

**Testimony of Crawford Allan**  
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**On behalf of TRAFFIC and WWF**  
**Oversight Hearing on the Convention on International Trade in Endangered Species**  
**(CITES)**  
**House Natural Resources Committee**  
**Subcommittee on Fisheries, Wildlife and Oceans**  
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Mrs. Chairwoman and members of the Subcommittee, thank you for the opportunity to testify today. My name is Crawford Allan, Acting Director of TRAFFIC North America. TRAFFIC is the wildlife trade monitoring program of IUCN-World Conservation Union (IUCN) 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, 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, thanks to the support of 1.2 million members in the United States and more than 5 million members worldwide. This testimony is on behalf of World Wildlife Fund here in the United States, TRAFFIC North America, and the broader WWF and TRAFFIC networks around the globe.

We are happy to be here today to discuss CITES and the 14<sup>th</sup> Meeting of the Conference of the Parties to CITES (CoP 14), to be held in The Hague, the Netherlands, June 3 -15, 2007. TRAFFIC has worked in close cooperation with the CITES Secretariat since our inception in 1976, and WWF has been engaged with CITES since its inception and has attended every CITES meeting of the Conference of the Parties. TRAFFIC works with our other parent organization IUCN, in analyzing all proposals submitted to the Conference of Parties, and develops recommendations on these proposals as well. The IUCN/TRAFFIC Analyses and TRAFFIC Recommendations for CoP14 are presented as appendices to this testimony and are now available at [www.traffic.org](http://www.traffic.org) for your review. WWF has developed positions on several issues to be discussed at the CITES CoP 14, which are also attached as an appendix to this testimony and is now available at [www.panda.org/species/cites](http://www.panda.org/species/cites); for any issue on which WWF hasn't issued a separate, detailed position and recommendation, please of course refer to the TRAFFIC recommendation.

The United States, as one of the primary funders of CITES, plays a critical role in ensuring that the treaty is adequately implemented and that international wildlife trade is both legal and sustainable. TRAFFIC strongly urges that the U.S. maintain, and indeed increase, its leadership role in CITES. We urge the U.S. to take a strong stand for wildlife at CoP14. The U.S. has historically been a significant leader in CITES and wildlife trade issues, and such leadership is needed now, more than ever.

## **ENFORCEMENT**

The enforcement of CITES is an issue of increasing concern, as low prioritization and resource allocation by enforcement agencies around the world continue to harm efforts to counter wildlife smuggling. Without strong enforcement, the Convention's tenets are merely words on a page. At CoP14, enforcement will be spotlighted through agenda documents, side events and the media. The United States is playing an influential role in highlighting illegal wildlife trade and the need for a partnership approach to combating it. CAWT - the Coalition Against Wildlife Trafficking - was initiated by the U.S. Government as way to bring together public and private sector partners across the globe. The U.S. State Department will be hosting a side event at CoP14 to discuss how CAWT and partnerships internationally and regionally can leverage change to stop wildlife trafficking. The idea of a global coalition is a good one but there has been a slow response from other foreign governments. Some are wary to commit to something that may require new investment and they do not find it easy to understand how the Coalition can make a difference. The existing CAWT partners need to address these concerns. Greater involvement and insights from lesser developed countries need to be urgently attained to encourage broad participation and balance.

Regional enforcement networks will feature heavily at CoP14, with particular emphasis on ASEAN-WEN, the Association of South East Asian Nations Wildlife Enforcement Network. This innovative regional agreement is being touted as a role model for cooperative approaches to combating wildlife crime at a regional level. The U.S. Agency for International Development (USAID) has provided significant funding to assist the governments of ASEAN to implement this network. Other regions such as South Asia and Central America would benefit greatly from establishing this type of network. We hope that the U.S. Government can support these regions if they propose such efforts.

Over the past few years, there has been a growing emphasis on regulation of the trade in resources such as timber and fish, using the species-based approach of CITES. For CoP14 there are seven proposals to list marine species and four to list timber species.

