



**WRITTEN TESTIMONY OF
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ON
U.S. CONSUMER DEMAND FOR WILDLIFE PRODUCTS TRADED ILLEGALLY OR
UNSUSTAINABLY
FOR THE
COMMITTEE ON NATURAL RESOURCES
SUBCOMMITTEE ON FISHERIES, WILDLIFE AND OCEANS
U.S. HOUSE OF REPRESENTATIVES**

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Madam Chairwoman, Mr. Ranking Member, and members of the Subcommittee, thank you for the opportunity to testify today. My name is Crawford Allan, Director of TRAFFIC North America. TRAFFIC is the wildlife trade monitoring program of IUCN (the International Union for the Conservation of Nature) and the World Wildlife Fund (WWF). TRAFFIC works to ensure that trade in wild plants and animals is not a threat to the conservation of nature. Over the past 30 years, TRAFFIC has gained a reputation as a reliable and impartial organization and a leader in the field of conservation as it relates to wildlife trade. We are a global network, with 25 offices around the world. Our parent organization, WWF, is the largest private conservation organization working internationally to protect wildlife and wildlife habitats. WWF currently sponsors conservation programs in more than 100 countries with the support of 1.2 million members in the United States and more than 5 million members worldwide.

TRAFFIC North America addresses illegal and unsustainable wildlife trade issues as they relate to North America by conducting and disseminating original research on pertinent trends, providing technical and policy guidance, collecting and sharing intelligence information with enforcement agencies, promoting consumer and industry awareness, and supporting capacity building efforts and trainings to address wildlife trade issues at their source, both in North America and abroad. My testimony today is offered on behalf of World Wildlife Fund-US and TRAFFIC North America. It also reflects the views of the broader WWF and TRAFFIC networks around the globe.

SCOPE AND SCALE OF U.S. DEMAND FOR WILDLIFE

The United States plays a leading role in the global wildlife trade. It is a primary destination for wildlife and wildlife products, as well as an exporter. It is estimated that 20% of the legal global

wildlife trade is destined for the United States,¹ with indications that demand is increasing. FWS reports that the value of U.S. legal wildlife trade has grown significantly in recent years- from \$1.2 billion in FY2000 to \$2.8 billion in FY2007². In the ten years between 1992 and 2002, U.S. trade in wildlife and wildlife products increased by 75%.

The trade in wildlife in the U.S. feeds a diverse range of market sectors, including the pet industry, fashion, furniture and medicine. From 2000-2005, the United States was the world's largest declared importer of corals and live reptiles and the second largest importer of cacti, mahogany and orchids.³ About 6.4 million live corals were traded globally during this period, with the United States accounting for 63% of the imports.⁴ Other major wildlife commodities traded include fish and fish products, birds, traditional medicines (including ingredients such as tiger, leopard, rhinoceros, bear and musk deer) and exotic foods. The U.S. is one of the largest markets for wild-harvested caviar, with domestic prices averaging more than \$100 per ounce for the most popular types.⁵ Live animal trade makes up the largest volume of U.S. wildlife trade, mostly to supply the pet trade, with the most commonly traded species being tropical fish, reptiles, song birds and amphibians.⁶ Nearly 96 million live animals collected from the wild were imported into the United States in both 2006 and 2007, and over 99% of these were imported for commercial purposes.⁷

In the United States, there is a valuable trade in native species such as Bobcat for fur, sturgeon and paddlefish for caviar, freshwater and terrestrial turtles for pets, food and medicine, live fish for aquaria and American ginseng for tonics, both for domestic and export markets.

