



United States Department of the Interior

FISH AND WILDLIFE SERVICE

International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803



NOV 8 2017

MEMORANDUM

To: Chief, Division of Management Authority

From: Chief, Division of Scientific Authority *Rosemary Green*

Subject: General Advice on Importation of Sport-hunted Trophies of African Elephants taken in Zambia in the Calendar Year 2018

This General Advice represents our Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) finding for permit applications that you have received, or may receive in the future, for the import of sport-hunted trophies of African elephants (*Loxodonta africana*) taken in Zambia in the calendar year 2018.

Please be advised that, based on the available information as of the date of this finding, we are able to determine that the importation of sport-hunted trophies of African elephants taken in Zambia in the calendar year 2018, will be for purposes that are not detrimental to the survival of the species. This General Advice applies only to African elephant sport-hunted trophies lawfully taken in Zambia during calendar year 2018 (i.e., January 1 through December 31), provided that they are to be imported by the persons who hunted them for personal use or personal display.

This finding is based on the best available biological information and is made consistent with the requirements at 50 CFR § 23.61. In making this finding, the U.S. Fish and Wildlife Service (Service) would have reviewed any pending applications to import sport-hunted trophies of African elephants taken in Zambia in 2018 for any new or additional information to consider. However, as of the date of this finding, no applications have been received for trophies to be taken in 2018. The Service also considered trade information, including trade demand, and other scientific management information available to the Service on the status and management of African elephant populations in Zambia.

This finding does not establish any conditions that must be satisfied for a permit to be granted. The Service monitors the status and management of African elephant populations in Zambia and retains

discretion to replace this finding at any time when it no longer reflects the best available biological information consistent with the requirements at 50 CFR § 23.61. In addition, this finding is subject to new analysis in the context of individual permit applications for import of sport-hunted trophies of African elephants taken in Zambia. The Service reviews and evaluates each individual application to determine whether it includes new or additional information regarding the status of elephants in Zambia such that the requirements of 50 CFR § 23.61 are satisfied. Each application for import also needs to meet all other applicable permitting requirements before it may be granted.

BASIS FOR ADVICE:

On September 12, 2017, we issued a General Advice on the import of sport-hunted trophies of African elephants from Zambia for the calendar years 2016 and 2017. In that finding, we found that, based on the available information as of the date of the finding, the importation of sport-hunted trophies of African elephants taken in Zambia in the calendar years 2016 and 2017 would be for purposes that are not detrimental to the survival of the species.

On November 7, 2017, the Division of Management Authority issued a positive finding indicating that permits for sport-hunted elephants taken from Zambia on or after January 1, 2016 and on or before December 31, 2018, meet the enhancement requirements under 50 CFR 17.32 and 50 CFR 17.40(e)(6)(i)(B).

Given that the Division of Management Authority's recently issued enhancement finding for sport-hunted elephants taken in Zambia is valid through 2018, the Division of Scientific Authority decided to review the best available information and issue a finding on the import of sport-hunted trophies of African elephants from Zambia for the calendar year 2018.

Conclusion

Based on the information currently available and detailed in our General Advice on the import of sport-hunted trophies of African elephants from Zambia for the calendar years 2016 and 2017, we believe that the status of the African elephant population in Zambia and the management efforts of the Government of Zambia are adequate to ensure that the sport hunting of African elephants does not adversely affect the status of the species in Zambia.

Furthermore, we expect that Zambia will make progress on the following issues raised in our 2016 - 2017 finding:

- 1) The Department of National Parks and Wildlife have notified us that they have submitted a revised Statutory Instrument on Elephant Sport Hunting to the Ministry of Justice for finalization, in light of the transformation of wildlife management in Zambia. DNPW has indicated that once the draft Statutory Instrument is finalized, the document will be made available to the Service. We await receipt of this revised Statutory Instrument on Elephant Sport Hunting from Zambia.

- 2) The 2005 National Strategy for Elephant Management in Zambia officially expired in 2012. Although the Government of Zambia still implements most of the strategies identified in the plan, the Strategy is scheduled for review this year. We strongly encourage Zambia to complete the review process and develop a new or revised Strategy. We would also like to request that Zambia provide us with a copy of the new or revised National Strategy for Elephant Management or Elephant Management Plan, once it is developed and finalized.
- 3) Given the possible decline in the Lower Zambezi elephant population and the drastic decline in the Sioma Ngwezi NP population (and an ecosystem carcass ratio of 85.5%), as well as a carcass ratio for Kafue National Park that increased from 1% in 2008 to 7% in 2015, we believe more effort is needed in these areas to address poaching, particularly in Sioma Ngwezi. Although we recognize that Zambia has greatly improved its anti-poaching activities, the levels of illegal activity need to be reduced as a first priority, and we will continue to monitor this situation.
- 4) In 2010, the Panel of Experts' analysis showed a steady decline in average tusk weight from 23.1 kg in 2005 to 19.6 kg in 2009. As such, the Panel raised some concern that the 2009 trophies were the smallest on record in terms of maximum weight, average weight and length, despite being above (on average) the minimum legal requirements. Then, in 2011 and 2012, the average trophy weight declined even further to 17 kg and 17.2 kg respectively. However, an analysis of trophy quality showed that the average trophy weight increased to 19.2 kg between 2015 and 2016. Although the further decline in trophy quality in 2011 and 2012 was very concerning, the increase in trophy quality in 2015 and 2016 is very promising and brings the current trophy quality level close to that of 2009. We would like to see the average tusk weight continue to increase and remain at a high level, and therefore, we encourage Zambia to continue to monitor trophy quality, especially in locations where illegal offtake is relatively high.

Therefore, we are able, at this time, to find that the importation of sport-hunted trophies of African elephants taken in Zambia in the calendar year 2018 will be for purposes that are not detrimental to the survival of the species. However, we will continue to monitor the status and management of African elephant populations in Zambia and retain discretion to replace this finding at any time when it no longer reflects the best available biological information consistent with the requirements at 50 CFR § 23.61.



U.S. CITES Implementation Report

(for the period 1 January 2013 to 30 June 2015)

PREPARED BY:

**DIVISION OF MANAGEMENT AUTHORITY
U.S. FISH AND WILDLIFE SERVICE
DEPARTMENT OF THE INTERIOR**

COMPLETED 23 SEPTEMBER 2015

U.S. CITES Implementation Report
(for the period 1 January 2013 through 30 June 2015)

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INTRODUCTION

Article VIII of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) prescribes that each Party shall prepare periodic reports on its implementation of CITES and shall transmit to the Secretariat, in addition to an annual report, a biennial report on legislative, regulatory, and administrative measures taken to enforce the provisions of CITES.

However, at the 16th meeting of the Conference of the Parties to CITES (CoP 16; March 2013), Resolution Conf. 11.17 was revised with respect to Parties' submissions of CITES biennial reports. The resolution now recommends that these reports be submitted "one year before each meeting of the Conference of the Parties." CoP17 is scheduled to begin on 24 September 2016. Therefore, the deadline for submission to the CITES Secretariat of the first "implementation report" is 24 September 2015. This U.S. report covers the time period from 1 January 2013 (the date immediately following the time period covered in the 2011-2012 biennial report), through 30 June 2015.

Work is underway to revise the reporting format under Decision 16.44, but until the new format is adopted, Parties are requested to submit their reports in accordance with the *Biennial Report Format* adopted by the Parties at CoP13 (October 2004) and distributed by the Secretariat in CITES Notification to the Parties No. 2005/035. Therefore, the United States submits this 2013-2015 report in accordance with that recommended format.

The original regulations implementing CITES in the United States were issued on 22 February 1977. On 23 August 2007, the U.S. Fish and Wildlife Service (USFWS) published a final rule in the *Federal Register* substantially updating the U.S. CITES-implementing regulations. These updates reflected measures adopted by the Parties at their regular meetings through CoP13. In 2008, USFWS published revisions to the regulations to include provisions related to international trade in sturgeon and paddlefish caviar adopted by the Parties at CoP14. In 2014, we published revisions that incorporated into the U.S. CITES-implementing regulations relevant provisions from Resolutions adopted by the Parties at CoP14 and CoP15. We are currently at work on revisions to incorporate relevant changes adopted at CoP16. U.S. CITES implementing regulations are found in Part 23 of Title 50 in the U.S. Code of Federal Regulations (50 CFR Part 23).

On the following pages, using the tabular *Biennial Report Format*, we report on the major legislative, regulatory, and administrative measures for implementation of the Convention taken during the reporting period (1 January 2013 – 30 June 2015). Attached to the tabular report are three Annexes providing narrative highlights of some of these measures with respect to Sections B, C, and D of the tabular report.

**REPORT IN TABULAR FORM OF ACTIVE MEASURES TAKEN BY
THE UNITED STATES 1 JANUARY 2013 THROUGH
30 JUNE 2015 IN ITS IMPLEMENTATION OF CITES**

A. General information

Party	United States of America
Period covered in this report:	1 January 2013 to 30 June 2015
Details of agency preparing this report	<p>U.S. Fish and Wildlife Service Division of Management Authority 5275 Leesburg Pike, MS:IA Falls Church, Virginia 22041 United States of America Tel: + 1 (703) 358 2095 Fax: + 1 (703) 358 2280 Email: managementauthority@fws.gov Web: http://www.fws.gov/international</p>
Contributing agencies, organizations or individuals	<p>U.S. Fish and Wildlife Service Division of Scientific Authority 5275 Leesburg Pike, MS:IA Falls Church, Virginia 22041 United States of America Tel: + 1 (703) 358 1708 Fax: + 1 (703) 358 2276 Email: scientificauthority@fws.gov Web: http://www.fws.gov/international</p> <p>U.S. Fish and Wildlife Service Office of Law Enforcement 5275 Leesburg Pike, MS:LE Falls Church, Virginia 22041 United States of America Tel: + 1 (703) 358 1949 Fax: + 1 (703) 358 2271 Email: lawenforcement@fws.gov Web: http://www.fws.gov/le</p>

B. Legislative and regulatory measures

1	<p>Has information on CITES-relevant legislation already been provided under the CITES National Legislation Project? If yes, ignore questions 2, 3 and 4.</p>	<p>Yes (fully) <input checked="" type="checkbox"/> Yes (partly) <input type="checkbox"/> No <input type="checkbox"/> No information/unknown <input type="checkbox"/></p>																																																
2	<p>If any CITES-relevant legislation has been planned, drafted or enacted, please provide the following details:</p> <hr/> <p>Title and date: _____ Status: _____</p> <hr/> <p>Brief description of contents: _____</p>																																																	
3	<p>Is enacted legislation available in one of the working languages of the Convention?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No information <input type="checkbox"/></p>																																																
4	<p>If yes, please attach a copy of the full legislative text or key legislative provisions that were gazetted.</p>	<p>legislation attached <input type="checkbox"/> provided previously <input checked="" type="checkbox"/> not available, will send later <input type="checkbox"/></p>																																																
5	<p>Which of the following issues are addressed by any stricter domestic measures adopted for CITES-listed species (in accordance with Article XIV of the Convention)? Tick all applicable</p>																																																	
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th rowspan="2">Issue</th> <th colspan="3">The conditions for:</th> <th colspan="3">The complete prohibition of:</th> </tr> <tr> <th>Yes</th> <th>No</th> <th>No information</th> <th>Yes</th> <th>No</th> <th>No information</th> </tr> </thead> <tbody> <tr> <td>Trade</td> <td align="center"><input checked="" type="checkbox"/></td> <td align="center"><input type="checkbox"/></td> </tr> <tr> <td>Taking</td> <td align="center"><input checked="" type="checkbox"/></td> <td align="center"><input type="checkbox"/></td> </tr> <tr> <td>Possession</td> <td align="center"><input checked="" type="checkbox"/></td> <td align="center"><input type="checkbox"/></td> </tr> <tr> <td>Transport</td> <td align="center"><input checked="" type="checkbox"/></td> <td align="center"><input type="checkbox"/></td> </tr> <tr> <td>Other (specify)</td> <td align="center"><input type="checkbox"/></td> </tr> </tbody> </table>		Issue	The conditions for:			The complete prohibition of:			Yes	No	No information	Yes	No	No information	Trade	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Taking	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Possession	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Transport	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other (specify)	<input type="checkbox"/>																					
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Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																																												
	<p>Additional comments:</p> <p>Major stricter domestic measures in the United States that in many instances affect CITES-listed species include the Endangered Species Act (ESA), the Lacey Act, the Wild Bird Conservation Act, the Migratory Bird Treaty Act, the Marine Mammal Protection Act, the Bald and Golden Eagle Protection Act, the African Elephant Conservation Act, the Rhinoceros and Tiger Conservation Act, and State natural resource and wildlife laws, and State and Federal regulations associated with these laws.</p>																																																	

6	What were the results of any review or assessment of the effectiveness of CITES legislation, with regard to the following items?				Tick all applicable
	Item	Adequate	Partially Inadequate	Inadequate	No information
	Powers of CITES authorities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Clarity of legal obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Control over CITES trade	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Consistency with existing policy on wildlife management and use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Coverage of law for all types of offences	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Coverage of law for all types of penalties	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Implementing regulations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Coherence within legislation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (please specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Please provide details if available:					
During previous and current efforts to revise the U.S. CITES-implementing regulations, USFWS reviewed U.S. legislation with regard to each of the above subjects related to the effectiveness of CITES implementation.					
In May 2014, USFWS published a final rule incorporating into the U.S. CITES-implementing regulations relevant provisions adopted at CoP14 and CoP15. Revisions to incorporate relevant changes adopted at CoP16 are currently under development.					
7	If no review or assessment has taken place, is one planned for the next reporting period?			Yes <input type="checkbox"/>	No <input type="checkbox"/>
				No information <input type="checkbox"/>	
Please provide details if available:					
8	Has there been any review of legislation on the following subjects in relation to implementation of the Convention?				Tick all applicable
	Subject	Yes	No	No information	
	Access to or ownership of natural resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Harvesting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Transporting of live specimens	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Handling and housing of live specimens	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Please provide details if available:					
During previous and current efforts to revise the U.S. CITES-implementing regulations, USFWS reviewed U.S. legislation with regard to each of the above subjects related to CITES implementation.					

9	<p>Please provide details of any additional measures taken:</p> <p>See ANNEX 1 for highlights of some of the major legislative and regulatory measures taken by the United States from 1 January 2013 through 30 June 2015.</p>
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C. Compliance and enforcement measures

		Yes	No	No information
1	<p>Have any of the following compliance monitoring operations been undertaken?</p> <p>Review of reports and other information provided by traders and producers:</p> <p>Inspections of traders, producers, markets</p> <p>Border controls</p> <p>Other (specify): In addition to the routine compliance monitoring noted above, USFWS wildlife inspectors and special agents have also conducted random or intelligence-based intensified inspection “blitzes” to check cargo, mail shipments, passengers, and vehicles at the border.</p> <p>Special enforcement operations focused on internet-based wildlife trafficking have also been undertaken.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	<p>Have any administrative measures (e.g. fines, bans, suspensions) been imposed for CITES-related violations?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	<p>If Yes, please indicate how many and for what types of violations? If available, please attach details.</p> <p>Fines were assessed and collected for CITES-related violations on numerous occasions. However, the structure of U.S. enforcement databases and the latitude for citing CITES-related violations under different statutes make it impossible to compile totals for the “number and type of violations” for which the United States took administrative measures.</p>			
4	<p>Have any significant seizures, confiscations and forfeitures of CITES specimens been made?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	<p>If information available:</p> <p><input type="checkbox"/> Significant seizures/confiscations</p> <p><input type="checkbox"/> Total seizures/confiscations</p> <p>If possible, please specify per group of species or attach details.</p> <p>Please note that seizure totals at right address the number or weight of CITES specimens seized, not the number of shipments seized for CITES violations. Some specimens included in this total may have been</p>	<p>Number</p> <p>In 2013, USFWS seized 166,852 CITES specimens (including live wildlife, parts, and products) as well as 21,424 kilograms of “commodities” representing CITES species. In 2014, USFWS seized 255,667 CITES specimens and 86,830 kilograms of CITES</p>		

	seized for violations of U.S. wildlife laws and regulations other than CITES. Each year, the United States submits detailed data on seizures as part of its CITES Annual Report.	“commodities.” See ANNEX 2 under the category “CITES ENFORCEMENT MEASURES,” for details on representative seizures.		
6	Have there been any criminal prosecutions of significant CITES-related violations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7	<p>If Yes, how many and for what types of violations? If available, please attach details as Annex.</p> <p>USFWS inspections and investigations resulted in multiple criminal prosecutions involving the smuggling of CITES-listed species and other significant violations. However, the structure of U.S. enforcement databases and the latitude for citing CITES violations under other U.S. laws (laws that often authorize higher penalties) make it impossible to compile totals for the “numbers and types of CITES violations” that resulted in criminal prosecution.</p> <p>See ANNEX 2, under the category “CITES ENFORCEMENT MEASURES,” for summaries of some of the major criminal prosecutions of CITES-related violations in the United States from 1 January 2013 through 30 June 30 2015.</p>			
8	Have there been any other court actions of CITES-related violations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	If Yes, what were the violations involved and what were the results? Please attach details as Annex.			
10	How were the confiscated specimens usually disposed of?	Tick if applicable		
	– Return to country of export	<input checked="" type="checkbox"/>		
	– Public zoos or botanical gardens	<input checked="" type="checkbox"/>		
	– Designated rescue centres	<input checked="" type="checkbox"/>		
	– Approved, private facilities	<input checked="" type="checkbox"/>		
	– Euthanasia	<input type="checkbox"/>		
	– Other (specify)	<input checked="" type="checkbox"/>		
	<p>Comments:</p> <p>U.S. Ivory Crushes: On 14 November 2013, at the USFWS’ National Wildlife Property Repository on Rocky Mountain Arsenal National Wildlife Refuge near Denver, Colorado, USFWS destroyed its 6-ton stock of confiscated elephant ivory in the first U.S. ivory crush. USFWS took this action to send a clear message that the United States will not tolerate ivory trafficking and is committed to protecting elephants from extinction. A second ivory crush was held on 19 June 2015, in Times Square, New York City, to destroy ivory from seizures and cases that had been resolved since 2013. Approximately one ton of elephant ivory was destroyed including full tusks, carved tusks, hundreds of smaller carvings, and other objects. Both ivory crushes generated a significant amount of media coverage and ignited conversation on social media. On the day of the first U.S. ivory crush, #IvoryCrush was the top trending topic in the United States, Canada, South Africa, and the United Kingdom. In addition, some confiscated specimens were also donated to educational facilities for use in conservation education to improve public</p>			

	understanding of wildlife conservation and trade issues.		
11	Has detailed information been provided to the Secretariat on significant cases of illegal trade (e.g. through an ECOMESSAGE or other means), or information on convicted illegal traders and persistent offenders?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/> No information <input type="checkbox"/>	
	Comments:		
12	Have there been any cooperative enforcement activities with other countries (e.g. exchange of intelligence, technical support, investigative assistance, joint operation, etc.)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No information <input type="checkbox"/>	
13	<p>If Yes, please give a brief description:</p> <p>USFWS routinely shared intelligence on potential CITES violations with the CITES Secretariat, appropriate enforcement authorities in other CITES Party nations, and Interpol.</p> <p>USFWS cooperative enforcement efforts during the reporting period included:</p> <ul style="list-style-type: none"> • Conducting cooperative inspection blitzes with Canadian wildlife and customs authorities at various ports of entry along the U.S.-Canada land border; • Conducting cooperative U.S., Canada, and Mexico investigations of illegal reptile trafficking and smuggling of totoaba and Asian arowanas; • Participating in wildlife trafficking workshop in Mexico focusing on totoaba, sea cucumber, and coral; • Stationing an international special agent attaché in Bangkok, Thailand, to build enforcement capacity; participating in multinational enforcement operations targeting illegal trade in wildlife; working to dismantle trafficking networks and prevent others from resuming their illegal activities; increasing coordination and cooperation across U.S. enforcement and intelligence agencies to detect, interdict, and investigate wildlife trafficking; enhancing information gathering and sharing; and providing support to regional Wildlife Enforcement Networks; and • Continuing the Trilateral meetings with Canada and Mexico to support the information exchange between international law enforcement officers, expand collaboration for measuring and sampling endangered wildlife, and develop joint operational plans. 		
14	Have any incentives been offered to local communities to assist in the enforcement of CITES legislation, e.g. leading to the arrest and conviction of offenders?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No information <input type="checkbox"/>	
15	<p>If Yes, please describe:</p> <p>The ESA (which implements CITES in the United States) and other U.S. wildlife laws that regulate international trade (such as the Lacey Act, African Elephant Conservation Act, and Wild Bird Conservation Act) authorize the use of fine money to pay rewards to individuals who provide information that leads to the arrest and conviction of offenders.</p>		

16	<p>Has there been any review or assessment of CITES-related enforcement?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p> <p>No information <input type="checkbox"/></p>
Comments:		
17	<p>Please provide details of any additional measures taken:</p> <p>USFWS worked proactively to improve CITES compliance by maintaining and improving communication with the U.S. wildlife import/export community and working directly with key groups and individual companies involved in wildlife trade. Specific compliance assistance activities from 1 January 2013 through 30 June 2015 include:</p> <ul style="list-style-type: none"> • Utilization of web and port-posted public bulletins to inform the import/export community about changes in CITES requirements and U.S. wildlife trade rules; • One-on-one CITES compliance guidance to company representatives and individuals engaged in wildlife trade; • Operation of an e-mail-based “contact” service to answer specific questions on wildlife import/export requirements and other enforcement issues; • Presentations and training on CITES and U.S. wildlife import/export requirements to other Federal agency officials, brokers, airlines, state game wardens, and international officials; and • Leveraged resources by combining a “Report Wildlife Trafficking” tip line (email address and toll free phone number) with USFWS’ Law Enforcement Office within the Refuge program. 	

D. Administrative measures

D1 Management Authority (MA)

1	<p>Have there been any changes in the designation of or contact information for the MA(s) which are not yet reflected in the CITES Directory?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>No information <input type="checkbox"/></p>
2	<p>If Yes, please use the opportunity to provide those changes here.</p>	
3	<p>If there is more than one MA in your country, has a lead MA been designated?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>No information <input type="checkbox"/></p>
4	<p>If Yes, please name that MA and indicate whether it is identified as the lead MA in the CITES Directory.</p>	
5	<p>How many staff work in each MA?</p> <p>The USFWS Division of Management Authority (DMA) is the only CITES Management Authority in the United States. Currently, 33 staff work in the Division of Management Authority.</p>	

6	Can you estimate the percentage of time they spend on CITES-related matters? If yes, please give estimation: About 75 percent.	Yes No No information	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
7	What are the skills/expertise of staff within the MA(s)?	Tick if applicable	
	- Administration		<input checked="" type="checkbox"/>
	- Biology		<input checked="" type="checkbox"/>
	- Economics/trade		<input type="checkbox"/>
	- Law/policy		<input checked="" type="checkbox"/>
	- Other (Outreach/Education)		<input checked="" type="checkbox"/>
	- No information		<input type="checkbox"/>
8	Have the MA(s) undertaken or supported any research activities in relation to CITES species or technical issues (e.g. labelling, tagging, species identification) not covered in D2(8) and D2(9)?	Yes No No information	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
9	If Yes, please give the species name and provide details of the kind of research involved.		
10	Please provide details of any additional measures taken: See ANNEX 3, Section "D1 and D2," for highlights of some of the major CITES-related administrative measures taken by the United States for the period 1 January 2013 to 30 June 2015, for which the U.S. Management and/or Scientific Authorities were integral parts.		

D2 Scientific Authority (SA)

1	Have there been any changes in the designation of or contact information for the SA(s) which are not yet reflected in the CITES Directory?	Yes No No information	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
2	If Yes, please use the opportunity to provide those changes here.		
3	Is the designated Scientific Authority independent from the Management Authority?	Yes No No information	<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
4	What is the structure of the SA(s)?	Tick if applicable	
	- Government institution		<input checked="" type="checkbox"/>
	- Academic or research institution		<input type="checkbox"/>
	- Permanent committee		<input type="checkbox"/>
	- Pool of individuals with certain expertise		<input type="checkbox"/>
	- Other (specify)		<input type="checkbox"/>
5	How many staff work in each SA on CITES issues? The USFWS Division of Scientific Authority is the only CITES Scientific Authority in		

	the United States. Currently, 10 staff in the Division of Scientific Authority work on CITES issues.						
6	Can you estimate the percentage of time they spend on CITES-related matters			Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
	If yes, please give estimation: About 80 percent.			No information	<input type="checkbox"/>		
7	What are the skills/expertise of staff within the SA(s)?						Tick if applicable
	– Botany						<input checked="" type="checkbox"/>
	– Ecology						<input checked="" type="checkbox"/>
	– Fisheries						<input checked="" type="checkbox"/>
	– Forestry						<input checked="" type="checkbox"/>
	– Welfare						<input type="checkbox"/>
	– Zoology						<input checked="" type="checkbox"/>
	– Other (specify)						<input type="checkbox"/>
	– No information						<input type="checkbox"/>
8	Have any research activities been undertaken by the SA(s) in relation to CITES species?			Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
				No information	<input type="checkbox"/>		
9	If Yes, please give the species name and provide details of the kind of research involved.						
	Species name	Populations	Distribution	Off take	Legal trade	Illegal trade	Other (specify)
	Polyodon spathula	Rangewide	United States		X		In partnership with the Association of Fish and Wildlife Agencies (AFWA) and the U.S. States, the U.S. Scientific Authority is examining the sustainable management practice for this species and has recently undertaken research into age structure.
	Hydrastis Canadensis	Rangewide	United States and Canada				Updated the NatureServe Global and State rankings for this species, including economic uses, IUCN Red List assessment, and Climate Change Vulnerability Index ranking (2012-2013). The IUCN Red List assessment pending review and publication by IUCN.
							No information <input type="checkbox"/>

10	Have any project proposals for scientific research been submitted to the Secretariat under Resolution Conf. 12.2?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No information <input type="checkbox"/>
11	Please provide details of any additional measures taken: See ANNEX 3, Section “D1 and D2,” for highlights of some of the major CITES-related administrative measures taken by the United States for the period 1 January 2013 to 30 June 2015, for which the U.S. Management and/or Scientific Authorities were integral parts.	

D3 Enforcement Authorities

1	Has the Secretariat been informed of any enforcement authorities that have been designated for the receipt of confidential enforcement information related to CITES?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No information <input type="checkbox"/>
2	If No, please designate them here (with address, phone, fax and email).	
3	Is there a specialized unit responsible for CITES-related enforcement (e.g. within the wildlife department, Customs, the police, public prosecutor’s office)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Under consideration <input type="checkbox"/> No information <input type="checkbox"/>
4	If Yes, please state which is the lead agency for enforcement: U.S. Fish and Wildlife Service Office of Law Enforcement 5275 Leesburg Pike MS: LE Falls Church, Virginia 22041 United States of America Tel: + 1 (703) 3581949 Fax: + 1 (703) 3582271 Email: lawenforcement@fws.gov Web: http://www.fws.gov/le	
5	Please provide details of any additional measures taken: See ANNEX 2, under the category “CITES ENFORCEMENT MEASURES,” for information on criminal prosecutions and seizures of specimens of CITES-listed species.	

D4 Communication, information management and exchange

1	To what extent is CITES information computerized?						Tick if applicable	
	– Monitoring and reporting of data on legal trade						<input checked="" type="checkbox"/>	
	– Monitoring and reporting of data on illegal trade						<input checked="" type="checkbox"/>	
	– Permit issuance						<input checked="" type="checkbox"/>	
	– Not at all						<input type="checkbox"/>	
– Other (specify)						<input type="checkbox"/>		
2	Do the following authorities have access to the Internet?						Tick if applicable	
	Authority	Yes, continuous and unrestricted	Yes, but only through a dial-up connection	Yes, but only through a different office	Some offices only	Not at all	Please provide details where appropriate	
	Management Authority	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Scientific Authority	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Enforcement Authority	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
3	Is there an electronic information system providing information on CITES species?						Yes	<input checked="" type="checkbox"/>
							No	<input type="checkbox"/>
							No information	<input type="checkbox"/>

4	<p>If Yes, does it provide information on:</p> <ul style="list-style-type: none"> - Legislation (national, regional or international)? <input type="checkbox"/> - Conservation status (national, regional, international)? <input type="checkbox"/> - Other (please specify)? The U.S. Combined Species database provides the CITES listing status of CITES-listed species, as well as their protected status under U.S. stricter domestic measures, such as the ESA, Wild Bird Conservation Act, Migratory Bird Treaty Act, and Marine Mammal Protection Act. <input checked="" type="checkbox"/> 	Tick if applicable		
5	<p>Is it available through the Internet: Note: USFWS is currently working on reprogramming the U.S. Combined Species database to make it available via the Internet. Please provide URL:</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable <input type="checkbox"/> No information <input type="checkbox"/></p>		
6	Do the authorities indicated have access to the following publications? Tick if applicable			
Publication		Management Authority	Scientific Authority	Enforcement Authority
2005 Checklist of CITES Species (book)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2008 Checklist of CITES Species and Annotated Appendices (CD-ROM)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Identification Manual		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
CITES Handbook		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7	If not, what problems have been encountered to access this information?			
8	<p>Have enforcement authorities reported to the Management Authority on:</p> <ul style="list-style-type: none"> - Mortality in transport? <input type="checkbox"/> - Seizures and confiscations? <input checked="" type="checkbox"/> - Discrepancies in number of items in permits and number of items actually traded? <input type="checkbox"/> <p>Comments:</p>	Tick if applicable		
9	<p>Is there a government website with information on CITES and its requirements?</p> <p>If Yes, please give the URL: http://www.fws.gov/international; http://www.fws.gov/le; and</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No information <input type="checkbox"/></p>		

http://www.aphis.usda.gov/import_export/plants/plant_imports/cites_endangered_plants.shtml
http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title50/50cfr23_main_02.tpl

10	<p>Have CITES authorities been involved in any of the following activities to bring about better accessibility to and understanding of the Convention's requirements to the wider public?</p>	Tick if applicable
	– Press releases/conferences	<input checked="" type="checkbox"/>
	– Newspaper articles, radio/television appearances	<input checked="" type="checkbox"/>
	– Brochures, leaflets	<input checked="" type="checkbox"/>
	– Presentations	<input checked="" type="checkbox"/>
	– Displays	<input checked="" type="checkbox"/>
	– Information at border crossing points	<input checked="" type="checkbox"/>
	– Telephone hotline	<input checked="" type="checkbox"/>
	– Other (specify)	<input type="checkbox"/>
	<p>Please attach copies of any items.</p>	
	<p>Note: These items are too numerous to gather together and attach to this report.</p>	
11	<p>Please provide details of any additional measures taken:</p> <ul style="list-style-type: none"> • USFWS Law Enforcement and DMA representatives staffed a compliance outreach booth at the national convention of Safari Club International in Nevada in 2013. USFWS also attended the Dallas, Texas, Safari Club Convention in January, 2015. USFWS participation at these events raises hunter awareness about CITES import/export permit requirements and helps improve compliance with the Convention by global big game hunters. • In November 2013 (Denver, Colorado) and June 2015 (Times Square, New York City), USFWS Law Enforcement crushed over 7 tons of confiscated ivory to send a message to ivory traffickers and their customers that the United States will not tolerate this illegal trade. It is hoped these crushes will also educate consumers in the United States and around the world, and encourage them not to buy products made with ivory that could be contributing to the poaching crisis. The events were viewed over social media, and other Internet technologies, by tens of thousands around the world. • In partnership with the Association of Zoos and Aquariums (AZA), USFWS issued a global design challenge seeking creative ideas on how best to use the crushed ivory from the U.S. Ivory Crushes to raise public awareness of wildlife trafficking and help reduce demand for elephant ivory and other illegal wildlife products. The art produced by the global design challenge will be part of a Demand Reduction Campaign. The Demand Reduction Campaign outreach displays will be updated and modernized. 	

	<ul style="list-style-type: none"> • The Suitcase for Survival program (collaboration between USFWS and TRAFFIC) is being restructured with newer technologies and an updated curriculum that will be circulated throughout the U.S. educational system. The program supplies materials, including confiscated specimens, to build awareness of the illegal wildlife trade. • USFWS law enforcement officers, forensic laboratory scientists, and the wildlife repository personnel are regularly interviewed by U.S. and international print, television, and online journalists and production companies and the final articles and shows are circulated worldwide. • USFWS law enforcement officers present educational outreach programs to elementary, middle, and high school students; environmental, conservation, and law enforcement university students; law school students; Federal agency staff; and private industry professionals highlighting wildlife conservation and ways the public can help reduce wildlife crime, trafficking, and take. <p>See ANNEX 3, Section “D4,” for highlights of some of the other major CITES-related administrative measures taken by the United States for the period 1 January 2013 to 30 June 2015, with respect to communication, information management, and information exchange.</p>
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D5 Permitting and registration procedures

1	<p>Have any changes in permit format or the designation and signatures of officials empowered to sign CITES permits/certificates been reported previously to the Secretariat?</p> <p>If no, please provide details of any:</p> <p>Changes in permit format:</p> <p>Changes in designation or signatures of relevant officials:</p>	Yes	<input checked="" type="checkbox"/>		
		No	<input type="checkbox"/>		
		Not applicable	<input type="checkbox"/>		
		No information	<input type="checkbox"/>		
2	<p>To date has your country developed written permit procedures for any of the following?</p>	Tick if applicable			
			Yes	No	No information
		Permit issuance/acceptance	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Registration of traders	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Registration of producers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Please indicate how many CITES documents were issued and denied in the two year period? (Note that actual trade is reported in the Annual Report by some Parties. This question refers to issued documents).					
Year 1 (2013)	Import or introduction from the sea	Export	Re-export	Other	Comments
How many documents were issued?	549	11,515	7,439	833	A total of 20,336 CITES documents were issued during 2013. Of the import permits issued, the vast majority were for sport-hunted trophies. Of the 833 “other” documents, 307 were for either export or re-export (cannot differentiate for these) and 526 were certificates (e.g., travelling exhibition, certificates of ownership).
How many applications were denied because of serious omissions or misinformation?	0	9	3	1	A total of 14 applications were denied, either in whole or partially, during 2013.
Year 2 (2014) How many documents were issued?	562	11,638	7,865	441	A total of 20,506 CITES documents were issued during 2014. Of the import permits issued, the vast majority were for sport-hunted trophies. Of the 441 “other” documents, 34 were for either export or re-export (cannot differentiate for these) and 407 were certificates (e.g., travelling exhibition, certificate of ownership).
How many applications were denied because of serious omissions or misinformation?	0	7	0	2	A total of 3 applications were denied, either in whole or partially, during 2014.

