how designed packaging cues promote sustainable disposal behaviours, how consumers respond to natural materials (such as mycelium) and how storytelling influences consumer adoption of product innovations. She collaborates in EU projects and in projects with municipalities.

Her highly regarded work has been published in a variety of influential, high-impact journals, including the Journal of Consumer Research and Proceedings of the National Academy of Sciences.



Davide Rigoni

Co-founder and managing partner of Sapience

Davide Rigoni, co-founder and managing partner of Sapience, is an international expert in evidence-based behavioural insights serving businesses, organizations, and governments. With over a decade in consumer and behavioural research, he excels in qualitative and quantitative methodologies, nudging interventions, and neuroscientific technologies. He holds a Ph.D. in cognitive science from the University of Padova and conducted research at Aix-Marseille and Ghent Universities. Rigoni bridges business and academia, having taught Consumer Behaviour at the Universities of Padova, Hult International Business School (UK), and Ghent University.



Boyd Leupen

Wildlife Trade Specialist at Monitor Conservation Research Society

Boyd Leupen is a wildlife trade specialist and Director at Monitor Conservation Research Society. Active in conservation since 2009, he has eight years of research experience, including roles at TRAFFIC Southeast Asia and Monitor. His expertise spans diverse taxa, international law, and research methods like trade and market surveys. He is an active member of IUCN SSC Specialist Groups and co-curator of the Songbirds in Trade Database. Boyd advocates for a holistic, collaborative approach to tackling complex wildlife trade issues.



Tim Geleyn

Senior Researcher at Sapience

Tim Geleyn is a Senior Researcher at Sapience who specialises in quantitative research, consumer insights, and data-driven evaluation. He has extensive experience designing and analysing large-scale surveys across Europe, and applies behavioural science to inform evidence-based communication, policy evaluation, and interventions promoting sustainable and responsible behaviour.



Bente Schrijver

Business development executive at VetEffect

Bente Schrijver joined VetEffect in 2018 as a business development executive for public health projects. With expertise in project management, public health, and zoonoses, she has worked on projects for the European Commission and the World Bank. Her skills include quality control, organizing international training, and data analysis using tools like EU Survey. She currently participates as a public health expert and data analyst on several One Health projects and manages the Dairy Competence Builder app.



Sandra Altherr

Co-founder of Pro Wildlife

Dr. Sandra Altherr is a biologist and co-founder of the non-profit organization Pro Wildlife (1999), where she has been Scientific Director since 2015. Her long career has focused on investigating and documenting the wildlife trade and its impact on biodiversity, leading to numerous publications. A major focus has been the exotic pet trade, where her work, notably the "Stolen Wildlife" report series, influenced the EU's Action Plan against Wildlife Trafficking. She also managed a project on demand reduction for reptile and small mammal pets for the German Federal Agency of Nature Conservation.



Nick Clark

Wild Animals Programme Leader

Nick Clark is Wild Animals Programme Leader at Eurogroup for Animals. Born in the UK, but having lived in Spain and Brussels, he studied zoology and has a Masters in Human Ecology, where he specialises in using science and multiple stakeholder opinions to help inform sound and responsible policy. Nick has a varied career as a head teacher, advocate for sustainable development through the social economy and as wild animals expert at Eurogroup for Animals. He believes that we need to change the way humans use nature, to more highly value nature for nature's sake.



Agata Sobiech

DG Environment CITES, Team Leader for Wildlife Trade, European Commission, DG Environment

Agata Sobiech leads the team dealing with CITES and wildlife trafficking in the European Commission's Directorate-General for Environment. Prior to this assignment she worked in several other European Commission departments, including international cooperation and home affairs, on issues such as Schengen cooperation, migration, trafficking in human beings and youth participation. She holds degrees in international relations, European studies and psychology.