While most wildlife trade in the United States is legal, illegal trade also occurs, due to high consumer demand for some species that are not easily obtainable through lawful channels. Between 2000 and 2004, the FWS intercepted approximately \$35 million worth of illegal wildlife products upon their entry to the United States.⁸ Wildlife is smuggled into the United States from every corner of the globe, ranging from the most endangered tortoise from Madagascar to tiger bone medicines from China to sea turtle leather from Mexico. Recent studies

¹ Randi Alacron, "The Convention on the International Trade of Endangered Species: The Difficulty in Enforcing CITES and the United States Solution to Hindering the Trade in Endangered Species," *N.Y. International Law Review*, vol. 14, no. 2 (2001), pp. 105-108. Referenced from Congressional Research Report available at http://assets.opencrs.com/rpts/RL34395_20080303.pdf

² U.S. Department of the Interior, Fish and Wildlife Service (FWS), Office of Law Enforcement, Annual Reports, FY2000-FY2006, at [<http://www.fws.gov/le/AboutLE/annual.htm>]; and personal communication with FWS officials, February 20, 2008. Figures are in constant FY2008 U.S. dollars. Referenced from Congressional Research Report available at http://assets.opencrs.com/rpts/RL34395_20080303.pdf

³ Maylynn Engler and Rob Perry-Jones, *Opportunity or Threat: The Role of the European Union in the Global Wildlife Trade* (Brussels, Belgium: TRAFFIC Europe, 2007)

⁴ Maylynn Engler and Rob Perry-Jones, *Opportunity or Threat: The Role of the European Union in the Global Wildlife Trade* (Brussels, Belgium: TRAFFIC Europe, 2007)

⁵ Caviar prices obtained from TRAFFIC web analyses for beluga caviar. July 2008.

⁶ U.S. Department of the Interior, FWS, Office of Law Enforcement, Intelligence Unit, *U.S. Wildlife Trade: An Overview for 1997-2003*.

⁷ TRAFFIC analysis of USFWS LEMIS data. July 2008.

⁸ U.S. Department of the Interior, FWS, Office of Law Enforcement, Intelligence Unit, *U.S. Illegal Wildlife Trade: LEMIS Data Analysis and Risk Assessment*, November 2005.

indicate that illegal products such as elephant ivory and bushmeat from Africa can be purchased in U.S. markets, and the United States may be the single largest market for the illegal live reptile trade. Illegal wildlife trade has evolved into a big business that can quickly deplete sensitive species and threaten them with extinction. Just last month, for example, U.S. Customs agents in Texas intercepted a large consignment of illegal elephant ivory said to be worth \$185,000. The shipment originated in Ethiopia and was concealed within a crate declared as musical drums.

ILLEGAL VS UNSUSTAINABLE TRADE

Trade in wildlife is deemed not detrimental to a species if it can be proven that the species is being harvested sustainably. Indeed, legal wildlife trade can be highly profitable and, if managed effectively, revenues can benefit local communities and bolster support for wildlife habitat protection. However, overharvesting often results, either because of factors and pressures that push those extracting the wildlife to take too much, or because there are no effective checks and balances to ensure that the harvest does not exceed a sustainable level. Pressures to harvest unsustainably include existing large international markets that demand a regular supply of consistent quality, and growing demand from consumers for wildlife and their products as economies expand and new trends emerge. Many of the source countries for wildlife are developing nations, where poverty and the relative high return that can be gained from selling wildlife create powerful incentives to harvest and trade unsustainably or illegally. At the same time, punitive measures associated with illegal wildlife trade in these countries are often insufficient to act as a deterrent. The links between resource security, livelihoods, poverty and security are entwined with the wildlife trade in developing nations and sustainable systems can help ensure that development is effective and stable. This can have benefits beyond wildlife conservation; namely benefits to communities.

It is important to make the distinction between illegal and unsustainable trade. Illegal trade is not always unsustainable. Similarly, unsustainable trade can often be legal; the fact that trade in a particular species is legal does not mean that the consumer or trader can be certain that it is not harming wild populations and potentially threatening their future viability. Part of the challenge is that trade trends can rapidly change in terms of commodity type or species involved. Wildlife trade management, trade regulatory mechanisms and enforcement measures are not always able to adapt in a timely way to address the impacts of a quickly evolving trade. Critically, most governments, conservation organizations and harvesters of wildlife frequently lack information on the size of a species population and its capacity to withstand off-take for trade. Without this information and scientific assessments to guide permissible trade levels, it is very difficult to ensure that trade is sustainable.