On the marine species, TRAFFIC and WWF would like to commend the United States on the proposed Appendix II listing of all red and pink corals (*Corallium*) species and the Banggai Cardinalfish (*Pterapogon kaudernii*) and offer our support for these proposals. We encourage the U.S. to maintain a strong stance on the coral listing, as it meets the criteria for listing, and is likely to face opposition.

In my testimony that follows, I highlight several key issues of priority for TRAFFIC and WWF.

## **SHARKS**

WWF and TRAFFIC North America would like to urge the United States to support the listings of the three elasmobranch species proposed for CoP14: Spiny Dogfish (*Squalus acanthias*), Porbeagle (*Lamna nasus*) and all species of Sawfish (Pristidae).

Like other shark species, spiny dogfish are particularly vulnerable to overexploitation because of their slow growth, late maturity and low reproductive rate. The failure of fisheries managers to implement catch limits that would ensure long-term sustainable fisheries has led WWF,

TRAFFIC and other conservation groups to call for support of the CITES Appendix II proposal. The CITES listing is the means of addressing the major threat to the Northwest Atlantic population of dogfish that is posed by the international trade in dogfish meat and fins. TRAFFIC has prepared a report entitled “Conservation of Spiny Dogfish *Squalus Acanthias*: A Role for CITES?” that is a useful tool for CITES Parties who are thinking about potential implementation issues. This report is available at [www.traffic.org](http://www.traffic.org).

WWF and TRAFFIC are also concerned about the status of porbeagle stocks, which in the United States are managed as part of the Highly Migratory Species Management Plan. Porbeagles also have life history characteristics that make them vulnerable to over-harvesting. Furthermore, products from this species command high market prices, especially in European markets. Porbeagle stocks in the Northwest Atlantic have experienced marked decline in annual landings over the last several decades to approximately one-quarter of unexploited levels. WWF and TRAFFIC encourage the U.S. Government to support the Appendix II listing of both porbeagles and spiny dogfish as a way to ensure that international trade be supplied by sustainably managed and well recorded fisheries that are not detrimental to the status of the wild populations. We stress here that an Appendix II listing is not a trade ban, but rather is a means by which sustainable, legal trade can be facilitated and ensured for the future.

WWF and TRAFFIC commend Kenya, Nicaragua and the United States for their joint proposal to list all species of Sawfish (*Pristidae*) on Appendix I. Sawfish, like other elasmobranchs, have life history characteristics that make their populations vulnerable to exploitation and vulnerable to trade related pressures. The IUCN/TRAFFIC Analyses are in agreement with the information presented in the proposal and we feel that protection and a ban on commercial trade in these species will help protect the last remaining fragmented populations of these intriguing animals.

The support of the U.S. Government for these three proposals is essential to ensure global protection for these species and will send a strong message to the international community that the United States is serious about shark conservation and management, building on the vital support of the U.S. for past CITES listings of the whale shark, basking shark and great white shark.

### **TIGERS and CITES**

Tigers have been included in Appendix I of CITES since 1975. Illegal hunting of tigers and trade in their parts and derivatives constitute one of the major threats to the survival of tigers, compounded by habitat loss and conversion.

Progress has been made in some areas, as described in TRAFFIC’s review of the implementation of *Res. Conf. 12.5*. This review will be available at CoP14. We refer you as well to the detailed discussion in the WWF position document, at [www.panda.org/species/cites](http://www.panda.org/species/cites). CITES has taken bold action in the past for the tiger—including recommending, by consensus of the Parties, that CITES Parties ban all domestic trade in tiger parts and products. We commend those Parties that have taken steps to address the illegal trade in tigers, such as strengthening domestic legislation, banning domestic trade, increasing public awareness and education, convening training workshops, working with traditional medicine communities, and

establishing anti-poaching initiatives. Without those efforts, the status of tigers in the wild would indeed be more dire than it is today.