Dunkerque le 5 mai 2026

Philippe ANCELOT

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Subject:

Complaint for maladministration concerning the governance, methodology, and composition of the expert panel for the project "Reframing the exotic pet trade in Europe" (ENV/2023/OP/0020)

Attachments:

- Statutes
- Workshop Summary Report dated October 28, 2025

Madam Ombudsman,

The French Federation of Aquarium Keepers, known as FédéAqua, has a legitimate interest in taking legal action, as the work of the European project "**Reframing the exotic pet trade in Europe**" is likely to directly and substantially affect the very purpose of the Federation, which is to promote, regulate, and defend the responsible practice of aquarium keeping and the amateur breeding of aquatic and exotic species. The methodological guidelines and recommendations stemming from the project—particularly those aimed at reducing demand, introducing competency tests, mandatory digital registries, and widespread restrictions—are likely to restrict the legal, transparent, and regulated exercise of its members' activities. These potential developments undermine the collective interests that FédéAqua is statutorily mandated to represent and protect, thus establishing its direct, personal, and legitimate interest in bringing the matter before the European Ombudsman to ensure respect for the principles of good administration, pluralism, and a balance of stakeholders.

In light of the foregoing, the French Federation of Aquarists (FédéAqua) also justifies its standing to sue with regard to the principles enshrined in the *European Code of Good Administrative Conduct* adopted by the European Parliament in 2001, which imposes requirements of **neutrality, impartiality, objectivity, balance of stakeholders, and fair consideration of the interests concerned** on the institutions and bodies of the Union. However, the methodological guidelines and recommendations stemming from the project "*Reframing the exotic pet trade in Europe*" are likely to directly affect the legal, transparent, and responsible activities that FédéAqua is statutorily mandated to promote and defend. Any infringement of these fundamental principles therefore harms the collective interests that the Federation represents, which forms the basis of its direct, current, and legitimate interest in bringing the matter before the European Ombudsman.

In this context, I would like to draw your attention to several elements that may constitute cases of **maladministration** within the meaning of Article 228 of the TFEU, concerning the design, governance, methodology, and representativeness of the panel of experts associated with the European project "*Reframing the exotic pet trade in Europe: developing effective science-based demand reduction interventions.*"

The facts presented below are based in particular on the **Workshop Summary Report of 28 October 2025**, produced for the European Commission.

1. A project oriented towards demand reduction, not a neutral study

The official document specifies that the project aims to “develop effective science-based demand reduction interventions” (p. 3). This wording reveals that the objective is not to objectively analyze practices, but rather to **reduce demand**, which constitutes a predetermined normative orientation.

Such an objective, stated in the title itself, raises questions about the expected neutrality of a project funded by the European Union and intended to inform public policy.

It can also be noted that the very design of the project, as presented in its official documents, seems to be based on a logic in which keeping animals other than dogs and cats is implicitly considered a problematic practice that must be progressively reduced. The project is indeed structured around “demand reduction interventions,” and the work presented focuses exclusively on levers aimed at decreasing the acquisition and keeping of exotic animals, without ever considering the possibility of responsible, regulated keeping that complies with animal welfare standards. This methodological approach, combined with the complete absence of field experts, exotic animal veterinarians, ethologists, animal scientists, or representatives of responsible owners, leads to a one-dimensional portrayal of keeping non-domestic animals as a practice to be discouraged, or even eliminated in the long term. While not explicitly stating that this is an objective of the institutions, this project structure reveals an **implicit ideological bias** that could undermine the diversity of legal practices and the collective interests that the Federation is tasked with defending.

It should also be noted that several aspects of the project are based not on established scientific principles, but on ideological assumptions regarding the keeping of non-domestic animals by European citizens. The very structure of the project—entirely focused on *demand reduction interventions*—leads to presenting the keeping of animals other than dogs and cats as an inherently “**unsustainable**” practice, even though no veterinary, ethological, zootechnical, or scientific expertise has been mobilized to objectively assess its “*unsustainable and untenable*” nature. This bias is clearly evident in the “Growing a coalition” session, where the report states that “*Some stakeholders were more motivated by conservation aims than by animal welfare*” (p. 6), while no animal welfare specialist was present to qualify or analyze these motivations. Such an approach, based on perceptions rather than rigorous scientific evaluation, raises a *serious risk of disproportionately infringing on citizens freedom to legally keep animals*, a freedom that can only be restricted on the basis of objective, transparent, and scientifically sound data. As it stands, the project appears to be based more on normative beliefs than on science, contradicting the principles of impartiality, objectivity and proportionality enshrined in the *European Code of Good Administrative Conduct*.