Major consumer countries like the United States have a responsibility to ensure that the wildlife and products they import are legal and sustainable. Working with exporting countries, the United States needs to prevent illegal wildlife trade while promoting measures to ensure that any legal trade is sustainable. By ensuring that the supply entering U.S. markets is consistent, sustainable, and clearly legal, the U.S. government can alleviate the problems that wholesale, retail and consumer sectors face in trying to make such a determination when confronted with the array of wildlife and wildlife products that are available.

SPOTLIGHT ON TYPES OF WILDLIFE TRADE IN THE UNITED STATES

Tigers

The estimated 5,000 tigers in captivity within the borders of the United States offer a timely example of the result of U.S. consumer demand for wildlife. These tigers are being bred to feed U.S. demand for tigers as pets, as well as for entertainment purposes. While this may not seem to have much relevance to potential impact on tigers in the wild, a report launched last month by TRAFFIC shows that there could be problems in future. The report, entitled *Paper Tigers? The Role of the U.S. Captive Tiger Population in the Trade in Tiger Parts*, sought to answer two central questions:

- i) Are tigers or tiger parts from the U.S. captive population entering the international tiger trade?
- ii) What implications might trade in this tiger population have on conservation of the world's remaining wild tigers?

In general, the report finds that the U.S. captive tiger population does not at present play a significant role in the domestic or international trade in tiger bone or other parts. Tiger bone has been widely used in traditional Asian medicine and poaching to meet consumer demand that has pushed the tiger to the brink of extinction in the wild. However, the report does find flaws in the United States' management of its large captive tiger population. Specifically, the report suggests that the U.S. is currently not in compliance with a Convention on the International Trade of Endangered Species (CITES) Resolution agreed upon in 2000. CITES Resolution Conference 12.5 *“urges Parties and non-Parties in whose territory tigers and other Asian big cat species are bred in captivity to ensure that adequate management practices and controls are in place to prevent parts and derivatives from entering illegal trade from or through such facilities.”*

The United States' failure to properly manage its captive tiger population could have global trade implications if it is not adequately addressed. The concern is that this large population of tigers could act as a drip feed of supply, thus helping to keep alive consumer demand for tiger parts. Any demand could further threaten wild tiger populations, as wild tiger parts are always preferred over captive tigers in traditional medicines, and it is much cheaper to poach a wild tiger than to raise one in captivity. Making greater supply available to markets for tiger products could lead to the resumption of a demand that many governments, traditional medicine practitioners, conservation organizations and others have worked for decades to suppress. The U.S. must do its part to ensure that its captive tiger population does not unintentionally play a role in the endangerment of the world's remaining wild tiger populations.

TRAFFIC recommends that the United States take steps on the legal, regulatory, oversight, educational, and law enforcement fronts to better track the U.S. captive tiger population and ensure that these animals or their parts cannot enter illegal trade. At the federal level, legal loopholes exempting certain categories of captive U.S. tigers from regulation need to be rescinded, particularly under the Captive-Bred Wildlife (CBW) Registration system. Additionally, all persons or facilities holding USDA licenses for exhibition or breeding/dealing in tigers should be required to report annually on the number of tigers held, births, mortality, and

transfer or sale. Lastly, all U.S. states that allow private citizens to keep captive tigers should enact laws or regulations that require a comprehensive accounting of the number and location of all captive tigers in their jurisdictions, and the disposal of these tigers when they die.

(Paper Tigers? The Role of the U.S. Captive Tiger Population in the Trade in Tiger Parts can be accessed at: <http://www.worldwildlife.org/who/media/press/2008/WWFBinaryitem9751.pdf>)

Marine Species and Products from the “Coral Triangle”

A substantial volume of wildlife trade to the United States derives from the “Coral Triangle” region of Southeast Asia, which is comprised of marine areas bordering Indonesia, Malaysia, Papua New Guinea, Philippines, Solomon Islands, Timor-Leste and Fiji. Much of the trade coming from this region is concentrated in mollusk products from the Philippines, but there is also abundant trade in marine fish and coral products to supply aquariums. In 2007 alone, over 1,655,000 kg of corals and 655,000 pieces of coral were imported into the United States, with most of this trade originating from Indonesia.⁹

The negative impacts of trade on the coral species in the region have been well-documented. Coral reefs face a number of conservation concerns. Because of these pre-existing vulnerabilities, trade in coral products is an important focus for conservation resources. Many mollusk and fish species are part of the reef ecosystem and are negatively affected by illegal or unsustainable trade in corals, as well as by unsustainable fishing practices. Activities that deplete the integrity of coral reefs endanger these species as well and threaten the commodities that supply the fish and mollusk trades.

