

Dr Tedros Adhanom Ghebreyesus
Director General
World Health Organisation
Avenue Appia 20 1211 Geneva
Switzerland

23rd of April 2025

Dear Dr Ghebreyesus,

Re: Request to consider amendments to the global traditional medicine strategy (2025–2034) and reject the use of threatened wild animal species in TCIM

We, the undersigned organisations, acknowledge and commend the World Health Organisation's (WHO) ongoing commitment to expand universal health coverage, protect populations from health emergencies, support the development of integrative medicine and uphold traditional, complementary, and integrative medicine (TCIM) to the highest attainable standard of health and well-being.

We praise the progressive draft global traditional medicine strategy (2025–2034) for recognising the fundamental importance of sustainability, One Health and biodiversity compared to the previous WHO Traditional Medicine Strategy 2014–2023.

However, we remain deeply concerned that the WHO has still not recognised how demand for, and promotion of, wildlife use in some TCIM is leading to legal and illegal trade that significantly threatens the survival of a range of wild animal species.[1] [2] Legal use does not automatically equate to ecologically sustainable use, and the strategy does not recognise the International Union for the Conservation of Nature's call for the prevention of the use of threatened species of wildlife in traditional medicine.[3] By not explicitly rejecting the use of threatened wild animal species for TCIM, the WHO is also contradicting its own guiding principle of sustainability and One Health, as well as the Sustainable Development Goals.

While many TCIM use natural ingredients including minerals, plants and animals in their practices, the parts and derivatives of wild animals constitutes a relatively small portion of all ingredients used,[4][5] and that of threatened[6] wild animals an even smaller extent, with substitutes of alternative species or materials readily available[7]. However, such usage still has a significant effect. Due to marketing by traders and pharmaceutical companies, as well as legislative loopholes in some key countries that continue to permit the trade and utilisation of vulnerable species,[8] TCIM exerts disproportionately devastating impacts on the survival of many species including big cats such as tigers and leopards, pangolins, rhinos, bears, saiga antelope and more.[9]

Investigations and research have indicated that utilisation or legal domestic trade in threatened species for TCIM, including in parts and derivatives of captive bred specimens, is a high-risk approach that exacerbates the threat they face in the wild. [10]

The recent COVID-19 pandemic clearly highlights the public health risks posed by the trade and consumption of wild animals. Given that health risks related to the breeding, processing and transportation of wild animal species are present regardless of the ultimate purpose of consumption, any encouragement of wild animal use in TCIM undermines the fundamental purpose of WHO's global strategy.

Moreover, as some TCIM promote the idea of food and medicine as intrinsically related and not drawing any clear distinction between the two, accepting the consumption of wild animals for TCIM purposes may unintentionally justify the consumption of wild meat, further compromising global efforts on the prevention of zoonotic and emerging diseases.

Any recognition from an entity of the WHO's stature without a strong statement on the use of threatened wild animals in TCIM will be perceived by the global community as a stamp of approval from the United Nations on the overall practice including such utilization. Failure to specifically reject the use of threatened wild animal species in TCIM will hence sustain the demand for these species, exacerbating the pressure on their survival amidst the biodiversity crisis, and undermine One Health and efforts under other international agreements.

Biodiversity is essential for One Health and the wellbeing of humankind. As the world's leading global public health organization, the WHO should set an example and:

- recognise that any use of threatened wild animal species for medicine is unsustainable;
- explicitly reject such use in TCIM;
- call on WHO members to remove threatened wild animal species ingredients and products from their pharmacopoeia.

We respectfully request the following amendments to the draft WHO traditional medicine strategy 2025–2034 to be considered prior to/at the World Health Assembly in May;

(Suggested deletions are reflected in strikethrough (~~strikethrough~~), and suggested additions are underlined.)

Guiding principles

Sustainability and One Health. Healthcare should consciously support environmental sustainability. TCIM is rooted in natural resources, traditional medical knowledge, culture and history. It can contribute to safeguarding biodiversity by promoting sustainable TCIM practices and a One Health approach to achieving the Sustainable Development Goals. TCIM should not exacerbate the threats to wildlife, and any use of threatened wild animal species should end and where necessary be replaced with suitable sustainable alternatives.

Direction 2.1. Provide appropriate regulatory mechanisms for TCIM products that are sustainably produced and supplied

Actions for Member States

New action

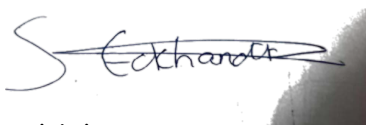
- Specifically, and urgently, end the use of threatened wild animal species for medicinal purposes, with time-bound plans to phase out current usage and to research and implement sustainable alternatives.

Suggested additions and deletions;

- Enforce relevant restrictions on the use of ~~endangered species~~ wider biodiversity for medicinal products, subject to stringent regulatory oversight, in line with applicable international conventions and national legislation.
- Encourage sustainable practices in the production, supply, use and disposal of TCIM products that contribute to the preservation and repopulation of biodiversity ~~endangered species~~.

