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Chairman Flake, Ranking Member Markey, and members of the subcommittee, thank you for the opportunity to testify on the global wildlife trafficking and poaching crisis and its implications for conservation, economic growth and development, and U.S. security interests. WWF is the largest private conservation organization working internationally to protect wildlife and wildlife habitats. We currently sponsor conservation programs in more than 100 countries with the support of over 1.2 million members in the United States and more than 5 million members worldwide.

INTRODUCTION

Illegal wildlife trafficking and poaching to supply the illegal trade in wild fauna and flora is one of the greatest current threats to many of our planet's most charismatic, valuable, and ecologically important species. Wildlife poaching and trafficking also poses significant threats not only to wildlife conservation and our shared natural heritage but also to security, good governance, and economic development objectives around the globe. In fact, wildlife trafficking has become a transnational criminal enterprise worth billions of dollars annually that is strongly connected to other transnational organized crimes, such as drug and arms trafficking, and is helping to finance agents of instability and corruption in many developing countries.[1] According to the best estimates, the illegal wildlife trade has a value of $7.8 – $10 billion per year, a figure which puts it the top 5 largest illicit transnational activities worldwide, along with counterfeiting and the illegal trades in drugs, people, and oil.[2] If the illegal trades in timber and fish are included in the total, then the estimated value of illegal wildlife trafficking rises to $19-20 billion annually. In terms of its size, wildlife trade outranks the small arms trade. It also has strong connections to other illegal activities – guns, drugs, and ivory may be smuggled by the same criminal networks and using the same techniques and smuggling routes.

Much of the testimony offered today, including my own, will appropriately focus on two iconic African species: rhinos and elephants. But wildlife trafficking impacts a wide range of species across the globe. Tigers continue to be subjected to intense poaching pressures throughout their range in Asia – the parts of almost 1,600 tigers were seized in tiger range countries over the past 15 years, an average of 2 per week – and numerous other species are being rapidly depleted to feed a voracious global trade, including marine turtles, sharks, pangolins, totoaba, corals, tortoises and terrapins, tokay geckos, song birds, and endangered plant species, such as orchids and tropical hardwoods. Every year, an estimated 73 million sharks are killed, primarily for their fins.[3] Over the past decade, 20,500 tons of abalone have been poached and illegally traded from South Africa.[4] Between 2000 and 2012, 218,155 pangolins

[1] www.dni.gov/files/documents/Wildlife_Poaching_White_Paper_2013.pdf
[2] http://transcrime.gfintegrity.org/
[3] TRAFFIC and the Pew Environment Group analysis produced for the 2011 meeting of the UN FAO's Committee on Fisheries (COFI)
[4] South Africa's illicit abalone trade: An updated overview and knowledge gap analysis, 2014, TRAFFIC

were reported in seizures—a significant underrepresentation of the total estimated volume of trade.[5] In Thailand alone, 19,000 tortoises and freshwater turtles were seized between 2008 and 2013.[6] Illegal gillnet fishing and the resulting bycatch in Mexico's Gulf of California to supply consumers in Asia with the dried swim bladders of the totoaba fish is driving the world's most endangered marine mammal—the vaquita—to extinction.[7]

At the root of this wildlife trafficking and poaching crisis is the growing demand – primarily in Asia – for high-end products made from wildlife parts, such as elephant ivory, rhino horn, and tiger skins and bones. Products made from these and other increasingly rare species command high prices on Asian black markets as purported medicinal cures (e.g. rhino horn powder and tiger bone wine), culinary delicacies (e.g. shark fins), or demonstrations of wealth and status (e.g. ivory carvings). Growing wealth in Asia, particularly in countries such as China and Vietnam, is a primary driver and has resulted in a steep increase in Asian consumers with the means to purchase such products – and in the prices being paid for them. However, the criminal networks feeding Asia's growing demand are global in nature, reaching across oceans and continents and operating in many countries, including the U.S. Middleman traders often direct poaching activities and engage in targeted efforts to corrupt law enforcement, border inspection, and wildlife protection efforts in affected countries. In some cases, organized Asian criminal syndicates, which are now increasingly active in Africa, work with local economic and political elites to subvert control systems and operate with relative impunity.

Overall, illegal wildlife trade produces a broad corrupting influence on governments, which is a central challenge. The combination of rapidly rising prices and inadequate enforcement regimes in many countries makes poaching and illegal wildlife trafficking a high profit, low risk criminal enterprise and has led to a dramatic upsurge in not just the amount of poaching and illegal wildlife trafficking, but also its severity. Poachers supplying products such as elephant ivory and rhino horn are less often local criminals armed with spears or shotguns and more frequently resemble highly-organized and heavily-armed gangs, at times including militia or military personnel. They violate international borders, carry AK-47s and rocket-propelled grenades, and possess strong connections to transnational criminal networks. In some regions of Africa, trafficking in wildlife and other natural resources has been strongly connected to the financing of destabilizing forces, including armed insurgencies, groups responsible for human rights abuses, and organizations with ties to terrorism.[8] In many parts of Africa and Asia, poachers and wildlife traffickers can operate largely with impunity due to weak laws or law enforcement, poor capacity, governance shortfalls, and an overall failure of governments to recognize wildlife crime as a serious crime.

It is on the ground, primarily in developing countries and rural regions, where large-scale illegal trade in wildlife and wildlife products is having its most devastating effects, negatively impacting local communities by undermining regional security and economic growth while exacerbating corruption and instability. Many developing countries are witnessing the rapid decimation of their wildlife – a potentially valuable resource on which to build sustainable growth and eventually bring greater stability to impoverished and often conflict-torn regions. At the same time that wildlife crime is taking a profound toll on many ecological systems, it is also robbing some of the poorest communities on earth of their natural wealth, breeding corruption and insecurity and disenfranchising them of sustainable pathways to prosperity.