Increasing the awareness of certification measures for aquarium resources and emphasizing the importance of such certification is one way to drive market pressure towards sustainable sourcing practices. Because so many small companies are engaged in the trade, it is a difficult industry to pressure regarding responsible corporate practices. However, increasing supply chain transparency and better knowledge about fishing practices may go a long way toward changing market dynamics.

The ecological systems of the Coral Triangle produce biological resources that directly sustain the lives of more than 120 million people living within this area, and benefit millions more worldwide. USAID is currently exploring the need in the region to sustain the natural productivity of the Coral Triangle for current and future generations, including potential support for fisheries and trade policy reforms, improved international standards for the Live Reef Food Fishery Trade, and encouraging consumer and retailer demand for sustainably sourced seafood from the Coral Triangle. WWF and TRAFFIC support these efforts.

CONSUMER and INDUSTRY INVOLVEMENT

There are two diametrically opposed issues at play in addressing demand for illegal and unsustainable wildlife trade, each with a different solution. The first issue is addressing consumers and industries that unwittingly make poor purchasing decisions. Steps need to be

⁹ TRAFFIC analysis of USFWS LEMIS data. July 2008.

taken to increase their awareness and improve their ability to make better choices. The second issue is dealing with those consumers and companies that know that their purchases or trading are illegal or unsustainable. In this case, steps need to be taken to effectively detect and deter these practices.

Corporate Engagement with Wildlife Conservation

One major solution is for key business sectors in the United States to encourage sustainable trade through their buying practices and the marketing of products. Businesses are primarily interested in reducing costs and increasing revenue, which add to the long-term value of the trade. The wildlife conservation community, informed consumers and some parts of the public sector are interested in the long-term conservation of biodiversity. It is vital that these separate interests can engage and inform each other, helping to improve the way in which the market in the U.S. views and supports sustainability of trade. Businesses need to understand that sustainable use is critical to their success over time and can be a source of profit. Adopting sustainable practices is certainly in the best interest of businesses that participate in the wildlife trade, and sustainability should be an important focus for them. Partnerships with civil society may be the most effective way to achieve these goals.

A critical example of this approach is Wal-Mart's decision to move towards supplying its supermarkets with fish from sustainable sources that are certified under the Marine Stewardship Council (MSC). As the world's largest retailer, Wal-Mart buys and sells thousands of seafood and aquaculture products every year. The company has committed to purchasing 100 percent of its wild-caught seafood sold in the United States from MSC-certified sources by 2011, leveraging its size and scale in order to effect change within the entire industry. WWF has partnered with Wal-Mart, MSC, and the Sustainable Fisheries Partnership in order to make this goal a reality. WWF is helping Wal-Mart to use its purchasing power to secure seafood from environmentally sustainable sources by actively engaging with fisheries and helping improve them to MSC certification standards.

Tourism and Travel

The international trade in souvenirs, curios and duty free goods made from wildlife and aimed at tourists and travel markets presents numerous challenges for the consumer. A large proportion of international wildlife seizures are comprised of tourist souvenirs. Many wildlife curios are available as souvenirs, and travelers often have no way of knowing the harm done to wildlife by the high turnover sales of such products in the world's major tourist and travel centers.