We would be happy to discuss this with you further at your convenience. Please do not hesitate to contact us for further information.

Your sincerely,



Simone Eckhardt
Managing Director, Stichting SPOTS

On behalf of (in alphabetical order):

1. A Rocha Ghana
2. AAP – Animal Advocacy and Protection
3. ACEDH
4. ACTAsia
5. Action for Primates (AfP)
6. ADM Capital Foundation
7. Advocating Wild
8. Andean Cat Alliance (AGA)
9. Anima Denmark
10. Animal Defenders International
11. Animal & Biodiversity Programme at the Global Research Network Think Tank (Animal & Biodiversity Programme at the GRN Think Tank)
12. Animal Friends Croatia (AFC)
13. Animal People Inc
14. Animal Protection Denmark
15. Animals Aotearoa
16. Artictis Binturong Conservation (ABConservation)
17. Ban Animal Trading
18. Bears in Mind (BIM)
19. Big Cat Rescue (BCR)
20. BirdLife International
21. Blood Lions NPC
22. Born Free Foundation
23. Botswana Predator Conservation (BPC)
24. Campaign Against Canned Hunting (CACH)
25. CATCA Environmental and Wildlife Society
26. Centre for Wildlife Studies
27. Chelui4lions
28. Chimbo Foundation
29. Civet Project Foundation (The Civet Project)
30. Coopérative des Apicultrices et Vendeurs du Mile au Kivu
31. Corbett Foundation
32. Earth Island Institute Asia Pacific (EII-AP)
33. Earth League International
34. EcoJust
35. Environmental Investigation Agency (EIA)
36. Eyes Wild Open
37. Floron
38. For Tigers
39. Forgotten Parks Asbl
40. FOUR PAWS UK
41. Global Federation of Animal Sanctuaries (GFAS)
42. GlobeGuards
43. Gorilla Foundation (Gorilla Stichting Nederland)
44. Help Animals
45. Help Animals India
46. Herpetofauna Foundation
47. Hollow Paws
48. I.D.P.E.
49. Innovation pour le Développement et la Protection de l'Environnement
50. IUCN National Committee of the Netherlands (IUCN NL)
51. IUCN Section on Small Apes (SSA)
52. International Wildlife Bond (IWB)
53. Jakarta Animal Aid Network (JAAN)

54. Japan Anti-Vivisection Association (JAVA)
55. JK Wildlife Pte Ltd (JKW)
56. Kalaweit
57. Lady Freethinker (LFT)
58. Landmark Foundation (LMF)
59. Landschappen Nederland
60. Leo foundation
61. Marjo Hoedemaker Elephant Foundation (MHEF)
62. Netherlands Rugvin foundation (stichting Rugvin)
63. Neushoornstichting
64. Nowzad
65. NY4Whales
66. Observatoire Paysan de l'Environnement et les Droits de l'Hommes
67. Ouwehand Zoo Foundation
68. Paddenstoelenonderzoek Nederland
69. Painted Dog Conservation (PDC)
70. Pan African Sanctuary Alliance
71. Plataforma ALTO
72. Ravon
73. Sanctuary for Health & Reconnection to Animals & Nature (SHARAN)
74. Sanctuary Nature Foundation
75. Sarawak Society for the Prevention of Cruelty to Animals (SSPCA)
76. Sarvin Wildlife Conservation
77. Seaotter Alliance
78. Society for the Prevention of Cruelty to Animals Hong Kong (SPCA HK)
79. Society for Travelers Respecting Animal Welfare (STRAW)
80. SPOTS foundation (stichting SPOTS)
81. StopMonkeyAbuseAsia (SMAA)
82. Stripes and Green Earth Foundation (SAGE Foundation)
83. Sun Bear Outreach
84. Susy Utzinger Stiftung für Tierschutz / Susy Utzinger Animal Welfare Foundation (SUST)
85. Synergie des Ecologistes pour la Paix et le Développement
86. Synergie des Vanniers et Amis de la Nature
87. Taiwan Society for the Prevention of Cruelty to Animals 台灣防止虐待動物協會 (TSPCA)
88. The Lions Foundation
89. Tiger Watch
90. Vegan Hacktivists (VH)
91. VIER VOETERS (FOUR PAWS Netherlands)
92. Violet Studios
93. Voice4lions
94. Vogelbescherming Nederland (BirdLife Netherlands)
95. Wanicare Foundation
96. We Animals Media (WAM)
97. Whale & Dolphin Conservation (WDC)
98. Wildlife Alliance
99. Wildlife Conservation Trust (WCT)
100. Wildlife Justice Commission
101. World Animal Protection NL

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- [3] IUCN Congress 2020. Motion 108 Adapting traditional medicine to achieve social and environmental sustainability". Adopted by Electronic Vote. Operative Paragraph 2 "CALLS ON Members to support the prevention of the use in TM of threatened species of wildlife assessed in IUCN Red List categories Endangered or higher, or which are considered Data Deficient"
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