[5] Background report on illegal trade in elephant, rhino, big cats and pangolins, 2013, TRAFFIC
[6] Seizures of Tortoises and Freshwater Turtles in Thailand 2008-2013, 2014, TRAFFIC
[7] http://www.iucn-csg.org/index.php/vaquita/
[8] www.dni.gov/files/documents/Wildlife_Poaching_White_Paper_2013.pdf

Over the past three years, the U.S. government has taken strong and significant steps to recognize that wildlife crime is a serious crime with serious consequences, including President Obama's Executive Order 13648 and the Administration's release in February 2014 of the National Strategy for Combatting Wildlife Trafficking and in February 2015 of its subsequent implementation plan for the Strategy. Congress has also taken action, providing increased resources to U.S. agencies working to implement the National Strategy, proposing new legislation to strengthen U.S. laws and programs designed to combat wildlife trafficking and build anti-poaching capacity in developing countries, and holding hearings such as this one, which have done much to bring attention to the current poaching crisis and educate decision makers about potential policy responses. In my testimony, I hope to present not just the current state of the problem but also some examples of both immediate and long-term solutions, as well as recommendations on further actions Congress and the Administration can take to implement and enhance the National Strategy.

AFRICAN RHINOS

The poaching crisis facing Africa's rhinos today is exemplary of the degree to which the current situation differs from the poaching challenges we have faced in the past. Highly organized, transnational criminal networks are taking advantage of emerging markets and skyrocketing prices for a black market luxury product – rhino horn – and have suddenly created a grave situation for a set of species that had, until recently, been regarded as one of Africa's great conservation success stories. WWF has been involved in rhino conservation and management in Africa for nearly 50 years. During that time, we have seen great strides in the recovery of both black and white rhinos on the continent. Southern white rhinos, once thought to be extinct, have recovered to number roughly 20,000 individuals in South Africa alone. Black rhinos have doubled in number over the past two decades from their low point of 2,480 individuals, though their total numbers are still a fraction of the estimated 100,000 that existed in the early part of the 20th century. Namibia is now the primary stronghold for the black rhino, South Africa for the white rhino. However, the continued recovery of these populations and the very survival of rhinos in parts of sub-Saharan Africa is now in doubt as these animals are mercilessly killed for their horns. Though trafficked in smaller amounts, rhino horn is worth far more than ivory and priced higher than gold pound for pound. Illicit traders can make more profit smuggling a kilo of rhino horn than from smuggling any illicit drug, and the risks are minimal in comparison.

South Africa

South Africa is home to over 80% of the world's remaining rhinos and, through public and private efforts, has been largely responsible for the return of the southern white rhino. However, in just the past seven years, it has seen the number of its rhinos killed illegally rise by 10,000%. In the early 2000s, roughly a dozen rhinos were poached in South Africa in any given year, but since 2007, the number has risen exponentially: from 13 rhinos poached in 2007 to over 1215 in 2014.[9] We anticipate that the South African Government will soon announce that nearly 700 rhinos were poached in that country in just the first six months of 2015 – a figure that, if confirmed by the government, would put 2015 on track to be the worst year yet for rhino poaching in South Africa. Kruger National Park, which holds the majority of South Africa's roughly 20,000 rhinos, remains the epicenter of illegal activity: the Park lost 827 rhinos throughout 2014, representing nearly two-thirds of all the animals killed that year. The situation is all the more shocking given that South Africa is recognized to have the most well developed park system in Africa, with the highest capacity and best enforcement.

[9] http://wwf.panda.org/?uNewsID=203098

Rhino horn poaching and trading operations in South Africa are closely associated with organized crime networks, some with access to high-powered weapons, helicopters and night vision goggles. These paramilitary-type operations can easily outgun wildlife rangers, and South Africa has even resorted to military support and interventions in Kruger National Park – the primary site of the poaching surge – in order to combat rhino poachers. However, with potential profits so high, even some of those charged with protecting rhinos are becoming corrupted and helping to facilitate poaching. Current WWF-supported research in South Africa has found strong evidence confirming that rhino horn trafficking in the country is controlled by serious organized crime groups that are also involved in smuggling people and narcotics. The operations of these groups are firmly embedded within South Africa, and in spite of tens of millions of dollars in additional funding to the South African government and other stakeholders from various sources in recent years, the poaching and trafficking is getting worse.

WWF is particularly concerned about the persistent allegations of serious levels of corruption occurring hand-in-hand with serious organized crime activities, which are facilitating rhino poaching and trafficking within the government and private sector. For example: in September 2014, Lawrence Baloyi, a South African National Parks (SANParks) employee who was the section ranger for the Lower Sabie region of Kruger Park, was caught poaching rhinos. He was arrested and is awaiting trial. South Africa also faces the challenge of its long, porous border with Mozambique, a 220-mile stretch of which comprises the eastern border of Kruger National Park. Mozambique has come under increasing scrutiny as a major driver of both rhino horn and ivory trafficking, due to its role as a major trans-shipment point for illegal wildlife products out of Africa and a major base for poaching operations into Kruger National Park. It is estimated that 80 percent of the rhino poaching occurring in the Park is being carried out by poaching gangs from Mozambique. The Convention on International Trade in Endangered Species (CITES) has placed increased scrutiny on Mozambique's failure to curtail illegal trade of rhino horn and elephant ivory, and some have called for stronger diplomatic action against the country, including possible certification by the U.S. under the Pelly Amendment to the Fisherman's Protective Act.