Cruise ship tourism is one specific area of concern. These operations have very relaxed checks on travelers, and very little information is available to let travelers know whether the wildlife souvenirs they purchase are made from protected species (as is often the case), whose export from their country of origin or import into the United States is prohibited. This is particularly common in many ports of call around the Caribbean, which see millions of cruise ship tourists annually. A TRAFFIC North America study of sea turtle exploitation in the Northern Caribbean found that hawksbill turtle shell products continue to be sold in port shops and tourist markets throughout the Caribbean, despite the fact that this species is critically endangered and protected

under domestic and international laws.¹⁰ A more recent TRAFFIC North America market survey of shops in the Dominican Republic in 2006 found 50,000 hawksbill turtle shell items openly available in the majority of stores frequented by cruise ship passengers, regardless of their illegality.¹¹

Other items may be legally traded but are harvested for trade in volumes that are not sustainable, further threatening already imperiled species. Species supplying this unsustainable trade from the wild include birds of prey, corals, queen conch, crocodiles and caimans. Incredibly, live animals such as parrots, sea turtles and rare endemic lizards are sometimes purchased by tourists and carried with them in their hand luggage. Sometimes the wildlife sold in tourist centers may not even originate from the country or region of purchase, even though marketed as a local souvenir. In the Caribbean, many souvenirs are imported from Asia, including those made from corals and sea turtle shells.

It is important for tourists to understand that even though a product is openly offered for sale, the product may not be legal to export from that country. TRAFFIC recommends that tourists, and particularly cruise ship passengers, be provided with clear guidelines regarding what is illegal to purchase and/or transport out of any given port country. Outreach of this sort will help protected species while helping tourists avoid any unfortunate incidents involving their purchased products being seized by Customs. TRAFFIC is preparing outreach materials that will help inform cruise ship tourists about which wildlife souvenirs to avoid.

The Role of Transport

Trade in wildlife invariably involves transport of wildlife merchandise as it moves from the supplier to the consumer, often across international borders. A commodity may be transported by a number of different means on its journey from source to consumer. Because of this, the transport industry can play a constructive role in helping to counter illegal trade, including trade that can transmit disease or invasive species. The United States transport industry can work hand in hand with consumers and law enforcement to raise the awareness of their cargo customers and passengers to illegal and unsustainable trade in wildlife, and to alert the authorities to problems.

The demand for black market wildlife tends to generate a trade gradient of wildlife from biodiversity-rich countries in Asia, Africa and South America to consumers and markets in North America, Europe, China and Japan. The most rare and valuable wildlife tends to be smuggled by air, which is the most rapid and secure transport method. Sea freight tends to be used for smuggling non-perishable, bulky products in large consignments, such as elephant ivory. Live wildlife invariably is smuggled by air or by road, transported in crates, luggage, or on the person of passengers. Express mail courier services are frequently utilized as well. The incentives for smuggling wildlife are high but the penalties for offences are low, and smuggling methods can be complex and creative. Not all smuggling involves hiding contraband within packages and crates; much of the wildlife smuggled involves fraudulent documentation. Often, a smuggler will merely claim that a rare, protected species is something more common and, of course, legal.

¹⁰ Fleming, E.H. 2001. *Swimming Against the Tide: Recent surveys of exploitation, trade, and management of marine turtles in the Northern Caribbean*. TRAFFIC North America. Washington, D.C.

¹¹ Reuter, A. and Allan, C. (2006). *Tourists, Turtles and Trinkets: a look at the trade in marine turtle products in the Dominican Republic and Colombia*. TRAFFIC North America, Washington, D.C.

The higher value illegal wildlife, including the parts and derivatives of rarer species such as rhinos and tigers, are transported using international airlines. This is also true of live animals and plants, such as parrots, reptiles and orchids. Airline staff, because they are present from the beginning to the end of any journey, may have closer and more frequent contact with cargo, baggage and passengers than customs officers. Airlines therefore have more opportunity to notice suspicious shipments or wildlife in passenger's luggage. Unfortunately, cabin crew, cargo and baggage handlers and administrative staff generally have little or no knowledge of the legal requirements for transport of wildlife and products. Increasing the basic awareness of U.S. airline staff, passengers and cargo customers could help reduce the incidence of smuggling of illegal wildlife, as well as the spread of diseases and invasive species into the United States.