<p>Year 3 (1st 6 months of 2015) How many documents were issued?</p>	254	6,176	3,248	234	<p>A total of 9,912 CITES documents were issued during the first 6 months of 2015. Of the import permits issued, the vast majority were for sport-hunted trophies. Of the 234 “other” documents, 31 were for either export or re-export (cannot differentiate for these) and 203 were certificates (e.g., travelling exhibition, certificate of ownership).</p>
<p>How many applications were denied because of serious omissions or misinformation?</p>	0	2	2	0	<p>A total of 4 applications were denied, either in whole or partially, during the first 6 months of 2015.</p>
4	<p>Were any CITES documents that were issued later cancelled and replaced because of serious omissions or misinformation?</p>				<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No information <input type="checkbox"/></p>
5	<p>If Yes, please give the reasons for this.</p>				
6	<p>Please give the reasons for rejection of CITES documents from other countries.</p>				<p>Tick if applicable</p>
<p style="text-align: center;">Reason</p>					<p style="text-align: center;">Yes No No information</p>
<p>Technical violations</p>					<p style="text-align: center;"><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p>
<p>Suspected fraud</p>					<p style="text-align: center;"><input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p>
<p>Insufficient basis for finding of non-detriment</p>					<p style="text-align: center;"><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p>
<p>Insufficient basis for finding of legal acquisition</p>					<p style="text-align: center;"><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p>
<p>Other (specify)</p>					<p style="text-align: center;"><input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p>
7	<p>Are harvest and/or export quotas used as a management tool in the procedure for issuance of permits?</p> <p>Comments</p>				<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No information <input type="checkbox"/></p>
8	<p>How many times has the Scientific Authority been requested to provide opinions?</p> <p>Between 1 January 2013 and 30 June 2015, the U.S. Scientific Authority provided individual findings in response to 460 CITES permit applications. During this time frame, the U.S. Scientific Authority also issued 22 programmatic findings that are valid for at least one year and authorize or deny import or export of specimens. The programmatic findings eliminate the need for individual findings, provided documentation requirements are met. Permit applications covered a wide range of activities including import and export of biological specimens, import of sport-hunted trophies, import of live animals, export of wild-sourced native species, certificates of artificially propagated plants, export of non-native captive-born animals, and bred-in-captivity certificates.</p>				

9	<p>Has the MA charged fees for permit issuance, registration or related CITES activities?</p> <ul style="list-style-type: none"> - Issuance of CITES documents: <input checked="" type="checkbox"/> - Licensing or registration of operations that produce CITES species: <input checked="" type="checkbox"/> - Harvesting of CITES-listed species : <input type="checkbox"/> - Use of CITES-listed species: <input type="checkbox"/> - Assignment of quotas for CITES-listed species: <input type="checkbox"/> - Importing of CITES-listed species: <input checked="" type="checkbox"/> - Other (specify): <input type="checkbox"/> 	<p>Tick if applicable</p>
10	<p>If Yes, please provide the amounts of such fees.</p> <p>U.S. permit fees vary depending on the activity requested. The fees are listed in the U.S. Code of Federal Regulations Title 50, Part 13, Section 13.11.</p>	
11	<p>Have revenues from fees been used for the implementation of CITES or wildlife conservation?</p> <ul style="list-style-type: none"> - Entirely: <input checked="" type="checkbox"/> - Partly: <input type="checkbox"/> - Not at all: <input type="checkbox"/> - Not relevant: <input type="checkbox"/> <p>Comments:</p>	<p>Tick if applicable</p>
12	<p>Please provide details of any additional measures taken:</p> <p>See ANNEX 3, Section "D5," for highlights of some of the other major CITES-related administrative measures taken by the United States for the period 1 January 2013 to 30 June 2015, with respect to permitting and registration procedures.</p>	

D6 Capacity building

1	<p>Have any of the following activities been undertaken to enhance effectiveness of CITES implementation at the national level?</p>		<p>Tick if applicable</p>
Increased budget for activities		<input type="checkbox"/>	Improvement of national networks <input checked="" type="checkbox"/>
Hiring of more staff		<input checked="" type="checkbox"/>	Purchase of technical equipment for monitoring/enforcement <input checked="" type="checkbox"/>
Development of implementation tools		<input checked="" type="checkbox"/>	Computerization <input checked="" type="checkbox"/>
Other (specify):			<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> • USFWS is participating in the development of the Automated Customs Environment/International Trade Data System (ITDS) – a U.S. Government-wide project to centralize the policing and processing of all international trade entering or exiting the United States. The system, which is being designed and 			

deployed over a multi-year period, will improve U.S. CITES enforcement and USFWS efforts to detect and interdict illegal wildlife trade by providing access to integrated trade and law enforcement intelligence information, as well as selectivity and targeting mechanisms.

- On 15 March 2014, the U.S. Food and Drug Administration, USFWS, and National Marine Fisheries Service (NMFS) joined the Commercial Targeting and Analysis Center (CTAC) in Washington, D.C., to partner with U.S. Customs and Border Protection (CBP) and seven other participating Federal agencies to enhance targeting efforts on commercial imports posing a threat to the health and safety of the American public or other border management goals such as conservation of species.
- In 2013, USFWS launched its first ever professional wildlife detector dog program, stationing professionally trained wildlife inspector/canine teams at the ports of Miami, Florida, Louisville, Kentucky, Chicago, Illinois, and Los Angeles, California. The dogs and their handlers reported for duty in April 2013 after completing a rigorous training program at a U.S. Department of Agriculture (USDA) training center near Atlanta, Georgia.
- In early 2015, USFWS Law Enforcement hired 24 additional special agents and several of the open positions, frozen by the Federal Government's hiring freeze, have been or will be filled.

2 Have the CITES authorities received or benefited from any of the following capacity building activities provided by external sources?

Please tick boxes to indicate which target group and which activity.	Oral or written advice/guidance	Technical assistance	Financial assistance	Training	Other (specify)	What were the external sources?
Target group						
Staff of Management Authority	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other U.S. Government agencies, traders, nongovernmental organizations (NGOs), scientific experts, and the public.
Staff of Scientific Authority	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff of enforcement authorities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

3

Have the CITES authorities been the providers of any of the following capacity building activities?

Please tick boxes to indicate which target group and which activity.	Oral or written advice/guidance	Technical assistance	Financial assistance	Training	Other (specify)	Details
Target group						
Staff of Management Authority	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Staff of Scientific Authority	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Staff of enforcement authorities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Traders	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
NGOs	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Public	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other parties/International meetings	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

4

Please provide details of any additional measures taken:

- USFWS wildlife inspectors nationwide conducted wildlife import/export training sessions for CBP Protection enforcement officers at U.S. ports of entry and border crossings.
- In 2013, USFWS Law Enforcement placed four wildlife detector dogs at four U.S. ports of entry.
- In response to the wildlife poaching crisis in Africa and Southeast Asia, USFWS presented comprehensive criminal investigations training programs in 2013, 2014, and 2015 at the U.S. State Department's International Law Enforcement Academy in Botswana and Thailand. Officers from sub-Saharan African nations (Botswana, Cameroon, Democratic Republic of the Congo, Gabon, Kenya, Namibia, South Africa, Republic of the Congo, Tanzania, Uganda, Rwanda, Malawi, and Zambia) and from Southeast Asia (China, Thailand, Brunei, Malaysia, Indonesia, Philippines, Timor-Leste, Hong Kong, Macau, Singapore, Laos, Cambodia, Myanmar, and Viet Nam) completed the intensive two-week course, which included both classroom studies and a mock investigation.
- In January 2014, the first international special agent attaché was stationed in Bangkok, Thailand. Three additional attachés have been selected for Peru, Botswana, Tanzania, and one additional attaché for Asia has been approved.
- USFWS Law enforcement staff completed a 3-month detail in Bangkok, Thailand, focused on investigative coordination; spent three weeks in Togo providing investigative assistance to authorities on ivory trafficking; and made multiple trips to the Philippines to help develop a wildlife law enforcement database.
- USFWS Law enforcement staff represented the United States at conferences on timber trafficking in Brussels, Belgium, and London, the United Kingdom; a global meeting on corruption and wildlife trafficking in Thailand; the 12th African Wildlife Consultative Forum in Zambia; and, in Kenya, the CITES Rhinoceros Enforcement Task Force meeting, the INTERPOL Wildlife Crime Working Group, and TRAFFIC's workshop addressing wildlife trafficking.
- The USFWS National Fish and Wildlife Forensics Laboratory in Ashland, Oregon, hosted a one-week training program for forensic experts from Southeast Asia in August 2013. During the reporting period, Laboratory scientists also provided forensics training and consultation in Vietnam and Australia.
- In June 2013, the USDA's Animal and Plant Health Inspection Service (APHIS) and USFWS conducted a CITES training workshop in Brownsville, Texas, for APHIS and CBP inspectors of the Southwestern region of the United States.
- In June 2014, APHIS and USFWS conducted a CITES training workshop in Seattle, Washington, for APHIS and CBP inspectors of the Western region of the United States. In addition, several inspectors from Canada's Food inspection Agency were attendance.
- In June 2015, APHIS and USFWS conducted a CITES training workshop in Linden, New Jersey, for APHIS and CBP inspectors of the Northeastern region of the United States.

See ANNEX 3, Section “D6,” for highlights of some of the other major CITES-related administrative measures taken by the United States for the period 1 January 2013 to 30 June 2015, with respect to capacity building.

D7 Collaboration/co-operative initiatives

1	<p>Is there an interagency or inter-sectoral committee on CITES?</p> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>No information <input type="checkbox"/></p>
2	<p>If Yes, which agencies are represented and how often does it meet?</p> <p>The U.S. interagency CITES Coordination Committee (CCC) meets 3-4 times a year. The following agencies are represented in the CCC:</p> <p>U.S. Department of the Interior U.S. Fish and Wildlife Service Division of Management Authority</p> <p>U.S. Department of the Interior U.S. Fish and Wildlife Service Division of Scientific Authority</p> <p>U.S. Department of the Interior U.S. Fish and Wildlife Service Office of Law Enforcement</p> <p>U.S. Department of the Interior Office of the Solicitor</p> <p>U.S. Department of the Interior International Technical Assistance Program</p> <p>U.S. Department of Commerce National Oceanic and Atmospheric Administration National Marine Fisheries Service</p> <p>U.S. Department of Agriculture Animal and Plant Health Inspection Service</p> <p>U.S. Department of Agriculture Forest Service</p> <p>U.S. Department of Agriculture Foreign Agriculture Service</p>

	<p>U.S. Department of Justice</p> <p>U.S. Department of State</p> <p>Office of the U.S. Trade Representative</p> <p>U.S. Department of Commerce</p> <p>U.S. Agency for International Development</p> <p>Association of Fish and Wildlife Agencies</p> <p>U.S. Department of Homeland Security Customs and Border Protection</p> <p>Smithsonian Institution National Museum of Natural History</p>																														
3	<p>If No, please indicate the frequency of meetings or consultancies used by the Management Authority to ensure co-ordination among CITES authorities (e.g. other MAs, SAs, Customs, police, others):</p> <table border="1"> <thead> <tr> <th></th> <th>Daily</th> <th>Weekly</th> <th>Monthly</th> <th>Annually</th> <th>None</th> <th>No information</th> <th>Other (specify)</th> </tr> </thead> <tbody> <tr> <td>Meetings</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> </tr> <tr> <td>Consultations</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td></td> </tr> </tbody> </table>								Daily	Weekly	Monthly	Annually	None	No information	Other (specify)	Meetings	<input type="checkbox"/>		Consultations	<input type="checkbox"/>											
	Daily	Weekly	Monthly	Annually	None	No information	Other (specify)																								
Meetings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
Consultations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																									
4	<p>At the national level have there been any efforts to collaborate with:</p>				<p>Tick if applicable</p>		<p>Details if available</p>																								
	<p>Agencies for development and trade</p>				<p><input checked="" type="checkbox"/></p>																										
	<p>Provincial, state or territorial authorities</p>				<p><input checked="" type="checkbox"/></p>																										
	<p>Local authorities or communities</p>				<p><input checked="" type="checkbox"/></p>																										
	<p>Indigenous peoples</p>				<p><input checked="" type="checkbox"/></p>																										
	<p>Trade or other private sector associations</p>				<p><input checked="" type="checkbox"/></p>																										
	<p>NGOs</p>				<p><input checked="" type="checkbox"/></p>																										
	<p>Other (specify)</p>				<p><input type="checkbox"/></p>																										

5	<p>To date, have any Memoranda of Understanding or other formal arrangements for institutional cooperation related to CITES been agreed between the Management Authority and the following agencies?</p> <p>Scientific Authority <input checked="" type="checkbox"/></p> <p>Customs <input checked="" type="checkbox"/></p> <p>Police <input type="checkbox"/></p> <p>Other border authorities (specify): USFWS Law Enforcement; U.S. Department of Agriculture Animal and Plant Health Inspection Service (USDA-APHIS); and U.S. Department of Homeland Security Customs and Border Protection (DHS-CBP) <input checked="" type="checkbox"/></p> <p>Other government agencies <input checked="" type="checkbox"/></p> <p>Private sector bodies <input type="checkbox"/></p> <p>NGOs <input checked="" type="checkbox"/></p> <p>Other (specify) <input type="checkbox"/></p>	<p>Tick if applicable</p>
6	<p>Has Government staff participated in any regional activities related to CITES?</p> <p>Workshops <input checked="" type="checkbox"/></p> <p>Meetings <input checked="" type="checkbox"/></p> <p>Other (specify) <input type="checkbox"/></p>	<p>Tick if applicable</p>
7	<p>Has there been any effort to encourage any non-Party to accede to the Convention?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>No information <input type="checkbox"/></p>
8	<p>If Yes, which one(s) and in what way?</p>	
9	<p>Has technical or financial assistance been provided to another country in relation to CITES?</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>No information <input type="checkbox"/></p>
10	<p>If Yes, which country(ies) and what kind of assistance was provided?</p> <p>From 2 January 2013 – 30 June 2015: USFWS Law Enforcement personnel:</p> <ul style="list-style-type: none"> • Presented seven comprehensive criminal investigations training programs at the U.S. State Department’s International Law Enforcement Academy in Botswana and Thailand. Officers from sub-Saharan African nations (Botswana, Cameroon, Democratic Republic of the Congo, Gabon, Kenya, Namibia, South Africa, Republic of the Congo, Tanzania, Uganda, Rwanda, Malawi, and Zambia) and from Southeast Asia (China, Thailand, Brunei, Malaysia, Indonesia, Philippines, Timor-Leste, Hong Kong, Macau, Singapore, Laos, Cambodia, Myanmar, and Vietnam) completed the intensive two-week course, which included both classroom studies and a mock investigation. • Presented training for forensic specialists from Southeast Asia and Australia • Participated in the conference of the Central American Dominican Republic 	

	<p>Wildlife Enforcement Network in Costa Rica.</p> <ul style="list-style-type: none"> • Conducted an anti- smuggling training program hosted by the Department of Homeland Security in Bangkok, Thailand, providing courses on CITES, surveillance, controlled deliveries, and crime scene processing to 40 participants from Thailand, Laos, and Myanmar. • Met with United States Africa Command (AFRICOM) representatives in Stuttgart, Germany, to conduct in-person classified briefings on wildlife trafficking intelligence and establish protocols and persons which would disseminate and receive intelligence intercepts. • Completed a 3-month detail in Bangkok, Thailand, focused on investigative coordination; spent three weeks in Togo providing investigative assistance to authorities on ivory trafficking; and made multiple trips to the Philippines to help develop a wildlife law enforcement database. • Represented the United States at conferences on timber trafficking in Brussels, Belgium, and London, the United Kingdom; a global meeting on corruption and wildlife trafficking in Thailand; the 12th African Wildlife Consultative Forum in Zambia; and, in Kenya, the CITES Rhinoceros Enforcement Task Force meeting, the INTERPOL Wildlife Crime Working Group, and TRAFFIC's workshop addressing wildlife trafficking. • U.S. CITES delegation visit to China: As part of the U.S.-China Nature Conservation protocol, in June-July 2013, the U.S. CITES Management and Scientific Authorities sent a delegation to China to meet with the State Forestry Administration of the People's Republic of China. U.S. and Chinese officials discussed results of CoP16 and strategies for reducing consumer demand for products from threatened and endangered wildlife species. In addition, they participated in a turtle identification workshop with Chinese Customs officers and had the opportunity to visit a turtle farm and an ivory carving facility.
11	<p>Has any data been provided for inclusion in the CITES Identification Manual?</p> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>No information <input type="checkbox"/></p>
12	<p>If Yes, please give a brief description:</p> <p>The United States has taken an active role in improving the Wiki ID Manual, which currently presents challenges with respect to accessibility and content, and in its utility for inspection and enforcement officers. The United States led the Drafting Group for Decisions 16.59-16.61, adopted by the CITES Parties at CoP16, directing the Animals and Plants Committees and the Secretariat to survey existing and needed identification materials, and explore improvements and dissemination of these materials. During the reporting period, ID sheets for all species of North American map turtles (<i>Graptemys</i> spp.) and the alligator snapping turtle (<i>Macrochelys temminckii</i>) have been completed, and are ready for submission.</p> <p>This material has not been uploaded to the Wiki Manual because the Wiki platform is unable to accommodate identification materials that are produced on a genus level or that are based on a dichotomous key format. This problem will be explored as part of the Joint Intersessional Working Group on the Identification Manual. The United States</p>

	is also developing ID Sheets for three turtle species that were listed in Appendix II at CoP 16: Blanding's turtle (<i>Emydoidea blandingii</i>), spotted turtle (<i>Clemmys guttata</i>), and diamondback terrapin (<i>Malaclemys terrapin</i>). Drafts are currently being reviewed internally and the completed pages will be ready for distribution by fall 2015.
13	<p>Have measures been taken to achieve co-ordination and reduce duplication of activities between the national authorities for CITES and other multilateral environmental agreements (e.g. the biodiversity-related Conventions)?</p> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>No information <input type="checkbox"/></p>
14	<p>If Yes, please give a brief description.</p> <p>For an example, see ANNEX 3, Section "D7," under "Cooperation between CITES and the International Tropical Timber Organization (ITTO)."</p>
15	<p>Please provide details of any additional measures taken:</p> <p>See ANNEX 3, Section "D7," for highlights of some of the major CITES-related administrative measures taken by the United States for the period 1 January 2013 to 30 June 2015, with respect to collaboration and cooperative initiatives.</p>

D8 Areas for future work

1	Are any of the following activities needed to enhance effectiveness of CITES implementation at the national level and what is the respective level of priority?				
	Activity	High	Medium	Low	
	Increased budget for activities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Hiring of more staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Development of implementation tools	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Improvement of national networks	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Purchase of new technical equipment for monitoring and enforcement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Computerization	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
2	Were any difficulties encountered in implementing specific Resolutions or Decisions adopted by the Conference of the Parties?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	No information <input type="checkbox"/>
	If Yes, which one(s) and what is the main difficulty?				
	Resolution Conf. 10.14 (Rev. CoP14) on Quotas for leopard hunting trophies and skins for personal use: The United States worked with leopard (<i>Panthera pardus</i>) range countries to resolve problems associated with the import of some leopard hunting trophies. We developed a discussion document for consideration at the 62 nd meeting of the CITES Standing Committee (SC62) in July 2012 (Document SC62 Doc. 35), and draft revisions to the Resolution for consideration at CoP16. The draft				

	revisions to Resolution Conf. 10.14 (Rev. CoP14) were adopted, with minor changes, at CoP16 in March 2013.		
4	Have any constraints to implementation of the Convention arisen in your country requiring attention or assistance?	Yes No No information	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
5	If Yes, please describe the constraint and the type of attention or assistance that is required.		
6	Have any measures, procedures or mechanisms been identified within the Convention that would benefit from review and/or simplification?	Yes No No information	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
7	If Yes, please give a brief description.		
8	Please provide details of any additional measures taken:		

E. General feedback

Please provide any additional comments you would like to make, including comments on this format.

Thank you for completing the form. Please remember to include relevant attachments, referred to in the report. For convenience these are listed again below:

Question	Item		
B4	Copy of full text of CITES-relevant legislation NOTE: Already provided.	Enclosed	<input type="checkbox"/>
		Not available	<input type="checkbox"/>
		Not relevant	<input checked="" type="checkbox"/>
C3	Details of violations and administrative measures imposed NOTE: See attached ANNEX 2.	Enclosed	<input checked="" type="checkbox"/>
		Not available	<input type="checkbox"/>
		Not relevant	<input type="checkbox"/>
C5	Details of specimens seized, confiscated or forfeited NOTE: See ANNEX 2.	Enclosed	<input checked="" type="checkbox"/>
		Not available	<input type="checkbox"/>
		Not relevant	<input type="checkbox"/>
C7	Details of violations and results of prosecutions NOTE: See ANNEX 2.	Enclosed	<input checked="" type="checkbox"/>
		Not available	<input type="checkbox"/>
		Not relevant	<input type="checkbox"/>
C9	Details of violations and results of court actions NOTE: See ANNEX 2.	Enclosed	<input checked="" type="checkbox"/>
		Not available	<input type="checkbox"/>
		Not relevant	<input type="checkbox"/>
D4(10)	Details of nationally produced brochures or leaflets on CITES produced for educational or public awareness purposes NOTE: These items are too numerous to gather together and attach to this report. Comments	Enclosed	<input type="checkbox"/>
		Not available	<input type="checkbox"/>
		Not relevant	<input checked="" type="checkbox"/>

HIGHLIGHTS OF LEGISLATIVE AND REGULATORY MEASURES TAKEN BY THE UNITED STATES WITH RESPECT TO SECTION B OF THIS REPORT

CITES-RELATED REGULATORY MEASURES

Revision to U.S. regulations implementing CITES: USFWS published revised CITES-implementing regulations in 2007, 2008, and 2014. The current regulations, which became effective in June 2014, incorporate provisions from Resolutions adopted by the Parties through CoP15. U.S. CITES-implementing regulations are found in the Code of Federal Regulations (in 50 CFR part 23) and are available at http://www.ecfr.gov/cgi-bin/text-idx?SID=2e690de335b377fb74df3b384594d09d&mc=true&tpl=/ecfrbrowse/Title50/50cfr23_main_02.tpl. Revisions to incorporate relevant changes adopted at CoP16 are currently under development.

U.S. regulation to list four native U.S. freshwater turtle species in Appendix III: On 30 October 2014, USFWS published a proposed rule in the *Federal Register* to include the common snapping turtle (*Chelydra serpentina*), Florida softshell turtle (*Apalone ferox*), smooth softshell turtle (*Apalone mutica*), and spiny softshell turtle (*Apalone spinifera*) in Appendix III of CITES. The proposed listing includes live and dead whole specimens, and all readily recognizable parts, products, and derivatives of these species. Including these species in Appendix III is necessary to allow the United States to adequately monitor international trade in these species and to determine whether further measures are required to conserve these species. After analysis of comments received on the proposed rule, we will publish our final decision in the *Federal Register*. If we decide to list these species in Appendix III, we will contact the CITES Secretariat prior to publishing the final rule to clarify the exact time period required by the Secretariat to inform the Parties of the listing, so that the effective date of the final rule coincides with the effective date of the listing in Appendix III. The listing would take effect 90 days after the CITES Secretariat informs the Parties of the listing.

STRICTER DOMESTIC MEASURES

Executive Order on Combatting Wildlife Trafficking and the National Strategy for Combating Wildlife Trafficking: On 1 July 2013, President Obama issued Executive Order 13648 (<https://www.whitehouse.gov/the-press-office/2013/07/01/executive-order-combating-wildlife-trafficking>), which established a Presidential Task Force on Wildlife Trafficking and recognized that the “poaching of protected species and the illegal trade in wildlife and their derivative parts and products...represent an international crisis that continues to escalate.” The Executive Order calls on U.S. Government agencies to take all appropriate actions within their authority to “enhance domestic efforts to combat wildlife trafficking, to assist foreign nations in building capacity to combat wildlife trafficking, and to assist in combating transnational organized crime.” In February 2014, the President issued the National Strategy for Combating Wildlife Trafficking (<https://www.whitehouse.gov/the-press-office/2014/02/11/fact-sheet-national-strategy-combating-wildlife-trafficking-commercial-b>), which established guiding principles and strategic priorities for U.S. efforts to stem illegal trade in wildlife. The National Strategy identified three strategic priorities for combating wildlife trafficking: strengthening enforcement; reducing demand for illegally traded wildlife; and expanding international cooperation and

commitment. Among other things, the National Strategy called for increased control of the U.S. market for elephant ivory.

Director's Order 210: Following issuance of the Executive Order and the National Strategy for Combating Wildlife Trafficking, and in response to the unprecedented poaching of African elephants (*Loxodonta africana*), the United States made changes to its stricter domestic measures governing the import of African elephant ivory. Under the new provisions, first issued in February 2014 and revised in May 2014, import into the United States of African elephant ivory is prohibited, except for ivory that meets the purposes and applicable criteria of one of the following categories: ivory for law enforcement purposes; ivory for genuine scientific purposes that will contribute to the conservation of the species; or worked, pre-Convention ivory that is either part of a musical instrument, a traveling exhibition, or a household move or inheritance, if specific conditions are met.

Amendments to the U.S. Endangered Species Act 4(d) rule for the African Elephant: The African elephant is listed as threatened under the U.S. ESA with a rule under section 4(d) of the Act regulating trade in the species. We have recently published a proposed rule to revise the African elephant 4(d) rule to more strictly control the U.S. market for elephant ivory. None of the changes proposed will go into effect until we have considered input received during the public comment period and published a final rule. *[The proposed rule was published in the Federal Register on 29 July 2015.]*

Certification of Iceland under the Pelly Amendment to the Fishermen's Protective Act: On 31 January 2014, Secretary of the Interior Jewell certified to President Obama that she had determined that the actions of Icelandic nationals were diminishing the effectiveness of CITES. The certification was based on an evaluation of Iceland's commercial whaling activities and international commercial trade in whale meat and products. In response to the certification, as well as a 2011 certification by the Secretary of Commerce, President Obama directed his Cabinet to take a number of diplomatic actions aimed at encouraging Iceland to cease its commercial whaling and international trade in whale meat.

Amendments to the U.S. Lacey Act regarding plants: The Lacey Act, first enacted in 1900, is the United States' oldest wildlife protection statute. It makes it illegal to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce any wildlife specimen taken or traded in violation of U.S. or foreign law. However, with regard to plants, until 2008 the Act only applied to plants that were U.S. native species and its application to those plants was limited. In May 2008, the U.S. Congress adopted significant amendments to the Lacey Act expanding its protection to a broader range of plants, including foreign plant and timber species. Now, in addition to its application to wildlife, the Act makes it unlawful to import, export, transport, sell, receive, acquire, or purchase in interstate or foreign commerce any plant specimen (with some limited exceptions) taken or traded in violation of foreign law or the laws or regulations of a U.S. State. The Act also now makes it unlawful to submit any false record of any covered plant and to import any covered plant or plant product without a declaration indicating the genus and species, quantity, value, and country of origin of the covered plant material. During the reporting period, the U.S. Government took a number of steps toward fully implementing the 2008 Lacey Act amendments including: submitting a report to the U.S. Congress in May 2013 examining the implementation of the 2008 amendments and how the import declaration assists with enforcement of the amendments; publishing a final rule in the *Federal Register* in July 2013 providing definitions of the terms "common cultivar" and "common food crop," as they apply in the Lacey Act; continuing its phased-in approach to the declaration requirement; and providing additional national and international outreach.

Endangered Species Act listings: During the reporting period, the United States published final rules in the *Federal Register* listing, delisting, or reclassifying the following CITES-listed species under the U.S. ESA (ESA):

Species	Publication Date	ESA Status	CITES Status
Yellow-billed parrot (<i>Amazona collaria</i>)	03/12/2013	Threatened	Appendix II
Argentina population of broad-snouted caiman (<i>Caiman latirostris</i>)	06/25/2013	Reclassified from Endangered to Threatened	Appendix II
Southern white rhinoceros (<i>Ceratotherium simum simum</i>)	09/11/2013	Threatened	Populations of South Africa and Swaziland = Appendix II (for certain purposes; other populations = Appendix I)
Fickeisen plains cactus (<i>Pediocactus peeblesianus</i> var. <i>fickeiseniae</i>)	10/01/2013	Endangered	Appendix I
Acuna cactus (<i>Sclerocactus erectocentrus</i> var. <i>acunensis</i>)	10/01/2013	Endangered	Appendix I
Blue-throated macaw (<i>Ara glaucogularis</i>)	10/03/2013	Endangered	Appendix I
Florida semaphore cactus (<i>Consolea corallicola</i>)	10/24/2013	Endangered	Appendix II
Aboriginal prickly-apple (<i>Harrisia aboriginum</i>)	10/24/2013	Endangered	Appendix II
Esmeraldas woodstar (<i>Chaetocercus berlepschi</i>)	10/29/2013	Endangered	Appendix III
Blue-billed curassow (<i>Crax alberti</i>)	10/29/2013	Endangered	Appendix III
Sakhalin sturgeon (<i>Acipenser mikadoi</i>)	06/02/2014	Endangered	Appendix II
Adriatic sturgeon (<i>Acipenser naccarii</i>)	06/02/2014	Endangered	Appendix II

Chinese sturgeon (<i>Acipenser sinensis</i>)	06/02/2014	Endangered	Appendix II
Baltic sturgeon (<i>Acipenser sturio</i>)	06/02/2014	Endangered	Appendix I
Huso sturgeon (<i>Huso dauricus</i>)	06/02/2014	Endangered	Appendix II
White cockatoo (<i>Cacatua alba</i>)	06/24/2014	Threatened	Appendix II
Philippine cockatoo (<i>Cacatua haematuropygia</i>)	06/24/2014	Endangered	Appendix I
Yellow-crested cockatoo (<i>Cacatua sulphurea</i>)	06/24/2014	Endangered	Appendix I
Central and Southwest Atlantic Distinct Population Segment (DPS) and Indo-West Pacific DPS of scalped hammerhead shark (<i>Sphyrna lewini</i>)	07/03/2014	Threatened	Appendix II
Eastern Atlantic DPS and Eastern Pacific DPS of scalped hammerhead shark (<i>Sphyrna lewini</i>)	07/03/2014	Endangered	Appendix II
Staghorn coral (<i>Acropora crateriformis</i>)	09/10/2014	Threatened	Appendix II
Staghorn coral (<i>Acropora globiceps</i>)	09/10/2014	Threatened	Appendix II
Staghorn coral (<i>Acropora jacquelineae</i>)	09/10/2014	Threatened	Appendix II
Staghorn coral (<i>Acropora lokani</i>)	09/10/2014	Threatened	Appendix II
Staghorn coral (<i>Acropora pharaonis</i>)	09/10/2014	Threatened	Appendix II
Staghorn coral (<i>Acropora retusa</i>)	09/10/2014	Threatened	Appendix II
Staghorn coral (<i>Acropora rudis</i>)	09/10/2014	Threatened	Appendix II

Staghorn coral (<i>Acropora speciosa</i>)	09/10/2014	Threatened	Appendix II
Staghorn coral (<i>Acropora tenella</i>)	09/10/2014	Threatened	Appendix II
Coral (<i>Anacropora spinosa</i>)	09/10/2014	Threatened	Appendix II
Pillar coral (<i>Dendrogyra cylindrus</i>)	09/10/2014	Threatened	Appendix II
Trumpet coral (<i>Euphyllia paradivisa</i>)	09/10/2014	Threatened	Appendix II
Boulder star coral (<i>Montastrea annularis</i>)	09/10/2014	Threatened	Appendix II
Mountainous star coral (<i>Montastrea faveolata</i>)	09/10/2014	Threatened	Appendix II
Boulder star coral (<i>Montastrea franksi</i>)	09/10/2014	Threatened	Appendix II
Coral (<i>Montipora australiensis</i>)	09/10/2014	Threatened	Appendix II
Rough cactus coral (<i>Mycetophyllia ferox</i>)	09/10/2014	Threatened	Appendix II
Cactus coral (<i>Pavona diffluens</i>)	09/10/2014	Threatened	Appendix II
Coral (<i>Porites napopora</i>)	09/10/2014	Threatened	Appendix II
Birds nest coral (<i>Seriatopora aculeata</i>)	09/10/2014	Threatened	Appendix II
Straight-horned markhor (<i>Capra falconeri jerdoni</i>)	10/07/2014	Reclassified from Endangered to Threatened	Appendix I
Kabul markhor (<i>Capra falconeri megaceros</i>)	10/07/2014	Reclassified from Endangered to Threatened	Appendix I
Knifetooth sawfish (<i>Anoxypristis cuspidata</i>)	12/12/2014	Endangered	Appendix I

Dwarf sawfish (<i>Pristis clavata</i>)	12/12/2014	Endangered	Appendix I
Freshwater sawfish (<i>Pristis microdon</i>)	12/12/2014	Endangered	Appendix I
Smalltooth sawfish (<i>Pristis pectinata</i>)	12/12/2014	Endangered	Appendix I
Largetooth sawfish (<i>Pristis perotteti</i>)	12/12/2014	Endangered	Appendix I
Common sawfish (<i>Pristis pristis</i>)	12/12/2014	Endangered	Appendix I
Green sawfish (<i>Pristis zijsron</i>)	12/12/2014	Endangered	Appendix I
Mexican wolf (<i>Canis lupus baileyi</i>)	01/16/2015	Endangered	Appendix II
Southern Resident DPS of killer whale (<i>Orcinus orca</i>)	02/10/2015	Remove exclusion for captive members of the population	Appendix II
Wyoming and western Great Lakes populations of wolf (<i>Canis lupus</i>)	02/20/2015	Endangered	Appendix II
Captive population of chimpanzee (<i>Pan troglodytes</i>)	06/16/2015	Reclassified from Threatened to Endangered	Appendix I

For additional details and the *Federal Register* publications see: <http://www.fws.gov/policy/frsystem/default.cfm>.

Listing one python species and three anaconda species as Injurious: On 10 March 2015, USFWS published a final rule in the *Federal Register* listing the reticulated python (*Python reticulatus*), the Beni anaconda (*Eunectes beniensis*), the dark-spotted anaconda (*Eunectes deschauenseei*), and the green anaconda (*Eunectes murinus*) as Injurious. By this action, the importation into the United States and interstate transportation between U.S. States, the District of Columbia, the Commonwealth of Puerto Rico, or any territory of the United States of any live animal, gamete, viable egg, or hybrid of these four snake species is prohibited, except by permit for zoological, educational, medical, or scientific purposes. These four species are also listed under CITES.