Many African nations have watched South Africa's rhino poaching rates with alarm, fearing that their rhinos would be targeted next – particularly if South Africa somehow manages to prevent further slaughter and the poachers seek out easier targets. Unfortunately, over the past two years we have seen the situation not only worsen in South Africa but also spread elsewhere. Kenya has seen an increase in rhino poaching losses, which, as a percentage of their total rhino population, are worse than those in South Africa, and Namibia, which has remained largely immune to rhino poaching until recently, has seen a sudden surge of its own over the past twelve months.

Namibia

Namibia is home to the largest free-roaming population of black rhinos on the planet and is an inspiring example of how conservation can benefit both people and wildlife when embraced by both the national government and local communities. Having written conservation into its constitution when it achieved independence in 1990, the Namibian government proceeded to devolve ownership over wildlife resources to the local level, empowering local people in rural areas to establish community-run "conservancies", in which communities own and manage their own wildlife resources and derive profits from ecotourism opportunities and sustainable use of wildlife. The conservancy movement, which has been strongly supported by WWF on the ground, has grown over the past two decades to the point where over 20 percent of Namibia's land area is now under conservancy management. This has resulted in new local attitudes towards wildlife, rebounding populations of such charismatic species as

rhinos and lions, and an exponential increase in the economic benefits that communities receive from their wildlife resources, including income and employment. Due to joint-venture lodges and related eco-tourism opportunities, community conservancies now generate upwards of 6 million USD annually for rural Namibians – up from an insignificant amount in the mid-1990s. These successful programs receive critical support from USAID and, more recently, the Millennium Challenge Corporation, as well as WWF and others. By demonstrating the value of wildlife to local communities, these programs have made essential partners out of local people in the long-term conservation of wildlife and defense against poaching, helping to build successful informer networks and wildlife stewardship among communities, which have helped keep wildlife poaching low-to-nonexistent in communities where these programs have become established.

Unfortunately, while Namibia's conservancies have overall seen low levels of elephant and rhino poaching, over the past year the country has seen a sudden uptick in rhino poaching centered on Etosha National Park. Around 70 rhinos have been poached in Namibia this year, nearly all in the more remote western area of the Park. WWF has been concerned that it was only a matter of time before rhino poaching came to Namibia, and from our perspective, the biggest problem has been the lack of anti-poaching capacity and, in the case of Etosha, the involvement of corrupt governmental officials. However, given the recent spike in poaching incidents, the situation now seems to be receiving high attention from very senior-level government officials, including with the federal Cabinet, who have worked with the Ministry of Environment and Tourism to appoint external investigators from the police, military and Protected Resource Unit, which is responsible for investigating crime related to diamonds, drugs, and rhino/ivory. It appears that the government has responded by adopting a "no-tolerance" policy towards rhino and elephant poaching in Namibia, and the past month has seen 22 arrests related to the rhino poaching in Etosha National Park, as well as nine additional arrests related to rhino poaching in northwestern Namibia around Palmwag nature reserve and nearby conservancies.

These strong enforcement actions by the Namibian Government are promising signs and, demonstrate it is taking the new wave of rhino poaching seriously. However, WWF remains concerned with respect to the judiciary: we have seen magistrates release elephant poachers on bail and then the same poachers go back to poaching more elephants. The appointment this month of a new dedicated and experienced wildlife prosecution specialist to work exclusively on prosecution of rhino and elephant poaching cases is encouraging, but support for prosecutors is critical. Successful prosecutions under organized crime legislation – not just poaching legislation – will serve as the real disincentives to additional poaching. This will take time and require greater investigative and forensic support, and it applies everywhere, not just in Namibia.

In addition to evidence of the Namibian government's high-level commitment to stop the poaching early and root out corruption, the continued strength of Namibia's model is the strong ownership over wildlife that communities possess through the conservancies. Many arrests for poaching have been achieved via community intelligence and community informer networks established through conservancies, which have passed intelligence on to law enforcement officials. In several instances when poaching incidents have occurred, the poachers have been apprehended within 24 hours because of information provided by local informers. WWF has seen similar successes through programs we support in Nepal, where an approach combining Community-Based Anti-Poaching Units, strong engagement by the government in park protection, and enhanced intelligence sharing have led to 12 months free of poaching of rhinos, tigers or elephants in that country on three separate occasions – in 2011, 2013 and 2014.

Namibia's conservancy members increasingly resent both the increased poaching and low arrest and prosecution rates of those responsible – further evidence that conservancy members consider their wildlife a point of pride and that the conservancy movement has built wildlife conservation allies at the local level. In addition, it has helped to create local governance structures and local democracy, greater rural economic prosperity, and a respect for the rule of law in the country's post-apartheid era. It is clear that anti-poaching efforts are not yet making a major difference to rhino poaching in South Africa – in part because the land area is so large and borders porous. The situation may be different in Namibia, however, where the poaching is evolving rapidly and there are few resources to combat it. The relationship between protected areas and neighboring communities is key to combatting poaching activities, and we must work to disrupt the transnational organized crime syndicates that are funding poachers and smugglers and corrupting officials. A balanced approach including law enforcement efforts, successful prosecutions targeting organized crime and building the enabling environment for effective law enforcement, including core support from the local community, is the key to success in Namibia.