The potential for serious human health and agricultural impacts due to the illegal trade in wildlife must not be underestimated. Imported live animals and their parts and products may present disease risks to humans and domestic wildlife. Parrots, for example, can carry respiratory diseases that can be fatal; Gambian pouch rats introduced monkey pox into the United States; meat from wildlife for human consumption, smuggled from West Africa in passenger luggage, may transmit serious diseases; and animal skins can carry anthrax spores. Agriculture can be catastrophically affected by diseases transmitted to domestic livestock, and invasive pests can wreak havoc on crops, as well as U.S. ecosystems. Because U.S. consumers are at the end of the trade chain, they may end up being responsible for driving a trade with adverse health and agricultural impacts, almost certainly through a lack of awareness.

SUPPORTING HUMAN LIVELIHOODS AND COMMUNITY BENEFITS

Many rural households, especially in developing countries, depend on wildlife for their livelihood. Some communities depend on wildlife for subsistence living. Others derive part of their income through benefits from wildlife trade. As species populations are depleted by illegal or unsustainable trade resulting from the growing demand for wildlife globally, the livelihoods of poor communities are also threatened as they struggle to find wildlife to trade or consume. On the other hand, well-managed wildlife trade has the potential to deliver significant development benefits for the world's poor and to decrease the incentives for illegal trade. The challenge is to find the right balance and to ensure equitable revenue flows along the trade chain so that poor communities benefit.

TRAFFIC and WWF issued a report highlighting this dynamic entitled, *Trading Nature: The Contribution of Wildlife Trade Management to Sustainable Livelihoods and the Millennium Development Goals*. The report details how wildlife trade offers opportunities to the poor and provides benefits to local communities. It also shows how these benefits are threatened when illegal or unsustainable trade is allowed to flourish, providing case studies on the wild meat trade in East and Southern Africa, the trade in peccari and caiman skins and vicuña wool in Latin America, and the trade in Asian coastal fisheries products. To cite just one example, seahorse fishers and traders in the Philippines reported that their catch contributes around 30–40% of their annual income—sometimes reaching as high 80%. Many of the products they harvest are regularly imported into the United States and sold to U.S. consumers.

ENFORCEMENT

The United States has comprehensive policies and enforcement mechanisms for regulating wildlife trade and for prohibiting international and interstate trade of endangered, threatened, and protected species. Nonetheless, illegal wildlife trade continues to take place. Implementation of existing regulations is still lacking, in large part because many of the agencies responsible are severely under-resourced. To close these gaps, wildlife trade needs to be made a priority on the political agenda, which it has not been up until now. Given the proper resources, undercover investigations and inspection programs can be highly successful. *Operation Shell Game* was an 18-month-long joint Canadian and U.S. investigation into the unlawful import and export of queen conch *Strombus gigas*.¹² Conducted in 2006, it was one of the largest U.S.-Canadian endangered species smuggling cases in years, with over 111,000 pounds (50,349 kilograms) of threatened queen conch shipped to the United States and Canada from Colombia and Haiti without the proper permits. The case involved defendants in both the United States and Canada. This is just one example of the law enforcement challenges faced by U.S. agencies responsible for regulating wildlife traffic, and it highlights the enormity of this illegal trade.

Countries impacted by U.S. consumer demand also need assistance with implementing and enforcing their own wildlife trade laws. To this end, the United States, with the support of conservation organizations such as TRAFFIC, has been engaged for many years in capacity building efforts around the globe. The Central America - Dominican Republic (CAFTA-DR) Free Trade Agreement CITES Support Program is a good example of a medium-term capacity building program established by the United States to support CAFTA-DR member countries. These countries encompass a wide variety of ecosystems and a spectacular diversity of wildlife. At the same time, they face chronic threats to biodiversity, which often derive from unsustainable natural resource management practices. As demand for exotic leather, corals, parrots, fisheries products and an array of other wildlife products continues to grow, it is important for government agencies and industry to meet the implementation requirements of CITES and support enforcement.