HIGHLIGHTS OF COMPLIANCE AND ENFORCEMENT MEASURES TAKEN BY THE UNITED STATES WITH RESPECT TO SECTION D OF THIS REPORT

CITES COMPLIANCE MEASURES

U.S. efforts related to Peruvian mahogany: During the reporting period, USFWS continued to work closely with Peru regarding Peru's implementation of the Appendix-II listing of bigleaf mahogany (*Swietenia macrophylla*). For 2013, Peru did not set a voluntary bigleaf mahogany export quota and has not yet established one for 2015. However, for 2014, Peru established a voluntary bigleaf mahogany export quota of 801.143 cubic meters. USFWS closely monitored the volume of bigleaf mahogany imported into the United States from Peru during the reporting period and provided Peru with periodic reports on those imports, which totalled 224 cubic meters of wood in 2013, 72 cubic meters of wood in 2014, and 230 cubic meters of between 1 January 2015, and 30 June 2015. USFWS continues to monitor the volume of bigleaf mahogany imported into the United States from Peru and provides this information to Peru, as well as the CITES Secretariat and other major mahogany importing countries, on a regular basis to assist Peru in monitoring its exports of mahogany to the United States.

CITES ENFORCEMENT MEASURES

Seizures, confiscations, and forfeitures of CITES wildlife specimens: The USFWS wildlife inspection program provides front-line enforcement of the CITES treaty at U.S. ports of entry. Selected seizures of unlawfully imported CITES specimens for 2013 and 2014 are provided below (seizure data for 2015 will not be compiled until 2016):

- In Los Angeles, California, USFWS wildlife inspectors intercepted multiple shipments of CITES corals from Tonga, Viet Nam, and Australia. Other live wildlife seized included 800 emperor scorpions from Togo; a shipment of Sulawesi forest turtles from Hong Kong; 20 Indian star tortoises shipped from Slovenia; 10 superb parrots imported from the Netherlands; 86 chameleons and 600-plus spiders from Tanzania; and 120 seahorses from Brazil.
- Interceptions in Los Angeles also included a 12,000-pound ocean cargo shipment of live rock from Fiji; 518 CITES leather products smuggled by a traveler from Nigeria; and international mail parcels containing primate skulls from Indonesia, 737 pangolin scales from Hong Kong, iguana meat from Mexico and El Salvador, and big cat teeth from Malaysia.
- USFWS inspectors in Chicago, Illinois, uncovered a large-scale smuggling scheme involving live CITES-listed giant clams exported from Vietnam. Shipments were also seized in Los Angeles, California, and New York, New York.
- A USFWS wildlife inspector at John F. Kennedy (JFK) International Airport in New York, New York, caught a paid courier smuggling hundreds of caiman products from Columbia; the company involved paid a 13,475 USD penalty and abandoned 10,000 USD worth of wildlife.

- An air cargo shipment seized in New York, New York, contained 24 endangered Asian arowanas and 20 endangered catfish from Thailand worth 70,000 USD. USFWS inspectors stopped a shipment of gloves made from the broad-snouted caiman and intercepted a shipment of blue coral live rock being smuggled by a company that was already awaiting sentencing for coral trafficking.
- In Dallas-Fort Worth, USFWS inspectors interdicted the smuggling of seven endangered Asian arowana fish from Vietnam. In Houston, Texas, USFWS inspectors found an import from the United Arab Emirates that contained over 360 smuggled boots, shoes, and handbags made from sea turtle, African elephant, and other species.
- USFWS inspectors in Atlanta, Georgia, intercepted a cargo shipment from France containing Siberian sturgeon without CITES documents and caught a passenger from Nigeria smuggling ivory and undeclared currency. They also seized live corals from Fiji and 5,000 USD worth of hippopotamus knives from South Africa. In Seattle, Washington, USFWS inspectors seized 268 pieces of live coral that arrived from Indonesia without valid CITES permits.
- USFWS wildlife inspectors in San Francisco, California, seized multiple shipments containing Asian medicinals made from CITES species. These interceptions included an ocean shipment of raw herbs from China; an 88-box shipment (also from China) of products made from seahorse, seal, and turtle shell; a 300-box shipment of similar products from Hong Kong; 400 boxes of medicinals made from tiger, musk deer, seal, and orchids being smuggled by a traveler from Vietnam; and 1,440 bottles of medicine made from Appendix-III Chinese pond turtle.
- Other interceptions in San Francisco included a mail parcel containing 12 CITES Appendix-I serow horns; 10 parcels containing wildlife skulls and skeletons that all arrived in a single month; and 451 key chains made from dried seahorses from China.
- Inspections in New Orleans, Louisiana, resulted in the seizure of a shipment of crocodilian leather goods from Singapore; a crate of “handicrafts” from the Ivory Coast containing CITES reptile handbags; and two commercial shipments of river otter skins headed for Canada and Hong Kong.
- In Miami, Florida, USFWS inspectors stopped a shipment from Paraguay that arrived with false export permits and returned 2,272 live amphibians and tarantulas to that country. They refused clearance of four illegal shipments from Benin containing 6,660 pythons and 1,600 monitor lizards.
- Interceptions of live wildlife in Miami also included CITES tortoises and mammals from Guyana; 500-plus reptiles and amphibians from Madagascar; 90 Appendix-II pancake tortoises from Tanzania; and 40 CITES-listed giant clams re-exported from Viet Nam with altered permits; and a shipment from Ghana of 2,000 emperor scorpions falsely identified as to country of origin.
- USFWS inspectors in Miami turned back a 2,500 pound shipment of queen conch meat from the Bahamas. Other seizures included a shipment of over 200 live hard corals from Indonesia; 128 caviar-based cosmetic products from Spain that lacked CITES permits; 6,000 Queen conch shells from Belize and 12,000 from the Bahamas; and 4 crates from Jamaica containing 15 live birds.

- In Newark, New Jersey, USFWS inspectors seized over 588 musk deer pills from a shipment of traditional Chinese medicines and caught a dog food company importing 1,000 pounds of endangered saltwater crocodile bone parts from Australia. Other interceptions included a 50,670 USD shipment of saltwater crocodile handbags and 3,000 cartons of Chinese pond turtle medicinals.
- USFWS inspectors based in Baltimore, Maryland, seized an ocean container of Muscovy duck products and three container shipments packed with over 10,000 seahorse pills in Norfolk, Virginia.
- In San Juan, Puerto Rico, a USFWS inspector caught a crew member of a Hong Kong vessel smuggling elephant ivory carvings and stopped a shipment of 250 pounds of queen conch meat unlawfully imported by ocean ferry from the Dominican Republic.
- USFWS inspectors in Tampa, Florida, investigated a Florida company that illegally imported some 7,400 kilograms of frozen CITES II Amazonian cod (*Arapaima* species) from Brazil.
- Proactive inspections at Dulles International Airport outside of Washington, D.C., resulted in the seizure of a 3,500 USD shipment of Appendix-II agarwood chips and an air cargo export of CITES reptilian leather goods headed for Saudi Arabia.
- USFWS inspectors working the U.S./Mexico border in Texas seized two large shipments of wildlife leather products crossing via Laredo and caught a manufacturer smuggling more than 10,700 tegu lizard leather and skin pieces into El Paso.

Seizures of CITES plant parts and products in 2013 and 2014: During 2013 and 2014, U.S. plant inspection authorities seized the following specimens of CITES-listed non-living plant parts and products upon import into the United States (seizure data for 2015 will not be compiled until 2016):

2013

- 1 shipment of *Swietenia macrophylla*; imported from Mexico; containing 1,199 square meters of veneer.
- 2 shipments of *Cedrela odorata*; 1 imported from Ghana and 1 from an unknown country; containing a total of 37 cubic meters of sawn wood.
- 2 shipments of *Cedrela fissilis*; imported from Brazil; containing a total of 6,428 square meters of veneer.
- 4 shipments of *Dalbergia nigra*; 1 imported from Canada, 1 from Italy, and 2 from the United Kingdom; containing a total of 1 wood product and an unknown volume of sawn wood and veneer.
- 2 shipments of *Dalbergia retusa*; 1 imported from Canada and 1 from Mexico; containing an unknown volume of sawn wood.
- 1 shipment of *Dalbergia stevensonii*; imported from Belize; containing 10 cubic meters of sawn wood.
- 1 shipment of *Percopsis elata*; imported from Portugal; containing 4 cubic meters of sawn wood.
- 1 shipment of *Guaiacum officinale*; imported from Jamaica; containing 1 dried plant.
- 1 shipment of *Prunus africana*; imported from India; containing 450 grams of extract.

- 42 shipments of *Aquilaria* spp.; 1 imported from Canada, 7 from China, 4 from Kuwait, 1 from Pakistan, 1 from Qatar, 23 from Saudi Arabia, 2 from the United Arab Emirates, and 3 from unknown countries; containing a total of 29 wood chips and 18 kilograms of wood chips, 117 wood products and 2 kilograms of wood products, 310 medicinal products and 48 grams of medicinal products, 1 kilogram of powder, and 2.62 liters of essential oil.
- 1 shipment of *Bulnesia sarmientoi*; imported from Paraguay; containing 35 kilograms of essential oil.
- 6 shipments of *Panax quinquefolius*; 3 imported from Canada and 3 from unknown countries; containing a total of 29 kilograms of root.
- 57 shipments of *Saussurea costus*; 53 imported from China, 2 from Hong Kong, 1 from Thailand, and 1 from Viet Nam; containing a total of 773 medicinal products and 1 kilogram of medicinal products, and 1,200 unknown units of powder.
- 14 shipments of *Cibotium barometz*; 11 imported from China, 2 from Hong Kong, and 1 from Viet Nam; containing a total of 1 kilogram of extract, 492 medicinal products, and 3 kilograms of medicinal products.
- 21 shipments of *Cistanche deserticola*; 13 imported from China, 6 from Hong Kong, and 2 from Viet Nam; containing a total of 612 extracts, 999 medicinal products, and 8 kilograms of medicinal products.
- 1 shipment of *Cylindropuntia* cactus specimens; imported from Mexico; containing 14 kilograms of extract.
- 2 shipments of *Opuntia* cactus specimens; both imported from Mexico; containing 2 cactus skeletons.
- 22 shipments of *Gastrodia elata* orchid specimens; 2 imported from Cambodia, 16 from China, 1 from Hong Kong, and 3 from Viet Nam; containing a total of 240 extracts, 32 roots and 519 kilograms of root, and 2,014 medicinal products.
- 19 shipments of other orchid specimens; containing 1 dried plant and 185 grams of dried plants, 510 grams of extract, 2 kilograms of powder, 32 roots, 39 kilograms of stems, 131 medicinal products, and 1 kilogram of medicinal products.

2014

- 2 shipments of *Dalbergia nigra*; both imported from Brazil; containing an unknown volume of sawn wood and veneer.
- 1 shipment of *Gonystylus* spp.; imported from China; containing 3 cubic meters of wood products.
- 1 shipment of *Aquilaria* spp.; imported from the United Arab Emirates; containing an unknown number of wood chips.
- 24 shipments of *Panax quinquefolius*; 1 imported from Canada, 2 from China, and 21 from unknown countries; containing a total of 246 kilograms of root.
- 6 shipments of *Saussurea costus*; all 6 imported from China; containing a total 86 extracts and an unknown quantity of medicinal products.
- 7 shipments of *Cistanche deserticola*; 5 imported from China, 1 from Malaysia, and 1 from Thailand; containing a total of 4,200 extracts and 9 envelopes of extract, and an unknown quantity of powder.
- 3 shipments of *Opuntia* cactus specimens; all 3 imported from Mexico; containing 10 cactus skeletons.
- 2 shipments of other cactus specimens; containing 6 cactus skeletons.

- 4 shipments of *Gastrodia elata* orchid specimens; 2 imported from China and 2 from Hong Kong; containing a total of 300 medicinal products.
- 11 shipments of other orchid specimens; containing an unknown quantity of dried plants, 1 kilogram of leaves, 500 grams of powder, 9,588 stems, and 254 kilograms of stems.

Criminal prosecutions of CITES-related violations: USFWS investigations of CITES violations resulted in criminal prosecutions for illegal trafficking in CITES-listed species. Key cases from 1 January 2013 through 30 June 2015 are summarized below:

Operation Crash – Special agents with the USFWS Division of Law Enforcement continued their work on Operation Crash – a comprehensive nationwide investigation of trafficking in rhinoceros horn that, by the close of the reporting period, had multiple individuals and/or companies sentenced in addition to the disruption of two large-scale rhino horn smuggling networks.

- In May 2015, a Florida businessman and his company were sentenced to 36 months in prison followed by 2 years of supervised release. The company was ordered to pay a 1.5 million USD criminal fine and the corporation was banned from trading in wildlife during a five year term of probation.
- In May 2015, a Texas man was sentenced to 25 months in prison, followed by 3-years supervised release, and assessed a fine of 150,000 USD. He had previously pleaded guilty to a 1-count information charging conspiracy to smuggle and violate the Lacey Act for his participation in an illegal wildlife smuggling ring, during which rhinoceros horns and objects made from rhino horn and elephant ivory worth nearly 1 million USD were smuggled from the United States to China.
- In April 2015, a Chinese national was sentenced to time served, 4 months home confinement in the United States, and 2 years supervised release for his role in a scheme to smuggle protected rhinoceros carvings, ivory carvings, and other protected wildlife from the United States.
- In March 2015, a British Columbia, Canada, antiques dealer was sentenced to 30 months in prison in the Southern District of New York, New York, for his role in smuggling and attempting to smuggle rhinoceros horns, as well as items carved from elephant ivory and coral, from auction houses throughout the United States to Canada. He and his co-conspirators smuggled more than 500,000 USD worth of horns and sculptures from the United States to Canada, and attempted to smuggle two black rhinoceros horns he purchased from undercover USFWS agents.
- In May 2013, two Los Angeles, California, businessmen who ran one of these networks were sentenced to serve 42 months and 46 months in prison and pay 20,000 USD in criminal fines and a 185,000 USD tax penalty and assessment after having each pleaded guilty to five felony counts. Between January 2010 and February 2012 (when they were arrested), these men bought up rhino horns valued at as much as 2.5 million USD from suppliers across the country so they could export them overseas. These defendants abandoned their interest in 2 million USD worth of rhino horns and two seized vehicles. The judge also ordered that some 800,000 USD in cash, gold, jewelry, and precious stones (all profits from rhino horn trafficking) be turned over to the USFWS Multinational Species Conservation Fund for use in protecting rhinos in Africa. A company run by one of these individuals also pleaded guilty to smuggling and wildlife violations and was sentenced to pay 100,000 USD in criminal fines.

- Arrests and indictments in 2013 included a group of Chinese and U.S. antiques dealers operating a rhino horn and elephant ivory smuggling network. One of these defendants, a New York businessman who pleaded guilty to conspiring to smuggle rhino horn and elephant ivory to Hong Kong, was sentenced to serve 37 months in Federal prison.
- The owner of an antiques business in China pleaded guilty in December 2013 to 11 felony counts in connection with having orchestrated the smuggling of more than 4.5 million USD worth of rhino horn and elephant ivory out of the United States. This defendant was the “boss” of three U.S. antiques dealers (including the New York man mentioned above) who made purchases at his direction and shipped the items to him via Hong Kong.
- In September 2013, USFWS special agents working on Operation Crash arrested an Irish national at Liberty International Airport in Newark, New Jersey, as he was boarding a flight to London. This man, known to be a member of a crime organization operating out of Ireland, pleaded guilty to conspiracy to violate the Lacey Act in connection with rhino horn trafficking. He was sentenced in January 2014 to serve 14 months in prison, pay a 10,000 USD fine, and forfeit 50,000 USD in illegal proceeds.
- In April 2014, two California residents were indicted by a Federal grand jury in Las Vegas, Nevada, on felony charges connected with their sale of two black rhinoceros horns to an undercover USFWS agent. The men were arrested by USFWS officers on March 19, 2014, after closing the deal in a Las Vegas hotel room.

Totoaba Trafficking – In the spring of 2013 (and continuing into 2014 and 2015), the USFWS Office of Law Enforcement teamed with Homeland Security Investigations and CBP to disrupt large-scale trafficking of swim bladders removed from totoaba (*Totoaba macdonaldi*) fish – a CITES Appendix I-listed species that lives off the coast of Mexico. Ten individuals (including two Canadian women) were indicted on Federal charges in San Diego, California, in connection with these smuggling operations. The more than 550 swim bladders seized are worth an estimated 3.5 million USD in Asian markets where they are prized as a culinary delicacy with alleged medicinal properties.

- A lead player in this trafficking, who coordinated cross-border smuggling from Mexico with plans to market totoaba swim bladders in Asia, pleaded guilty to Federal charges and was sentenced to four months in prison and two years of probation. He was ordered to forfeit his residence (where he stored the smuggled fish parts) to the Government, but subsequent negotiations changed this penalty to forfeiting a significant percentage of its value (138,750 USD) in cash. He must also pay 500,000 USD in restitution to support conservation programs in Mexico.

Coral Smuggler Convicted – A three-year USFWS investigation into the mislabeling and smuggling of rare CITES-protected stony corals resulted in the successful prosecution of a co-owner of one of the largest live coral import businesses in the United States. The defendant, who pleaded guilty to one felony count of smuggling in March 2013, was sentenced in July 2013 to spend one year in Federal prison and was barred from possessing CITES species for three years following completion of that sentence. He was also fined 6,000 USD and ordered to forfeit 523,835 USD in illegal proceeds from coral trafficking. This investigation, which started when a USFWS wildlife inspector

discovered corals hidden in a routine tropical fish shipment arriving at John F. Kennedy International Airport in New York, New York, documented extensive coral smuggling over a seven-year period.

Two-way Reptile Trafficker Sentenced – In January 2014, a former reptile store operator in Washington State was sentenced to 12 months in prison and three years of supervised release in connection with a wide-ranging conspiracy to illegally traffic in protected reptile species. This man and five co-defendants operated a two-way smuggling network that was responsible for the illegal export of domestic species and the unlawful importation of foreign reptiles, all via Hong Kong. Trafficked wildlife included Eastern box turtles, North American wood turtles, and Gulf Coast box turtles from the United States; foreign CITES-listed species included a critically endangered Arakan forest turtle, black-breasted leaf turtles, Chinese striped-necked turtles, and big-headed turtles.

Ivory Smuggler Pleads Guilty – On 4 June 2014, the owner of an African art store located in Philadelphia, Pennsylvania, who was arrested by USFWS special agents in July 2011, was sentenced for smuggling African elephant ivory to 30 months' imprisonment, to be followed by 2 years of supervised release for smuggling elephant ivory into the United States. As part of that sentence, the court ordered him to pay a fine of 7,500 USD and to forfeit 150,000 USD, along with the approximately one ton of elephant ivory that was seized by agents from the store in April 2009.

Giant Clam Smuggling – In a joint investigation involving USFWS Law Enforcement and HSI Agents, a man was indicted in Hawaii in 2013 on smuggling and CITES charges in connection with the unlawful importation of some 100 pounds of Appendix-II giant clam meat via passenger baggage at Honolulu International Airport in Hawaii. The investigation revealed that the man may have been a ringleader who had family members and associates smuggle the wildlife on his behalf.

Caviar Cosmetics Imported in Violation of CITES – In August 2013, a Miami, Florida, customs broker investigated by the USFWS Division of Law Enforcement pleaded guilty to a felony violation in connection with the illegal importation of 12 shipments of cosmetics made from Siberian sturgeon caviar which arrived in the United States without the required CITES permits and were not declared as wildlife. Another company involved in these transactions agreed to pay a 97,836 USD civil penalty.

Arowana Trafficking – Two men in Washington State, investigated in connection with the smuggling of endangered Asian arowanas, were ordered at sentencing to forfeit assets valued at over 150,000 USD and spend three months in home confinement and one year on probation. The property forfeited included four of the highly prized and valuable endangered fish, 300 live marijuana plants, and commercial-scale drug production and processing equipment.

Bear Gall Smuggler Sentenced – A foreign national from Canada who lives in Washington State was sentenced to 12 months in prison for felony obstruction of justice and wildlife trafficking. The defendant illegally purchased 18 CITES Appendix-II black bear gallbladders and smuggled them to China for sale in that country for their alleged medicinal properties. He was also ordered to pay an 8,000 USD fine and spend five years on probation.

Indictment in Reptile Case – A U.S. reptile dealer was indicted in California in 2013 on multiple felony charges of conspiring to smuggle wildlife (including native U.S. species) into and out of the United States. This individual is the first U.S. defendant to be prosecuted in Operation Flying

Turtle – a USFWS investigation that already secured the successful prosecution of three Japanese nationals for smuggling thousands of CITES-protected turtles, tortoises, lizards, and snakes to and from the United States and Japan from 2004 through 2011.

Narwhal Tusk Trafficking – The USFWS Division of Law Enforcement teamed with the National Oceanic and Atmospheric Administration and the Canadian Wildlife Service to investigate four individuals involved in the unlawful harvest, sale and export of 1.5 million USD worth of CITES-listed narwhal tusks from Canada into the United States. The investigation secured Federal felony indictments against three U.S. residents and their Canadian supplier; charges include conspiracy and money laundering as well as smuggling. The Canadian defendant, who was arrested in the province of New Brunswick on December 19, 2013, on an extradition warrant requested by the United States, was successfully prosecuted in Canada in connection with smuggling hundreds of narwhal tusks across the border to U.S. buyers. Convicted on seven counts, he was fined 385,000 Canadian dollars and given an 8-month conditional sentence. Two of the U.S. defendants (both Tennessee residents) pleaded guilty to felony conspiracy and wildlife trafficking charges in January 2013. The third defendant (a New Jersey man) stood trial in Maine in March 2014 and was found guilty of smuggling narwhal tusks from Canada and related money laundering crimes. A New Jersey resident was sentenced to 33 months in prison for illegally importing and trafficking in narwhal tusks and associated money laundering crimes, ordered to forfeit 85,089 USD, six narwhal tusks, and one narwhal skull, and fined 7,500 USD. His prison sentence will be followed by three years of supervised release.

Cross-Border Reptile Trafficking – In 2013, a 28-year-old New York woman who over a two-year period smuggled over 18,000 protected reptiles (many of them species requiring CITES permits) from the United States to Canada for the pet trade was sentenced to spend 18 months in prison after pleading guilty to felony Lacey Act and conspiracy charges. USFWS and Canadian investigators showed that the defendant transported the reptiles by boat across the St. Lawrence River from the U.S. side of the Mohawk Indian Reservation to the Canadian side and delivered them to a Canadian co-conspirator. Species smuggled included native U.S. reptiles such as live American alligators and red-footed tortoises, as well as foreign wildlife such as Hermann's tortoises, Russian tortoises, Jackson horned chameleons, and green iguanas. Market value of the smuggled reptiles in Canada exceeded 800,000 Canadian dollars.

- The Canadian co-conspirator in this reptile smuggling ring was successfully prosecuted in Canada, where he was found guilty of two counts of violating that country's major wildlife law. He was sentenced to serve 90 days in jail, spend three years on probation, and pay 50,000 Canadian dollars in restitution to Canada's Environmental Defense Fund. The smuggled reptiles were forfeited to the Crown.

U.S./Canada Wildlife Smuggling – In the fall of 2012, the USFWS Division of Law Enforcement, the Canadian Wildlife Service, the Ontario Ministry of Natural Resources, and New York State officers completed a successful investigation of the unlawful commercialization of CITES-protected Asian arowanas and injurious snakehead fish being smuggled into the United States from Canada. The main defendant – the owner of a commercial aquarium business in Toronto – pleaded guilty to violating U.S. and State wildlife laws and paid 13,000 USD in fines and restitution. He was also prosecuted in Canada on Federal and Provincial charges and was sentenced there to spend 60 days in prison and he and his business will pay some 75,000 Canadian dollars in fines.

Hummingbird Charms Trafficking – On 7 April 2015, a Texas man was sentenced to four years of supervised probation and ordered to pay 5,000 USD in fines and restitution for trafficking in dried hummingbird carcasses referred to as “chuparosas.”

HIGHLIGHTS OF ADMINISTRATIVE MEASURES TAKEN BY THE UNITED STATES WITH RESPECT TO SECTION D OF THIS REPORT

D1 and D2. Management Authority (MA) and Scientific Authority (SA)

COP-RELATED ACTIVITIES

Preparation for CoP16: North American Regional meeting: 4-8 February 2013. Canada, Mexico, and the United States met in Cuernavaca, Mexico, to discuss preparations for CoP16, including issues of shared interest and identification of issues on which there was agreement on a regional position.

Public participation in U.S. preparations for CoP16: CoP16 was held 3-14 March 2013 in Bangkok, Thailand. In addition to the five notices that USFWS published in the U.S. *Federal Register* in 2011 and 2012 leading up to CoP16, the USFWS published a notice on 28 February 2013, announcing the tentative negotiating positions of the United States on the issues on the agenda for CoP16.

U.S. approved 28 observers for CoP16: In accordance with CITES Article XI, paragraph 7, USFWS approved 66 individuals representing 28 national NGOs to attend CoP16 as observers.

Results of CoP16: The United States submitted 12 species listing proposals (10 animal proposals and two plant proposals) for consideration at CoP16 (March 2013), and also submitted two discussion documents, including a proposal for a new Resolution and revisions to an existing Resolution. The Parties adopted 10 of the species proposals submitted by the United States, which included: transferring from Appendix II to Appendix I the Roti Island snake-necked turtle (*Chelodina mccordi*), Burmese star tortoise (*Geochelone platynota*), and all big-headed turtles (family Platysternidae); listing in Appendix II the spotted turtle (*Clemmys guttata*), Blanding's turtle (*Emydoidea blandingii*), diamondback terrapin (*Malaclemys terrapin*), a number of pond, river, and wood turtles in the family Geoemydidae, and a number of softshell turtles in the family Trioychidae; listing in Appendix II the oceanic whitetip shark (*Carcharhinus longimanus*); removing from Appendix II the Laguna Beach live-forever (*Dudleya stolonifera*) and the Santa Barbara live-forever (*Dudleya traskiae*); and amending the annotation to the Appendix-II listings of America ginseng (*Panax quinquefolius*) and Asian ginseng (*Panax ginseng*). Additionally, the Parties adopted the new Resolution proposed by the United States, Resolution Conf. 16.8, on *Frequent cross-border non-commercial movements of musical instruments*, and, with minor changes, the amendments proposed by the United States to Resolution Conf. 10.14 (Rev. CoP14), on *Quotas for leopard hunting trophies and skins for personal use*.

Preparation for CoP17: In preparation for the CoP17 (scheduled to be held in Johannesburg, South Africa, in September-October 2016), USFWS published two *Federal Register* notices during the reporting period. The first notice, published on 27 June 2014, solicited public comments on amendments to Appendix I and Appendix II that the United States should consider proposing for consideration at CoP17. The second notice, published on 11 May 2015, solicited public comments on Resolutions, Decisions, and agenda items the United States should consider submitting for discussion at CoP17.

STANDING COMMITTEE-RELATED ACTIVITIES

65th meeting of the Standing Committee: The United States sent a 9-person delegation to the 65th meeting of the CITES Standing Committee (SC65), which was held 7-11 July 2013, in Geneva, Switzerland. The interagency U.S. delegation included five representatives from USFWS, one from the U.S. Department of State, one from NMFS, one from APHIS, and one from AFWA. The United States submitted two working documents for consideration at the meeting: the report of the interim working group on annotations for species listed in the CITES Appendices (submitted by the United States as chair of the interim working group); and the regional report for North America (submitted by the United States as the North American Regional Representative to the Standing Committee).

Communications with the Chair of the Standing Committee and the Secretariat: The United States served as both the North American Regional Representative and Vice-Chair of the Standing Committee throughout the reporting period, and in the capacity of Vice-Chair had regular communications with the Secretariat and the Chair of the Standing Committee, primarily by e-mail. These communications were largely for the purpose of the Secretariat providing informal updates on its activities, such as preparations for meetings (including CoP16 and SC65), interactions with UNEP, and further investigation into the GEF as a potential funding source for CITES.

Introduction from the sea: The United States was an active participant in the Introduction from the Sea Working Group established by the Standing Committee. Following CoP15, Fabio Hazin (Brazil) was elected Chair of the working group and Robert Gabel (United States) was elected Vice-Chair of the working group. The group developed a discussion document and draft revisions to Resolution Conf. 14.6 (Rev. CoP15), *Introduction from the sea*. The draft revisions to Resolution Conf. 14.6 (Rev. CoP15) developed by the working group were adopted by the Parties at CoP16 (March 2013). The United States was a strong supporter of these efforts to reach a common understanding of implementation of the Convention for specimens taken in the marine environment not under the jurisdiction of any State.

Implementation of the Convention relating to captive-bred and ranched specimens: At SC61 (August 2011), the United States and Hungary, on behalf of the European Union and its Member States, submitted a document on implementation of the Convention relating to captive-bred and ranched specimens. The resulting discussion led to the creation of an intersessional working group, chaired by the United States. The United States introduced a document at SC62 (July 2012) describing the working group's activities and presenting a series of recommendations, including several draft Decisions for CoP16 (March 2013). The Standing Committee accepted these recommendations and draft Decisions, with some revisions. The Secretariat prepared a document on behalf of the Standing Committee for CoP16. The Parties adopted the draft Decisions contained in Document CoP16 Doc. 48 Annex.

Working group on development and application of annotations: At SC61 in 2011, the Standing Committee formed an intersessional working group, under the chairmanship of the Regional Representative of North America (the United States), to explore the shared understanding among Parties of annotations, and to explore the adoption of appropriate and reasonable procedures for crafting plant annotations. In October 2012, the United States, as Chair of the working group, submitted a document for CoP16 on the development and application of annotations that proposed amendments to six Resolutions, adoption of three new Decisions, revisions to one existing Decision and the retention of one existing

Decision, and adoption of a definition of the term “extract” as it applies in existing annotations in the Appendices. These proposals were adopted by the Parties at CoP16, with several changes. Also at CoP16, the Parties adopted several Decisions related to continued work on annotations, including Decision 16.162 directing the Standing Committee to re-establish a working group on annotations at SC65.

The United States, as Chair of the interim working group, submitted a document for SC65 (July 2014) presenting the history of the use of annotations in CITES and a discussion of options for where to permanently include definitions of terms in annotations. The Standing Committee re-established the formal working group at SC65 and the United States was again designated as the Chair.

In 2015, leading up toward SC66, the United States worked electronically with the other members of the working group to prepare a discussion document for SC66.

Working group on Decision 16.39: At CoP16, the Parties adopted Decision 16.39, which called on the Standing Committee, at SC65, to initiate a process to assess implementation and enforcement of the Convention as it relates to the trade in species listed in Appendix I. The Standing Committee formed a working group at SC65, chaired by the United States as the North American regional representative, and developed terms of reference. Since that time, the working group has been working intersessionally to develop recommendations for consideration at SC66.

Working group to review the administrative hosting arrangements for the CITES Secretariat: At SC65, the Standing Committee formed a working group to work intersessionally on this issue. The working group was initially chaired by the Standing Committee Chair, but in May 2015, the United States, as Vice Chair of the Standing Committee, was asked to continue to chair the working group on the Chair’s behalf. Since that time, the United States has been consulting with the other working group members and the working group will develop recommendations for consideration at SC66.

Other Standing Committee working groups: In addition to the working groups discussed above, the United States was also an active member of the following intersessional Standing Committee working groups leading up to CoP16 (March 2013): 1) CITES strategic vision; 2) review of Resolutions; 3) purpose codes; 4) use of taxonomic serial numbers; 5) e-commerce of specimens of CITES-listed species; 6) personal and household effects; 7) humphead wrasse; 8) Asian snake trade management, conservation and enforcement; 9) conservation of and trade in African and Asian rhinoceroses; and, 10) review of Resolution Conf. 10.10 (Rev. CoP15), trade in elephant specimens; and, 11) Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES).

The following working groups accomplished their mandates at CoP16 and were subsequently dissolved at the CoP: 1) introduction from the sea; 2) review of Resolutions; 3) personal and household effects; 4) humphead wrasse; and 5) transport. In addition to the working groups on which the United States is an active member that were in place prior to CoP16 and that have carried on their work after CoP16, following are the working groups on which the United States is an active member that were initiated after CoP16: 1) bushmeat; 2) disposal of seized specimens; 3) reporting on trade in artificially propagated plants; 4) decision-making mechanism for a process of trade in elephant ivory; 5) cooperation between CITES and FAO; 6) review of Resolution Conf. 12.7 (Rev. CoP16), conservation of and trade in sturgeons and paddlefish; and, 7) pangolin.

In addition, the United States is currently chairing a contact group discussing the issues raised in Document SC65 Inf. 4, regarding the smuggling of Bahamian rock iguanas, such as the issuance of permits for endemic species for which the country of origin does not report their lawful export.

CITES TECHNICAL COMMITTEE-RELATED ACTIVITIES

Regional Alternate Representative for North America to the Animals Committee: At CoP16, the North American Region selected Dr. Rosemarie Gnam, Chief of the U.S. Scientific Authority, to serve as the Alternate Regional Representative for North America to the Animals Committee for the intersessional period between CoP16 and CoP17.

27th Meeting of the Animals Committee: The United States sent a five-person delegation to the 27th meeting of the Animals Committee (AC27) (Veracruz, Mexico, 28 April - 3 May 2014). The U.S. delegation included four representatives from USFWS and one from NMFS. In addition, Dr. Gnam participated at AC27 as the Alternate Regional Representative for North America. The United States submitted six documents for the meeting: (i) species reviews of *Monachus tropicalis* (AC27 Doc. 24.3.4), *Pteropus tokudae* (AC27 Doc. 24.3.5), *Grus canadensis pulla* (AC27 Doc. 24.3.6) and *Epicrates inornatus* (AC27 Doc. 24.3.7); and (ii) two information documents: Final Report on Planning and Implementation of an International Meeting in Puerto Rico for the Conservation of Caribbean Iguanas (*Cyclura* spp. and *Iguana* spp.) (AC27 Inf. 13) and Report on Implementation of the United States National Plan of Action for the Conservation and Management of Sharks (AC27 Inf. 19). At AC27, the United States was a member of eight working groups, which included: (i) Review of Significant trade of Appendix-II species; (ii) Captive-bred and ranched specimens; (iii) Illegal trade in Cheetahs (*Acinonyx jubatus*) (Decision 16.72); (iv) Snake trade and conservation management (*Serpentes* spp.); (v) Sturgeons and paddlefish; (vi) Standard nomenclature; (vii) Conservation and management of sharks; and (viii) Periodic review of species included in Appendices I and II. As the Alternate Regional Representative for North America, Dr. Gnam co-chaired the working group on the Review of Significant trade of Appendix-II species.

Leading up to AC27, the United States participated intersessionally on the evaluation of the review of significant trade. To further the Committee's work on the Periodic Review of Species included in Appendices I and II, the United States offered to review *Epioblasma sampsonii* (AC27 WG8 Doc. 1). Leading up to AC28 (Tel Aviv 2015), the United States has agreed to work intersessionally on tortoises and freshwater turtles (*Testudines* spp.) (Decision 16.111), freshwater stingrays (*Potamotrygonidae* spp.) (Decisions 16.131 and 16.132), the Review of Significant Trade, and the Periodic Review of Species.