Rhino Horn Trafficking and Demand

It is estimated that 3000 kg of illicit rhino horn reaches Asian markets each year. Evidence indicates that horn smuggled from South Africa will go directly to consumer markets in Asia, but primarily to the middlemen market in Bangkok. From there it is sold onward to buyers from Vietnam, Laos and China and smuggled into those countries. Increased law enforcement at Bangkok Airport also means that some horns are now being smuggled to Malaysia and driven overland to Bangkok in order to reduce the risk of detection. The spike in rhino poaching has surged due largely to rising demand for rhino horn in Vietnam, where some believe it to be a last resort cure for fever and even cancer and others employ it as a party drug/hangover cure that doubles as a status symbol due to its exorbitant cost. Wealthy buyers have driven up prices and demand for rhino horn to a level where it is now being sourced not just from live rhinos in Africa and Asia, but also from trophies, antiques and museum specimens in the U.S. and Europe. While trade in rhino horn is illegal in Vietnam, possession is not. Rhino horns are officially permitted in Vietnam only as personal effects, not for commercial purposes (under CITES rules) and are not to be traded or used post-import. Under the terms of the export permit from South Africa, horns are not to be used for commercial purposes. However, Vietnamese are not known for trophy hunting, and it is illegal for any private individual to own a gun in the country, suggesting that the large majority of legally imported horns are actually intended for illegal purposes. Until recently, Vietnam had shown little willingness to clamp down on illegal trade in rhino horn, but engagement by the U.S. government and recent CITES decisions regarding rhino horn have helped move Vietnam to be more cooperative in addressing the problem. Much more will need to be done to dry up the illegal trade in rhino horn and educate the Vietnamese public, however, if current trends are to be reversed and demand for the product is to be curtailed and eliminated.

ELEPHANT IVORY

WWF has over 40 years of experience in elephant conservation, and through our African Elephant Program, we aim to conserve forest and savanna elephant populations through both conservation projects and policy development with elephant range state governments, local people and non-governmental partners. TRAFFIC, a strategic alliance of WWF and IUCN--The World Conservation Union and the world's leading wildlife trade monitoring organization, tracks illegal trade in elephant ivory using records of ivory seizures that have occurred anywhere in the world since 1989. The Elephant Trade Information System (ETIS) managed by TRAFFIC, one of the two monitoring systems

for elephants under CITES, comprises over 18,000 elephant product seizure records from some 90 countries, the largest such collection of data in the world.

African elephants once numbered in the millions across Africa, but by the mid-1980s their populations had been devastated by poaching. An international ban on the sale of ivory, put in place in 1989, helped to slow the rate of decline significantly for the past two decades in many parts of Africa. The status of the species now varies greatly across the continent. Some populations have remained in danger due to poaching for meat and ivory, habitat loss and conflict with humans. In Central Africa, where enforcement capacity is weakest, estimates indicate that populations of forest elephants in the region declined by 62% between 2002 and 2011 and lost 30% of their geographical range,[10] primarily due to poaching. Elephants in Central Africa are also heavily impacted by the existence of large, unregulated domestic ivory markets, especially those still functioning in Kinshasa, Democratic Republic of Congo (DRC) and Luanda, Angola.

In other parts of Africa, populations have remained stable or grown until recently, but evidence now shows that African Elephants are facing the most serious crisis since the 1989 ban, and gains made over the past 25 years are in the process of being reversed. Tens of thousands of African elephants are being killed every year to supply the illegal ivory market, with an average of 18 tons seized per year over the past 20 years and annual highs of over 32 tons seized. The Convention on International Trade in Endangered Species of Fauna and Flora (CITES) reported that roughly 25,000 elephants were illegally killed on the African continent in 2011 and that another 22,000 fell victim to poaching in 2012. Many independent experts see these estimates as conservative and believe the number to be significantly higher, with some estimates ranging from 30,000 to as high as 50,000. The consensus is that in the three years from the start of 2012 through the end of 2014, approximately 100,000 elephants were illegally killed across the African continent – a brutal loss for the species.

Data show an increasing pattern of illegal killing of elephants throughout Africa and demonstrate an escalating pattern of illegal trade – one that has reached new heights over the past five years. Those working on the ground throughout Africa have seen an alarming rise in the number of elephants being illegally killed, even in areas that were until recently relatively secure and free from large-scale poaching, such as southern Tanzania and northern Mozambique.[11] Reports out in recent months from those two countries indicate that elephant populations have declined by 60 percent in the former and 50 percent in the latter in just five years time – shocking declines. Witnesses have also seen a disturbing change in the sophistication and lethality of the methods being used by the poachers, who are frequently well armed with automatic weapons, professional marksmen and even helicopters. In most cases, poachers are better equipped than park guards and supervisors. In some instances, they are better equipped even than local military forces. Illegal trade in ivory has been steadily increasing since 2004 with the real surge beginning in 2009. Each of the subsequent years has hit historic highs for large-scale ivory seizures. Successive years of high-volume, illegal trade in ivory is not a pattern that has been previously observed in ETIS data. This represents a highly worrying development and is jeopardizing two decades of conservation gains for the African Elephant, one of Africa's iconic flagship species and an animal that the U.S. public feels adamant about protecting.