However, recent significant losses to tiger populations across India from poaching have forcefully re-focused the attention of the international conservation community on the threats facing tigers in the wild. We strongly urge the U.S. to take decisive action at CoP14 — for the benefit of the tiger. The tiger is currently found in the wild in 14 range States — and we encourage the U.S. to use the opportunity of CoP14 to support the work of these range States. The strong U.S. efforts of the 1990's for tiger conservation, including strong advocacy and support for tiger conservation through the Rhino and Tiger Conservation Act, stand as a pillar of conservation leadership—we ask the United States to again mobilize the energy it galvanized over a decade ago.

As a response to global concerns, along with U.S. efforts (including Pelly Amendment actions), China, for instance, implemented a ban on domestic tiger trade in 1993. The Chinese ban has been effective, and has helped prevent the extinction of tigers in the wild by curbing demand in what was historically the world's largest consumer in tiger parts. Together with international law under CITES, the ban has virtually eliminated the domestic market for tiger products in traditional medicines. China's government is to be congratulated for the positive, long-standing impacts of its policy, its enforcement actions, and awareness efforts in support of tiger conservation. China is to be commended for the implementation of its ban.

However, TRAFFIC's recent report, *Taming the Tiger Trade* – which was submitted for the record by my colleague, Dr. Sybille Klenzendorf, before this Subcommittee on April 9 and is available on [www.traffic.org](http://www.traffic.org) – warns that Chinese business owners who would profit from the tiger trade are putting pressure on the Chinese government to overturn its successful ban and resume domestic trade in parts from tigers bred on “tiger farms” for use in traditional medicine. For example, investors in the growing number of large-scale captive-breeding “tiger farms” in China are pushing for legalizing trade of products from these facilities, which now house approximately 5,000 tigers.

Reopening any legal trade in tiger parts would be an enormous step backwards for tiger conservation. Evidence is strong that the ban has worked, even after only 14 years—and the future of tigers across Asia cannot and should not be risked for the sake of the profits of tiger farm owners. A legal market in China would muddy the waters for enforcement officials and provide smugglers with a convenient cover for laundering wild tigers, given that farmed and wild products are indistinguishable—and indeed many consumers do value products from wild tigers over those raised in captivity. Raising tigers in captivity is 250 times more expensive than poaching wild tigers so there's plenty of incentive to poach and smuggle the last remaining wild populations to extinction.

Undercover surveys by TRAFFIC included in the report found little tiger bone currently available in China. Less than 3 percent of 663 medicine shops and dealers claimed to stock it, and most retailers were aware that tigers are protected and illegal to trade. Thus China's measures to implement and enforce its trade ban - ranging from public education campaigns

and promotion of effective substitutes for tiger medicines, to severe punishment for law breakers - have been effective.

However, TRAFFIC documented 17 instances of tiger bone wine for sale on Chinese auction websites, with one seller offering a lot of 5,000 bottles. And demand for big cat skins as status symbol clothing, particularly in China's Tibetan Autonomous Region, is increasing, with about 3 percent of Tibetans in major towns claiming to own tiger or leopard skin garments even though they knew it was illegal.

In the early 1990s, WWF and TRAFFIC, along with the global community, feared that Chinese demand for tiger parts would drive the tiger to extinction by the new millennium. The tiger survives today thanks in large part to China's prompt, strict and committed action--and U.S. leadership and support for it. To overturn the ban and allow any trade in captive-bred tiger products would waste all the efforts invested in saving wild tigers—including the excellent support of Congress for tiger conservation, through the Rhino and Tiger Conservation Act and Multilateral Species Conservation Fund. It would be a catastrophe for tiger conservation. The excellent efforts of governments across the range of the tiger, to benefit tigers, their habitats, and local communities, would be undermined. The bottom line is, there are too many unanswered questions and too few wild tigers for the world to risk reopening trade from any source.

WWF and TRAFFIC continue to call on the Chinese government to: maintain its domestic trade ban; strengthen its efforts to enforce the law against the illegal trade in tigers and other Asian big cats; impose a moratorium on all tiger breeding; destroy the stocks of tiger carcasses; and increase public awareness of the current trade ban.

WWF and TRAFFIC call on the U.S. to take a strong stand for tigers at CoP14 and to support these continuing efforts and urge the Chinese government to not weaken its domestic trade ban.