Joint sessions of the 27th meeting of the Animals Committee and 21st meeting of the Plants Committee: The United States sent a six-person delegation to the Joint sessions of the 27th meeting of the Animals Committee and the 21st meeting of the Plants Committee (AC26/PC20) (Veracruz, 2-3 May 2014). The U.S. delegation included four representatives from USFWS, one from NMFS, and one from APHIS. In addition, Dr. Gnam participated in AC27/PC21 as the Alternate Regional Representative for North America to the Animals Committee. The United States agreed to work intersessionally on capacity building (AC27/PC21 Doc. 9.1), extinct or possibly extinct species (Decision 16.164) (AC27/PC21 Doc.10), and review of identification and guidance material (Decision 16.59) (AC27/PC21 Doc.14). At AC27/PC21, the United States participated in the working group on review of reporting requirements (Decision 16.45) (AC27/PC21 Doc.11), and the evaluation of the review of significant trade (AC27/PC21 Doc. 12.1). The United States also participated in several

intersessional working groups leading up to AC27/PC21, including the periodic review of species, bigleaf mahogany and neotropical tree species, and evaluation of the review of significant trade.

21st meeting of the Plants Committee: The United States sent a six-person delegation to the 21st meeting of the CITES Plants Committee (PC21, Veracruz, 2-8 May 2014) The U.S. delegation included three representatives from USFWS, one from APHIS, and two from the U.S. Forest Service (USFS). Leading up to PC21, the United States chaired the interim Standing Committee working group on listing annotations (submitted AC27/PC21 Doc. 7.2 Annex 1), participated in working groups on evaluation of the review of significant trade (AC27/PC21 Doc. 12.1), and review of reporting requirements (Decision 16.45). The United States also participated in intersessional working groups on IPBES, standard nomenclature, and trade in artificially propagated plants. The United States submitted documents to the meeting, including a progress report on the periodic review of the genus *Sclerocactus* and *Lewisia serrata*, and four information documents: Distinguishing wild from cultivated agarwood (*Aguilaria* spp.) using direct analysis in real time and time-of-flight mass spectrometry (PC21 Inf.5), Evaluating agarwood products for 2-(2-Phenylethyl) chromones using direct analysis in real time time-of-flight mass spectrometry (PC21 Inf. 6), Analysis of select *Dalbergia* and trade timber using direct analysis in real time and time-of-flight mass spectrometry (PC21 Inf. 7), and Primer on Importing & Exporting CITES-Listed Species Used in the United States in Dietary Supplements, Traditional Herbal Medicines, and Homeopathic Products (PC21 Inf. 11). The U.S. delegation was active on numerous issues and participated in several working groups, including the review of significant trade in Appendix-II plants and the periodic review of the Appendices for plants for species selected following CoP16. The United States supported the preparation of a list of species for the current periodic review cycle (CoP16-CoP18).

At the request of the Plants Committee, the United States provided the Strategic Planning working group (PC21 WG1) a draft table it developed to show the work of the Plants Committee that supports the CITES Strategic Vision: 2008-2020 (Resolution Conf. 16.3) (PC21 Doc. 6.1).

Plants and Animals working groups: The United States worked cooperatively in the following intersessional Animals Committee working groups leading up to CoP16: 1) Asian snake trade management, conservation, and enforcement; 2) captive-bred and ranched specimens, and, 3) transport/IATA. Leading up to CoP16 there were also several working groups the United States worked cooperatively on that have application in both the Animals and Plants Committees: 1) evaluation of the review of significant trade; 2) periodic review of species, 3) capacity building; and, 4) annotations working group.

Several working groups have been created since CoP16. The United States is a member of the following new Animals Committee working groups: 1) tortoise and freshwater turtles (*Testudines* spp.); and, 2) freshwater stingrays (*Potamotrygonidae* spp.). The United States is a member of the following new Plants Committee working groups: 1) Global Strategy for Plant Conservation; and, 2) Neotropical tree species. The United States has also agreed to work intersessionally on the following new working groups that occur in both the Plants and Animals Committees: 1) extinct or possibly extinct species: and, 2) review of identification and guidance material

Periodic Reviews of the Appendices: Periodic Review is an evaluation of the status of CITES-listed species in order to determine if they need to have higher protection, remain the same or be removed from the Appendices. The United States conducted the following periodic reviews between 1 January 2013 and 30 June 2015:

- The United States conducted periodic reviews of the Caribbean monk seal (*Monachus tropicalis*), the Mississippi sandhill crane (*Grus canadensis pulla*), the Puerto Rican boa (*Epicrates inornatus*) and the Guam flying-fox/Guam fruit bat (*Pteropus tokudae*); these reviews were submitted to AC27.
- The United States conducted a periodic review of the Wabash riffleshell (*Epioblasma sampsonii*) (an extinct mollusk) and the results of the review will be submitted at AC28.
- The United States completed a periodic review of the native plant *Dudleya stolonifera*, and submitted a proposal to delist the species from Appendix II at CoP16, which was adopted by the Parties. The U.S. is completing periodic reviews of the genus *Sclerocactus* (Cactaceae); its range includes the United States and Mexico, and the native plant *Lewisia serrata*. A progress report on the periodic review of *Lewisia serrata* will be submitted to PC22.
- The United States is conducting a range-wide status review of Appendix-II-listed goldenseal (*Hydrastis canadensis*), native to the United States and Canada, which is harvested for its medicinal properties. In 2012, USFWS contracted with NatureServe, a U.S.-based non-profit conservation organization that maintains national conservation and status data on more than 70,000 species, to update the species' conservation status rankings and to complete assessments using the IUCN Red List Criteria and the Climate Change Vulnerability Index, as well as update information on economic botany of the species. The current phase of the review will include updating market and industry data.
- Canada and the United States are collaborating on the periodic review for *Puma concolor cougar* and *Puma concolor coryi* as part of the region's commitment toward the completion of the periodic review of the Felidae.

Review of Significant Trade: This is a review of the biological, trade, and other relevant information on Appendix-II species subject to levels of trade that are significant in relation to the population of the species, in order to identify problems concerning the implementation of Article IV paragraphs 2 (a), 3 and 6 (a) of the Convention, and possible solutions. The species subject to the Review of Significant Trade are selected by the Animals and Plants Committees. Non-compliance by any State with the solutions recommended by these Committees may ultimately lead to a recommendation by the Standing Committee to suspend trade with that State in specimens of the species concerned. The following Significant Trade Review activities concerning species native to the United States occurred between 1 January 2013 and 30 June 2015:

- At AC27, the Significant Trade Review Working group selected the polar bear (*Ursus maritimus*) and seahorse (*Hippocampus erectus*) for review. The United States subsequently responded to the Animals Committee concerning information on U.S. management and trade in these species.
- The U.S. Scientific Authority participated in a meeting of the Advisory Working Group on the Evaluation of the Review of Significant Trade, held at the USFWS National Conservation Training Center (NCTC) in Shepherdstown, West Virginia, in April 2015. The meeting facilitated further discussions of the working group and prepared documents for review by the Animals and Plants Committees.

OTHER CITES-RELATED ACTIVITIES

U.S. submits its 2012 and 2013 CITES annual reports: Article VIII of CITES prescribes that each Party shall prepare annual reports on its trade in CITES-listed species. On 5 November 2013, USFWS submitted, directly to UNEP-WCMC in electronic format, the U.S. CITES Annual Report data file for 2012 (148,594 data records), which contained data on all U.S. trade with the rest of the world in CITES-listed species of fauna and flora during 2012. On 22 October 2014, USFWS submitted, directly to UNEP-WCMC in electronic format, the U.S. CITES Annual Report data file for 2013 (148,287 data records), which contained data on all U.S. trade with the rest of the world in CITES-listed species of fauna and flora during 2013. The data in these files represent actual trade and not just numbers of CITES permits issued.

U.S. Contributions to CITES Activities: USFWS has worked continuously with the Secretariat to direct additional voluntary contributions of the United States to execute the Decisions of the Conference of the Parties taken at CoP15 and CoP16. The United States has funded a wide range of activities and issues including, but not limited to, those related to elephants and rhinoceros, Asian snakes, tortoises and freshwater turtles, the making of non-detriment findings, website maintenance, and the Secretariat's meetings and registration database.

Animal Transport for the Animal Care Professional Class: In February 2015, a representative from the U.S. Management Authority participated in the first AZA class “Animal Transport for the Animal Care Professional.” The three day class presented information of legal, regulatory, veterinary and best practice techniques for moving live wildlife and will be presented annually.

Reducing Opportunities for Unlawful Transport of Endangered Species Meeting: On the 3rd and 4th of June 2015, the U.S. Agency for International Development (USAID) convened a workshop in Washington, D.C., on Reducing Opportunities for Unlawful Transport of Endangered Species (ROUTES) to address the complex challenge of combating wildlife trafficking in transcontinental transportation and logistics supply chains. Participants included government agencies, NGOs, and transport industry representatives from Europe, Africa, and Asia.

Participants developed a joint understanding of the problems and challenges in order to clarify existing efforts and activities and identified key areas for collaborative action. Action plans for further cooperative efforts are in progress.

D4. Communication, information management and exchange

CITES 40th Anniversary: Leading up to CITES CoP16, USFWS launched a social media campaign highlighting facts about the Convention, as well as a representative sample of the animal and plant species that it protects. The 40-day campaign, which was anchored by a [blog](#) and subsequent posts on Facebook and Twitter, served as a countdown to CoP16 and also as a reminder that 2013 marked the 40th Anniversary of CITES. U.S. Department of State engaged on this campaign and a number of social media posts were shared or retweeted by U.S. Embassies around the globe. USFWS also wrote a series of articles on the history of the Convention and U.S. priorities for CoP16, all of which were prominently featured in the [Winter 2013 edition of Fish & Wildlife News](#)- a USFWS publication that is distributed to a variety of stakeholder groups and is available online.

Ivory Crush Design Challenge: In 2014, USFWS launched a “Crushed Ivory Design Challenge” calling on the public to submit ideas for a compelling, thought provoking, and informative display to increase awareness about the threats that poaching and illegal trade pose to elephants and other at-risk species. The goal is to use the crushed ivory from the U.S. ivory crushes to raise awareness, reduce the demand for illegal wildlife products, and ultimately protect wildlife from senseless killing and illegal trade. The Design Challenge closed on 31 March 2015, and submissions are currently under review by a panel of experts.

Online Presence and Social Media: USFWS continues to share information regarding CITES implementation and proceedings with interested stakeholder groups via the USFWS International Affairs website (www.fws.gov/international), Facebook (USFWS_International Affairs), Twitter (@USFWSInternatl), blogs, and email distribution list. Of particular note, USFWS launched a new webpage to educate and inform U.S. fishermen, exporters, and dealers about implementation of the shark and ray listings adopted at CoP16. This webpage can be viewed at <http://www.fws.gov/international/permits/by-species/sharks-and-rays.html>.

U.S. elephant seizure data: On 14 May 2013, USFWS submitted to TRAFFIC East/Southern Africa data files containing U.S. elephant part and product seizure data for the year 2012 for inclusion in the Elephant Trade Information System (ETIS). On 10 December 2014, in response to CITES Notification No. 2014/052, regarding the same issue, USFWS submitted to TRAFFIC East/Southern Africa data files containing U.S. elephant part and product seizure data for the year 2013 for inclusion in ETIS.

Poster on CITES-listed tree frogs: The CITES Authorities of the United States, Canada, and Mexico (CONABIO) developed the poster “Tree frogs of the genus *Agalychnis* protected by CITES,” published in April 2013, for the purpose of identifying the frog species included in the Appendices at CoP15 (Doha, 2010). The poster was distributed at Mexico’s main ports, airports and border crossings. The purpose of, and dissemination of, this material is to encourage the legality and sustainability of international trade in those species.

Ginseng brochure: In 2014, USFWS developed and published a brochure titled “Wild American ginseng Information for Dealers and Exporters.” The brochure promotes good stewardship harvest practices and observance of laws and regulations for the harvest and export of wild American ginseng (*Panax quinquefolius*).

Brochures were distributed to American ginseng dealers and exporters in the United States, and can be viewed or downloaded at the USFWS website:

<http://www.fws.gov/international/pdf/factsheet-american-ginseng-harvesters-dealers-exporters.pdf>.

D5. Permitting and registration procedures

Applications for CITES permits: The U.S. CITES Management Authority handled over 21,500 applications for CITES documents received during 2013, over 20,500 CITES applications received in 2014, and 9,900 applications received in the first half of 2015.

A large portion of the applications received during the reporting period related to the export or re-export of commercially traded Appendix-II specimens. The bulk of CITES import permits issued by the U.S. Management Authority are for the import of sport-hunted trophies from Southern Africa.

International cooperation: The U.S. Management Authority works closely with other CITES Management Authorities to identify concerns and problems before CITES documents are issued. Such coordination ranges from informing other Management Authorities what documents the United States has issued, to discussions of how and when documents can be issued.

State coordination: During the reporting period, as part of the requirement to determine legal acquisition of specimens, the U.S. Management Authority continued to consult with U.S. State wildlife management agencies regarding legal take of CITES-listed species. Such consultation also ensures that any permit issued will not conflict with State programs. For paddlefish (*Polyodon spathula*), for example, the U.S. Management Authority ensures that permit conditions on U.S. CITES permits comply with State regulations for take and transportation. This coordination with the States also extends to providing State wildlife agencies copies of CITES permit applications received from their residents. This allows the State wildlife agencies to better understand the paddlefish trade.. Both the U.S. Management Authority and the State wildlife agencies benefit from the maintenance of strong communication channels.

Non-Detriment Findings: A non-detriment finding is a conclusion by a Scientific Authority that the export of specimens of a particular species will not impact negatively on the survival of that species in the wild. The non-detriment finding by a Scientific Authority is required before an export or import permit or a certificate for an introduction from the sea may be granted for a specimen of an Appendix-I species, and before an export permit or a certificate for an introduction from the sea may be granted for a specimen of an Appendix-II species. The following are non-detriment findings conducted by the U.S. Scientific Authority during the reporting period:

- In August 2014, the U.S. Scientific Authority made a positive non-detriment finding for the export of wild American ginseng (*Panax quinquefolius*) legally harvested during the 2014 harvest season in 19 USFWS-approved States and for one Indian Tribal lands. The finding noted our continuing concern about illegal harvest of wild ginseng, including roots dug out of season and the harvest of under-sized/under-age plants, which puts additional harvest pressure on this species as plants are harvested before they produce seeds necessary for regeneration. Numerous States reported an increase in public interest in the harvest and selling of wild American ginseng resulting from the History Channel's television reality program "Appalachian Outlaws" that aired last winter.
- In August 2014 the U.S. Scientific Authority made a positive non-detriment finding for the export of porbeagle shark (*Lamna nasus*) legally harvested in the commercial fishery by U.S. fisherman in the 2014 harvest season. The finding was based on a species management plan produced by NMFS in 2006, which was developed to rebuild the porbeagle stock. The yearly harvest is based on a quota and all harvest is suspended when 80% of the quota is reported; all harvest must be reported within seven days of landing. The fishery was closed to harvest in 2015.
- In June 2015, the U.S. Scientific Authority made a positive non-detriment finding for the export of wild scalloped hammerhead shark (*Sphyrna lewini*), great hammerhead shark

(*Sphyrna mokarran*), and smooth hammerhead shark (*Sphyrna zygaena*) harvested in the commercial fisheries of the Atlantic and Gulf of Mexico by U.S. fisherman in the 2015 harvest season. The positive finding was based on a management plan, produced by NMFS in 2013, which was developed to rebuild the hammerhead stocks. There are two separate management groups, one in the Atlantic and one in the Gulf of Mexico; each group has a separate harvest quota. Each group is regulated separately and all harvest in the group is suspended when 80% of its quota is reported; all harvest must be reported within seven days of landing.

D6. Capacity building

Regional Workshop on Sharks Listed in Appendix II of CITES - Preparing for Implementation: This workshop was held in Recife, Brazil, during 3-4 December 2013. The United States helped with preparations for this workshop, hosted by Brazil, to prepare for implementation of CITES provisions for the five species of sharks added to CITES Appendix II at CoP16 (with an effective date of September 2014). The United States actively supported adoption of the proposals to list these sharks under CITES and considers effective implementation of the listings to be a priority for shark conservation. Representatives from both USFWS and NMFS participated in the workshop in Recife, which was attended by more than 70 representatives from 28 CITES Parties in Latin America and the Caribbean.

Cooperation between CITES and the International Tropical Timber Organization (ITTO): The United States continued to provide financial support to the ITTO-CITES Program, which supports work on CITES-listed tree species in all three tropical regions. The current work includes support to projects on the management, DNA traceability, timber tracking, and artificial propagation of a number of species, including *Aquilaria* spp., *Dalbergia* spp., *Gonystylus* spp., *Gyrinops* spp., *Pericopsis elata*, *Prunus africana*, *Swietenia macrophylla*, and *Cedrela odorata*.

Caribbean Iguana Conservation Workshop: USFWS hosted a Caribbean Iguana Conservation Workshop in San Juan, Puerto Rico, in December 2013. The workshop was intended to advance a regional approach to conservation and recovery problems for the Appendix-I Caribbean rock iguanas (*Cyclura* sp.) and the critically endangered Lesser Antillean iguana (*Iguana delicatissima*). While the main threats to the species include habitat destruction, predation, and competition from feral animals, hybridization with the Green iguana (*I. iguana*; Appendix II), a serious spike in poaching and trafficking of the animals to the western European and Asian pet markets is occurring. The workshop was attended by government and non-governmental islands across the insular Caribbean and a wide range of recommendations for actions were developed. USFWS is in the process of following-up on our commitments from the workshop.

First Pangolin Range States Meeting, De Nang, Viet Nam, 24-26 June 2015: Delegates from 14 Asian and 17 African pangolin range countries met 24-26 June 2015, for the First Pangolin Range States Meeting in De Nang, Viet Nam. The workshop provided an opportunity for delegates to develop a unified action plan with recommendations to protect pangolin species against over-exploitation as a result of international trade and resulted in enhanced connectivity between range states, heightened determination to tackle complex challenges, and progress towards CITES-prescribed calls for information and action. Experts from the International Union for the Conservation of Nature (IUCN), Species Survival Commission (SSC), and Pangolin Specialist Group shared expertise on pangolins through presentations and working group sessions. The final outcomes from the workshop were joint recommendations for the following critical actions to address: making of CITES non-detriment

findings for exports of pangolin species; pangolin biological data deficits; evaluation of pangolin species against the CITES species listing criteria; legal and illegal harvest and trade; the care and husbandry of pangolins; and enforcement. The recommendations will be presented in a report to the CITES Intersessional Pangolin Working group, which will be reviewed by the Standing Committee at SC66.

Polar Bear Stakeholder Forum: Canada and the United States hosted a Polar Bear Stakeholder Forum at the USFWS NCTC facility in Shepherdstown, West Virginia, in June 2015. Because Canada and the United States have shared responsibility for the management of polar bears in the respective countries, a Stakeholder Forum was convened to present information about polar bear conservation and management among a broad range of perspectives. Forum participants had the opportunity to ask questions and to improve understanding of the different perspectives to polar bear conservation and management.

Wildlife Enforcement Network: USFWS has been working to develop a plan for wildlife law enforcement networking, capacity building, and technical assistance in the Caribbean - for both terrestrial and marine species. USFWS is working cooperatively with the U.S. Department of State and NMFS, as well as the Secretariat and others, to develop a plan to convene a workshop and advance the prospects for the development of a Wildlife Enforcement Network (WEN) in the region. The development of improved enforcement coordination in the Caribbean was recommended by the Parties to the SPAW Protocol in 2014 and by an international workshop on iguana conservation in 2013. We hope to convene this enforcement workshop in early 2016.

Guide on Importing and Exporting CITES-Listed Species: The American Herbal Products Association (AHPA), a U.S. national trade association representing members of the herbal products industry, developed a “Primer on Importing & Exporting CITES-Listed Species” to provide guidance for U.S. importers and exporters of commonly traded CITES-listed species that are used as ingredients in traditional medicines and dietary supplements. The United States submitted the Primer as an information document (PC21 Inf. 11) to PC21. It is available on-line at: http://www.ahpa.org/Portals/0/pdfs/AHPA_CITES_Import_Export_Primer.pdf.

Central America, the Caribbean, Africa and Asian Regions: The United States participated in the following international workshops in an effort to enhance capacity in those countries/regions:

- Workshop to Strengthen the Capacity of Authorities to Implement CITES in the Republic of Panama (May 2013). Representatives from the U.S. Scientific Authority the U.S. Department of the Interior International Technical Assistance program (DOI-ITAP), and the CITES Secretariat conducted a workshop in Panama City to train Panamanian CITES officials in the making of non-detriment findings and general CITES matters. Approximately 35–40 officials, including government lawyers, military personnel, border patrol agents and environmental police, and plant and wildlife inspectors participated in the 3-day workshop.
- Sub-Saharan Africa Red List Workshop in Togo (August 2013). A U.S. Scientific Authority representative participated in the IUCN/SSC Tortoise and Freshwater Turtle Specialist Group's workshop on Conservation Status of the Tortoises and Freshwater Turtles of Sub-Saharan Africa, with other African CITES Authorities (Liberia, South Africa, Kenya, and Tanzania). This workshop was critically important because it included a discussion on the potential listing of African turtles, particularly soft-shelled turtles, for CoP17.

- Regional Workshop to Build Capacity to Undertake CITES Non-detriment Findings in Central America and the Dominican Republic (September 2013). Thirty-five experts from the CITES Scientific and Management Authorities, and national fisheries agencies of Colombia, Costa Rica, El Salvador, Ecuador, Guatemala, Honduras, and Panama, as well as representatives from the Organization of Fisheries and Aquaculture Sector of the Central American Isthmus (OSPESCA), participated in a 3 ½ day regional training workshop on making non-detriment findings (NDFs), held in San Salvador, El Salvador, 3-6 September 2013. Workshop participants learned about CITES Resolutions pertaining to NDFs, tools and methodologies to improve making NDFs, and discussed NDFs developed by other countries. Participants analyzed plant and animal species case studies from the region, and developed recommendations and agreements intended to improve the general knowledge and capacity relating to making NDFs for CITES-listed species traded in the region.
- Caribbean Region-Wide Workshop on Rock Iguana (*Cyclura* species) Conservation in San Juan, Puerto Rico (December 2013). USFWS, in cooperation with the Puerto Rico Department of Natural and Environmental Resources, San Diego Zoo Global, Island Conservation, the Caribbean Landscape Conservation Consortium, and the Fort Worth Zoo, sponsored a Caribbean-wide workshop on rock iguana conservation in San Juan, Puerto Rico. The workshop was attended by 61 participants from 16 nations, islands, and NGOs which identified the most critical issues for rock iguana conservation and developed actions plans and timelines for high priority projects focused on alleviating threats to rock iguanas, including unsustainable or illegal international trade. Iguanas are the largest native vertebrates that remain on many Caribbean islands and face threats from introduced mammalian predators, habitat destruction, collection for the pet trade, hunting, vehicular mortality, and competition and interbreeding with the invasive green iguana. As seed dispersers, rock iguanas are vital to maintaining native plant communities and supporting ecosystem health.
- Third Workshop on Non-Detriment Findings (NDF), Guatemala City, Guatemala (March 2014). The objectives of the workshop, which was attended by 32 participants including several representatives from the United States, were to share the progress made by countries on the implementation of the new CITES marine species listings, including three species of hammerhead sharks in Appendix II; to share efforts in preparing NDFs considering the agreements and recommendations of the workshop in September 2013 (El Salvador); and to establish collaborative mechanisms both regionally and nationally among CITES Authorities, fisheries, and organizations to contribute to sustainable and responsible management of shark species in Appendix II.
- The U.S. Scientific Authority attended the workshop in Bonn, Germany, hosted by the German CITES Scientific Authority, 2-22 August 2014, to assist in developing an NDF guidance document for shark species. The main outcome of the workshop was the development of General Guidelines for the formulation of NDFs of CITES-listed sharks. It is now available to all Parties to help guide their making of NDFs for sharks.
- Capacity Exchange Workshop between Guatemala and the United States (3-7 November 2014). Representatives of the U.S. Scientific and Management Authorities participated in this workshop, hosted by the Guatemalan CITES Scientific Authority, for CITES-listed timber species. The

purpose of the workshop was to improve the effective implementation of CITES for Guatemalan timber species.

- The United States participated in the 11th Meeting of the Convention on Migratory Species (CMS). The meeting occurred from 4-9 November 2014, in Quito, Ecuador. While not a signatory to the CMS, the United States has many international commitments for CMS-listed species. CMS agenda items of conservation interest to the United States included migratory birds, sharks and rays, polar bear, Asiatic and African lion, and wildlife crime.
- CITES Authorities from the United States, the USFWS Office of Law Enforcement, and NMFS participated in the “International CITES Workshop: Articulating Experiences and Strategies for the Implementation of Shark Species Included in Appendix II”, in Santa Marta, Colombia, 25-27 November, 2014. More than 60 participants, representing over 20 countries, participated in the workshop. Topics discussed included: the making NDFs to ensure sustainable use of shark species in international trade; species identification; and traceability of products (fins and meat). The presentation of the identification software iSharkfin (an application to aid the identification of shark’s fins through photographs) was an outcome of the workshop. The participants also identified current needs and recommendations for effectively implementing the shark listings. This workshop was hosted by the government of Colombia, with support from the CITES Secretariat, NMFS, and USFWS.
- To improve the effective implementation of CITES, the United States provides assistance to other CITES Parties through capacity building. The African French speaking countries are a U.S. priority area for these efforts given their high biodiversity and volume of traded wildlife. At the request of both Gabon and Cameroon, representatives of the U.S. CITES Authorities conducted two CITES Needs Assessments: one in Gabon (June 2014) and the other in Cameroon (December 2014), in order to provide them with recommendations to improve CITES implementation in their respective countries.
- The U.S. Scientific Authority attended a two day workshop hosted by Amphibian Survival Alliance, Defenders of Wildlife, Animal Welfare Institute, and Singapore Zoo, jointly held 12-13 March 2015, concurrently in both Washington, D.C., and Singapore. The workshop brought together experts from around the world to identify amphibian species that are most threatened by international trade activities, and for which a listing proposal at CoP17 could possibly be warranted.
- The U.S. Scientific Authority participated in a regional workshop in Georgetown, Guyana, on 21 May 2015, at the request of the U.S. Embassy. The workshop, which was organized by the NGO Panthera and the Government of Guyana, and partially funded by a USFWS grant, was designed to build the capacity of governments in the region to make scientific-based decisions under CITES, particularly in the setting of export quotas for wild-caught specimens.

Foreign Service Training: On 23 June 2014, DOI-ITAP and USFWS presented a talk on CITES and anti-wildlife trafficking measures to 20 trainees of the U.S. Department of State (Foreign Service Institute). The trainees will be assigned to U.S. Embassies and Consulates around the world.

United States participates in the Masters Course module on plant trade: The United States continued its long history of participating in the International University of Andalucia's CITES Master's Course: Management, Access and Conservation of species in trade: The International Framework. In 2014, USFWS provided an instructor to participate in the modules on introduction and implementation of CITES and the scientific aspects related to flora.

Free trade agreements: The United States continues to build capacity and strengthen efforts to implement CITES obligations through Free Trade Agreements (FTAs) and other international partnership programs. DOI-ITAP, in consultation with USFWS, develops and conducts CITES capacity-building and training programs for the signatory countries of the Central America-Dominican Republic Free Trade Agreement (CAFTA-DR) and for several countries in the Middle East and North Africa. Both programs are funded by the U.S. Department of State. All of the activities were undertaken by DOI-ITAP. Some activities were also co-sponsored by TRAFFIC. Examples of recent, and ongoing, projects, by region, include:

Central America and the Caribbean

Costa Rica

- Spring 2014, San Jose: DOI-ITAP assisted Costa Rican CITES authorities in developing and establishing an on-line, automated CITES permit application and tracking system, increasing efficiency and reducing workload and data errors for users and government officials.
- March 2015, Punta Arenas: DOI-ITAP provided support to a meeting for Costa Rican authorities from INCOPESCA and other agencies, and their counterparts they invited from El Salvador and Guatemala, to learn about risk assessment methodologies in developing a CITES NDF. Technical experts: Mexico's National Fisheries Institute (INAPESCA), the CITES Secretariat, and the Costa Rican Government.

Dominican Republic

- April-May 2013: DOI-ITAP sponsored two 2-day CITES workshops, one in Santo Domingo and one in Barahona.

Guatemala

- 25 February 2014, Guatemala City: DOI-ITAP assisted the National Committee for Protected Areas (CONAP), CITES administrative authority, in conducting a national-level workshop to discuss with relevant government institutions the processes to implement the new CITES Appendix-II shark listings. The institutions defined the actions to be taken for the regulation, control, and procedures for the export and import of these species beginning in September 2014. A series of meetings were planned to continue working together inter-institutionally.
- May 2015, Guatemala City: DOI-ITAP developed and supported a 2-day workshop to provide an overview of CITES and wildlife inspection techniques to Guatemalan Customs, border protection, and inspection officials. Technical experts: USFWS Office of Law Enforcement, DOI-ITAP, and the Guatemalan National Committee for Protected Areas (CONAP).

Honduras

- 2013-2014, Tegucigalpa: DOI-ITAP assisted Honduran CITES authorities in developing and establishing an automated CITES permit tracking system, increasing efficiency and fraud detection while reducing workload and data errors for government officials.
- April 2015, La Cieba: DOI-ITAP developed and supported a 2-day workshop to provide an overview of CITES and wildlife inspection techniques to Honduran Customs, border protection, and inspection officials. Technical experts: USFWS Office of Law Enforcement and DOI-ITAP.

Nicaragua

- DOI-ITAP was not able to use funding to support the Government of Nicaragua during this period.

Multi-national and Regional

- September 2013, San Salvador, El Salvador: DOI-ITAP supported a 4-day intensive workshop to provide training on numerous aspects of CITES NDFs, such as risk assessment, methodology, information and data needed, and other considerations and guidelines in formulating an NDF. Participating countries: Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Panama, and Peru. Technical experts: USFWS, the CITES Secretariat, UNEP-WCMC, OSPESCA, and Traffic.
- March 2014: DOI-ITAP worked with UNEP-WCMC to develop a CITES Trade Data Analysis report for Central America and the Dominican Republic. The companion web site to this report in Spanish: <http://citescentroamerica.unep-wcmc.org/wordpress/spanish/> In English: <http://citescentroamerica.unep-wcmc.org/wordpress/english/>.
- March 2014 in Guatemala City, Guatemala: DOI-ITAP, USFWS, and the CITES Secretariat supported a 2-day workshop focused on developing national and potentially regional CITES NDFs for hammerhead and other shark species. DOI-ITAP also supported a 1-day training session on use of CITES databases and an overview of the recently completed CITES Trade Data Analysis report conducted by UNEP-WCMC. Participating countries: Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, and Panama. Technical experts: CITES Secretariat, USFWS, NMFS, IUCN, OSPESCA, and WCS.
- 25-27 November 2014, Santa Marta, Colombia: DOI-ITAP with the support of USFWS facilitated the participation of CITES authorities of Honduras and Costa Rica to the International Shark CITES Workshop: Joint Experiences and Strategies for Implementation of the Inclusion of Species in Appendix II. Participants from the region shared their progress on regional processes to define protocols for making NDFs, implementing strategies to ensure monitoring, and identification of species.
- January 2015, Guatemala City, Guatemala: DOI-ITAP, in conjunction with OSPESCA, USFWS, and Humane Society International supported a Regional Expert Consensus Workshop for the Procedures for Making Non-detriment Findings for Species of Sharks and Rays in Central American Integration System (SICA) member countries. Participating countries: Belize, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Nicaragua, and Panama. A regional protocol on guidelines for the development of marine species NDFs was agreed upon

by the CITES scientific authorities and was presented to the board of OSPESCA for their review and implementation.

- 1 January 2013 - 30 June 2015, various locations: DOI-ITAP has provided judicial authorities (judges, prosecutors, and solicitors) training on CITES and the regulations promulgated for implementation in various CAFTA-DR countries within the framework of the Central American Wildlife Enforcement network (CAWEN, or ROAVIS in Spanish).

South America

Chile

- 1 January 2013 – 30 June 2015, Santiago and Valparaiso, Chile: In a CITES legislation support effort, DOI-ITAP helped contact 70 legislative stakeholders to inform them about the status of Chile's CITES-implementing legislation and potential challenges associated with Chile remaining in Category 2 status. These efforts helped to reactivate legislative discussion of the CITES bill 4 years after its original introduction to the Legislature. DOI-ITAP also served as a technical assistance resource to the CITES National Committee and others during each one of its legislative stages.
- June 2014, Santiago, Chile: DOI-ITAP sponsored a 4-day workshop on CITES Enforcement for 40 Chilean officials from a variety of agencies. Technical experts from USFWS Office of Law Enforcement and CITES offices provided presentations along with Chilean officials and CITES authorities. As a result of intensive working sessions, the group identified a series of best practices for inter-agency coordination protocols and species ID techniques in border controls.
- August 2014, Santiago, Chile: DOI-ITAP, in partnership with two leading agencies in marketing and strategic communication from Chile and the United States, delivered a multi-media campaign proposal to CITES national authorities. It aimed to call citizens' attention to protecting Chilean wildlife and increasing awareness about CITES among Chilean policy-makers. The campaign was valued at 80,000 USD and was financed through in-kind donations from both agencies.
- September 2014, Santiago, Chile: DOI-ITAP and the CITES National Committee of Chile sponsored a 1-day CITES seminar attended by over 100 government officials, policy makers, NGOs, and other relevant stakeholders to increase awareness of the value and importance of CITES. DOI-ITAP supported the participation of CITES Secretariat Communications and Outreach Officer Juan Carlos Vásquez and FWS Assistant Director for International Affairs Bryan Arroyo.
- October 2014, Valparaiso, Chile: DOI-ITAP supported the participation of CITES Secretariat Communications and Outreach Officer Juan Carlos Vásquez and USFWS Assistant Director for International Affairs Bryan Arroyo in a series of meetings with key Chilean congress members involved in re-introducing CITES implementation legislation, providing testimony to the Agricultural Commission of the Representatives' Chamber, and meeting with National Customs Service of Chile to discuss CITES enforcement issues.