[10] Maisels F, Strindberg S, Blake S, Wittemyer G, Hart J, et al. (2013) Devastating Decline of Forest Elephants in Central Africa.PLoS ONE 8(3):e59469. doi: 10.1371/journal.pone.0059469

[11] http://namnewsnetwork.org/v3/read.php?id=180566; http://www.sanwild.org/NOTICEBOARD/2011a/Elephant%20poachers%20use%20helicopter%20in%20Mozambique%20National%20Park.HTM; http://www.savetheelephants.org/news-reader/items/selous-the-killing-fields-40tanzania41.html

Requiring greater finance, levels of organization and an ability to corrupt and subvert effective law enforcement, large-scale movements of ivory are a clear indication that organized criminal syndicates are becoming increasingly more entrenched in the illicit trade in ivory between Africa and Asia. Virtually all large-scale ivory seizures involve container shipping, a factor that imposes considerable challenges to resource-poor nations in Africa. Large-scale movements of ivory exert tremendous impact upon illegal ivory trade trends. Unfortunately, very few large-scale ivory seizures actually result in successful investigations, arrests, convictions and the imposition of penalties that serve as deterrents. International collaboration and information sharing between African and Asian countries in the trade chain remains weak, and forensic evidence is rarely collected as a matter of routine governmental procedure. Finally, the status of such large volumes of ivory in the hands of Customs authorities in various countries, which generally do not have robust ivory stock management systems, remains a problematic issue and leakage back into illegal trade has been documented.

Elephant Ivory Trafficking and Demand

In terms of ivory trade flows from Africa to Asia, East African Indian Ocean seaports remain the paramount exit point for illegal consignments of ivory today, with Kenya and the United Republic of Tanzania as the two most prominent countries of export in the trade. This development stands in sharp contrast to ivory trade patterns previously seen whereby large consignments of ivory were also moving out of West and Central Africa seaports. Whether the shift in shipping ivory from West and Central African Atlantic Ocean seaports reflects a decline in elephant populations in the western part of the Congo Basin remains to be determined, but the depletion of local populations is steadily being documented throughout this region, according to the IUCN's Species Survival Commission's African Elephant Database. Data on elephant poaching from the Monitoring Illegal Killing of Elephants (MIKE) program, the other site-based monitoring system under CITES, also show that illegal elephant killing has consistently been higher in Central African than anywhere else on the African continent. Now, however, poaching is seriously affecting all parts of Africa where elephants are found.

China and Thailand are the two paramount destinations for illegal ivory consignments from Africa. While repeated seizures of large consignments of ivory have occurred in Malaysia, the Philippines and Viet Nam since 2009, these countries essentially play the role of transit countries to China or Thailand. Directing large shipments of ivory to other Asian countries for onward shipment is an adaptation by the criminal syndicates to the improved surveillance and law enforcement action in China and Thailand where targeting of cargo from Africa has increased. Importation into other Asian countries allows the shipping documents to be changed, concealing the African origin of the containers in question. In the case of Viet Nam, which shares a long terrestrial border with China, ivory is being smuggled overland into China. CITES data also suggest that Cambodia, Laos and most recently Sri Lanka have been emerging as new trade routes into China and Thailand, reflecting further adaptations by criminal trading networks.

Without any doubt, ivory consumption in China is the primary driver of illegal trade in ivory today, and China remains the key for stopping the growing poaching crisis facing Africa's elephants. The Chinese government recognizes ivory trafficking as the country's greatest wildlife trade problem, and law enforcement officials are making almost two ivory seizures every single day, more than any other country in the world. Regardless, strict implementation of China's domestic ivory trade control system seriously faltered in the wake of the CITES-approved one-off ivory sale held in four southern African countries in late 2008. Various observers to China, including TRAFFIC monitors, have found government-accredited ivory trading retail outlets persistently selling ivory products without the benefit of product identification certificates, which previously were an integral discriminating feature in the Chinese control system. The ability of retail vendors to sell ivory products without these

certificates means that they do not become part of China's database system, which is designed to track ivory products at the retail level back to the legal stocks of raw ivory at approved manufacturing outlets. This circumvention creates the opportunity to substitute products from illicit sources of ivory into the legal control system. Within the country, stricter internal market monitoring and regulation are needed, as well as scaled up and dedicated investigative efforts directed at fighting the criminal syndicates behind the ivory trade. Chinese nationals based throughout Africa have become the principle middleman traders behind the large illegal movements of ivory to Asia, and the advent of Asian criminal syndicates in Africa's wildlife trade stands as the most serious contemporary challenge. China needs to collaborate with African counterparts to address the growing Chinese dimension in Africa's illegal trade in ivory and other wildlife products.

Thailand also has one of the largest unregulated domestic ivory markets in the world. But unlike China, until recently Thailand has consistently failed to meet CITES requirements for internal trade in ivory. Interdictions of several large shipments of ivory have occurred at Thailand's ports of entry in recent years, and this past spring the two largest ever seizures were recorded in Thailand, yielding seven tons of illegal ivory in a month. After intense pressure from CITES, including the threat of sanctions, the Thai government recently passed long overdue new laws and regulations as part of a National Ivory Action Plan. Reforms have been desperately needed for a system that has, until now, allowed hundreds of retail ivory vendors to exploit legal loopholes and offer tens of thousands of worked ivory products to tourists and local buyers. CITES data underscore the global reach of Thailand's ivory markets as more than 200 ivory seizure cases have been reported by other countries regarding illegal ivory products seized from individuals coming from Thailand over the last three years. As a result of the new laws, Thai citizens have brought forward a massive 200 tons of ivory to be registered with officials. Questions remain about how Thai officials will deal with this situation, given the number of pieces this represents and the likelihood that much of the ivory is from illegally poached African elephants. Given the presence of U.S. Fish and Wildlife Service Law Enforcement and State Department Bureau of International Narcotics and Law Enforcement on the ground in Bangkok working on wildlife trafficking, we hope that U.S. agencies are actively engaging with their Thai counterparts to address the current situation, and we commend the Chairman and Ranking Member for their leadership of a recent letter to Presidential Task Force co-chairs to this effect.