2. Homogeneous and activist composition of the consortium

The report shows that the project partners include exclusively:

- Eurogroup for Animals,
- Pro Wildlife,
- Monitor Conservation Research Society,
- Sapience,
- TUDelft,
- VetEffect.

No representatives of:

- responsible pet owners,
- hobby breeders,
- exotic animal veterinarians,
- ethologists,
- animal scientists,
- human-animal relationship specialists.

his homogeneity is problematic with regard to the requirements of **pluralism, balance, and impartiality**.

3. A methodology focused on consumer perceptions and behavior, not on the animal

The report describes exclusively behavioral approaches :

- eye tracking: “Participants were shown a mock-up Instagram feed, and their eye movements were recorded using eye-tracking technology” (p. 3),
- emotional scenarios,
- message testing (costs, animal welfare, legal risks),
- storytelling analysis,
- psychological segmentation of pet owners.

No expertise in :

- animal welfare,
- ethology,
- animal husbandry,
- reproduction,
- health management,
- adaptation to captivity.

The project studies owners as consumers, never as field experts.

4. Over-representation of international trade specialists and conservation NGOs

The report devotes considerable space to international trade analyses (CITES, TRACES, EUROSTAT, EU TWIX, WiTIS). For example, it states: “Results showed that available trade data are heavily skewed toward CITES-listed species” (p. 4).

This structural, risk-centered approach leads to a **systematic problematization** of keeping animals, without distinguishing between :

- responsible breeding / trafficking,
- captive breeding / wild harvesting,
- legal / illegal channels.

In the absence of independent veterinary or zootechnical expertise, this partial view inevitably dominates the analysis.

5. Total absence of expertise essential for a balanced analysis

The document makes no mention of any input from :

- veterinarians specializing in exotic pets,
- ethologists,
- zootechnicians,
- specialists in the human-animal relationship,
- experts in population dynamics,
- representatives of responsible keepers.

Keepers are only present as **subjects of study** (surveys, tests, segmentation), never as **stakeholders consulted**.

6. A coalition built around a pre-existing vision, not a pluralist space

The “*Growing a Coalition*” session demonstrates that the proposed coalition is based on pre-defined values, centered on conservation and the reduction of practices deemed “**unsustainable**.”

Furthermore, it is methodologically problematic for a report to state that “*Some stakeholders were more motivated by conservation aims than by animal welfare*” (p. 6) when no scientific expert in animal welfare, ethology, or animal husbandry was present to analyze, qualify, or objectify these motivations.

In the absence of specialists capable of rigorously assessing the concepts of animal welfare, biological needs, adaptation to captivity, or husbandry practices, such a statement necessarily relies on **subjective perceptions**, not scientific expertise.

This reveals a **structural bias** : the project allows itself to assign motivations or priorities to stakeholders **without having the necessary skills to judge them**, which contravenes the principles of objectivity, neutrality and rigor required by the *European Code of Good Administrative Conduct* (2001).

7. Responsible keepers are never considered interlocutors

In the online sessions, owners and breeders are mentioned only as :

- targets of interventions,
- subjects to be regulated (positive lists, proof of knowledge, digital registry),
- objects of behavioral campaigns.

Never as legitimate stakeholders.

8. Potential breaches of good administration principles

In light of these elements, several fundamental principles appear to be compromised :

Impartiality

Prior normative orientation ("*demand reduction*"), ideological homogeneity of the consortium.

Balance of stakeholders

Complete absence of owners, breeders, veterinarians, ethologists, and animal scientists.

Transparency

Lack of explanation regarding the selection criteria for experts and partner organizations.

Scientific objectivity

Methodology focused on social perceptions, not on animal science or veterinary realities.

9. Request to the ombudsman

In light of the above, I respectfully request :

1. **The opening of an inquiry** into the governance, composition, and methodology of the ENV/2023/OP/0020 project.
2. **Verification of compliance with the principles of good administration**, including:
 - o impartiality,
 - o pluralism,
 - o transparency,
 - o balance of stakeholders.
3. **A recommendation to revise the composition of the panel** to include essential expertise (exotic animal veterinarians, ethologists, animal scientists, responsible keepers).
4. **Clarification of the selection criteria for partners and experts** associated with the project.
5. **A guarantee that future European consultations on animal keeping** include all stakeholders, including responsible keepers and breeders.