- November 2014, Santiago, Chile: DOI-ITAP sponsored a ½-day seminar for a group of Chilean judges to familiarize and update them on CITES legislative and enforcement efforts in Chile.
- November 2014, Santa Marta, Colombia: DOI-ITAP funded the participation of three Chilean delegates in an international shark workshop sponsored by the Government of Colombia and held in Santa Marta, Colombia. Its goal was to evaluate the necessary monitoring and control mechanisms to ensure traceability of international trade in products (fins and meat) of shark species listed in CITES Appendix II, and to define strategies for the development of NDFs on newly listed shark species.
- 10 December 2014, Santiago, Chile: DOI-ITAP delivered a total of 40 CD-ROMs to national authorities with audio-visual material about CITES and DOI-ITAP technical assistances projects executed during 2014 about CITES capacity building. These CDs will support independent training initiatives within Chilean Government agencies.

Multinational Species Conservation Funds: The Multinational Species Conservation Funds consist of five programs created to fulfill direct congressional mandates to conserve populations of and habitats for African elephants, Asian elephants, great apes, rhinoceroses and tigers, and marine turtles. These programs involve CITES-listed species: the African Elephant Conservation Act of 1989, Rhinoceros and Tiger Conservation Act of 1994, Asian Elephant Conservation Act of 1997, Great Ape Conservation Act of 2000, and Marine Turtles Conservation Act of 2004. These programs provide direct support to range countries through broad-based partnerships with national governments, NGOs, and other private entities for on-the-ground activities to conserve these species and their habitats. USFWS administers the Multinational Species Conservation Funds. During the period from January 2013 through June 2015, USFWS granted a total of 19,992,482 USD for various international projects focused on the conservation of African and Asian elephants, rhinoceroses, tigers, great apes, and marine turtles. Listed below is a breakdown of the funding by grant program:

African elephant:	38 projects totalling 2,959,899 USD in funding
Asian elephant:	86 projects totalling 4,448,448 USD in funding
Rhinoceros & tiger:	96 projects totalling 5,264,872 USD in funding
Great ape:	61 projects totalling 3,701,856 USD in funding
Marine turtles:	100 projects totalling 3,617,408 USD in funding

D7. Collaboration/co-operative initiatives

U.S. CITES Export Tagging Program: The United States cooperates with its States and Indian Tribes in utilizing a tagging program for the export of skins of the following Appendix-II species: bobcat (*Lynx rufus*); river otter (*Lontra canadensis*); Canada lynx (*Lynx canadensis*); gray wolf (*Canis lupus*); brown bear (*Ursus arctos*); and American alligator (*Alligator mississippiensis*). During the reporting period, USFWS approved the State of Montana’s request to annually export up to 200 gray wolf hides/skins. This approval was for one year, with renewal conditional upon compliance with tagging and reporting conditions.

USFWS initiated this program over 30 years ago to streamline their CITES permit issuance process for the export of skins of these species. USFWS currently cooperates with 48 States and 30 Indian Tribes that have instituted approved harvest programs. USFWS approves a State or Indian Tribe for inclusion in the CITES Export Tagging Program when it can make the two CITES findings based on that State's or Tribe's harvest program and enforcement regime. Each approved State or Tribe applies CITES tags, provided by USFWS, to new skins of approved species taken in that State or Tribe and intended for export from the United States. The tags serve as evidence that the skins were legally taken and that their export will not be detrimental to the survival of the species.

During 2013, USFWS issued nearly 780,000 tags, and during 2014, the USFWS issued over 735,000 tags. During the reporting period, USFWS approved into the program one Tribe for exports of river otter and six Tribes for exports of bobcat.

U.S. CITES American ginseng export program: In implementing the CITES Appendix-II listing of American ginseng (*Panax quinquefolius*), USFWS works closely with other Federal agencies and the 25 U.S. States and one Tribe that have approved American ginseng export programs. The State and tribal natural resource and agricultural agencies are responsible for managing this species on State, tribal, and private lands within their jurisdiction. The USFS and the National Park Service manage the species on Federal lands. Subsequently, USFWS relies on those State, tribal, and Federal agencies to provide information on legal and illegal harvest of American ginseng, the status of the species in the wild, and population trends. Using the information received annually from the States and Tribes, USFWS is able to make State and tribal-wide legal acquisition and non-detriment findings. This approach allows USFWS to streamline its evaluation of CITES permit applications to export American ginseng roots from the United States. During the reporting period, USFWS regularly communicated with the States and Tribes on issues related to American ginseng, including revision of State and tribal ginseng management regulations and administrative changes to the State and tribal programs.

CITES Plant Rescue Center Program: USFWS established the CITES Plant Rescue Center Program in 1978 in response to the need to care for live CITES-listed plants legally abandoned or forfeited to the U.S. Government due to non-compliance with the import/export requirements of the Convention. USFWS administers this program in cooperation with APHIS, the U.S. inspection agency for live CITES-listed plants entering the United States. Currently, 84 institutions cooperate as volunteer plant rescue centers. All of the cooperating rescue centers are public botanical gardens, arboreta, zoological parks, or research institutions, and are either government entities or governmentally or privately funded non-profit entities. During 2013, APHIS confiscated 31 shipments of live plant material that were in violation of CITES. These shipments contained a total of 6,695 plants. The 31 shipments assigned to plant rescue centers contained 3,864 orchids, 2,343 aloes, 411 cacti, 27 euphorbias, 27 pitcher plants, and 8 tree ferns. During 2014, APHIS confiscated 28 shipments of live plant material that were in violation of CITES. These shipments contained a total of 3,985 plants and 16 cactus skeletons. The 26 shipments assigned to plant rescue centers contained 2,693 cacti, 1,113 euphorbias, 112 orchids, 50 podophyllums, 11 succulents, 3 tillandsias, and 2 cycads, 2,343 aloes, 27 pitcher plants, and 8 tree ferns, plus 14 cactus skeletons.

USFWS participates in Wood Summit: A representative of the U.S. Management Authority participated in the Fifth Bi-Annual Wood Summit on 7 May 2015, hosted by the C. F. Martin & Co., Inc. at the company's headquarters in Nazareth, Pennsylvania. Topics on the agenda ranged from the

regulation of international trade in CITES-listed timber species and Lacey Act Due Care to DNA Chain of Custody tracking and alternative material sourcing.

USFWS participates in European Regional CITES Plants Meeting: A representative of the U.S. Management Authority participated in the IX European Regional CITES Plants Meeting, held in Wageningen, the Netherlands, in November 2014. The U.S. representative participated in discussions on plant issues of interest to the European region and gave presentations on the progress of work in the Standing Committee Working Group on Annotations and initiatives and challenges in the United States related to implementation of CITES tree species listings.

20th North American Trilateral Meeting (April 2015): The CITES Table met during the 2015 annual meeting of the Canada/Mexico/United States Trilateral Committee for Wildlife and Ecosystem Conservation and Management, held April 2015, in San Diego, California. Much of the work of the CITES Table focuses on regional coordination in preparation for CITES meetings. Topics addressed included evaluation of the Review of Significant Trade, the periodic review of the Appendices, listing annotations, implementation of CITES listings for timber species, implementation of CITES for marine species, illegal trade of *Totoaba macdonaldi*, and the U.S. Executive Order on Combating Wildlife Trafficking.

Association of Fish and Wildlife Agencies (AFWA) workshop: In partnership with USFWS, a workshop was convened by AFWA in January 2014 to discuss management measures and the conservation status of the paddlefish (*Polyodon spathula*). Representatives from 20 U.S. State Fish and Wildlife Agencies and three USFWS regions attended. The primary outcome of the workshop was an agreement that paddlefish should be managed by river basins, rather than individually by each State. The Lower Mississippi River Basin States previously developed a management plan for paddlefish in Alabama, Arkansas, Mississippi, and Tennessee, which may serve as a model for management of the species on a multi-state level. In an effort to implement recommendations that came out of the workshop, the States have begun to age paddlefish. Aging data is needed for the models the States anticipate to develop in order to inform paddlefish management and set regulations. The aging data should be available by August 2015. Also, the commercial paddlefish States continue to advance the development of basin-wide management plans and look for ways to provide the funds needed to manage paddlefish.

National Assessment of Non-Timber Forest Products (September 2014): The USFS sponsored this stakeholders meeting to inform policy options and identify information gaps that can limit effective decision making in the sustainable harvest and management of non-timber forest products (NTFPs). A segment on CITES and NTFPs was presented by a representative of the U.S. Scientific Authority, as part of in-depth discussions of the major issues affecting NTFPs (e.g., ecology, culture, economics, and regulations). NTFPs include the more than 200 medicinal plants that are listed in the CITES Appendices, along with numerous plant species used for food, wax, fragrances, and horticulture. The meeting represented one of the first national, “all-lands” meetings to bring together multiple disciplines from Federal and non-Federal entities to focus exclusively on NTFPs, and will result in the publication of a comprehensive national assessment of NTFPs and impacts from climatic variability and change (anticipated publication early 2016).

Chambered nautilus meeting: NMFS and USFWS hosted a meeting on 4-5 June 2014, in Silver Spring, Maryland, with several chambered nautilus species experts. The goal of the meeting was to bring these experts together to share and discuss recent and historical, biological and trade data. This species has been recommended for listing in the CITES Appendices in the past; however, to-date there has been a lack of biological and trade information on the species.

AZA meeting: The U.S. CITES Authorities participated in the mid-year meeting of the AZA held in Columbia, South Carolina, on 21-27 March 2015. The meeting included a workshop on CITES permitting requirements for the export and/or import of animals.

National seed strategy: The U.S. Scientific Authority is participating in the development of a U.S. national seed strategy to improve coordination between Federal and non-Federal land managers to conserve, restore, and rehabilitate native landscapes, ecosystems, and plant communities that are increasingly impacted by fire, development, encroachment from invasive species, or climate change. Of particular interest to U.S. CITES authorities are opportunities to coordinate with the variety of botanical experts (including plant geneticists, rare plant specialists, and restoration ecologists) to explore prospects for germplasm conservation and restoration for U.S. native CITES-listed plant species. The National Seed Strategy for Rehabilitation and Restoration 2015-2020 is near completion and is expected to be publicly released soon.

CITES-listed pollinators and pollinator health strategy: Through the Pollinator Partnership, a diverse set of partners who promote pollinator conservation and education, the USFWS raises the visibility of CITES-listed plants and animals that depend on pollination. Several animal species involved in pollination or seed dispersal, including bats, beetles, butterflies, hummingbirds, marsupials, primates, rodents, and treeshrews are regulated under CITES and are variously traded for consumption, for the pet trade, and for collectors, among other trade activities.

During U.S. National Pollinator Week in 2013, USFWS developed a social media campaign to raise awareness of CITES-listed pollinators and outreach material featuring such pollinators as hummingbirds (family Trochilidae; Appendix II) and pollinated plants such as Appendix-II listed saguaro cactus (*Carnegiea gigantea*; Appendix II). The featured species for National Pollinator Week in 2014 were orchids (family Orchidaceae; Appendix I and II), and carnivorous plants in 2015 (including Appendix-II *Sarracenia* spp. and *Dionaea muscipula*).

In May 2015, the United States released a comprehensive pollinator health strategy to outline needs and priority actions to better understand pollinator losses and improve pollinator health. The Strategy to Promote the Health of Honey Bees and Other Pollinators and accompanying Research Action Plan, written by an interagency task force at the direction of U.S. President Obama, can be accessed at <https://www.whitehouse.gov/blog/2015/05/19/announcing-new-steps-promote-pollinator-health>. More at: <http://www.fws.gov/pollinators/>

Criminal investigations training in Africa: In response to the wildlife poaching crisis in Africa, the USFWS Office of Law Enforcement presented comprehensive criminal investigations training programs in both June 2013 and August 2013 at the U.S. State Department's International Law Enforcement Academy in Gaborone, Botswana. A total of 65 officers from 10 sub-Saharan African nations – Botswana, Cameroon, Democratic Republic of the Congo, Gabon, Kenya, Namibia, Republic of the Congo, South Africa, Tanzania, and Zambia – completed the intensive two-week course.

Anti-smuggling training in Asia: In the fall of 2013, USFWS law enforcement officers helped conduct an anti-smuggling training program hosted by the Department of Homeland Security in Bangkok, Thailand. They provided courses on CITES, surveillance, controlled deliveries, and crime scene processing to 40 participants from the Royal Thai Police; Royal Thai, Laotian and Myanmar Customs; Thailand's Attorney General's Office; INTERPOL; the FREELAND Foundation; and the Association of Southeast Asian Nations Wildlife Enforcement Network.

Transnational Organized Crime Rewards Program: The first reward offered under this new U.S. program (which was created by Congress in 2013) was related to wildlife trafficking. In November 2013, the U.S. Department of State announced that the United States was offering up to 1 million USD reward for information leading to the dismantling of the Xaysavang Network. Based in Laos – with affiliates in South Africa, Mozambique, Thailand, Malaysia, Vietnam, and China – the Xaysavang Network facilitates the killing of endangered elephants, rhinos, and other species for products such as ivory.

Wood identification workshop in Nicaragua: The USFS sent an expert from its Forest Products Lab to Nicaragua in 2013 to deliver a wood identification workshop using the USFS' Central America wood identification manual. The workshop in Nicaragua had approximately 40 attendees from local government and universities.

USFWS senior special agent/international attache program: The USFWS Office of Law Enforcement created the first-ever program for stationing wildlife special agents at U.S. Embassies as international attaches to coordinate investigations of wildlife trafficking and support wildlife enforcement capacity-building. The first posting was effective January 2014 at the U.S. Embassy in Bangkok. USFWS will hire and recruit four additional agent/attaches over the course of 2014. Plans call for two postings in sub-Saharan Africa; one in South America; plus one additional posting in Asia.

International investigative liaison: During the reporting period, USFWS Office of Law Enforcement staff completed a 3-month detail focused on investigative coordination in Bangkok, Thailand; spent three weeks in Togo providing investigative assistance to enforcement authorities there; made multiple trips to the Philippines to help that nation develop a wildlife law enforcement database capability; and met with counterparts in South Africa and Namibia on investigative strategies and coordination.

CITES enforcement assistance to Viet Nam: In response to a request by Viet Nam's CITES Management Authority for assistance with wildlife trade enforcement, a forensic scientist from the USFWS Forensics Laboratory was selected by the U.S. State Department and USFWS for a Science Fellowship in Viet Nam during the summer of 2013, to work with Viet Nam's Management Authority to share the U.S. experience with wildlife trade enforcement, and to provide recommendations to increase the effectiveness of CITES enforcement in Viet Nam.

Targeting capacity enhanced: In March 2013, the USFWS Office of Law Enforcement expanded its abilities to target illegal wildlife shipments by joining 10 other Federal agencies with border management or import safety responsibilities as a member of the Commercial Targeting and Analysis Center in Washington, D.C. Two USFWS employees will be part of an interagency group of trade and intelligence analysts at the Center, which facilitates information sharing and collaboration across U.S. border enforcement agencies.

Preparing for the 17th Meeting of the Conference of the Parties to CITES

What is CITES?

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) entered into force in 1975, and became the only treaty to ensure that international trade in plants and animals does not threaten their survival in the wild. A country that has agreed to implement the Convention is called a Party to CITES. Currently there are 181 Parties including the United States.

CITES is administered through the United Nations Environment Programme (UNEP). A Secretariat, located in Geneva, Switzerland, oversees the treaty. The Secretariat:

1. Provides Parties with trade information and technical support
2. Acts as a liaison among Parties
3. Contracts trade studies
4. Informs governments and the public about CITES wildlife trade developments
5. Investigates possible CITES violations and trade threats to wildlife
6. Organizes meetings of the Conference of the Parties

How are species protected by CITES?

Species protected by CITES are included in one of three appendices.

- Appendix I includes species threatened with extinction and provides the greatest level of protection, including restrictions on commercial trade. Examples of species currently listed in Appendix I include gorillas, sea turtles, most lady slipper orchids, and giant pandas.
- Appendix II includes species that, although not necessarily



The elephant-shaped CITES logo was first used at CoP3 in 1981. The original version, a simple black and white design, has since evolved to include species protected by CITES.

threatened with extinction, may become so without trade controls. Most CITES species are included in this appendix, including American ginseng, paddlefish, African lions, and many corals.

- Appendix III includes species protected by at least one country, which needs assistance from other Parties to regulate trade. Examples of species currently listed in Appendix III include map turtles, walrus, and Cape stag beetles.

Changes to Appendices I and II must be proposed at a Conference of the Parties (CoP) and agreed to by a two-thirds majority of the Parties present and voting at the CoP. Changes to Appendix III can be requested by individual Parties at any time.



Frank Kohn/USFWS

Delegations from the Parties meet at CoP15

What is the purpose of a CoP?

The Parties meet every two to three years at a CoP. During this 2-week meeting, they review and vote on:

1. Proposed resolutions and decisions to improve the effectiveness of CITES
2. Amendments to CITES Appendix I and Appendix II

They also work to resolve policy and implementation issues. Attendants include delegations from the Parties, representatives of the CITES Secretariat, and approved non-governmental and inter-governmental organizations (NGOs and IGOs), who attend as observers.

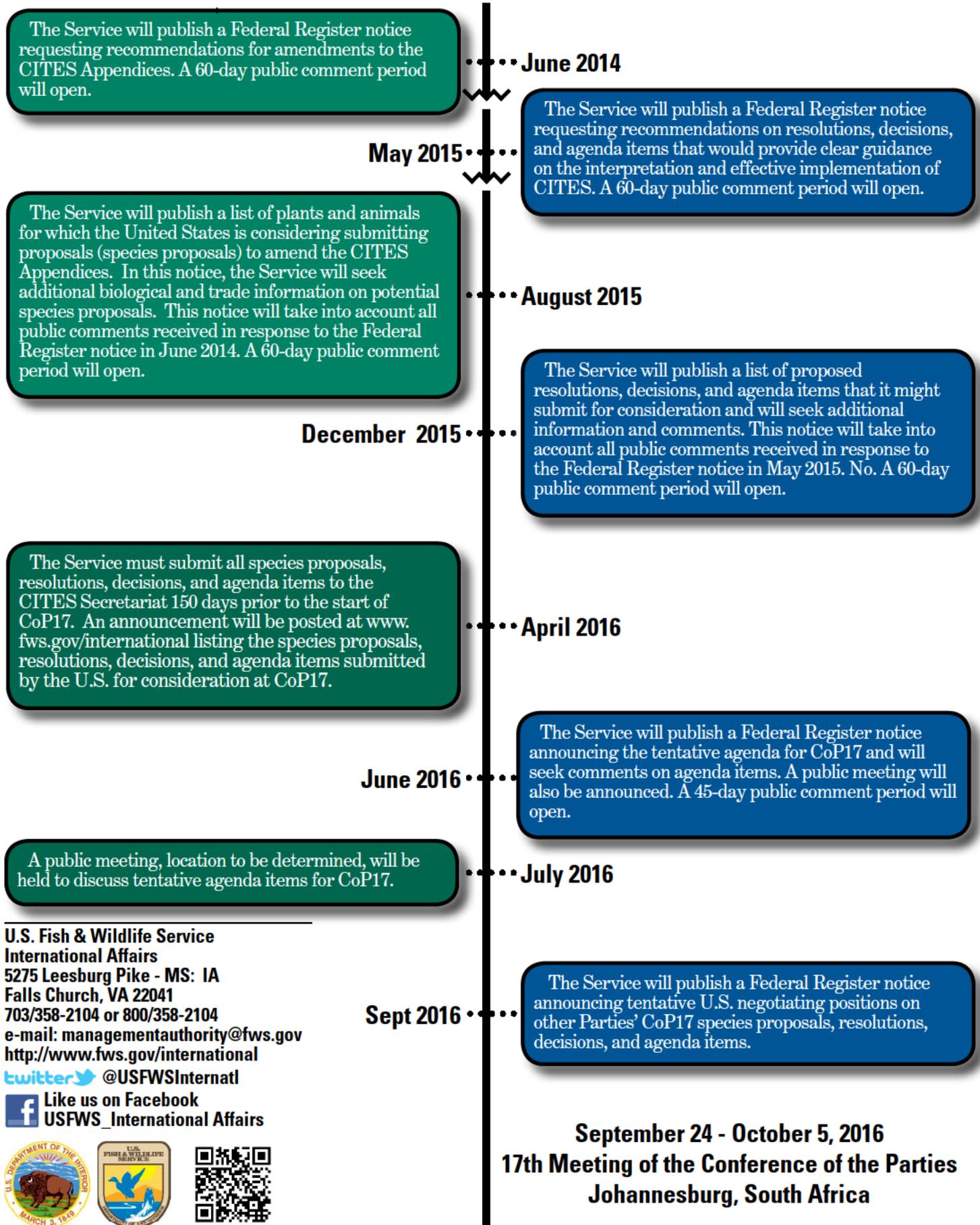
How is the United States preparing for CoP17?

The United States began to prepare for CoP17 almost immediately after CoP16 ended. The Department of the Interior and the U.S. Fish and Wildlife Service (the Service) lead the U.S. delegation to each CoP. All preparations for CoP17 are coordinated through the Service, in close consultation with the National Oceanic and Atmospheric Administration (NOAA), Department of State (DOS), U.S. Department of Agriculture Animal and Plant Health Inspection Service (APHIS), the Association of Fish and Wildlife Agencies (AFWA), and other government agencies.

The Service examines international trade and biological data for species that may warrant a change in their protection status under CITES. Through a series of Federal Register notices, website postings, and public meetings, the Service solicits public input, evaluates the public's recommendations, and prepares formal documents and negotiating positions for consideration at CoP17.

How does the public provide input for the United States to consider in drafting its submissions and negotiating positions for CoP17?

The Service solicits public input through a series of announcements, including Federal Register notices, website postings, and public meetings. Details on how to submit public comments are contained in each Federal Register notice. A tentative timeline for CoP17 preparations is:



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Lion and Elephant ESA Listings and the Permitting Process

- Lions (*Panthera leo melanochaita*) and African elephants (*Loxodonta africana*) are both listed as Threatened under the U.S. Endangered Species Act (ESA);
- Import of sport-hunted trophies requires an ESA permit, which can be issued if the Fish and Wildlife Service is able to make a finding that the sport-hunting activity enhances the survival of the species in the wild;
- For elephants, we currently have positive findings and allow the import of such trophies from South Africa and Namibia. We have negative findings for Tanzania and Zimbabwe for 2014 and 2015 and our reevaluating both countries for the 2016 and 2017 hunting seasons. We are completing findings for Mozambique and Zambia, where we do not currently have any finding in place;
- U.S. imports of sport-hunted elephant trophies in 2013: Botswana = 181; Namibia = 30; Tanzania = 34; South Africa = 60; Zambia = 5; Zimbabwe = 188;
- As of July 10, we have 55 permit applications for elephants taken in 2016 or 2017;
- For lions, we have a positive finding for “wild” and “wild-managed” lions from South Africa and a negative finding for “captive” lions for 2016. We are finalizing findings for South Africa for 2017-19 and for Tanzania, Zambia and Zimbabwe in July.
- U.S. imports of sport-hunted lion trophies in 2013: Burkino Faso = 3; Mozambique = 6; Namibia = 9; South Africa = 545 trophies; Tanzania = 3; Zambia = 17; Zimbabwe = 44 trophies.
- As of July 10, we have 66 pending permit applications for lions taken in 2016 or 2017.



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November 24, 2017

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***Re: Comments Opposing the Establishment of an International Wildlife
Conservation Council (Docket No. FWS-HQ-R-2017-N118)***

Dear Mr. Winchell and Chief Van Norman,

The Humane Society of the United States (“HSUS”), Humane Society International (“HSI”), Humane Society Legislative Fund (“HSLF”), and the twenty-two undersigned organizations strongly urge the U.S. Fish and Wildlife Service (“Service”) not to establish the euphemistically-named International Wildlife Conservation Council (“IWCC”), as establishing the IWCC as proposed would violate the Federal Advisory Committee Act (“FACA”, 5 U.S.C. App. 2) and would be arbitrary and capricious and not in accordance with law. *See* 82 Fed. Reg. 51,857 (Nov. 8, 2017).

The Service Proposes to Create a Duplicative and Biased Advisory Council

The Service is proposing to establish the IWCC for the purpose of “**increasing public awareness** domestically regarding the **conservation**, wildlife law enforcement, and **economic benefits that result from U.S. citizens traveling to foreign nations to engage in hunting**. Additionally, the Council shall **advise the Secretary on the benefits international hunting** has on foreign wildlife and habitat conservation, anti-poaching and illegal wildlife trafficking programs, and other ways in which international hunting benefits human populations in these areas.” *Id.* (emphasis added).

The duties of the IWCC would include:

- developing a plan for public engagement and education on the benefits of international hunting;
- reviewing and making recommendations for changes, when needed, on all Federal programs, and/or regulations, to ensure support of hunting as: (a) An enhancement to foreign wildlife conservation and survival, and (b) an effective tool to combat illegal trafficking and poaching;
- recommending strategies to benefit the U.S. Fish and Wildlife Service's permit office in receiving timely country data and information so as to remove barriers that impact consulting with range states;
- recommending removal of barriers to the importation into the United States of legally hunted wildlife;
- ongoing review of import suspension/bans and providing recommendations that seek to resume the legal trade of those items, where appropriate;
- reviewing seizure and forfeiture actions/practices, and providing recommendations for regulations that will lead to a reduction of unwarranted actions;
- reviewing the Endangered Species Act's foreign listed species and interaction with the Convention on International Trade in Endangered Species of Wild Flora and Fauna [*sic*], with the goal of eliminating regulatory duplications; and
- recommending methods for streamlining/expediting the process of import permits.

Id.

As detailed herein, the IWCC is unnecessary, duplicative, not in the public interest, and designed to be inappropriately influenced by the trophy hunting industry in a manner that undermines the Service's statutory duties under the Endangered Species Act (16 U.S.C. § 1531 *et seq.*) and FACA. Therefore, the IWCC cannot lawfully be established.

Requirements for Establishing a Federal Advisory Committee

The FACA provides that “new advisory committees should be established only when they are determined to be essential and their number should be kept to the minimum necessary.” 5 U.S.C. App. 2 § 2(b)(2). Further, “[n]o advisory committee shall be established unless such establishment is determined...to be in the public interest in connection with the performance of duties imposed on that agency by law.” *Id.* § 9(a)(2). Advisory committees can only be used “solely for advisory functions” (*id.* § 9(b)) and must serve a “clearly defined purpose” (*id.* § 5(b)(1)). The membership of an advisory committee must “be fairly balanced in terms of the points of view represented and the functions to be performed by the advisory committee” (*id.* § 5(b)(2)), and must “not be inappropriately influenced by... any special interest” (*id.* § 5(b)(3)). Agency actions contrary to the requirements of FACA are subject to judicial review under the Administrative Procedure Act (APA). *See, e.g., Fertilizer Institute v. U.S. E.P.A.*, 938 F.Supp. 52, 54-55 (D.D.C., 1996); 5 U.S.C. § 702. *See also Food Chem. News, Inc. v. Davis*, 378 F. Supp. 1048, 1049 (D.D.C. 1974) (enjoining agency from convening advisory committee meetings unless conducted in full compliance with FACA).

Establishing the IWCC Would Violate FACA

A. The IWCC Is Duplicative and Not Essential

The purpose of FACA is “to enhance the public accountability of advisory committees established by the Executive Branch and to reduce wasteful expenditures” that result only in “worthless committee meetings and biased proposals.” *Pub. Citizen v. U.S. Dep’t of Justice*, 491 U.S. 440, 453, 459 (1989). To this end, it is unlawful for FWS to establish an advisory committee that exceeds the minimum number of committees necessary or to establish a committee that is not needed to advance an agency’s statutory duties and regulatory agenda. *See* 5 U.S.C. App. 2 § 2(b)(2). The IWCC wholly fails to meet these standards – indeed, the IWCC raises the precise concerns that FACA was designed to guard against.

Notably, there already exists an advisory council entitled the Wildlife and Hunting Heritage Conservation Council (“WHHCC”), which has the authority to address the matters included in the IWCC’s proposed purview. *See* 75 Fed. Reg. 6,056 (Feb. 5, 2010); <https://www.fws.gov/whhcc/>. Like the IWCC, the WHHCC’s mission explicitly includes providing “advice on wildlife and habitat conservation endeavors that (1) **benefit recreational hunting**; (2) benefit wildlife resources; and (3) encourage partnerships among the public, the sporting conservation community, wildlife conservation groups, the States, Native American Tribes, and the Federal government.” 75 Fed. Reg. 6,056 (Feb. 5, 2010) (emphasis added). To achieve that goal of promoting recreational hunting, the WHHCC focuses in part on “Providing appropriate access to hunting and recreational shooting on Federal lands” and “Providing recommendations to improve implementation of Federal conservation programs that benefit wildlife, hunting and outdoor recreation on private lands.” *Id.* Consistent with these broad purposes, the WHHCC has multiple times discussed and formed recommendations on international trophy hunting issues.

For example, in July 2012, the WHHCC sent a letter to the Service on behalf of “millions of hunters and anglers nationwide, including many who hunt internationally and seek to import and export their trophies into and out of the United States.” (Attached). That letter included criticism of the process the Service uses to interpret and apply restrictions on the import and seizure of hunting trophies, and provided eight particular recommendations relating to “1) amendments to CITES resolutions and/or decision documents; 2) modifications to FWS manuals, policies, Directors’ Orders, guidance documents and/or practices; and 3) coordinating efforts with representative organizations of the international hunting community.” *Id.* Similarly, in July 2014, the WHHCC sent another letter to the Service, this time urging the Service to reverse its decision to suspend the import of elephant hunting trophies from Tanzania and Zimbabwe, noting the WHHCC’s “efforts on behalf of the hunting community.” (Attached). That latter letter followed a June 2014 meeting of the WHHCC where Safari Club International (“SCI”) presented “updates on African Lion and Elephant” trophy hunting.¹ At its March 2016 meeting, WHHCC again discussed the topic of international trophy hunting, specifically focusing on African lion import issues and including a presentation from SCI.² These are the precise tasks identified

¹<https://www.facadatabase.gov/committee/historymeeting.aspx?mid=123631&cid=2299&fy=2014>.

²<https://www.facadatabase.gov/committee/historymeetingdocuments.aspx?flr=135324&cid=2299&fy=2016>.

in the IWCC notice, demonstrating that there already exists a forum for trophy hunters to attempt to influence FWS policy on these matters.

Indeed, the WHCC currently includes members that represent international trophy hunting interests, such as the Congressional Sportsmen's Foundation.³ The WHCC also currently includes representatives from the Boone & Crockett Club, Backcountry Hunters & Anglers, Ducks Unlimited de Mexico, and Urban American Outdoors, many of whose members trophy hunt in the U.S.—and likely abroad. Further, the IWCC seeks representation from “the firearms or ammunition manufacturing industry,” but a representative from the National Shooting Sports Foundation – a national trade association for the firearms industry – already serves as a member of the WHCC. The incredibly slight differences in the membership these councils maintain/are seeking, demonstrate the duplicative nature of the IWCC.

Therefore, it would be wholly duplicative for the Service to establish the IWCC, whose proposed purpose and tasks are matters that can and are already being carried out by another advisory group.

Similarly, the Service has failed to demonstrate that establishing the IWCC is *essential*. For example, in 2013 the Service established a Wildlife Trafficking Advisory Council to combat issues of illicit wildlife trade and to improve enforcement of wildlife trade laws. 78 Fed. Reg. 45,555 (Jul. 29, 2013). That committee discussed issues of international trophy hunting as a type of wildlife trade.⁴ However, that advisory council was deemed inessential and discontinued pursuant to Executive Order No. 13811 (September 29, 2017).⁵ It is arbitrary and capricious for the Service to now establish the IWCC to take on activities that were previously covered by the Wildlife Trafficking Advisory Council, which was deemed unnecessary by this Administration. Further, the duplicative nature of the IWCC is further demonstrated by the fact that the IWCC would include a representative from the U.S. Department of State – the Presidential Task Force on Wildlife Trafficking established pursuant to Executive Order No. 13,648 (July 1, 2013) already provides a forum for the Service and the State Department to discuss issues of international wildlife trade, including trade in hunting trophies.

Thus, there are already multiple fora for detailed discussion of the issues the IWCC is tasked with providing advice to the Service on, meaning that establishing the IWCC is not essential, as required by law. This is especially true given the broader statutory context, as discussed further below – the Endangered Species Act already provides the opportunity for the trophy hunting industry to submit applications for import permits that demonstrate the alleged benefit of trophy hunting and to submit comments on other permit applications and foreign species listing petitions. *See* 16 U.S.C. § 1539(c). Thus, there is no functional need

³ *See, e.g.*, Congressional Sportsmen's Foundation. Press Release. Aug. 7, 2013. *Sportsmen's Priorities Moving in Congress* (supporting bill allowing import of polar bear trophies hunted in Canada), <http://sportsmenslink.org/the-media-room/news/sportsmens-priorities-moving-in-congress>.

⁴ *See* <https://www.fws.gov/International/advisory-council-wildlife-trafficking/pdf/acwt-meeting-minutes-march-20.pdf>.

⁵ *See* <https://www.whitehouse.gov/the-press-office/2017/09/29/presidential-executive-order-continuance-certain-federal-advisory>.

for an advisory committee dedicated to promoting propaganda of the trophy hunting industry.

Because the IWCC is per se inessential and duplicative, chartering the IWCC would violate FACA.

B. The IWCC Is Not in the Public Interest

Chartering the IWCC would further violate FACA because its purpose is inconsistent with the public interest and the “performance of duties imposed on [the Service] by law.” 5 U.S.C. App. § 9(a)(2).

The primary stated purpose of the IWCC is to *promote* trophy hunting of foreign species and to relax the legal restrictions for importing trophies of threatened and endangered species, accepting as incontrovertible fact the notion that trophy hunting promotes the conservation of wildlife species. However, this is a highly controversial and hotly debated topic, with ample scientific evidence to the contrary, and the notice of IWCC creation patently reveals the biased and unsupported positions that the council would advance.

The FACA was specifically adopted to avoid such a circumstance. *See, e.g., Moss v. C.A.B.*, 430 F.2d 891, 893 (1970) (when the “subject matter of” a FACA council’s “involve[s] serious and much-debated...issues...[t]he Government’s consideration of such sensitive issues must not be unduly weighted by input from the private commercial sector, lest the Government fall victim to the devastating harm of being regulated by those whom the Government is supposed to regulate in the public interest.”); H.R. REP. 92-1017, 1972 U.S.C.C.A.N. 3491, 3496 (“One of the great dangers in th[e] unregulated use of advisory committees is that special interest groups may use their membership on such bodies to promote their private concerns. Testimony received [on the passage of the FACA] pointed out the danger of allowing special interest groups to exercise undue influence upon the Government through the dominance of advisory committees which deal with matters in which they have vested interests.”).

Thus, forming the IWCC as proposed would be unlawful.