We also encourage the U.S. Government to continue to be a strong voice at CITES ensuring that the Thai government delivers on its commitments and responsibilities to that treaty. Last year, WWF ran a campaign to generate public pressure on the Thai government to take serious action on illegal ivory trade in a way that would not violate military restrictions on political organizing and in a culturally appropriate manner. The campaign, called "Chor Chang," condemned the killing of elephants for ivory by asking supporters to symbolically remove the letter representing elephant, "Chor Chang" (ช), from their names and sharing this on social media. The campaign tapped into Thailand's ancient affinity with the elephant and creatively utilized this deep cultural attachment to illustrate what an enormous loss it would be if elephants disappeared. Nearly 1.3 million people and over 50 influential celebrities, politicians and bloggers participated, taking the campaign viral.

Next to China, Thailand's domestic ivory market is perhaps the second greatest driver of illegal trade in ivory at the present time. After years of inaction, there are promising signs that Thailand may be taking an active role in addressing this problem. Culturally tailored approaches to demand reduction along with continued international and bilateral engagement, particularly through CITES, will be needed to ensure Thailand follows through on effective implementation and enforcement of the long-overdue legal reforms to its ivory markets.

THREATS TO SECURITY, STABILITY & RULE OF LAW

Poaching, by definition, entails armed individuals, often gangs, operating illegally in wildlife habitats which, in many cases, are protected areas that attract tourists and contribute to the economic development of many African countries. Where poaching is particularly entrenched and pernicious, armed militias from one country temporarily occupy territory in another country, destroying its wildlife assets and posing serious national security threats on many levels. Every year, throughout Africa, dozens of game scouts are killed by poachers while protecting wildlife. Poachers who profit from killing elephants and harvesting illegal ivory may also have ties to criminal gangs and militias based in countries such as Sudan (in the case of Central Africa) and Somalia (in the case of East Africa). Longstanding historical ties between slave trading, elephant poaching and the tribes that form Sudan's Janjaweed militia (responsible for many of the worst atrocities in Darfur), mean that illegal ivory may well be being used as powerful currency to fund some of the most destabilizing forces in Central Africa. In parts of West and Central Africa, the situation has been dire for some time, and severe poaching is already resulting in the local extinction of elephant populations. In the past few years, the situation has grown even worse as we have seen a disturbing change in the sophistication and lethality of the methods being used by the poachers, who are frequently well armed with automatic weapons, professional marksmen and even helicopters. In most cases, poachers are better equipped than the park supervisors and guards. In some instances, they are better equipped even than local military forces.

Leadership in the region clearly understands the links between wildlife crime, peace and security and economic development, as demonstrated during the high-level round table on the links between wildlife crime and peace and security in Africa organized by the French government on December 5th, 2013 (one day before the Elysee Summit on Peace and Security in Africa). Central African governments also agreed to the language of the final Declaration[12] of the London Conference on Illegal Wildlife Trade, convened by the UK government from February 12-13, 2014 at Lancaster House, London to inject a new level of political momentum into efforts to combat the growing global threat posed by illegal wildlife trade.

ECONOMIC GROWTH AND DEVELOPMENT

Wildlife resources, if properly protected, can form the basis for future economic growth in impoverished, rural regions of the continent. In several African and Asian countries, this is already happening. As described above, Namibia's community-run "conservancies" allow local communities to manage their own wildlife resources and derive profits from ecotourism opportunities and sustainable use of wildlife. In Central Africa, a wildlife-based economic success story can also be told about Virunga National Park – Africa's oldest national park and one of its most important in terms of biodiversity. It is also the continent's best known park, because it is home to the last remaining mountain gorillas. Gorilla-based tourism is a huge economic engine: the annual revenue earned directly from gorilla tourism in the Virungas is now estimated at 3 million USD. When combined with the additional income received by related business, such as hotels and restaurants, the total figure may exceed 20 million USD shared between Rwanda, Uganda and DRC. In Rwanda alone, the number of tourists visiting the country from 2010 to 2011 increased 32% and tourism revenues rose an amazing 12.6%, from $200 million to $252 million in 2011 – much of it due to mountain gorillas and other eco-tourism opportunities.

Through USAID, the U.S. is currently helping to support additional community-based wildlife conservation efforts in other priority landscapes for wildlife, including southern Africa's Kavango-Zambezi Transfrontier Conservation Area (KAZA) – the largest transboundary conservation area in the

[12] https://www.google.cm/?gws_rd=cr&ei=Gb90U4z_Eo7S4QSdpYGICA#q=Declaration+of+the+London+Conference

world, encompassing 109 million acres, crossing five southern Africa countries (Angola, Botswana, Namibia, Zambia and Zimbabwe), and home to nearly half of Africa's remaining elephant population. Given its rich wildlife resources, the KAZA partnership in particular has the potential to improve the livelihoods of the 2.5 million people who live in the Okavango and Zambezi river basin regions through Community-Based Natural Resource Management (CBNRM) approaches that ensure that local communities benefit economically from wildlife on their land, through conservation of animals and their habitats and the creation of a world-class tourism experience while also bringing southern African countries together to more effectively combat international wildlife trade and poaching through information sharing, joint patrols and surveillance, as well as harmonized law enforcement policies.