Thank you for your attention to this complaint. I remain at your disposal should you require any further information. Please accept, Madam Ombudsman, the expression of my highest regards.

Pour la Fédération Française d'Aquariophilie
Philippe Ancelot
Président

Info - VetEffect.NL

24/04/26 11:53

Workshop Exotic Pets

à : Philippe ANCELOT

cc : env-cites@ec.europa.eu, jean michel corbeaux, JJ Lorrin, Isabelle CAZALIS, Gérard BASSOT, Sarah AUSSEIL

Dear Mr. Ancelot,

Thank you for your reaction. The document that was circulated are not minutes, but aimed to summarise the workshop event. Every participant may have different views, and we are sorry you consider the content wrongly framed. The project deliverables are published with the consent of the Commission, and throughout project implementation, stakeholder's opinions were considered, and we were happy to receive contributions from sector representatives as well as animal protection NGOs.

We were glad to recognise your mentioning of responsible breeders and owners engaged in compliant, transparent, and conservation-beneficial practices as this seems to echo a common ground for the future.

For further comments or reactions on this project we may refer you to the Commission, who has commissioned the project.

Best regards,
Team VetEffect

**veteffect**Website: www.veteffect.nl

From: Philippe ANCELOT <philippe.ancelot@wanadoo.fr>

Sent: Monday, April 20, 2026 17:57

To: Remco Schrijver <remco.schrijver@veteffect.nl>

Cc: env-cites@ec.europa.eu <env-cites@ec.europa.eu>; Info - VetEffect.NL <info@veteffect.nl>; jean michel corbeaux <jmcorbeaux@outlook.fr>; JJ Lorrin <jjlorrin@gmail.com>; Isabelle CAZALIS <icazalis@fedeaqua.org>; Gérard BASSOT <gerard.bassot@developpement-durable.gouv.fr>; Sarah AUSSEIL <sarah.ausseil@wanadoo.fr>

Subject: Re: Workshop Exotic Pets

Dear Sir/Madam,

Thank you for sending the minutes of the “Reframing the exotic pet trade” workshop. However, given its content, it is impossible for me to remain silent. I must express, with full transparency and the necessary institutional firmness, our profound indignation.

The document you have circulated presents itself as a neutral and analytical piece of work. Yet, upon careful reading, it clearly appears oriented toward a predetermined political objective: reducing demand and preparing a framework for the generalized restriction of exotic pet ownership. The conclusions, proposed tools, and methodological frameworks converge toward a logic that resembles an abolitionist strategy more than a balanced approach based on comprehensive data and genuine consultation.

You yourselves acknowledge that the available data are partial, biased, and insufficient to accurately describe the reality of the sector. Nevertheless, on this fragile basis, the report promotes burdensome measures—mandatory registries, species lists, competency tests, and

reinforced traceability systems—which would have the concrete effect of marginalizing, or even suffocating, responsible breeders and owners engaged in compliant, transparent, and conservation-beneficial practices.

We firmly contest this framing. We contest the manner in which the conclusions are presented as consensual when they rest on ideological presuppositions. We contest the failure to account for stakeholders on the ground, who are nevertheless essential to the knowledge, conservation, and responsible management of these species. And we contest the drift toward tools traditionally used by movements campaigning for the progressive disappearance of animal husbandry.

We expect, from the European institutions, work that is rigorous, balanced, and respectful of all stakeholders. We request that the next stages of the project genuinely incorporate breeders, responsible owners, and professional structures, and that they be based on complete, verified, and scientifically sound data.

Awaiting your clarifications on how these deviations will be corrected, please accept the expression of our distinguished consideration.

Philippe Ancelot

Président

Fédération Française d'Aquariophilie

envoyé : 9 avril 2026 à 22:24
de : Remco Schrijver <remco.schrijver@veteffect.nl>
à :
cc : env-cites@ec.europa.eu
objet : Workshop Exotic Pets

Dear participant,

Thank you again for attending the hybrid workshop on "Addressing the illegal wildlife trade through consumer-focused interventions," held in October 2025 at the Royal Library of Belgium.

Please find attached a workshop summary.

We hope it serves as a useful record of the workshop.

The Final Report will be published by the Commission at a later stage

Best regards,

Team VetEffect



Website: www.veteffect.nl