1. Trophy hunting undermines conservation efforts

As detailed in numerous documents in the Service’s possession (*e.g.*, petitions to list African lions, elephants, and leopards as endangered under the ESA; letters submitted with respect to the import of lions and elephants from Tanzania, Zimbabwe, Zambia, and South Africa, as well as the expert declarations in support thereof; and comments opposing the import of endangered bontebok, cape mountain zebra, and black rhinoceros trophies, attached), there is ample scientific evidence that trophy hunting of threatened and endangered species does not in fact enhance the survival of the species in the wild. With respect to three of the so-called “Big Five” species targeted by trophy hunters, a summary of that evidence is as follows.

Trophy Hunting of African Lions

With the world's preeminent lion scientist as the lead author, Packer et al. (2009)⁶ and Packer et al. (2010)⁷ identify trophy hunting as the likely cause of multiple lion population declines in Africa.⁸ In addition to direct population reduction through lethal take, trophy hunting poses a threat to lions because it can weaken a population's genetic constitution (e.g. Allendorf et al. 2008⁹). Because hunters target the biggest and strongest males, trophy hunting removes these animals from the breeding pool and unnaturally selects for smaller or weaker animals (Allendorf and Hard, 2009¹⁰). In this way, trophy hunting can decrease genetic variation, shift the population structure, and cause unnatural evolutionary impacts. This effect has already been documented in other species. For example, selective hunting likely increased the occurrence of mature female African elephants (*Loxodonta africana*) lacking tusks from 10% to 38% in parts of Zambia over 20 years (Jachmann et al. 1995¹¹), and recent studies of bighorn sheep suggest that horn size and body weight decreased over time as a result of trophy hunting (e.g. Coltman et al., 2003¹²; Festa-Bianchet et al., 2013¹³). Further, when trophy hunting is sanctioned, poaching activity increases, likely due to the perception that species authorized for hunting are of diminished value and the perception that legal killing increases the acceptability of poaching.¹⁴ Moreover, trophy hunting of lions has cascading lethal impacts on lion populations, as the social instability created by removing dominant males leads to infanticide of cubs sired by the male killed for a trophy (Packer et al. 2009).

⁶ Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L., and Nowell, K. (2009). Sport Hunting, Predator Control and Conservation of Large Carnivores. *PLoS ONE*, 4(6): e5941. DOI:10.1371/journal.pone.0005941

⁷ Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., and Caro, T. (2010) Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology*, 25, 142–153.

⁸ See also Bauer H, Henschel P, Packer C, Sillero-Zubiri C, Chardonnet B, Sogbohossou EA, et al. (2017) Lion trophy hunting in West Africa: A response to Bouché et al. *PLoS ONE*12(3): e0173691. <https://doi.org/10.1371/journal.pone.0173691>.

⁹ Allendorf, F.W., England, P.R., Luikart, G., Ritchie, P.A., and Ryman, N. (2008). Genetic effects of harvest on wild animal populations. *Trends in Ecology and Evolution*, 23, 327-337. doi:10.1016/j.tree.2008.02.008

¹⁰ Allendorf, F.W. and Hard, J.J. (2009). Human-induced evolution caused by unnatural selection through harvest of wild animals. *Proceedings of the National Academy of Sciences of the United States of America*, 106, 9987-9994. See also Coltman, D. W., et al. (2003). Undesirable evolutionary consequences of trophy hunting. *Nature* 426(6967): 655-658.; Palazy, L., et al. (2012). Rarity, trophy hunting and ungulates. *Animal Conservation* 15(1): 4-11.; Darimont, C. T., et al. (2015). The unique ecology of human predators. *Science* 349(6250): 858-860.

¹¹ Jachmann, H., Berry, P.S.M., and Imae, H. (1995). Tuskslessness in African Elephants: a future trend. *African Journal of Ecology*, 33, 230-235. DOI: 10.1111/j.1365-2028.1995.tb00800.x

¹² Coltman, D.W., O'Donoghue, P., Jorgenson, J.T., Hogg, J.T., Strobeck, C., and Festa-Bianchet, M. (2003). Undesirable evolutionary consequences of trophy hunting. *Nature*, 426, 655-658. doi:10.1038/nature02177

¹³ Festa-Bianchet, M., Pelletier, F., Jorgenson, J.T., Feder, C., and Hubbs, A. (2013). Decrease in Horn Size and Increase in Age of Trophy Sheep in Alberta Over 37 Years. *Journal of Wildlife Management*, 78, 133-141.

¹⁴ Chapron, G. and Treves, A., *Blood does not buy goodwill: allowing culling increases poaching of a large carnivore*, Proc. R. Soc. B 283 (2016), <http://dx.doi.org/10.1098/rspb.2015.2939>.

Lion scientists have produced a steady drumbeat of warnings that trophy hunting across African range states is unsustainable and is a threat to survival of the species:

African Continent:

- Rosenblatt (2014)¹⁵: “...overharvesting of lions has been well-documented throughout Africa”, recognize trophy hunting as one of the reasons for the decline of the lion throughout its range.
- Hunter et al. (2014)¹⁶: “there is considerable scientific evidence of negative population impacts associated with poorly-managed trophy hunting of lions.” The authors state “there have been documented negative impact on lion populations resulting from trophy hunting” and call for lion trophy hunting reform.
- Lindsey et al. (2013)¹⁷ stated that, regarding the recent decline of lion populations, “Most of the factors that contribute to this decline are now well understood, although evidence of the impacts of trophy hunting on lions has only emerged relatively recently.” The authors also state, “lion quotas remain higher than the 0.5/1,000 km² recommended by [Packer et al. (2011)] in all countries except Mozambique” and “in all countries where data are available, harvests appear too high in a proportion of hunting blocks.”

Zambia:

- Rosenblatt et al. (2014): found a declining lion population in South Luangwa National Park with low recruitment, low sub-adult and adult survivorship, depletion of adult males and an aging adult female population and attributed this to the “severe male depletion” caused by trophy hunting.
- Lindsey et al. (2014)¹⁸: numerous problems identified with trophy hunting in Zambia including that the Zambia Wildlife Authority establishes trophy quotas arbitrarily and “quotas of lions have been particularly excessive”.
- Lindsey et al. (2013): “Excessive offtake from trophy hunting also lowered population density of lions and altered sex-ratios of lions in Hwange National Park, Zimbabwe, South Luangwa, Kafue and Lower Zambezi national parks in Zambia, and the Bénoué Complex in Cameroon.” The authors also said that mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Zambia.

Tanzania:

- Dolrenry et al. (2014)¹⁹: populations in Tanzania are declining in part due to “overexploitation due to poor management of trophy hunting”.

¹⁵ Rosenblatt, E., Becker, M. S., Creel, S., Droge, E., Mweetwa, T., Schuette, P. A., & Mwape, H. (2014). Detecting declines of apex carnivores and evaluating their causes: An example with Zambian lions. *Biological Conservation*, 180, 176-186.

¹⁶ Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H. ...White, P., Whitman-Gelatt, K. (2014). Urgent and comprehensive reform of trophy hunting of lions is a better option than an endangered listing; a science-based consensus [sic]. Unpublished.

¹⁷ Lindsey, P. A., Balme, G. A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013). The trophy hunting of African lions: Scale, current management practices and factors undermining sustainability. *PloS one*, 8(9), e73808.

¹⁸ Lindsey, P. A., Nyirenda, V. R., Barnes, J. I., Becker, M. S., McRobb, R., Tambling, C. J., ... & t'Sas-Rolfes, M. (2014). Underperformance of African Protected Area Networks and the Case for New Conservation Models: Insights from Zambia. *PloS one*, 9(5), e94109.

- Lindsey et al. (2013): “Trophy hunting has contributed to population declines outside (and inside some) protected areas in Tanzania, a country that holds between 30-50% of Africa’s lion.”

Zimbabwe:

- Groom et al. (2014)²⁰: the low densities of lion populations in Gonarezhou National Park and trophy hunting concessions in Tuli are due to the collapse of these populations in the past due to “unsustainably high trophy hunting within Tuli and in the concessions around Gonarezhou ...” The authors concluded, “hunting has probably had a strong negative effect on lion abundance in both reserves.”
- Lindsey et al. (2013): “Excessive offtake from trophy hunting also lowered population density of lions and altered sex-ratios of lions in Hwange National Park, Zimbabwe, South Luangwa, Kafue and Lower Zambezi national parks in Zambia, and the Bénoué Complex in Cameroon.”
- Lindsey et al. (2013): mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Zimbabwe.

Namibia:

- Lindsey et al. (2013): mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Namibia.

Cameroon:

- Lindsey et al. (2013): “Excessive offtake from trophy hunting also lowered population density of lions and altered sex-ratios of lions in Hwange National Park, Zimbabwe, South Luangwa, Kafue and Lower Zambezi national parks in Zambia, and the Bénoué Complex in Cameroon.”

Burkina Faso:

- Lindsey et al. (2013): mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Burkina Faso.

Benin:

- Sogbohossou et al. (2014)²¹: the low lion density and small group size found in Pendjari Biosphere Reserve in Benin is due to human disturbance and mortality through trophy hunting, the Pendjari lion hunting quota is three times higher than recommended by Packer et al. (2011), and the existing age limit for ‘old males’ is not enforced.

Trophy Hunting of African Elephants

Similarly, trophy hunting is documented to undermine the conservation of African elephants. As explained in a recent scientific study, range states from which the Service

¹⁹ S. Dolrenry, J. Stenglein, L. Hazzah, R.S. Lutz, and L. Frank (2014). A metapopulation approach to African lion (*Panthera leo*) conservation. Plos One 9 (2), e88081.

²⁰ R.J. Groom, P.J. Funston and R. Mandisodza (2014). Surveys of lions *Panthera leo* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx 2014: 1-9.

²¹ Sogbohossou, E. A., Bauer, H., Loveridge, A., Funston, P. J., De Snoo, G. R., Sinsin, B., & De Iongh, H. H. (2014). Social Structure of Lions (*Panthera leo*) Is Affected by Management in Pendjari Biosphere Reserve, Benin. *PloS one*, 9(1), e84674.

currently allows trophy imports (such as South Africa) may be setting unsustainably high hunting quotas: in the Greater Mapungubwe Transfrontier Conservation Area scientists found that, in contrast to current hunting allowances, “only a small number of bulls (<10/year) could be hunted sustainably. At current rates of hunting, under average ecological conditions, trophy bulls will disappear from the population in less than 10 years.”²²

Researchers have found that the selective nature of trophy hunting causes changes in desirable phenotypic traits in harvested species. In particular, trophy sizes for wild herbivores experienced temporal decline in South Africa and Tanzania. “Declines in trophy size over time due to selective harvesting could be attributed to phenotypic plasticity that may result due to a decline in abundance of big tuskers and individuals with big horns or tusks as these are mostly selected by hunters.”²³ Again, because hunters target the biggest and strongest male elephants, trophy hunting removes these animals from the breeding pool and unnaturally selects for smaller or weaker animals.²⁴ In this way, trophy hunting can decrease genetic variation, shift the population structure, and cause unnatural evolutionary impacts. For example, selective hunting likely increased the occurrence of mature female African elephants (*Loxodonta africana*) lacking tusks from 10% to 38% in parts of Zambia over 20 years.²⁵ Additionally, trophy hunting has been shown to disrupt family groups and social stability, negatively impacting elephant survival.²⁶

Another study reviewed the functioning of Zambia’s protected areas and game management areas (GMAs), where trophy hunting occurs.²⁷ The authors found numerous problems that pertain to management of trophy hunting in GMAs including: uncontrolled human immigration and open access to wildlife; the Zambia Wildlife Authority (ZAWA) retains most of income derived from trophy hunting, little of this income goes to people living in GMAs with affluent community members benefiting most, and there are frequent financial

²² S. Selier et al. (2014), Sustainability of elephant hunting across international borders in southern Africa: A case study of the greater Mapungubwe Transfrontier Conservation Area. *The Journal of Wildlife Management*, 78: 122–132.

http://www.researchgate.net/publication/259539652_Sustainability_of_elephant_hunting_across_international_borders_in_southern_Africa_A_case_study_of_the_greater_Mapungubwe_Transfrontier_Conservation_Area.

²³ Muposhi VK, Gandiwa E, Bartels P, Makuza SM, Madiri TH, *Trophy Hunting and Sustainability: Temporal Dynamics in Trophy Quality and Harvesting Patterns of Wild Herbivores in a Tropical Semi-Arid Savanna Ecosystem*, *PLoS ONE* 11(10) (2016), <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0164429>.

²⁴ Allendorf, F.W. and Hard, J.J. (2009). Human-induced evolution caused by unnatural selection through harvest of wild animals. *Proceedings of the National Academy of Sciences of the United States of America*, 106, 9987-9994.

²⁵ Jachmann, H., Berry, P.S.M., and Imae, H. (1995). Tuskllessness in African Elephants: a future trend. *African Journal of Ecology*, 33, 230-235. DOI: 10.1111/j.1365-2028.1995.tb00800.x

²⁶ Milner J.M., Nielsen E.B., Andreassen HP, *Demographic side effects of selective hunting in ungulates and carnivores*, *Conservation Biology* Vol. 21:36-47 (2007), doi: 10.1111/j.1523-1739.2006.00591.x (“Such selective harvesting can destabilize social structures and the dominance hierarchy and may cause loss of social knowledge, sexually selected infanticide, habitat changes among reproductive females, and changes in offspring sex ratio.”)

²⁷ Lindsey, P. A., Nyirenda, V. R., Barnes, J. I., Becker, M. S., McRobb, R., Tambling, C. J., ... & t’Sas-Rolfes, M. (2014). Underperformance of African Protected Area Networks and the Case for New Conservation Models: Insights from Zambia. *PLoS one*, 9(5), e94109.

irregularities associated with the distribution of this income; scouts employed in anti-poaching in GMAs are poorly and irregularly paid, insufficiently trained and equipped, and inadequate in number; ZAWA is poorly funded, has an inadequate number of staff to protect elephants against poaching, has increased hunting quotas to unsustainable levels in GMAs in order to raise money (the authors state that ZAWA ‘are sometimes forced to make decisions to achieve financial survival at the expense of the wildlife they are mandated to conserve’), establishes trophy quotas arbitrarily, and does not monitor wildlife populations or trophies; and hunting concession agreements are not effectively enforced and unscrupulous concession operators are not adequately punished. The authors blame these many failures for the low numbers and diversity of wildlife, including elephants.

Thus, it is not surprising that elephant densities are lower in trophy hunting areas compared to a national park where trophy hunting is not permitted.²⁸ The Service itself acknowledged such impacts in 2014 when it suspended the issuance of elephant trophy imports from Tanzania and Zimbabwe.²⁹

The Service has previously rejected attempts to import trophies from Zambia due to similar concerns of mismanagement including inconsistencies in reported elephant population estimates, failure to comply with monitoring requirements, absence of government funding for elephant protection, and lack of effective anti-poaching measures.³⁰ Further, the Service has not made enhancement findings for elephant trophy imports from either Mozambique or Cameroon even though elephant trophy hunting is allowed there.³¹

Trophy Hunting of African Leopards

Balme et al. (2010)³² demonstrated the impact of trophy hunting on infanticide in a population of leopards in South Africa; high trophy hunting offtake resulted in particularly high male leopard mortality and high levels of male turnover; females cannot successfully raise cubs because of immigration into the population of new males; the consequences were low cub survival rates, delayed age at first parturition, reduced conception rates, and low annual litter production; the combined impact of high mortality and low reproductive

²⁸ Crosmary, W. G., S. D. Cote, and H. Fritz. (2015). Does trophy hunting matter to long-term population trends in African herbivores of different dietary guilds?. *Animal Conservation*, 18, 117-130.

²⁹ See 80 Fed. Reg. 42524 (July 17, 2015); 79 Fed. Reg. 44459 (July 31, 2014) (“Without management plans with specific goals and actions that are measurable and reports on the progress of meeting these goals, the Service cannot determine if...Zimbabwe is implementing, on a national scale, appropriate management measures for its elephant populations.”). Note that the Service’s November 2017 decision to reverse this suspension was put “on hold” by President Trump and Secretary Zinke on November 17, 2017.

³⁰ See *Marcum v. Salazar*, 810 F.Supp.2d 56, 63 (D.D.C. 2011); *Marcum v. Salazar*, 694 F.3d 123 (D.C.Cir. 2012). Note that the Service’s November 2017 decision to allow elephant trophy imports from Zambia was put “on hold” by President Trump and Secretary Zinke on November 17, 2017.

³¹ See <https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies-elephants.html>.

³² Balme, G.A., Hunter, L.T., Goodman, P., Ferguson, H., Craigie, J. and Slotow, R., 2010. An adaptive management approach to trophy hunting of leopards *Panthera pardus*: a case study from KwaZulu-Natal, South Africa. *Biology and conservation of wild felids*. Oxford University Press, Oxford, pp.341-352. See also Brackowski, A. R., et al. (2015). Who Bites the Bullet First? The Susceptibility of Leopards *Panthera pardus* to Trophy Hunting. *PLOS ONE* 10(4).

output led to a negative population growth rate. Further, the 2016 IUCN assessment for *Panthera pardus* specifically notes that “concern about unsustainable trophy hunting has lately increased” and cites studies concretely demonstrating that “trophy hunting was a key driver of Leopard population decline” (Stein et al. 2016).³³

Moreover, few of the potential benefits from hunting are consistently realized by local communities that live amongst lions, elephants, leopards, and other species targeted by trophy hunters. According to an IUCN analysis from 2009, big-game hunting only provided one job for every 10,000 inhabitants in the area studied,³⁴ and many of these jobs were temporary seasonal positions like opening the trails at the start of the hunting season (IUCN 2009³⁵). Trophy hunting fails to create a significant number of permanent jobs (and those that it does create do not automatically benefit conservation), but ecotourism offers a possible solution. Consider the Okavango in Botswana where, as of 2009, a safari ecotourism tourism park provided 39 times the number of jobs than would big-game hunting on an area of equal size (IUCN 2009). Another example is the Luangwa National Park in Zambia, which produced twice the number of jobs provided by Benin and Burkina Faso’s trophy hunting sector combined in 2007 (IUCN 2009).

The IUCN also found that Africa’s 11 main big-game hunting countries only contributed an average of 0.6% to the national GDP as of 2009 (IUCN 2009). Of this marginal profit, studies suggest that as little as 3-5% of trophy hunting revenues are actually shared with local communities (Economists at Large 2013³⁶; IUCN 2009; Sachedina 2008³⁷). Perhaps because of this, locals do not always view trophy hunting as the positive economic driver that hunting advocates portray it as. For example, villagers in Emboreet village in Tanzania characterized hunting as “destructive, exploitative, and disempowering,” and blame hunting for jeopardizing village revenues (Sachedina 2008). The same study presents an interview with the Village Executive Officer, who explained that villagers feel more closely partnered with photographic tour operators than with hunters because hunters “are finishing off the wildlife before we’ve had a chance to realize a profit from it,” and because villagers never see the 5% of revenue they are supposed to receive from trophy hunting (Sachedina 2008).

A 2017 report from Economists at Large³⁸ found that in Botswana (where trophy hunting is now prohibited since 2014), Ethiopia, Mozambique, Namibia, South Africa, Tanzania,

³³ Stein, A.B., Athreya, V., Gerngross, P., Balme, G., Henschel, P., Karanth, U., Miquelle, D., Rostro, S., Kamler, J.F. and Laguardia, A. 2016. *Panthera pardus*. The IUCN Red List of Threatened Species 2016: e.T15954A50659089. Downloaded on 11 July 2016. <http://www.iucnredlist.org/details/full/15954/0>

³⁴ South Africa, Namibia, Tanzania, Botswana, Cameroon, Central African Republic, Burkina, and Benin.

³⁵ IUCN. (2009). Programme Afrique Centrale et Occidentale. Big Game Hunting in West Africa. What is its contribution to conservation?

³⁶ Economists at Large. (2013). The \$200 million question: How much does trophy hunting really contribute to African communities? A report for the African Lion Coalition, prepared by Economists at Large, Melbourne, Australia.

³⁷ Sachedina, H.T. 2008. “Wildlife Is Our Oil: Conservation, Livelihoods and NGOs in the Tarangire Ecosystem, Tanzania.” University of Oxford. PhD. Thesis.

³⁸ Economists at Large. (2017). The Lion’s Share? On The Economic Benefits Of Trophy Hunting. A report for the Humane Society International, prepared by Economists at Large, Melbourne,

Zambia and Zimbabwe, trophy hunting brings in less than \$132 million in tourism spending to the eight study countries out of \$17 billion annual tourism spending, or just 0.78 percent. And trophy hunting has only a marginal impact on employment in these eight countries, contributing only between 7,500-15,500 jobs or 0.76 percent or less of nearly 2.6 million overall tourism jobs.

On average, American trophy hunters import more than 126,000 trophies every year.³⁹ While not all of these species are protected under the U.S. Endangered Species Act, it is an unfounded and sweeping generalization to assert that trophy hunting always provides a biological or economic benefit to the conservation of the species, as asserted in the IWCC notice. Therefore, an advisory council designed solely to *educate* the public on the *benefits* of trophy hunting is not in the public interest, as those alleged benefits are not supported by the best available science. Nor is that conclusion supported by the American public – indeed, in the last week alone, over 435,121 members of the public have voiced their opposition to American trophy hunters killing African lions and elephants threatened with extinction, and nearly 2 million people worldwide have taken action in opposition to elephant trophy hunting in another call to action.⁴⁰

2. Using taxpayer dollars to promote the commercial interests of trophy hunting industry is not in the public interest

The purpose of the FACA is “to eliminate useless advisory committees, strengthen independence of remaining advisory committees, and prevent advisory groups from becoming self-serving.” *Consumers Union of U.S., Inc. v. Department of Health, Ed. and Welfare*, 409 F.Supp. 473, affirmed 551 F.2d 466 (D.D.C.1976). Establishing the IWCC would require the Service to expend resources on convening and participating in the council, unnecessarily diverting resources from an already strapped agency. Indeed, the Fiscal Year 2018 budget proposes to decrease funds spent on foreign species protection by \$1,000,000.⁴¹ To use precious agency resources to create a self-serving platform for trophy hunters to amplify their voice, especially while funds are already provided for other FACA advisory committees addressing these same topics, does not meet the FACA requirements for actions in the public interest.

Therefore, the IWCC is not in the public interest and cannot be lawfully chartered.

C. The IWCC Is Designed to Undermine the Implementation of the ESA and the Service’s Other Legal Obligations

The IWCC represents an effort by a commercial industry to undermine the statutory duties of an agency, and as such the establishment of the IWCC would be patently *ultra vires*.

Australia.

³⁹ http://www.hsi.org/assets/pdfs/report_trophy_hunting_by_the.pdf;
<http://www.hsi.org/assets/pdfs/trophy-madness-report.pdf>;
http://www.ifaw.org/sites/default/files/IFAW_TrophyHuntingReport_UK_v2.pdf.

⁴⁰ <https://www.thepetitionsite.com/takeaction/721/417/558/>;
https://secure.avaaz.org/campaign/fr/trump_vs_elephants/.

⁴¹ <https://www.fws.gov/budget/2018/FY2018-FWS-Greenbook.pdf>

As an initial matter (and to be discussed further in comments submitted on or before December 8, 2017), the proposed makeup of the IWCC is inherently biased – it would include up to eighteen members who represent “Wildlife and habitat conservation/management organizations; U.S. hunters actively engaged in international and/or domestic hunting conservation; The firearms or ammunition manufacturing industry; Archery and/or hunting sports industry; and Tourism, outfitter, and/or guide industries related to international hunting.” There is no suggestion that objective conservation biologists will be invited to have a roll on this committee that would make recommendations on the management of threatened and endangered species. Indeed, even the reference to participation by conservation and management organizations is so vague that it could even include biased groups like Safari Club International/Safari Club International Foundation or the National Rifle Association, groups that have filed lawsuits against the Service to assert the interests they now seek to address via the IWCC.

The IWCC is inherently designed to allow the trophy hunting industry to have an amplified voice, with an air of formality, on the question of whether killing threatened and endangered species enhances the survival of the species as required under the Endangered Species Act. 16 U.S.C. § 1539(a)(1)(A); 50 C.F.R. § 17.40. Specifically, the IWCC would be charged with:

- recommending removal of barriers to the importation into the United States of legally hunted wildlife;
- ongoing review of import suspension/bans and providing recommendations that seek to resume the legal trade of those items, where appropriate;
- reviewing seizure and forfeiture actions/practices, and providing recommendations for regulations that will lead to a reduction of unwarranted actions;
- reviewing the Endangered Species Act's foreign listed species and interaction with the Convention on International Trade in Endangered Species of Wild Flora and Fauna [*sic*], with the goal of eliminating regulatory duplications; and
- recommending methods for streamlining/expediting the process of import permits.”

The ESA mandates that the Service itself make enhancement findings and determine whether listing a species is warranted, and these are not tasks that can be delegated to the regulated industry. 16 U.S.C. §§ 1533, 1539. Indeed, even without the creation of the IWCC the trophy hunting industry has had undue influence on such decisions of the Service, as evidenced by the fact that Safari Club International announced the recent decisions to allow elephant trophy imports from Zimbabwe and Zambia before such findings were even announced by the Service⁴² (and before such announcements were called into question by the President).⁴³

The IWCC would also apparently take on “recommending strategies to benefit the U.S. Fish and Wildlife Service's permit office in receiving timely country data and information so as to remove barriers that impact consulting with range states.” But it would be inappropriate

⁴² <https://www.safariclub.org/detail/news/2017/11/14/u.s.-now-allows-elephants-from-zimbabwe-zambia-to-be-imported?from=groupmessage&isappinstalled=0>

⁴³ Statement of President Trump, Nov. 17, 2017 at 8:47 pm, <https://twitter.com/realDonaldTrump/status/931685146415255552>; Statement of President Trump, Nov. 19, 2017 at 6:57 pm, <https://twitter.com/realDonaldTrump/status/932397369655808001>.

for such bilateral governmental discussions to be mediated by a third party with a financial stake in affecting the outcome of those communications. It is clear that the trophy hunting industry is aiming to minimize the impact of the ESA (indeed, they are currently arguing both in federal court⁴⁴ and before Congress that the ESA should add no more protections than what exists under CITES, even though that treaty explicitly calls for member countries to adopt national measures⁴⁵). The IWCC would give the regulated industry a special seat at the table, to the disadvantage of conservation and animal protection groups seeking to prevent species extinction in furtherance of the statutory mandate of the ESA.

With the establishment of the ESA, Congress created “a program for the conservation of such endangered species and threatened species” and mandated federal agencies to “utilize their authorities in furtherance of the purposes of” the ESA by committing “to conserve to the extent practicable the various species of fish or wildlife and plants facing extinction . . .” 16 U.S.C. § 1531(a)(4), (b), (c)(1). The ESA defines the term “conserve” to mean “to use all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to [the Act] are no longer necessary.” 16 U.S.C. § 1532(3). It is critical that any decisions to list species or allow imports of listed species are made based on the best available science, not pursuant to the commercial interests of the trophy hunting industry as envisioned by the IWCC.

Likewise, the IWCC would be charged with reviewing ESA listed and CITES listed species. Again, the criteria for listing species (or delisting them as the case may be) in either arena are specifically inscribed. Under the ESA, species listings/delisting are reviewed using five factors and decisions are made “solely on the basis of the best scientific and commercial data,” 16 U.S.C. § 1533(b)(1)(A), and CITES uses the best information available and specific biological criteria and reliance upon the precautionary principle that the Parties to CITES act in “best interest of the conservation of the species.” Res. Conf. 9.24 (Rev'd CoP17). Consideration of species listing proposals is done through a public process and by the agency, a FACA committee is unnecessary and risks abdicating the Service's responsibilities.

Equally concerning, is the IWCC delineated duty to “review[] seizure and forfeiture actions/practices.” 82 Fed. Reg. at 51,858. Seizure and forfeiture actions are entirely within the Service's prosecutorial discretion – an arena in which courts generally do not tread. See *Heckler v. Chaney*, 470 U.S. 821 (1985) (finding agencies have unreviewable prosecutorial discretion unless a statute or agency policy says otherwise). It is difficult to imagine how a FACA committee could “review” what a federal court may not.

⁴⁴ *SCI et al. v. Zinke*, Case No. 1:14-cv-00670-RCL (D.D.C. 2017).

⁴⁵ This international law sets the floor, expressly providing that parties may adopt “stricter domestic measures” for species covered by CITES (as well as those that are not). CITES, Art. XIV, para. 1. See also FWS, *Ensuring the Future of the Black Rhino* (Nov. 25, 2014), at <http://www.fws.gov/news/blog/index.cfm/2014/11/25/Ensuring-the-Future-of-the-Black-Rhino> (acknowledging that the ESA enhancement standard is in addition to the CITES non-detriment standard and that trophy import permits should only be issued if the Service finds “that the [animal] is taken as part of a well-managed conservation program that contributes to the long-term survival of the species”).

Therefore, the establishment of the IWCC is not in accordance with either the FACA or the ESA and must not be finalized. If the IWCC is finalized, HSUS, HSI, and one or more of the undersigned organizations will consider seeking legal review of this unlawful agency action. We will submit separate comments on the composition of the IWCC on or before December 8, 2017.

Sincerely,



Anna Frostic
Managing Attorney, Wildlife Litigation
The Humane Society of the United States



Teresa M. Telecky, Ph.D.
Senior Director, Wildlife Department
Humane Society International



Keisha Sedlacek
Senior Regulatory Specialist, Federal Affairs
Humane Society Legislative Fund

On behalf of the following organizations:

Animal Defenders International
Animal Welfare Institute
Animals Asia Foundation
Annamiticus
Big Cat Rescue
Center for Biological Diversity
Cetacean Society International
EMS Foundation
Environmental Investigation Agency
Fondation Brigitte Bardot
FOUR PAWS International
Japan Tiger and Elephant Fund
Lilongwe Wildlife Trust
Natural Resources Defense Council
One More Generation
Pegasus Foundation
Pettus Crowe Foundation
Pro Wildlife
Rainbow Eco-Farm and Training Center (South Africa)
Shark Research Institute
The Pan African Sanctuary Alliance
World Animal Protection

RECALLING that Resolution Conf. 9.24 (Rev. CoP17), adopted by the Conference of the Parties at its ninth meeting (Fort Lauderdale, 1994), recommended that the text and the Annexes of that Resolution be fully reviewed before the 12th meeting of the Conference of the Parties with regard to the scientific validity of the criteria, definitions, notes and guidelines, and to their applicability to different groups of organisms;

RECALLING that, at its 12th meeting (Santiago, 2002), the Conference of the Parties approved procedures for this review, laid down in Decision 12.97¹;

CONSIDERING the fundamental principles in paragraphs 1 and 2 of Article II of the Convention, which specify the species to be included in Appendices I and II;

RECOGNIZING that, to qualify for inclusion in Appendix I, a species must meet biological and trade criteria;

RECALLING that Article II, paragraph 2 (a), provides for the inclusion of species that may become threatened with extinction in Appendix II, in order to avoid utilization incompatible with their survival;

RECOGNIZING that, for the proper implementation of this provision, it is necessary to adopt appropriate criteria, considering both biological and trade factors;

RECALLING that Article II, paragraph 2 (b), provides only for the inclusion in Appendix II of species that must be subject to regulation in order that trade in specimens of certain species included in Appendix II in accordance with Article II, paragraph 2 (a), may be brought under effective control;

CONSIDERING, however, that this provision should also apply where there is a need to bring trade in specimens of species included in Appendix I under effective control;

RECOGNIZING that the range States of a species subject to an amendment proposal should be consulted by the proponent, or on its behalf by the Secretariat, in accordance with the relevant Resolutions of the Conference of the Parties, and that all Parties shall be consulted by the Secretariat in accordance with Article XV, paragraph 1 (a), of the Convention;

RECOGNIZING further that, in accordance with the same Article, the Secretariat shall consult intergovernmental bodies having a function in relation to marine species;

CONSIDERING that the Secretariat should also consult other intergovernmental bodies having a function in relation to any species subject to a proposal for amendment;

RECALLING that the international trade in all wild fauna and flora is under the purview of the Convention;

EMPHASIZING the importance of Resolution Conf. 3.4 on *Technical cooperation*, adopted by the Conference of the Parties at its third meeting (New Delhi, 1981), regarding the need to provide technical assistance to developing countries in matters relating to the Convention, and specifically in the application of the criteria for amendment of Appendices I and II;

* Amended at the 12th, 13th, 14th and 15th meetings of the Conference of the Parties; amended by the Secretariat in compliance with Decision 14.19 and with the decisions adopted at the 61st meeting of the Standing Committee; and further amended at the 16th and 17th meetings of the Conference of the Parties.

¹ Deleted at the 13th meeting of the Conference of the Parties.