The Namibian model of CBNRM offers lessons that may be applied throughout the region, and the interest of multilateral donor agencies like the GEF in supporting wildlife conservation linked to economic development in KAZA is lending additional momentum. Even as we seek to stop the bleeding of elephant populations in Central and Eastern Africa, it is important that we consolidate our gains in southern Africa and take strong steps to ensure that this last great stronghold of Africa's elephants does not become its next battlefield and to contain the rhino poaching that has begun to spread beyond its main locus in South Africa. As always, continued U.S. government support is critical for programs such KAZA, which help to create clear economic benefits for people to conserve wildlife, thereby incentivizing locally driven conservation efforts and building immunity to poaching and wildlife trafficking. They are an essential part of the long-term solution to the current crisis.

THE U.S. GOVERNMENT ROLE

The U.S. government has demonstrated historic leadership on the issue of wildlife trafficking, at all levels. Long an international leader on the issue, the U.S. has, since 2012, helped to elevate attention on wildlife crime both at home and abroad to a new apex. The President's issuance of Executive Order 13648 and the creation of the National Strategy for Combatting Wildlife Trafficking by a Presidential Task Force led by the Departments of State, Interior and Justice are a profound recognition by the Administration of the importance of this issue and the will to address it. This U.S. leadership has also set the stage internationally, putting the issue firmly on the agendas for our international partners, including in fora such as APEC, ASEAN, UNODC, the UN Security Council and – with renewed energy and impressive success – at the most recent CITES CoP. And the leadership of many in Congress, from both sides of the aisle, has already helped to raise the profile of the issue and strengthen U.S. law to address it, and is providing resources and oversight to ensure that the U.S. strategy is implemented efficiently, effectively and with the concerted energies of all relevant U.S. agencies in a whole-of-government approach. This whole-of-government approach should continue, guided by the strategy, and can serve as a model that other countries will emulate to ensure that they are bringing to bear not just their conservation resources and expertise to solve this problem, but also the full range of law enforcement, security, intelligence and diplomatic resources guided by high-level leadership and political will.

Diplomatic Recommendations

The U.S. Government should continue to raise the issue of wildlife trafficking at the highest levels with key countries and in international forums and should strive to insert wildlife crime into the agendas of relevant bilateral and multilateral agreements where it is not yet addressed and where the work of those agreements could benefit the fight against wildlife trafficking (as was done in 2013 with the UN Commission on Crime Prevention and Criminal Justice and at APEC in 2012). The U.S. Government should also continue to use its considerable diplomatic influence and technical capacity to

work with the primary consumer countries to shut down the illegal trade and should ensure that countries are held accountable at this January's CITES Standing Committee meeting for applicable decisions made at the last CITES Conference of the Parties. Recent steps by China are encouraging and need to be institutionalized and sustained through the US-China Strategic Economic Dialogue. Thailand must effectively implement the major legislative and enforcement reforms it has recently put in place to control its internal ivory market. And Vietnam must take action at all levels to enforce CITES rhino trade restrictions and launch public initiatives to reduce demand. These countries must be held accountable to CITES and the global community if they fail to live up to their international commitments. To drive needed action, the U.S. should consider application of the Pelly Amendment and the sanctions process that law offers in cases where CITES continues to be seriously undermined. The Pelly Amendment has been used sparingly but successfully in the past to achieve swift reforms in countries where endangered species trafficking was completely out of control, specifically for the illegal trade in tiger and rhino parts in Taiwan, China, South Korea and Yemen. Each of those countries made major positive wildlife trade control improvements as a result of action under the Pelly Amendment and parallel action through CITES. The ivory and rhino trade today is as serious as any wildlife trade issue in the past and warrants equally serious measures. The U.S. should also continue to support efforts to elevate the issue within the UN system, including the imminent passage of a UNGA resolution on wildlife crime, as well as robust implementation and accountability of that resolution once passed.

Anti-Poaching Recommendations

The men and women on the front lines who put their lives on hold, and often their lives on the line, in order to prevent wildlife crime are the thin green line between the poachers and the animals they wish to kill. In order to effectively reduce poaching, we need to ensure that they are up to the task when they are confronted with today's poaching threats, which are more dangerous than they have ever been and require more skills than have often been expected in the past. There are two ways to look at anti-poaching; the short-term emergency response and the long-term solution. In terms of the emergence response, effective on-the-ground protection requires: suitable operational support, including trained rangers; knowledge of patrol tactics; access to equipment and transportation; and adaptive management systems, such as that provided by the SMART[13] conservation tools. In order for on-the-ground operations to be efficient and pro-active they need to be supported by intelligence, and this can be gained through community relationships, informant networks, on-patrol interviews and through the use of surveillance technology. Interdiction also needs to lead to prosecution so that the cost of breaking the law outweighs the benefits, requiring a whole-of-government approach even at the local level. Crucially, the best anti-poaching operations are focused on crime prevention and not violator interdiction. This means working with communities through a community policing framework where there is a strong partnership between rangers and communities. These approaches are enhanced where communities see direct benefits between conservation and economic development. It is an integrated approach such as this one, which WWF has helped to foster through its program in Nepal, which has seen Nepal achieve zero rhino and elephant poaching in three of the last four years.