At the meeting of the Global Tiger Forum in Kathmandu, Nepal, just last month, China's delegation made a strong push for reopening a limited domestic trade in tigers. However, the delegation made no official statement regarding China's intentions. Tiger range states have made a formal request for China's official position and, as Parties to CITES, will be looking to fellow CITES Parties at CoP14 to help direct this issue. As this question of tiger trade will loom large at CoP14, it is therefore critical that the U.S. firmly encourages China, a CITES Party bound by the convention, to maintain its domestic trade ban and that the U.S. also encourages tiger range states to exert the same pressure.

TRAFFIC notes that the U.S. had submitted a proposal at the 54th Meeting of the CITES Standing Committee suggesting that progress of the range States in implementing the CITES Resolution pertaining to tigers should be assessed, trade suspensions considered if inadequate progress was being made, and that diplomatic missions also be considered. TRAFFIC urges that the U.S. reiterate these calls for stronger action and political commitment at CoP14. This is an opportunity for the U.S. to continue to illustrate leadership on this issue and help to mobilize global action to address many of the challenges in tiger conservation today in all countries involved in this continuing trade, whether a range State, transit State or consumer

State. CoP14 provides us with an opportunity to assess these problems and potential solutions coherently, and an opportunity for the international community to work together to find a way to monitor progress in the implementation of such solutions, so that we can be sure our combined efforts are succeeding. Reversing the trend of tiger population declines will not be an easy task, and we should take all efforts to reverse this trend.

## **MAHOGANY**

On timber, WWF and TRAFFIC are greatly concerned about the current regulation of trade in bigleaf mahogany, a CITES Appendix II species—which it has brought to the attention of the CITES Mahogany Working Group, the 16<sup>th</sup> Meeting of the CITES Plants Committee, 54<sup>th</sup> Meeting of the CITES Standing Committee, as well as directly to the Government of Peru and industry stakeholders. The U.S. is the main importer of mahogany from Peru—the major exporting country.

Our concerns specifically focused on:

- Failure to implement recommendations from previous meetings of the CITES Mahogany Working Group;
- Ineffective implementation of Article IV of the Convention, including either the non-issuance of non-detriment findings, or such issuance in the absence of inventories of existing stocks, and without sound scientific basis;
- Lack of transparency and effective controls in the chain-of-custody of the timber, with particular reference to accompanying documentation;
- Lack of high-level political will to ensure effective implementation of the Convention, despite the efforts being made by many dedicated staff within the Peruvian government (INRENA) to improve control of mahogany logging and exports.

As a result of these concerns, WWF and TRAFFIC have stated that, without significant change, it would become necessary to call for a moratorium on mahogany logging, and indeed or a moratorium on imports of all mahogany that were not strictly compliant with CITES requirements.

In addition, at the 16<sup>th</sup> Meeting of the CITES Plants Committee, WWF and TRAFFIC supported the inclusion of bigleaf mahogany in the Review of Significant Trade so that, under the auspices and support of the CITES Committees and the Secretariat, implementation of CITES Article IV in exporting countries could be reviewed, recommendations to exporting countries made and support provided to the implementation of those recommendations. WWF and TRAFFIC also supported the development of a strategic action plan which would facilitate the implementation of Mahogany Working Group recommendations in member countries. The Committee also agreed that such a plan should address issues concerning non-detriment findings, compliance, legal origin and enforcement issues, some of which could also be addressed through the already-established process of the CITES Review of Significant Trade.

WWF and TRAFFIC note that the Government of Peru is developing an Action Plan for the implementation of the Appendix II listing of mahogany, and other detailed follow-up to the recommendations from the 16<sup>th</sup> Meeting of the CITES Plants Committee. WWF and TRAFFIC

urge the U.S. to provide any support necessary to Peru in the development and implementation of this Action Plan, as it will be critical to insuring a sustainable mahogany trade into the future.