NOTING the objective to ensure that decisions to amend the Convention's Appendices are founded on sound and relevant scientific information, take into account socio-economic factors, and meet agreed biological and trade criteria for such amendments; and

RECOGNIZING the importance of the application of Rio Principle 15, the Precautionary Approach, in cases of uncertainty;

THE CONFERENCE OF THE PARTIES TO THE CONVENTION

1. ADOPTS the following Annexes as an integral part of this Resolution:

Annex 1: Biological criteria for Appendix I;

Annex 2 a: Criteria for the inclusion of species in Appendix II in accordance with Article II, paragraph 2 (a), of the Convention;

Annex 2 b: Criteria for the inclusion of species in Appendix II in accordance with Article II, paragraph 2 (b), of the Convention;

Annex 3: Special cases;

Annex 4: Precautionary measures;

Annex 5: Definitions, explanations and guidelines; and

Annex 6: Format for proposals to amend the Appendices;

2. RESOLVES that, by virtue of the precautionary approach and in case of uncertainty regarding the status of a species or the impact of trade on the conservation of a species, the Parties shall act in the best interest of the conservation of the species concerned and, when considering proposals to amend Appendix I or II, adopt measures that are proportionate to the anticipated risks to the species;

3. RESOLVES that, when considering proposals to amend Appendices I and II, the following applies:

- a) species that are or may be affected by trade should be included in Appendix I in accordance with Article II, paragraph 1, if they meet at least one of the biological criteria listed in Annex 1;
- b) species should be included in Appendix II under the provisions of Article II, paragraph 2 (a), if they satisfy the criteria listed in Annex 2 a;
- c) species should be included in Appendix II under the provisions of Article II, paragraph 2 (b), if they satisfy the criteria listed in Annex 2 b;
- d) no single species may be included in more than one Appendix at the same time;
- e) however subspecies, populations or other subcategories of a species may be included in different Appendices at the same time in accordance with the relevant criteria in Annex 3;
- f) higher taxa should be included in the Appendices only if they satisfy the relevant criteria in Annex 3;
- g) hybrids may be specifically included in the Appendices but only if they form distinct and stable populations in the wild;
- h) species of which all specimens in trade have been bred in captivity or artificially propagated should not be included in the Appendices if there is a negligible probability of trade taking place in specimens of wild origin;
- i) species included in Appendix I for which sufficient data are available to demonstrate that they do not meet the criteria listed in Annex 1 should be transferred to Appendix II only in accordance with the relevant precautionary measures listed in Annex 4;

- j) species included in Appendix II in accordance with Article II, paragraph 2 (a), that do not meet the criteria listed in Annex 2 a, should be deleted only in accordance with the relevant precautionary measures listed in Annex 4; and species included in accordance with Article II, paragraph 2 (b), because they look like the species subject to the deletion, or for a related reason, should also be deleted only in accordance with the relevant precautionary measures; and
 - k) the views, if any, of intergovernmental bodies with competence for the management of the species concerned should be taken into account;
4. RESOLVES that proposals to amend Appendices I and II should be based on the best information available and, when appropriate, presented in the format in Annex 6;
 5. URGES Parties that are considering the submission of a proposal to amend the Appendices, in cases where there is any doubt regarding the nomenclature to follow, to consult the nomenclature specialist of the Animals Committee or the Plants Committee as early as possible in advance of submitting the proposal;
 6. ENCOURAGES proponents that submit proposals to transfer species to Appendix I, or to establish zero export quotas for species under review in accordance with the provisions of the Review of Significant Trade, to take account of the applicable findings of that review;
 7. RESOLVES that annotations to proposals to amend Appendix I or Appendix II should be made in accordance with the applicable Resolutions of the Conference of the Parties, be specific and accurate as to which parts and derivatives are covered by the Convention, include those specimens that first appear in international trade as export from range States and that dominate the trade and the demand from the wild resource, and should, to the extent possible, be harmonized with existing annotations;
 8. ENCOURAGES Parties, when sufficient relevant biological data are available, to include a quantitative evaluation in the supporting statement of the amendment proposal;
 9. RESOLVES that, to monitor the effectiveness of protection offered by the Convention, the status of species included in Appendices I and II should be regularly reviewed by the range States and proponents, in collaboration with the Animals Committee or the Plants Committee, subject to the availability of funds;
 10. URGES Parties and cooperating organizations to provide financial and technical assistance, when requested, in the preparation of proposals to amend the Appendices, the development of management programmes, and the review of the effectiveness of the inclusion of species in the Appendices. Parties should be open to using other available international mechanisms and instruments for these purposes in the broader context of biodiversity; and
 11. REPEALS part of Resolution Conf. 1.3 (Bern, 1976) – *Deletion of species from Appendix II or III in certain circumstances* – paragraph a).
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Annex 1

Biological criteria for Appendix I

The following criteria must be read in conjunction with the definitions, explanations and guidelines listed in Annex 5, including the footnote with respect to application of the definition of 'decline' for commercially exploited aquatic species.

A species is considered to be threatened with extinction if it meets, or is likely to meet, **at least one** of the following criteria.

- A. The wild population is small, and is characterized by **at least one** of the following:

- i) an observed, inferred or projected decline in the number of individuals or the area and quality of habitat;
 - ii) each subpopulation being very small;
 - iii) a majority of individuals being concentrated geographically during one or more life-history phases;
 - iv) large short-term fluctuations in population size; or
 - v) a high vulnerability to either intrinsic or extrinsic factors.
- B. The wild population has a restricted area of distribution and is characterized by **at least one** of the following:
- i) fragmentation or occurrence at very few locations;
 - ii) large fluctuations in the area of distribution or the number of subpopulations;
 - iii) a high vulnerability to either intrinsic or extrinsic factors; or
 - iv) an observed, inferred or projected decrease in any one of the following:
 - the area of distribution;
 - the area of habitat;
 - the number of subpopulations;
 - the number of individuals;
 - the quality of habitat; or
 - the recruitment.
- C. A marked decline in the population size in the wild, which has been **either**:
- i) observed as ongoing or as having occurred in the past (but with a potential to resume); **or**
 - ii) inferred or projected on the basis of any one of the following:
 - a decrease in area of habitat;
 - a decrease in quality of habitat;
 - levels or patterns of exploitation;
 - a high vulnerability to either intrinsic or extrinsic factors; or
 - a decreasing recruitment.

Annex 2 a

Criteria for the inclusion of species in Appendix II in accordance with Article II, paragraph 2 (a), of the Convention

The following criteria must be read in conjunction with the definitions, explanations and guidelines listed in Annex 5, including the footnote with respect to application of the definition of 'decline' for commercially exploited aquatic species.

A species should be included in Appendix II when, on the basis of available trade data and information on the status and trends of the wild population(s), **at least one** of the following criteria is met:

- A. It is known, or can be inferred or projected, that the regulation of trade in the species is necessary to avoid it becoming eligible for inclusion in Appendix I in the near future; or

- B. It is known, or can be inferred or projected, that regulation of trade in the species is required to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences.
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Annex 2 b

Criteria for the inclusion of species in Appendix II in accordance with Article II, paragraph 2 (b), of the Convention

Species may be included in Appendix II in accordance with Article II, paragraph 2 (b), if **either one** of the following criteria is met:

- A. The specimens of the species in the form in which they are traded resemble specimens of a species included in Appendix II under the provisions of Article II, paragraph 2 (a), or in Appendix I, so that enforcement officers who encounter specimens of CITES-listed species are unlikely to be able to distinguish between them; or
- B. There are compelling reasons other than those given in criterion A above to ensure that effective control of trade in currently listed species is achieved.
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Annex 3

Special cases

Split-listing

Listing of a species in more than one Appendix should be avoided in general in view of the enforcement problems it creates.

When split-listing does occur, this should generally be on the basis of national or regional populations, rather than subspecies. Split-listings that place some populations of a species in the Appendices, and the rest outside the Appendices, should normally not be permitted.

For species outside the jurisdiction of any State, listing in the Appendices should use the terms used in other relevant international agreements, if any, to define the population. If no such international agreement exists, then the Appendices should define the population by region or by geographic coordinates.

Taxonomic names below the species level should not be used in the Appendices unless the taxon in question is highly distinctive and the use of the name would not give rise to enforcement problems.

Higher taxa

If all species of a higher taxon are included in Appendix I or II, they should be included under the name of the higher taxon. If some species in a higher taxon are included in Appendix I or II and all the rest in the other Appendix, the latter species should be included under the name of the higher taxon, with an appropriate annotation made in accordance with the provisions of the relevant Resolutions on the use of annotations in the Appendices.

When preparing a proposal to include a higher taxon in the Appendices, Parties are encouraged to note any extinct species in the higher taxon and to clarify whether these are included or excluded from the proposed listing.

Parties contemplating preparing a proposal to transfer an individual plant species from a higher-taxon listing in Appendix II to a separate listing in Appendix I should consider:

- i) the ease with which it can be propagated artificially;
- ii) the extent to which it is currently available in cultivation from artificially propagated specimens; and
- iii) any practical problems in identifying the species, particularly in the form in which it may be traded.

Extinct species

Extinct species should not normally be proposed for inclusion in the Appendices. Extinct species already included in the Appendices should be retained in the Appendices if they meet one of the precautionary criteria included in Annex 4.D.

Annex 4

Precautionary measures

When considering proposals to amend Appendix I or II, the Parties shall, by virtue of the precautionary approach and in case of uncertainty either as regards the status of a species or the impact of trade on the conservation of a species, act in the best interest of the conservation of the species concerned and adopt measures that are proportionate to the anticipated risks to the species.

- A. 1. No species listed in Appendix I shall be removed from the Appendices unless it has been first transferred to Appendix II, with monitoring of any impact of trade on the species for at least two intervals between meetings of the Conference of the Parties with the exception that extinct species may be deleted from Appendix I without first being transferred to Appendix II subject to the provisions of paragraph D.
- 2. Species included in Appendix I should only be transferred to Appendix II:
 - a) If they do not satisfy the relevant criteria in Annex 1 and when one of the following precautionary safeguards is met:
 - i) the species is not in demand for international trade, nor is its transfer to Appendix II likely to stimulate trade in, or cause enforcement problems for, any other species included in Appendix I; or
 - ii) the species is likely to be in demand for trade, but its management is such that the Conference of the Parties is satisfied with:
 - A) implementation by the range States of the requirements of the Convention, in particular Article IV; and
 - B) appropriate enforcement controls and compliance with the requirements of the Convention; or
 - iii) an integral part of the amendment proposal is an export quota or other special measure approved by the Conference of the Parties, based on management measures described in the supporting statement of the amendment proposal, provided that effective enforcement controls are in place; or
 - b) when a ranching proposal is submitted in accordance with an applicable Resolution and is adopted by the Conference of the Parties.
- 3. No proposal for transfer of a species from Appendix I to Appendix II shall be considered from a Party that has entered a reservation for the species in question, unless that Party agrees to remove the reservation within 90 days of the adoption of the amendment.
- 4. No species should be deleted from Appendix II if such deletion would be likely to result in it qualifying for inclusion in the Appendices in the near future.

5. No species should be deleted from Appendix II if, within the last two intervals between meetings of the Conference of the Parties, it has been subject to a recommendation under the provisions of the Review of Significant Trade to improve its conservation status.
- B. The following review procedures shall apply when a species is transferred to Appendix II pursuant to paragraph A. 2. iii) above:
1. Where the Plants Committee, the Animals Committee or a Party becomes aware of problems in compliance with the management measures and export quotas of another Party, the Secretariat shall be informed and, if the Secretariat fails to resolve the matter satisfactorily, it shall inform the Standing Committee which may, after consultation with the Party concerned, recommend to all Parties that they suspend trade with that Party in specimens of CITES-listed species, and/or request the Depository Government to prepare a proposal to transfer the population back to Appendix I.
 2. If, on review of a quota and its supporting management measures, the Animals or Plants Committee encounters any problems with compliance or potential detriment to a species, the relevant Committee shall request the Depository Government to prepare a proposal for appropriate remedial action.
- C. With regard to quotas established pursuant to paragraph A. 2. iii) above:
1. If a Party wishes to renew, amend or delete such a quota, it shall submit an appropriate proposal for consideration at the next meeting of the Conference of the Parties.
 2. When a quota has been established for a limited period of time, after that period the quota will become zero until a new quota has been established.
- D. Species that are regarded as possibly extinct should not be deleted from the Appendices if:
1. they may be affected by trade in the event of their rediscovery; or
 2. they resemble extant species included in the Appendices; or
 3. their deletion would cause difficulties implementing the Convention; or
 4. their removal would complicate the interpretation of the Appendices.
-

NOTE: Where numerical guidelines are cited in this Annex, they are presented only as examples, since it is impossible to give numerical values that are applicable to all taxa because of differences in their biology.

Species

In Article I of the Convention, the term 'species' is defined as "any species, subspecies or geographically separate population thereof".

'Species' and 'subspecies' refer to the biological concept of a species, and do not require any further definition.

The two terms also cover varieties.

'Geographically separate population' refers to parts of a species or a subspecies within particular geographical boundaries. This can also refer to populations or subpopulations, or, for the sake of convenience in certain cases, to 'stocks' as the term is understood in fisheries management.

Until now, the Conference of the Parties has interpreted 'geographically separate populations' as populations delimited by geopolitical boundaries, whereas they have rarely used the other option of geographical boundaries.

Affected by trade

A species "is or may be affected by trade" if:

- i) it is known to be in trade (using the definition of 'trade' in Article I of the Convention), and that trade has or may have a detrimental impact on the status of the species; or
- ii) it is suspected to be in trade, or there is demonstrable potential international demand for the species, that may be detrimental to its survival in the wild.

Area of distribution

The 'area of distribution' of a species is defined as the area contained within the shortest continuous imaginary boundary which can be drawn to encompass all the known, inferred or projected sites of occurrence, excluding cases of vagrancy and introductions outside its natural range (though inferring and projecting area of occurrence should be undertaken carefully, and in a precautionary manner). The area within the imaginary boundary should, however, exclude significant areas where the species does not occur, and so, in defining an area of distribution, account should be taken of discontinuities or disjunctions in the spatial distribution of species. This encompasses the concept of area of occupancy. For migratory species, the area of distribution is the smallest area essential at any stage for the survival of that species (e.g. colonial nesting sites, feeding sites for migratory taxa, etc.). The determination that a species has a restricted area of distribution is taxon-specific and should take into account considerations such as habitat specificity, population density and endemism.

Decline

A 'decline' is a reduction in the abundance, or area of distribution, or area of habitat of a species. The assessment of decline by reference to area of habitat may be more appropriate where there are intrinsic difficulties in measuring the number of individuals.

Decline can be expressed in two different ways: (i) the overall long-term extent of decline; or (ii) the recent rate of decline. The long-term extent of decline is the total estimated or inferred percentage reduction from a baseline level of abundance or area of distribution. The recent rate of decline is the percentage change in abundance or area of distribution over a recent time period. The data used to estimate or infer a baseline for extent of decline should extend as far back into the past as possible.

The judgement that a decline is marked is taxon-specific and can be justified by a number of considerations, for example the population dynamics of a related taxonomic group. A general guideline for a marked historical extent of decline is a percentage decline to 5%-30% of the baseline, depending on the biology and productivity of the species. Productivity is the maximum percentage growth rate of a population. It is a complex function of reproductive biology, fecundity, individual growth rates, natural mortality, age at maturity and longevity. More-productive species tend to have high fecundity, rapid individual growth rates and high turnover of generations.

The extremes of 5% and 30% will be applicable to only a relatively small number of species, but some species may even fall outside of these extremes. However, both these figures are presented only as examples, since it is impossible to give numerical values that are applicable to all taxa because of differences in their biology (see footnote with respect to application of decline to commercially exploited aquatic species).

A general guideline for a marked recent rate of decline is a percentage decline of 50% or more in the last 10 years or three generations, whichever is the longer. If the population is small, a percentage decline of 20% or more in the last 5 years or 2 generations (whichever is the longer) may be more appropriate. However, these figures are presented only as examples, since it is impossible to give numerical values that are applicable to all taxa because of differences in their biology.

The historical extent of decline and the recent rate of decline should be considered in conjunction with one another. In general, the higher the historical extent of decline, and the lower the productivity of the species, the more important a given recent rate of decline is.

In estimating or inferring the historical extent of decline or the recent rate of decline, all relevant data should be taken into account. A decline need not necessarily be ongoing. If data are available only for a short period and the extent or rate of decline based on these data are cause for concern, the guidelines above (extrapolated as necessary or relevant) should still apply. However, natural fluctuations should not normally count as part of a decline, but an observed decline should not necessarily be considered part of a natural fluctuation unless there is evidence for this. A decline that is the result of legal activities carried out pursuant to a scientifically-based harvesting programme that reduces the population to a planned level, not detrimental to the survival of the species, would not normally be covered by the term 'decline'.

² **Application of decline for commercially exploited aquatic species**

In marine and large freshwater bodies, a narrower range of 5-20 % is deemed to be more appropriate in most cases, with a range of 5-10 % being applicable for species with high productivity, 10-15 % for species with medium productivity and 15-20 % for species with low productivity. Nevertheless some species may fall outside this range. Low productivity is correlated with low mortality rate and high productivity with high mortality. One possible guideline for indexing productivity is the natural mortality rate, with the range 0.2-0.5 per year indicating medium productivity.

In general, the historical extent of decline should be the primary criterion for consideration of listing in Appendix I. However, in circumstances where information to estimate the extent of decline is limited, the rate of decline over a recent period could itself still provide some information on the extent of decline.

For listing in Appendix II, the historical extent of decline and the recent rate of decline should be considered in conjunction with one another. The higher the historical extent of decline, and the lower the productivity of the species, the more important a given recent rate of decline is.

A general guideline for a marked recent rate of decline is the rate of decline that would drive a population down within approximately a 10-year period from the current population level to the historical extent of decline guideline (i.e. 5-20 % of baseline for exploited fish species). There should rarely be a need for concern for populations that have exhibited an historical extent of decline of less than 50 %, unless the recent rate of decline has been extremely high.

Even if a population is not declining appreciably, it could be considered for listing in Appendix II if it is near the extent-of-decline guidelines recommended above for consideration for Appendix-I listing. A range of between 5 % and 10 % above the relevant extent of decline might be considered as a definition of 'near', taking due account of the productivity of the species.

A recent rate of decline is important only if it is still occurring, or may resume, and is projected to lead to the species reaching the applicable point for that species in the Appendix-I extent-of-decline guidelines within approximately a 10-year period. Otherwise the overall extent of decline is what is important. When sufficient data are available, the recent rate of decline should be calculated over approximately a 10-year period. If fewer data are available, annual rates over a shorter period could be used. If there is evidence of a change in the trend, greater weight should be given to the more recent consistent trend. In most cases, listing would only be considered if the decline were projected to continue.

In considering the percentages indicated above, account needs to be taken of taxon- and case-specific biological and other factors that are likely to affect extinction risk. Depending on the biology, patterns of exploitation and area of distribution of the taxon, vulnerability factors (as listed in this Annex) may increase this risk, whereas mitigating factors (e.g. large absolute numbers or refugia) may reduce it.

Extinct

A species is considered to be 'extinct' when there is no reasonable doubt that the last individual has died or when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual), throughout its historic range have failed to record an individual. Surveys should be over a time frame appropriate to the species' life cycle and life form.

Fluctuations

Fluctuations in population size or area of distribution are considered large when the population size or area in question varies widely, rapidly or frequently. The judgement that there are large short-term fluctuations in the number of individuals is taxon-specific. For instance, it depends on the generation length of the taxon.

Fragmentation

'Fragmentation' refers to the case where most individuals within a taxon are found in small and relatively isolated subpopulations, which increases the probability that these small subpopulations will become extinct and the opportunities for re-establishment are limited.

Generation length

'Generation length' is the average age of parents of the current cohort (i.e. newborn individuals in the population). Generation length therefore reflects the turnover rate of breeding individuals in a population. Generation length is greater than the age at first breeding and less than the age of the oldest breeding individual, except in taxa that breed only once. Where generation length varies under threat, the more natural (i.e. pre-disturbance) generation length should be used.

Inferred or projected

This refers to estimations using indirect or direct methods. Inferences may be made on the basis either of direct measurements or from indirect evidence. Projection involves extrapolation to infer likely future values.

Near future

This refers to a time period in which it can be projected or inferred that a species would satisfy one (or more) of the criteria in Annex 1 to the present Resolution unless it is included in Appendix II. This will be taxon- and case-specific but should be greater than 5 years and less than 10 years.

Population issues

Population

'Population' refers to the total number of individuals of the species (as 'species' is defined in Article I of the Convention and in this Annex).

Wild population

'Wild population' refers to the total number of free-living individuals of the species within its area of distribution, as defined in this Annex.

Subpopulation

'Subpopulations' are defined as geographically or otherwise distinct groups in the population between which there is limited genetic exchange.

Population size

When providing details on the size of a population or subpopulation, it should be made clear whether the information presented relates to an estimate of the total number of individuals or to the effective population size (i.e. individuals capable of reproduction, excluding individuals that are

environmentally, behaviourally or otherwise reproductively suppressed in the wild) or to another appropriate measure, index or component of the population.

In the case of species biologically dependent on other species for all or part of their life cycles, biologically appropriate values for the host or co-dependent species should be chosen.

Small wild population

The judgement that a wild population is small is taxon-specific and can be justified by a number of considerations, for example the population of a related taxonomic group. For some low-productivity species where data exist to make an estimate, a figure of less than 5,000 individuals has been found to be an appropriate guideline (not a threshold) of what constitutes a small wild population, but the number could be higher for higher productivity species. However, this figure is presented only as an example, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where this numerical guideline does not apply.

Very small wild subpopulation

The judgement that a wild subpopulation is very small is taxon-specific. For some species where data exist to make an estimate, a figure of less than 500 individuals has been found to be an appropriate guideline (not a threshold) of what constitutes a very small wild subpopulation. However, this figure is presented only as an example, since it is impossible to give numerical values that are applicable to all taxa. There will be many cases where this numerical guideline does not apply.

Recruitment

'Recruitment' is the total number of individuals added to any particular demographic class of a population by either sexual or asexual reproduction.

Threatened with extinction

'Threatened with extinction' is defined in Annex 1. The vulnerability of a species to threats of extinction depends on its population demographics, biological characteristics (such as body size, trophic level, life cycle, breeding structure or social structure requirements for successful reproduction), and vulnerability due to aggregating habits, natural fluctuations in population size, or residency/migratory patterns. This makes it impossible to give numerical threshold values for population size or area of distribution that are applicable to all taxa.

Vulnerability

'Vulnerability' can be defined as the susceptibility to intrinsic or external effects that increase the risk of extinction, even when mitigating factors are taken into account. There are a number of taxon- or case-specific biological and other factors that may affect the extinction risk associated with a given percentage decline, small population size or restricted area of distribution. These can be, but are not limited to, aspects of any of the following:

Intrinsic factors

- Life history (e.g. low fecundity, slow growth rate of the individual, high age at first maturity, long generation time)
- Low absolute numbers or biomass or restricted area of distribution
- Population structure (age/size structure, sex ratio)
- Behavioural factors (e.g. social structure, migration, aggregating behaviour)
- Density (for sessile or semi-sessile species)
- Specialized niche requirements (e.g. diet, habitat)
- Species associations such as symbiosis and other forms of co-dependency
- Reduced genetic diversity
- Depensation (prone to continuing decline even in the absence of exploitation)
- Endemism
- Seed dispersal mechanism
- Specialized pollinators

Extrinsic factors

- Selectivity of removals (that may compromise recruitment)
 - Threats from alien invasive species (hybridization, disease transmission, predation, etc.)
 - Habitat degradation (contamination, soil erosion, alteration by alien invasive species, etc.)
 - Habitat loss/destruction
 - Habitat fragmentation
 - Harsh environmental conditions
 - Threats from disease
 - Rapid environmental change (e.g. climate regime shifts)
 - Stochastic events.
-

Annex 6 Format for proposals to amend the Appendices

The following provides information and instructions for the submission of a proposal to amend the Appendices and the appropriate supporting statement. Proponents should be guided by the need to provide to the Conference of the Parties sufficient information, of sufficient quality and in sufficient detail, to allow it to judge the proposal against the criteria established for the proposed action. This means that the relevant published and unpublished sources of information should be used, although for some species the amount of scientific information will be limited. Furthermore, this means that it may not be possible to address all elements of the proposal format. Analogy with related taxonomic groups or species that are ecologically similar may be used to guide judgements. Where research has been undertaken specifically to obtain information for the proposal, it should be presented in sufficient detail to be assessed by the Parties.

Parties are reminded that proposals should normally be limited to 12 pages (exclusive of references cited). If the proposal is longer than 12 pages, the proponent should provide translations into the working languages of the Convention.

A. Proposal

The proponent should indicate the specific amendment to the Appendices and any relevant annotations or qualifications. The proponent should justify the basis on which the species meets the relevant criteria.

- Inclusion in Appendix I or transfer from Appendix II to Appendix I. Specify which of the criteria in Annex 1 of the Resolution are satisfied.
- Inclusion in Appendix II
 - in accordance with Article II 2 (a). Specify which of the criteria in Annex 2 a of the Resolution are satisfied.
 - in accordance with Article II 2 (b)
 - for reasons of look-alike problems (criterion A of Annex 2 b). In this case, the names of the similar species already included in the Appendices should be given in section C11, 'Additional remarks'.
 - for other reasons (such as those referred to in Annex 2 b, criterion B or Annex 3 to this Resolution).
- Transfer from Appendix I to Appendix II in accordance with a precautionary measure specified in Annex 4 to this Resolution. Specify which of the criteria in Annex 2 of this Resolution are satisfied; specify why the criteria in Annex 1 of this Resolution are no longer satisfied; specify which of the measures in Annex 4 of this Resolution are satisfied or implemented.

- Deletion from Appendix II. Specify why the criteria in Annex 2 of this Resolution are not satisfied.
- Other action (provide explanation, e.g. amendment of a quota).

Annotations

If a specific annotation to the listing in the Appendices is proposed, the proponent should:

- ensure that the proposed annotation is in compliance with the applicable Resolutions;
- indicate the practical intent of the annotation;
- be specific and accurate as to the parts and derivatives to be covered by the annotation;
- provide clear and simple definitions of any terms in the annotation that may not be easily understood by enforcement personnel and user groups (noting that definitions should be specific to CITES and scientifically and technically precise to the extent practicable for purposes of the annotation);
- ensure that the annotation includes those specimens that first appear in international trade as exports from range States and that dominate the trade and the demand from the wild resource;
- harmonize, to the extent practicable, new annotations with existing annotations; and
- where applicable, provide identification sheets to be included in the CITES Identification Manual that illustrate the parts and derivatives covered under the annotation.

B. Proponent

The proponent may only be a Party to the Convention, in accordance with Article XV of the Convention.

C. Supporting statement

1. Taxonomy

The proponent should provide sufficient information to allow the Conference of the Parties to identify clearly the taxon that is the subject of the proposal.

1.1 Class

1.2 Order

1.3 Family

1.4 Genus, species or subspecies, including author and year

If the species concerned is included in one of the standard lists of names or taxonomic references adopted by the Conference of the Parties, the name provided by that reference should be entered here. If the species concerned is not included in one of the adopted standard references, the proponent should provide references as to the source of the name used.

1.5 Scientific synonyms

The proponent should provide information on other scientific names or synonyms under which the species concerned may be known currently, especially if these names are used in the trade in the species.

1.6 Common names (including, where appropriate, trade names)

1.7 Code numbers

If the species concerned is already included in the Appendices, refer to the code numbers in the CITES Identification Manual.

2. Overview

Provide a brief overview of key elements of the proposal. Parties should cite key sections of the supporting statement.

3. Species characteristics

The information required in this section is a summary of surveys, literature searches, and relevant studies. The references used must be listed in section 12 of the proposal. It is understood that the quality of the information available will vary a lot, but these instructions indicate the type of information that is required. If the proposal relates to a geographically separate population or subspecies, it should consider, where relevant, the biological species in its entirety to provide the appropriate context.

3.1 Distribution

Specify the currently known range of the species. If possible, provide information to indicate whether or not the distribution of the species is continuous and, if it is not, indicate to what degree it is fragmented.

3.2 Habitat

Specify the types of habitats occupied by the species and, when relevant, the degree of habitat specificity and the extent of each habitat type over the range of the species.

3.3 Biological characteristics

Provide a summary of general biological and life history characteristics of the species (e.g. reproduction, recruitment, survival rate, migration, sex ratio, regeneration or reproductive strategies).

3.4 Morphological characteristics

Provide a general description of the morphological diagnostic characteristics of the species, including colour, and information on morphological features by which the species can be differentiated from taxonomically closely related species.

3.5 Role of the species in its ecosystem

If available, provide information about the role of this species in its ecosystem, and other relevant ecological information, as well as about the potential impact of this proposal on that role.

4. Status and trends

This section includes qualitative and quantitative information that allows past and present trends to be evaluated pursuant to the criteria. The sources used must be referenced in section 12 of the proposal. It is understood that the quality of the information available will vary. The instructions below indicate the type of information that should be provided if possible. If the proposal relates to a geographically separate population or subspecies, it should consider, when relevant, the biological species in its entirety to provide the appropriate context. If available, the proposal should include any relevant quantitative analyses, stock assessments, etc. The proposal should note whether conclusions are based on observations, inferences or projections.

4.1 Habitat trends

Give information on the nature, rate and extent of habitat change (e.g. loss, degradation or modification), noting when applicable the degree of fragmentation and discernible changes in the quality of habitat. Where appropriate, the relationship between habitat and population trends should be described.

4.2 Population size

Give an estimate of the current total population or number of individuals differentiated by relevant age classes where possible, or other indices of population abundance, based on the most recently available data. Provide information on the source of the data used. Where appropriate, provide the number of subpopulations, and their estimated sizes. Population size may be estimated by reference to population density, having due regard to habitat type and other methodological considerations.

4.3 Population structure

Provide basic information on the current structure of the population and any past or current changes over time in that structure (e.g. social structure, population demographics, proportion of mature individuals or sex ratio).

4.4 Population trends

Basic, quantitative and qualitative information, when available, should be provided on current and past trends in the species' abundance (provide sources). The period over which these trends, if any, have been measured should be indicated. If the species naturally undergoes marked fluctuations in population size, information should be provided to demonstrate that the trend transcends natural fluctuations. If generation-time has been used in estimating the trend, state how the generation-time has been estimated.

4.5 Geographic trends

Provide information, when available on current and past trends in the species' distribution, indicating the period over which these trends, if any, have been measured. If relevant, give data on the degree and periodicity of fluctuations in the area of distribution.

5. Threats

Specify the nature, intensity and, if possible, relative importance of human-induced threats (e.g. habitat loss or degradation; over-exploitation; effects of competition, predation or disease by introduced species; hybridization; toxins and pollutants; etc.).

6. Utilization and trade

6.1 National utilization

Specify the types and extent of all known uses of the species, indicating trends if possible. Provide details of harvest methods. Indicate the extent to which utilization is from captive-bred, artificially propagated, or wild specimens.

Provide details of any stockpiles known to exist, and the measures that might be taken to dispose of them.

6.2 Legal trade

Quantify the level of international trade, identifying the source of statistics used (e.g. Customs statistics, CITES annual report data, FAO data, industry reports, etc.). Provide justification for inferences made about trade levels. Provide information about the nature of the trade (e.g. primarily for commercial purposes, primarily live specimens, primarily parts and derivatives, primarily of captive-bred or artificially propagated specimens, etc.) and about how the proposed amendment is expected to affect the nature of the trade.

6.3 Parts and derivatives in trade

To the extent possible, list parts and derivatives, including types of products in trade, Customs tariff codes specific to those parts and derivatives, and major importing and exporting countries that trade in those parts and derivatives.

6.4 Illegal trade

To the extent possible, quantify the level of illegal trade, nationally and internationally, and describe its nature. Assess the relative importance of this trade in relation to legal offtake for national use or legal international trade. Provide information on how the proposed amendment is expected to affect the nature of the trade.

6.5 Actual or potential trade impacts

Discuss the importance of current and future exploitation for international trade relative to overall use (domestic included) as a threat to the species in question.

7. Legal instruments

7.1 National

Provide details of legislation relating to the conservation of the species, including its habitat, either specifically (such as endangered-species legislation) or generally (such as legislation on wildlife and accompanying regulations). Indicate the nature of legal protection (i.e. is the species totally protected, or is harvesting regulated or controlled). Provide an assessment of the effectiveness of this legislation in ensuring the conservation and/or management of the species.

Provide similar information relating to legislation governing the management of trade in the species in question. Provide an assessment of the effectiveness of this legislation in controlling illegal trade in the species.

7.2 International

Provide details of international instruments relating to the species in question, including the nature of the protection afforded by such instruments. Provide an assessment of the effectiveness of these instruments in ensuring the conservation and/or management of the species.

Provide similar information on international instruments relating to the management of trade in the species in question. Provide an assessment of the effectiveness of these instruments in controlling illegal trade in the species.

8. Species management

8.1 Management measures

Provide details of programmes in place in the range States to manage populations of the species in question (e.g. controlled harvest from the wild, captive breeding or artificial propagation, reintroduction, ranching, quota systems, etc.). Include, where appropriate, details such as planned harvest rates, planned population sizes, procedures for the establishment and implementation of quotas, and mechanisms for ensuring that wildlife management advice is taken into account.

Where applicable, provide details of any mechanisms used to ensure a return from utilization of the species in question to conservation and/or management programmes (e.g. pricing schemes, community ownership plans, export tariffs, etc.).

8.2 Population monitoring

Provide details of programmes in place to monitor the status of wild populations and the sustainability of offtake from the wild.

8.3 Control measures

8.3.1 International

Provide information on measures in place, in addition to CITES, to control the movement of specimens of the species in question across international borders. Include information about marking schemes in place, if any.

8.3.2 Domestic

Provide information on controls in the range States aimed at ensuring a sustainable harvest from the wild of the species in question. Include information on education, compliance and enforcement activities as appropriate, and an assessment of the effectiveness of the programmes.

8.4 Captive breeding and artificial propagation

Where applicable, provide details of commercial captive-breeding or artificial propagation operations, including plantations, for the species in question within the country in question, including the size of captive stocks and the production, and the extent to which these operations are either contributing to a conservation programme or meeting a demand that would otherwise be met by specimens from the wild. Discuss any management implications of captive-breeding or artificial propagation programmes. Also provide information on the extent of captive-breeding or artificial propagation outside the country or countries of origin to the extent possible.

8.5 Habitat conservation

Provide information, where available, regarding the number, size and type of protected areas relevant to the habitat of the species, and on habitat conservation programmes outside protected areas.

8.6 Safeguards

In the case of proposals to transfer species from Appendix I to Appendix II or to delete species from Appendix II, or proposals involving substantive annotations, provide information on any relevant safeguards.

If the proposed amendment is likely to lead to an increase in trade in the species concerned, explain why this would not result in unsustainable trade in similar species.

9. Information on similar species

Give the names of species of which specimens in trade look very similar. Provide details on how they may be distinguished, including, in particular, details on those commodities or parts and derivatives most common in trade, and explain whether or not it is reasonable to expect an informed non-expert to be able to make a firm identification. Provide details on how to resolve potential difficulties in distinguishing specimens of the species proposed for listing from those of similar species, in particular those specimens most common in trade.

10. Consultations

Provide details of the consultation undertaken to secure comments on the proposal from the range States of the species, either through direct contact or via the CITES Secretariat. Comments received from each country should be provided. Where comments were sought but not received in sufficient time to enable their inclusion in the supporting statement, this should be noted, as well as the date of the request.

In cases of proposals to transfer Appendix-II species that are subject to the Review of Significant Trade to Appendix I, the proponent should consult the affected range State(s) and, as appropriate, the Animals Committee or Plants Committee. The proponent should state the reasons to justify why the amendment proposal was made. In cases of consultation with Parties via the CITES Secretariat, information from range States and non-range States should be separated.

In the case of species that are also managed through other international agreements or intergovernmental bodies, provide details of the consultations undertaken to obtain the comments of those organizations or bodies, and indicate how those comments have been addressed in the supporting statement. Where comments were sought but not received in sufficient time to enable their inclusion in the supporting statement, this should be noted, as well as the date of the request.