We know what works and how to establish these systems at the local level. But we have also been here before: in the 1980s, conservationists worked to abate the last poaching crisis affecting elephant, rhino and tiger populations. We successfully abated that crisis, and with a concerted effort, we can abate the current one as well, but what we have not been able to do is get ahead of the curve to prevent the next

[13] Spatial Monitoring and Reporting Tool: a GPS-based law enforcement monitoring system that improves the effectiveness and transparency of patrols, www.smartconservationsoftware.org.

crisis from happening in the first place. To do this takes a more strategic, long-term approach; one of sector reform to make being a ranger a profession one aspires too. In order to do this we need to:

- Establish accredited higher education training centers that produce professionally trained rangers – in a similar fashion to police academies, no ranger should be hired without receiving a professional, accredited qualification;
- Provide rewards and promotions based on performance and set competencies – this means transforming the human resource systems in many ranger departments;
- Empower rangers with the legal authority to detain and arrest suspects, to process a crime scene and present admissible evidence in court, and to legally defend themselves in life threatening situations;
- Ensure rangers are reasonably protected by the law when they are doing their duty; provide adequate insurances to rangers and their families;
- Ensure outposts provide shelter, basic amenities, communications equipment and medical supplies.

The long-term solution to the poaching crisis is to reform the ranger force just like the international community supports reform in other sectors such as police, education and health. Professionalizing the ranger force will support rule of law, provide an additional layer of good governance and provide protection for environmental services including biodiversity, timber, fisheries, watersheds and carbon stocks. The U.S. government should consider how it can support the promotion of global standards and training and accreditation systems to achieve the transformation outlined above, whether through existing U.S. institutions, such as the State Department-run International Law Enforcement Academies, or through partnerships with national or regional training institutions that can help foster "ranger academies" and the long-term professionalization of the wildlife law enforcement sector in partner countries. Where suitable, the U.S. government should also explore possible collaboration and/or assistance by the Department of Defense/AFRICOM with those local forces tasked with wildlife and/or park protection as a mission in countries facing militarized poaching threats, whether through training opportunities, logistical support, or provision of equipment.

Anti-Trafficking Recommendations

In implementing the U.S. strategy, the U.S. should focus significant efforts on disrupting and dismantling the illicit trafficking networks and crime syndicates that are driving the poaching and illegal trade, including advanced investigative and intelligence gathering techniques and bringing to bear the same sorts of tools used to combat other forms of trafficking, such as narcotics. As the narrowest point in the trade chain, traffickers offer the best opportunity to disrupt the flow of illicit goods, represent the highest-value targets for arrest and prosecution, and their arrest, prosecution and incarceration can serve as a strong disincentive to others involved in or hoping to involve themselves in the illegal wildlife trade. There is legislation currently pending in both the Senate – **S.27** introduced by Senators Feinstein and Graham – and the House – **H.R.2494** introduced by Representatives Royce and Engel – that would make large-scale wildlife trafficking a predicate offence to money laundering, racketeering and smuggling offenses under Title 18 and provide U.S. law enforcement with the same tools they have available to go after other forms of trafficking, including narcotics. WWF strongly supports both of these bills and encourages committee members to consider cosponsoring S.27 if they have not already done so.

The U.S. should continue to support trans-regional programs, similar to Wildlife TRAPS and Operation Cobra/Cobra II/Cobra III, which coordinate joint law enforcement actions between demand, range and transit states and focus on multiple points in the illegal trade chain. We would also encourage a focus on enhancing port and border security at key transit points (e.g. seaports in

Southeast Asia and East and West Africa), including border detection efforts and investigative techniques. The expertise of U.S. Customs and Border Protection and others at the Department of Homeland Security could be of value in these efforts, and their active involvement should be encouraged. The U.S. should dedicate serious efforts to enhancing the prosecutorial and judicial law enforcement capacity in priority countries in order to ensure successful convictions and incarcerations of serious wildlife traffickers, including anti-corruption measures. The U.S. should support development and dissemination of new technologies and tools, including DNA testing of specimens, computer tracking of shipments, SMART or similar patrolling software, the International Consortium to Combat Wildlife Crime's (ICCWC) Forest and Wildlife Crime toolkit, and new or repurposed technologies that can be developing in partnership with innovations labs at the Department of the Defense.

The U.S. Government should also continue to improve wildlife crime intelligence sharing and cooperation in evidence-gathering between law enforcement, security and intelligence agencies of the U.S. government, including the Department of Defense (on security linkages) and the Department of the Treasury (on illicit financial flows). In many countries in Africa and Asia there are not proactive intelligence collection and analysis to direct enforcement efforts to tackle organized crime poaching and trafficking in wildlife like rhinos. This is a major flaw that could be remedied by training, provision on intelligence analysis software and resources to allow enforcement staff to spend time on collection, input and analysis of intelligence. NGOs like TRAFFIC are gathering and analyzing information to provide law enforcement agencies to assist their priority setting and for operational use, but governments should be doing this themselves.

CONCLUSION

We are once more at a crisis moment for elephants and rhinos and numerous other species targeted by the illegal wildlife trade. U.S. policymakers at the highest level have provided outspoken leadership and strong statements of commitment and action, and these have played a large part in galvanizing global action around this issue in an unprecedented way. We must continue to implement strategies and plans to combat wildlife trafficking with concerted efforts on the ground, energetic diplomatic engagement, and the full range of law enforcement tools. The United States Government at all levels has demonstrated its willingness to lead on this issue and to provide expertise and resources to back up its commitments. Such global leadership by the U.S. will continue to be pivotal to solving this crisis and protecting our planet's wildlife heritage over the long-term. WWF is redoubling its efforts to combat this threat. We are heartened and grateful to see the U.S. government doing the same. Working in partnership with other governments, civil society, the private sector, and communities on the front lines, we can help turn the tide and bring an end to the global poaching crisis.

On behalf of WWF, we thank you for the opportunity to provide testimony to the subcommittee. We thank you for highlighting this issue, and we look forward to continuing to work with Congress and the Administration to address this crisis.

Thank you.