TRAFFIC also encourages U.S. support of three proposals to list additional timber species on CITES Appendix II – the *Dalbergia retusa* and *D. granadillo* proposal, the *Caesalpinia echinata* proposal, and the *Cedrela* spp. proposal. TRAFFIC does not support an Appendix II listing for *Dalbergia stevensonii*, as there is no evidence of a trade threat, but would suggest that range states consider an Appendix III listing as an alternative.

### **CITES STRATEGIC PLAN**

TRAFFIC welcomes the draft CITES Strategic Plan 2008-2013 which includes consideration of CITES's links to sustainable development and achievement of the Millennium Development Goals. We are pleased that targets and indicators have been incorporated, but note that the baseline for these needs to be established, as well as a process for Parties to monitor their progress. This is an ambitious plan that will rely heavily on partnerships and collaboration with governments and civil society to be achieved. TRAFFIC hopes that Parties respond to the new CITES Strategic Vision and Plan by developing technical and financial assistance plans that would help producer countries meet the new challenges that it entails. TRAFFIC also hopes that discussions on the Plan in The Hague will further examine how it can address the underlying causes of unsustainable and illegal international trade in endangered species by meeting sustainable development and poverty alleviation goals.

### **NON-DETRIMENT FINDINGS**

TRAFFIC fully supports the draft Decision by Mexico encouraging Parties to provide financial support for an international experts workshop on CITES non-detriment findings (NDFs). TRAFFIC shares Mexico's opinion that there is an urgent need to enhance CITES Scientific Authorities' capacities, particularly those related to the methodologies, tools, information, expertise, and other resources needed to formulate the NDF. TRAFFIC encourages Parties to provide any help in this regard on specific taxa, in order to contribute to the development of such a workshop.

### **ELEPHANTS**

As in previous CITES CoPs, TRAFFIC will be producing its statistical analysis of elephant product seizure records held in the Elephant Trade Information System, or ETIS. These ETIS reports assessing trends in illegal ivory trade are expected this month and should be used as an integral source of information to inform the process and determine final decisions on elephant proposals that are before this CoP.

Previous ETIS analyses demonstrated that illegal trade in elephant ivory is most directly correlated with the presence of large-scale, poorly regulated domestic ivory markets. To address this paramount driving force behind illegal trade in ivory, Parties at CoP13 adopted *Decision 13.26*, calling for the implementation of an Action Plan for the control of trade in African elephant ivory. It is of great concern to TRAFFIC that nearly two years after this Decision was approved, many African countries have completely failed to meet their basic reporting requirements. Without information concerning the actions of governments in implementing the Action Plan, there is no basis upon which Parties can determine whether progress is being made

in meeting its objectives and where priorities need to be addressed. There is certainly little evidence the three African nations most heavily implicated in the illegal trade - the Democratic Republic of the Congo, Cameroon and Nigeria – have implemented the Action Plan, and these countries continue to serve as major conduits for Asian crime groups to move illicit elephant tusks to international markets. As a result, the frequency of large-scale ivory seizures has doubled in recent years, showing greater sophistication, organization and finance behind the illegal movement of ever larger volumes of illicit ivory to Asia. TRAFFIC therefore stresses that more resources and time need to be directed towards implementation of the Action Plan, including the development of a work plan that would outline tasks that need to be achieved for the Action Plan to be implemented and facilitate the active and collaborative engagement of other governments and the NGO community.

### **IMPLEMENTING REGULATIONS**

Finally, we would like to commend our colleagues at the U.S. Fish and Wildlife Service for their efforts to finalize the U.S. CITES implementing regulations prior to CoP14 or, at a minimum, prior to changes arising from CoP14 taking effect (i.e. 90 days after CoP14). We would also like to encourage a system by which these regulations would be updated immediately after each CITES CoP, to ensure that the U.S. is in full compliance with the convention in a timely way.

### **CONCLUSION**

In conclusion, we call upon the United States to recapture its former leadership in CITES, both on tigers and other critical conservation issues. Now is the time for action. The CITES CoP will not meet again until 2010—and the tiger and many other species cannot wait three more years for bold action.

Mrs. Chairwoman, thank you for the opportunity to testify before the Subcommittee today. I will be happy to answer any questions.