TRAFFIC has supported this program since 2006, in partnership with the U.S. Fish and Wildlife Service (USFWS) and the International Technical Assistance Program of the Department of the Interior. This capacity building effort enables governments to develop, implement and enforce laws and regulations in a coordinated manner, support sustainable use practices, and deter illegal activities that are currently commonplace. It also identifies where trade in wildlife to the United States could pose a problem and takes steps to mitigate it. This work is funded by the U.S. Department of State, and TRAFFIC would encourage further U.S. investment in addressing illegal wildlife trade abroad, as well as the U.S. consumer demand that too often drives it.

General Education

¹² Queen conch is a commercially valuable seafood product and is a protected species under the U.S. Endangered Species Act. Since 1992, queen conch has been listed on Appendix II of CITES so to engage in trade in queen conch, all imports or exports must be accompanied by a CITES export certificate from the country of origin, or a re-export permit from a country of re-export

The Suitcase for Survival program is a partnership of the U.S. Fish and Wildlife Service (FWS), American Zoo and Aquarium Association (AZA), World Wildlife Fund (WWF), National Oceanic and Atmospheric Administration (NOAA) - Fisheries Services' Office for Law Enforcement and with additional assistance from TRAFFIC North America. It is designed to address the need for a national education program focused on wildlife trade and biodiversity. Since 1991, the program has raised awareness about the devastation caused by illegal wildlife trade worldwide. It has also helped consumers understand the importance of biodiversity and how their buying habits can contribute to biodiversity conservation.

The program includes several components that build on the strengths of the partners. The FWS and NOAA provide wildlife trade artifacts that have been confiscated at ports of entry. These artifacts are disseminated to a wide array of environmental educators and their respective institutions throughout the nation, and host institutions can assemble the artifacts into used suitcases. These suitcases can then be used to conduct wildlife trade educational programs with educators and students as well as the general public. In addition to artifacts, the institutions can also use World Wildlife Fund's wildlife trade education module, *Wildlife for Sale: An Educator's Guide to Exploring Wildlife Trade*.

More funding for programs like Suitcase and the Buyer Beware program, developed with TRAFFIC and FWS, would go a long way in highlighting the conservation issues of wildlife trade and help to alleviate U.S. consumer impact.

RECOMMENDATIONS

The United States is increasingly taking positive steps to reduce its ecological footprint and improve the sustainability of its business practices. As this awareness and positive action grows, the United States must not overlook the need for sustainable sourcing of wildlife and legal controls on wildlife imports and exports. The following are priority considerations that frame the way in which the US can bring about change:

- Educating consumers and raising awareness about the impacts of their choices, and providing alternate sustainable choices, is vital. The impact that consumer behavior in the United States has on wildlife trade globally is large and direct. By working to influence that behavior in positive directions and to bring about constructive change with respect to enforcement efforts and business practices, the U.S. government can make a real difference for international biodiversity conservation.
- High-level political will and adequate resources to implement the necessary controls will be required to ensure that the U.S. wildlife trade is legal.
- More partnerships with the corporate sector and additional sustainable sourcing initiatives backed up by consumer marketing campaigns will be needed to make sure that trade is both legal and sustainable.

Notwithstanding isolated challenges such as on tigers discussed above, overall, the United States has one of the best regulatory systems in the world for addressing wildlife trade. From the excellent Wildlife Inspectors, Special Agents, Special Intelligence Unit, and Forensics Lab of the

U.S. Fish and Wildlife Service, to the prosecutors in the Environmental Crimes Section of the U.S. Department of Justice, the U.S. has a wealth of knowledge and expertise to share with countries looking to improve their own regulatory systems. Where such international efforts have received the needed support from the U.S., as in Southeast Asia under ASEAN-WEN (Association of Southeast Asian Nations-Wildlife Enforcement Network), they have met with great success. We therefore urge Congress to:

- ***Ensure that these U.S. enforcement agencies and units be better resourced to address the ever-growing wildlife trade issues threatening the United States, and they should be provided with additional resources in order to assist in countries where U.S. consumer demand is taking a serious toll on native wildlife***

Raising awareness of the legal implications and penalties for industry or individuals engaged in illegal wildlife trade is critical as well. Through the combination of approaches mentioned below, led by the U.S. government, there is the potential to elevate the level of attention to the challenges of wildlife trade and drive home initiatives to reduce illegal trade while increasing the benefits to developing communities that supply wildlife on a sustainable basis. Therefore, additionally:

- ***Congress should allocate greater resources to awareness of the legal and conservation issues surrounding wildlife trade. Educating consumers and industry so that they can make informed choices that are both legal and sustainable - with resulting conservation benefits - will be essential.***

These efforts to some degree take place through the multinational species programs authorized by Congress – often with your leadership, Madam Chair, and the leadership of this Subcommittee –for elephants, rhinos, tigers, great apes, sea turtles and neotropical migratory birds. All of these species are affected by illegal trade, and conservation efforts funded under appropriations through these programs have helped to address this problem. However, the bills apply to a narrow range of species, and provide only a drop in the bucket compared to what is necessary. While the Great Cats and Rare Canids Act will be an important addition to the multinational species programs, there are still a great many species that do not receive any benefit through legislation implemented by FWS. WWF has recently advocated before this Subcommittee¹³ the following recommendation and we stress this need again here:

- ***A broader approach to global species conservation is needed, covering a much broader number of species, to address a host of threats facing endangered species generally, including wildlife trafficking. Such an omnibus species conservation bill would go a long way to addressing the problems discussed in my testimony today.***

¹³ Testimony of Thomas Dillon, Senior Vice-President for Field Programs, World Wildlife Fund, Legislative Hearing on H.R. 4455 before the Subcommittee on Fisheries, Wildlife and Oceans. Committee on Natural Resources, U.S. House of Representatives, 24 June 2008.

I am appending to this testimony a statement of principles on what such a paradigm would look like, that WWF produced in conjunction with Wildlife Conservation Society.

Up to this point, the issue of illegal wildlife trade has tended only to capture the attention of those tasked with addressing it. It must be raised to a higher level of awareness and prioritization. One mechanism currently in place to help generate political will for addressing the problem is CAWT (Coalition Against Wildlife Trafficking). CAWT is a mechanism to highlight wildlife trade at the highest levels internationally, but it could also act as a mechanism for coordination within the United States amongst all the agencies tasked at any level with addressing this issue, including USFWS, NOAA, CBP and others. WWF and TRAFFIC urges:

- ***The United States to garner greater political will and elevate the issue of illegal wildlife trade as a priority at multilateral meetings and in diplomatic exchanges to bring about significant change globally. CAWT is vital to support this change and we hope that the United States continue and expand this effort and consider ways for more effective coordination between United States agencies regarding wildlife trade regulation and enforcement.***

TRAFFIC has over 30 years of in-depth insight into the wildlife trade, as well as experience in monitoring emerging trends, conducting investigations and trainings, facilitating multiregional enforcement networks, and analyzing data and legislation in every region around the world. Specifically, TRAFFIC holds a wealth of intelligence on wildlife smuggling and criminal networks in many regions, which we would be happy to share with Congress and relevant agencies in order to highlight the problems on the ground and to begin to develop effective and collaborative solutions. WWF has worked with local communities, industry and governments since 1961 and has pioneered education and awareness raising work throughout these sectors. WWF has also built significant partnerships with business and industry in the United States, and these relationships can provide role model approaches for future engagements with businesses engaged in the legal sale of wildlife and wildlife products. TRAFFIC and WWF offer their support and assistance to these efforts, wherever feasible.

CONCLUSION

The United States is one of the largest consumers of wildlife in the world. This demand results in many problems, and these problems need to be resolved if we are to ensure biodiversity conservation, continued livelihoods for communities in the developing world, and a legal and sustainable wildlife trade in the U.S. We call upon the United States to reconfirm its global leadership role in wildlife conservation by taking strong and immediate action to bring about positive change. Many species threatened by illegal and unsustainable wildlife trade cannot afford to wait.

Madam Chairwoman, thank you for the opportunity to testify before the Subcommittee today, and thank you for all you have done to protect some of the world's most endangered and iconic species from extinction. TRAFFIC will be happy to answer any questions or support the work of the Subcommittee, as necessary.