11. Additional remarks

12. References

RECOGNIZING that, in accordance with Articles III and IV of the Convention, export permits for specimens of species included in Appendices I and II shall be granted only when a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of the species (following a determination known as a 'non-detriment finding');

RECALLING that Article IV, paragraph 3, requires a Scientific Authority of each Party to monitor exports of specimens of Appendix-II species and, whenever necessary, to advise the Management Authority of suitable measures to be taken to limit such exports in order to maintain such species throughout their range at a level consistent with their role in the ecosystems and well above the level at which they would qualify for Appendix I;

NOTING that, in Resolution Conf. 14.7 (Rev. CoP15) on *Management of nationally established export quotas*, the Conference of the Parties recommends that, when Parties establish national voluntary export quotas, they do so on the basis of a non-detriment finding made by their Scientific Authority;

RECALLING further subparagraphs 2 c) and h) in Resolution Conf. 10.3 on *Designation and role of the Scientific Authorities*;

RECALLING that the effective implementation of Article IV, paragraphs 2 (a), 3 and 6 (a), of the Convention prevents the need to take actions in accordance with Resolution Conf. 12.8 (Rev. CoP17) on *Review of Significant Trade in specimens of Appendix-II species*;

NOTING that because of the great variety of taxa, life forms and biological characteristics of species included in Appendices I and II, there are various ways a Scientific Authority can make non-detriment findings;

AWARE of the challenges that Parties face when making scientifically-based non-detriment findings, and that the sharing of guiding principles and experience for making such findings would improve implementation of Articles III and IV of the Convention;

RECOGNIZING the outputs of the national, regional and international workshops on CITES non-detriment findings (in China, the Dominican Republic, Indonesia, Kuwait, Mexico, Nepal, Peru and other countries), the guidance for CITES Scientific Authorities produced by the International Union for Conservation of Nature (IUCN), and other capacity-building workshops; and

REAFFIRMING Objective 1.5 of the *CITES Strategic Vision: 2008-2020* in Resolution Conf. 16.3 (Rev. CoP17), adopted by the Conference of the Parties at its 16th meeting (Bangkok, 2013) and amended at its 17th meeting (Johannesburg, 2016), that the best available scientific information is the basis for non-detriment findings;

THE CONFERENCE OF THE PARTIES TO THE CONVENTION

1. RECOMMENDS that:

- a) Scientific Authorities take into account the following concepts and non-binding guiding principles in considering whether trade would be detrimental to the survival of a species:
 - i) a non-detriment finding for an Appendix-I or -II species is the result of a science-based assessment that verifies whether a proposed export is detrimental to the survival of that species or not;¹

* Amended at the 17th meeting of the Conference of the Parties.

¹ In considering whether an export may be detrimental, the sustainability of the overall harvest will usually be a necessary consideration.

- ii) Scientific Authorities should consider whether the species would be maintained throughout its range at a level consistent with its role in the ecosystems in which it occurs;
- iii) in making a non-detriment finding, Scientific Authorities should consider the volume of legal and illegal trade (known, inferred, projected, estimated) relative to the vulnerability of the species (intrinsic and extrinsic factors that increase the risk of extinction of the species);
- iv) the data requirements for a determination that trade is not detrimental to the survival of the species should be proportionate to the vulnerability of the species concerned;
- v) the making of an effective non-detriment finding relies upon a correct identification of the species concerned and verification that it is specimens of this species that are to be exported;
- vi) the methodology used to make a non-detriment finding should reflect the origin and type of specimen, such that the method used to make a non-detriment finding for a specimen known to be of non-wild origin may be less rigorous than that for a specimen of wild origin for example;
- vii) the methodology used should be flexible enough to allow for consideration of the specific and individual characteristics of different taxa;
- viii) the implementation of adaptive management, including monitoring, is an important consideration in the making of a non-detriment finding;
- ix) the non-detriment finding is based on resource assessment methodologies which may include, but are not limited to, consideration of:
 - A. species biology and life-history characteristics;
 - B. species range (historical and current);
 - C. population structure, status and trends (in the harvested area, nationally and internationally);
 - D. threats;
 - E. historical and current species-specific levels and patterns of harvest and mortality (e.g. age, sex) from all sources combined;
 - F. management measures currently in place and proposed, including adaptive management strategies and consideration of levels of compliance;
 - G. population monitoring; and
 - H. conservation status; and
- x) the sources of information that may be considered when making a non-detriment finding include but are not limited to:
 - A. relevant scientific literature concerning species biology, life history, distribution and population trends;
 - B. details of any ecological risk assessments conducted;
 - C. scientific surveys conducted at harvest locations and at sites protected from harvest and other impacts; and
 - D. relevant knowledge and expertise of local and indigenous communities;
 - E. consultations with relevant local, regional and international experts; and

- F. national and international trade information such as that available via the CITES trade database maintained by UNEP World Conservation Monitoring Centre (UNEP-WCMC), publications on trade, local knowledge on trade and investigations of sales at markets or through the Internet for example; and
- b) Scientific Authorities consider, as a reference for making non-detriment findings, the information included in the Annex to document AC26/PC20 Doc. 8.4 and any subsequent updates available on the CITES website¹;
2. ENCOURAGES Parties:
- a) to explore methods for making non-detriment findings;
- b) to share experiences and examples of ways of making non-detriment findings, including through appropriate regional or subregional workshops, and communicate them to the Secretariat;
- c) to request the Secretariat to make available these examples on the CITES web site;
- d) to maintain written records of the science-based rationale included in the Scientific Authorities' non-detriment finding assessments;
- e) to provide to the Secretariat for publication on the CITES website, where they exist, written records of the science-based rationales and scientific information used for non-detriment finding assessments, where possible, and
- f) to offer, on request, cooperative assistance to developing countries, for improvement of capacity to make non-detriment findings, based on nationally identified needs. Such cooperative assistance could take multiple forms, including financial and technical support; and
3. DIRECTS the Secretariat:
- a) to maintain a prominent section for non-detriment findings on the CITES website and to update it regularly with information from the Animals and Plants Committees, Parties and other sources;
- b) to implement a user-friendly mechanism on the CITES website that would allow Parties to easily submit relevant information to be considered for inclusion in the website;
- c) to ensure that this information is accessible in the appropriate sections of the CITES Virtual College; and
- d) to assist in identifying possible funding sources to help Parties implementing capacity-building activities related to the making of non-detriment findings.

¹ See: <http://www.cites.org/eng/prog/ndf/index.php>.



African Elephants and Lions and the U.S. Endangered Species Act

Gregory Sheehan
Principal Deputy Director
U.S. Fish and Wildlife Service

November 20, 2017



ESA Status

- African lions (*Panthera leo melanochaita*) and African elephants (*Loxodonta africana*) are listed as Threatened under the U.S. Endangered Species Act (ESA).
- Under current ESA special rules, import of parts of hunted elephants and lions requires an ESA permit, which can be issued if the Fish and Wildlife Service finds that the hunting activity enhances the survival of the species in the wild.
- Standard in place for elephants since 1992 and for lions since January 22, 2016.
- Factors that we consider include: species status; population trends; poaching levels; wildlife management plans; revenues generated by hunting and how they are used; how local communities benefit from sport hunting, etc.

Country status for import of elephant trophies from 2014 to present*

	Approved for elephants hunted	Under Review	Not Approved for elephants hunted
Namibia	X		
South Africa	X		
<u>Tanzania</u>		January 1, 2016 and beyond	January 1, 2014 - December 31, 2015
<u>Zambia</u>	January 1, 2016 - December 31, 2018 <i>(Zambia closed its 2014-2015 hunting seasons)</i>		
<u>Zimbabwe</u>	January 21, 2016 - December 31, 2018		May 12, 2014 - January 20, 2016

Elephant Findings

- Positive findings for South Africa and Namibia since the 1990s.
- Negative findings for Tanzania and Zimbabwe for 2014-2015. Positive findings from 1990s-2013.
- Positive findings for Zambia and Zimbabwe for 2016-2018.
- Mozambique and Tanzania for 2016+ under review.
- No applications pending for any other country.

Country status for import of lion trophies*

	Approved	Under Review	Not Approved to Date	Applies to Lions Hunted
Mozambique		X		
Namibia		X		
<u>South Africa: Wild Lions</u>	X			January 1, 2016 to December 31, 2019
<u>South Africa: Wild-Managed Lions</u>	X			January 1, 2016 to December 31, 2019
<u>South Africa: Captive Lions</u>			X	until new information is received
Tanzania		X		
Zambia	X			January 1, 2016 to December 31, 2018
Zimbabwe	X			January 1, 2016 to December 31, 2018

Lion Findings

- Positive finding for “wild” and “wild-managed” lions from South Africa and a negative finding for “captive” lions for 2016-2019.
- Positive finding for Zambia and Zimbabwe for 2016-2018.
- Mozambique, Namibia and Tanzania under review.

Permits Issued/Applications Pending

Permits issued/pending applications for lions:

- Mozambique – 3 applications pending; no finding made
- Namibia – 2 applications pending; no finding made
- Tanzania – 17 applications pending; no finding made
- South Africa – 11 permits issued; none pending
- Zambia – 16 permits issued; none pending
- Zimbabwe – 17 permits issued; none pending

Permits issued/pending applications for elephants:

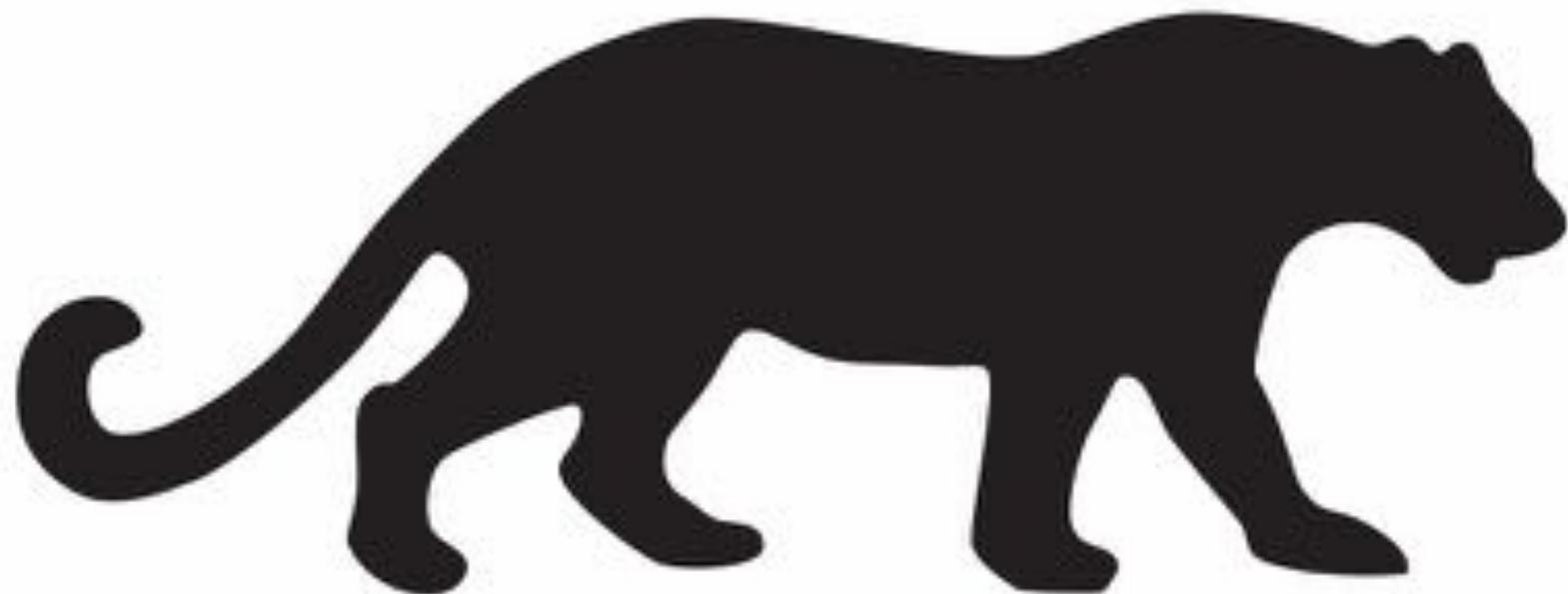
- Namibia – 6 applications pending; positive finding
- Tanzania – 2 applications pending; no finding made
- South Africa – 11 applications pending; positive finding
- Zambia – 4 permits issued; positive finding
- Zimbabwe – 37 applications pending for elephants taken in 2014 (3), 2016 or 2017; negative finding for 2014-15; positive finding for 2016-18.

Population Status

Benefits of Big Game Hunting

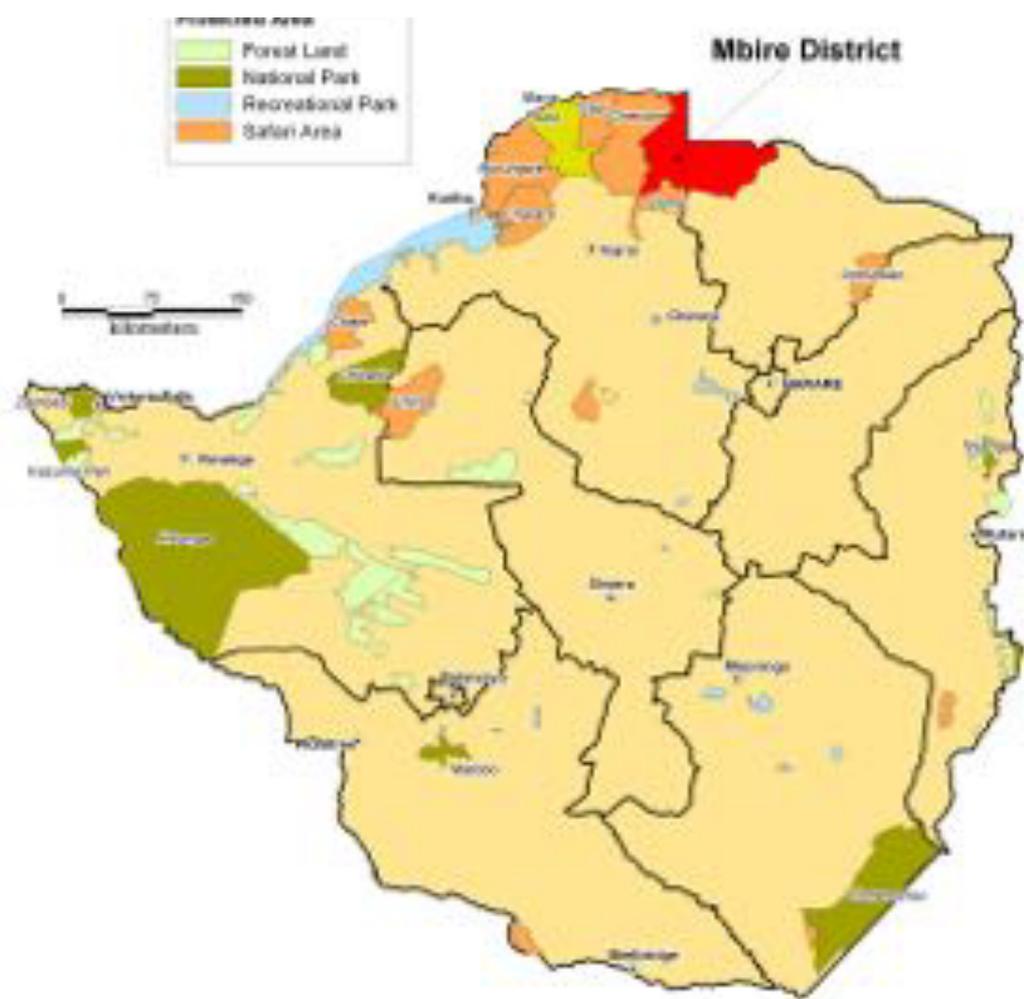
Lion and Elephant ESA Listings and the Permitting Process

- Lions (*Panthera leo melanochaita*) and African elephants (*Loxodonta africana*) are both listed as Threatened under the U.S. Endangered Species Act (ESA).
- Import of sport-hunted trophies requires an ESA permit, which can be issued if the Fish and Wildlife Service is able to make a finding that the sport-hunting activity enhances the survival of the species in the wild.
- Factors that we consider in making this finding include: the status of the species; population trends; poaching levels; wildlife management plans and how sport hunting is integrated into such plans; revenues generated by sport hunting and how they are used; how local communities benefit from sport hunting, etc.
- For elephants, we currently have positive findings and allow the import of such trophies from South Africa and Namibia. We have negative findings for Tanzania and Zimbabwe for 2014 and 2015 and our reevaluating both countries for the 2016 and 2017 hunting seasons. We are also developing findings for Mozambique and Zambia, where we do not currently have any finding in place.
- For lions, we have a positive finding for “wild” and “wild-managed” lions from South Africa and a negative finding for “captive” lions for 2016. We are currently finalizing findings for South Africa (for 2017-19) and for Tanzania, Zambia and Zimbabwe (for 2016-17).



DAPU

DANDE ANTI POACHING UNIT



Introduction

As you probably all know, **Charlton McCallum Safaris** is a hunting operator in the “Dande North” which is in the Mbire District. The concessions are made up of:

Dande North (communal land wards 1 & 2) = 77,500 hectares.
Dande Safari Area (National Parks) = 55,000 hectares.
Dande East (communal land wards 4 ,11,12) = 50,000 hectares
Total = **182,500 hectares**

79 % of the area is “communal land” with a core National Parks concession. All this we operate in a genuine partnership with the council and communities under the CAMPFIRE program.

Because of:

1. People living in the area.
2. The sheer size of the Mbire district and
3. The huge and porous borders between Zimbabwe, Mozambique and Zambia.

We face a much, much larger challenge than most. For our district the CAMPFIRE model simply has got to work. People MUST get FAIR value for their game, or all is lost. So our anti poaching and conservation efforts are under pinned by:

1. **Strong administrative, legal and financial** i.e. we make sure that all hunting proceeds are correctly channeled into producer ward accounts.
2. **Strong Sustainable Trophy Hunting Program** – through adaptive quota setting and adherence to the Parks and Wildlife Act and Industry code of conduct.
3. **Strong Conservation benefits** – early burning, roads, anti poaching, general stewardship.
4. **Strong Social benefits** – transparent on-time payments, employment and meat distribution.

1 Administrative, legal and financial.

At Charlton McCallum Safaris, we have always prided ourselves at being strong in the administrative, legal and economic departments.

All of our professional hunters are members of ZPGHA, CM Safaris is a paid up member of SOAZ and Myles McCallum has served on the SOAZ executive committee for 4 years.

It is extremely important to get all the administrative, legal and economics' of sport hunting correct, because ultimately the animals have to be worth money to all stakeholders in order to have broad buy in. The stakes are high for all parties to get the anti poaching and general best management practices right, as this reflects directly into the bottom line profit and thus makes it much, much easier to get everyone pulling in the same direction.

Please see slides showing distribution of revenue to Wards, National Parks, Council, ZTA and Campfire Association.

2013

Dande Safari Area, Dande North and Dande East - actual payments to National Parks and Communities

	<u>Hunting</u>	<u>Social Funds</u>	<u>Bird quota/ Camp rental</u>	<u>Total</u>	
<u>Council</u>	US\$206,624.0	US\$47,000.0	US\$3,000.0	US\$256,624.0	
<u>Parks</u>	US\$190,994.0	US\$0.0	US\$0.0	US\$190,994.0	
<u>Ward 4</u>	US\$27,365.0	US\$4,000.0	US\$3,500.0	US\$34,865.0	
<u>Ward 10</u>	US\$2,000.0	US\$1,000.0	US\$0.0	US\$3,000.0	
<u>Ward 11</u>	US\$21,057.0	US\$2,000.0	US\$0.0	US\$23,057.0	
<u>Ward 12</u>	US\$6,000.0	US\$2,500.0	US\$0.0	US\$8,500.0	
<u>Ward 1</u>	US\$41,237.5	US\$5,500.0	US\$0.0	US\$46,737.5	
<u>Ward 2</u>	US\$59,947.5	US\$5,500.0	US\$0.0	US\$65,447.5	
<u>Campfire</u>	US\$12,608.0	US\$0.0	US\$0.0	US\$12,608.0	
<u>ZTA</u>	US\$	US\$0.0	US\$0.0	US\$29,799.00	
<u>DAPU</u>	US\$0.0	US\$0.0	US\$0.0	US\$60,000.0	(estimated)
<u>Total Paid</u>	<u>US\$567,833.0</u>	<u>US\$67,500.0</u>	<u>US\$6,500.0</u>	<u>US\$731,632.00</u>	

2014

Dande Safari Area, Dande North and Dande East - actual payments to National Parks and Communities

	Hunting	Social Funds	Camp rental/ bird quota	Total	
<u>Council</u>	US\$225,172.0	US\$47,000.0	US\$3,000.0	US\$275,172.0	
<u>Parks</u>	US\$147,374.0	US\$0.0	US\$0.0	US\$147,374.0	
<u>Ward 4</u>	US\$33,520.0	US\$4,000.0	US\$3,000.0	US\$40,520.0	
<u>Ward 10</u>	US\$525.0	US\$1,000.0	US\$0.0	US\$1,525.0	
<u>Ward 11</u>	US\$26,597.8	US\$2,000.0	US\$0.0	US\$28,597.8	
<u>Ward 12</u>	US\$0.0	US\$2,500.0	US\$0.0	US\$2,500.0	
<u>Ward 1</u>	US\$49,217.0	US\$5,500.0	US\$0.0	US\$54,717.0	
<u>Ward 2</u>	US\$71,352.3	US\$5,500.0	US\$0.0	US\$76,852.3	
<u>Campfire</u>	US\$14,650.0	US\$0.0	US\$0.0	US\$14,650.0	
<u>ZTA</u>	US\$24,466.00	\$0	\$0	US\$24,466.00	
<u>DAPU</u>	US\$0.0	US\$0.0	US\$0.0	US\$71,968.0	(actual)
<u>Total Paid</u>	<u>US\$568,408.1</u>	<u>US\$67,500.0</u>	<u>US\$6,000.0</u>	<u>US\$738,342.00</u>	

2015

Dande Safari Area, Dande North and Dande East - actual payments to National Parks and Communities

	Hunting	Social funds	Camp rental/ Bird quota	Total	Notes
Council	\$166,022.75	\$47,000.00	\$4,000.00	\$171,693.00	
Parks	\$146,158.00	\$0	\$0	\$146,158.00	
Ward 4	\$22,261.91	\$4,000.00	\$3,500	\$29,762.00	
Ward 10	\$3,862.50	\$1,000.00	\$0	\$4,862.00	
Ward 11	\$15,950.05	\$2,000.00	\$0	\$17,950.00	
Ward 12	\$0	\$2,500.00	\$0	\$2,500.00	
Ward 1	\$35,582.86	\$5,500.00	\$0	\$41,082.00	
Ward 2	\$56,419.73	\$5,500.00	\$0	\$61,919.00	
Campfire	\$9,715.00	\$0	\$0	\$9,715.00	
ZTA	\$18,164.00	\$0	\$0	\$18,164.00	
DAPU	\$0	\$0	\$0	\$74,813.00	(Actual)
<u>Total Paid</u>	<u>\$474,136.8</u>	<u>\$67,500.00</u>	<u>\$7,500.00</u>	<u>\$549,136.00</u>	

2016

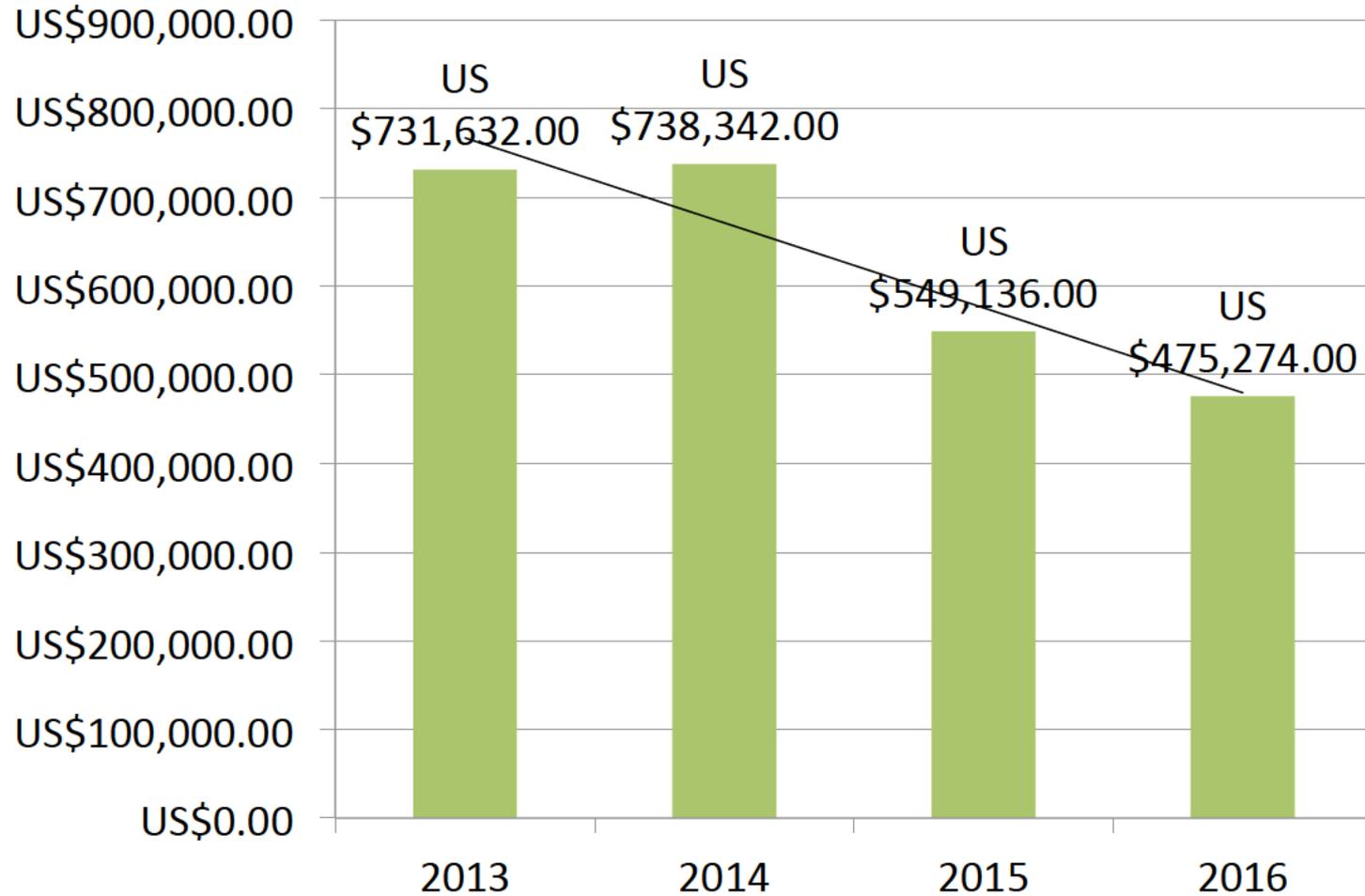
Dande Safari Area, Dande North and Dande East - actual payments to National Parks and Communities

	Hunting	Social funds	Camp rental/ Bird quota	Total	Notes
Council	\$79,010.00	\$47,000	\$3,000.00	\$129,010.00	
Parks	\$119,190.00	\$0	\$0	\$119,190.00	
Ward 4	\$11,300.00	\$4,000.00	\$3,000	\$18,300	
Ward 9& 10	\$611.61	\$1,000.00	\$0	1,611.61	
Ward 11	\$6,875.00	\$2,000.00	\$0	\$8,875.00	
Ward 12	\$0.00	\$2,500.00	\$0	\$2,500.00	
Ward 1	\$44,894	\$5,500.00	\$0	\$50,394.00	
Ward 2	\$22,195	\$5,500.00	\$0	\$27,695.00	
Campfire	\$6,879.00	\$0	\$0	\$6,879.00	
ZTA	\$15,814.77	\$0	\$0	\$15,814.00	
DAPU	\$95,006	\$0	\$0	\$95,006.00	(Actual)
<u>Total Paid</u>	<u>\$401,775.38</u>	<u>\$67,500.00</u>	<u>\$6,000.00</u>	<u>\$475,274.00</u>	

Four year earnings in US\$ Dande – decrease due to USFWS elephant and lion bans.

Note 36% decrease in earnings in 2016 compared to 2014

Note combined loss in revenue \$452,274.00 2015 and 2016 combined



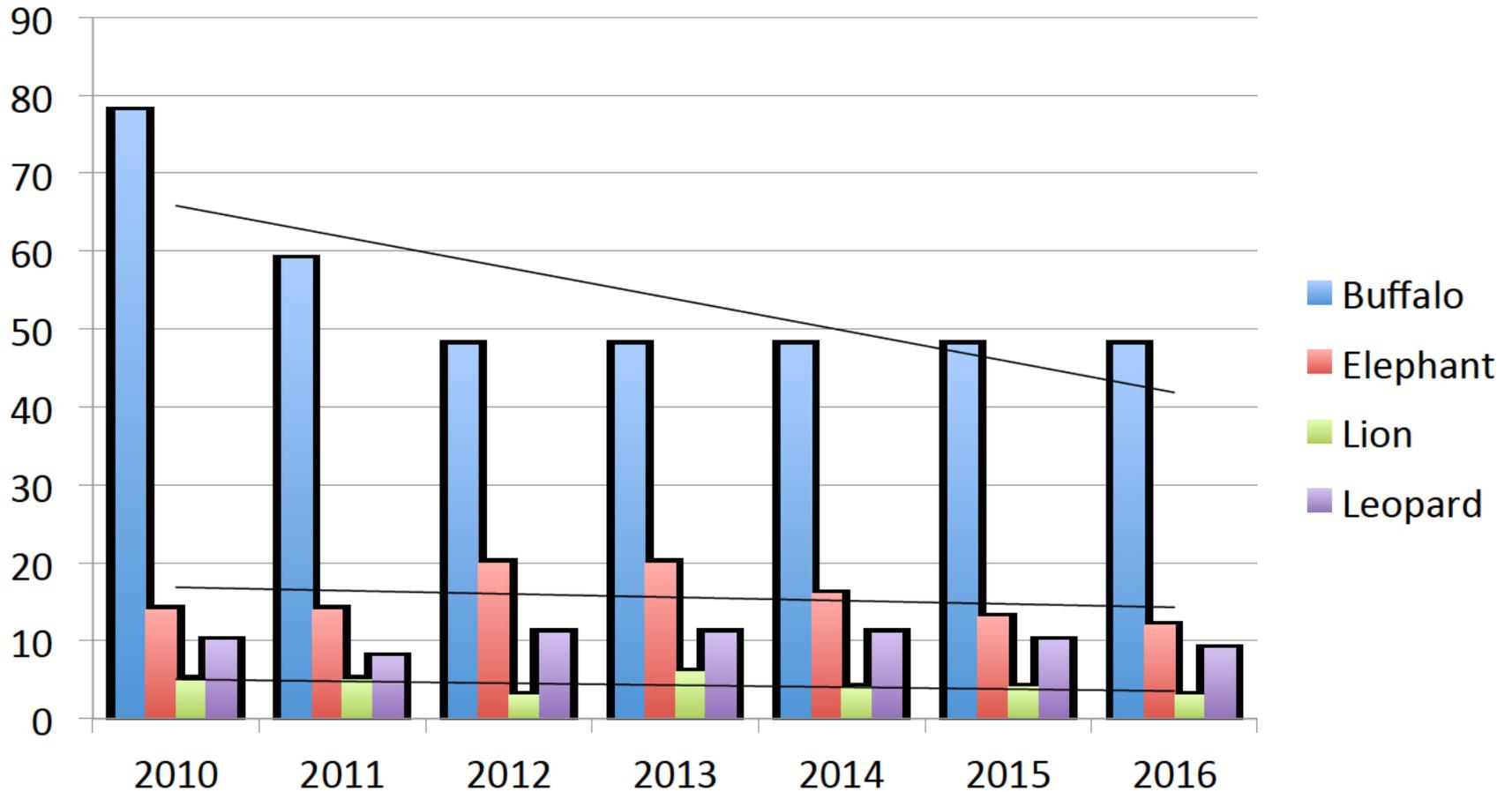
2 SUSTAINABLE HUNTING PROGRAM **(Adaptive quota setting)**

Zimbabwe uses an “adaptive quota setting system”. Information is collected annually at different levels at workshops, and is fed into the national plan. At the end of this, the government of Zimbabwe issues a “sport hunting quota ”per area.

1. Ward quota setting – information is collected at ward level amongst the villages.
2. Company quota setting – CM Safaris collects information from scouts, staff and professional hunters.
3. District quota setting – information from ward and company quota setting is fed into the District plan.
4. Provincial quota setting – The results from the Mbire district quota setting feeds into the Provincial plan at the quota setting workshop.
5. National quota setting – this is done by provincial ecologists from National Parks in conjunction with the Ministry of Environment Water and Climate.

All sorts of information is collected – water hole counts, aerial counts, spoor transects, trophy quality trends, trophy ages and it is surprisingly accurate. National parks is able to cross reference numbers from all these different sources.

Sustainable Trophy Hunting Program
(Adaptive quota setting)
Mbire North, Dande Safari Area and Dande East.



3 Social Responsibility and Benefits.

Some of the things that Charlton McCallum Safaris does annually:

1. Pays \$67,500.00 per annum to individual wards and council (as per tables above). This money is used per Ward and Council's discretion and must be on a capital project (house, classroom block etc...).
2. Fair and on-time distribution of revenue as per contract (see tables above)
3. Distribution of meat.
4. As per contract, we only employ locals and our annual wage bill is + \$110,000 per annum (not listed in any tables above).
5. Attention to Problem animal reports.
6. Financial and physical contributions towards National holidays (Heroes, Independence, Christmas).
7. Contributions to orphans and kids in need.
8. Various sponsorships towards soccer teams and tournaments.
9. Recognition and sponsorship of the local "spirit mediums" as per local culture.
10. Financial and physical help towards main road maintenance.

3 Conservation Benefits

At Charlton McCallum Safaris we pride ourselves on having the very finest:

1. Early burning and fire management.
2. Road maintenance for - ease of access, fire breaks and security.
3. New roads into areas previously unmanaged.
4. Anti poaching – DAPU.
5. Water – dams and boreholes.
6. Cut lines and boundaries to help with zoning.

All of this has meant a real long term improvement in all aspects of the concession – greater game populations, lower poaching and greater community benefits.





Practical anti poaching.

1. Poor rural communities on the frontline of elephant and human conflict zones **simply will not tolerate any crop damage and will take the law in to their own hands.** These same communities are what we call the producer wards and currently they enjoy the benefits of hunting.

2. Currently the communities in producer wards act as our eyes and ears and actually do not want to see their hunting benefits being depleted by poachers. HOWEVER, if there are no rewards to be had from legal hunting they will in turn actively assist or actually poach those same elephants for reward.

3. The use of **POISON** is a **GAME CHANGER.** Not only are poisons readily available, but also their use is almost risk free from a poachers point of view – silent and supremely efficient . They have an added benefit from a poachers/ disgruntled communities point of view of killing lions, leopards and hyenas too.

DAPU – on the ground operations.

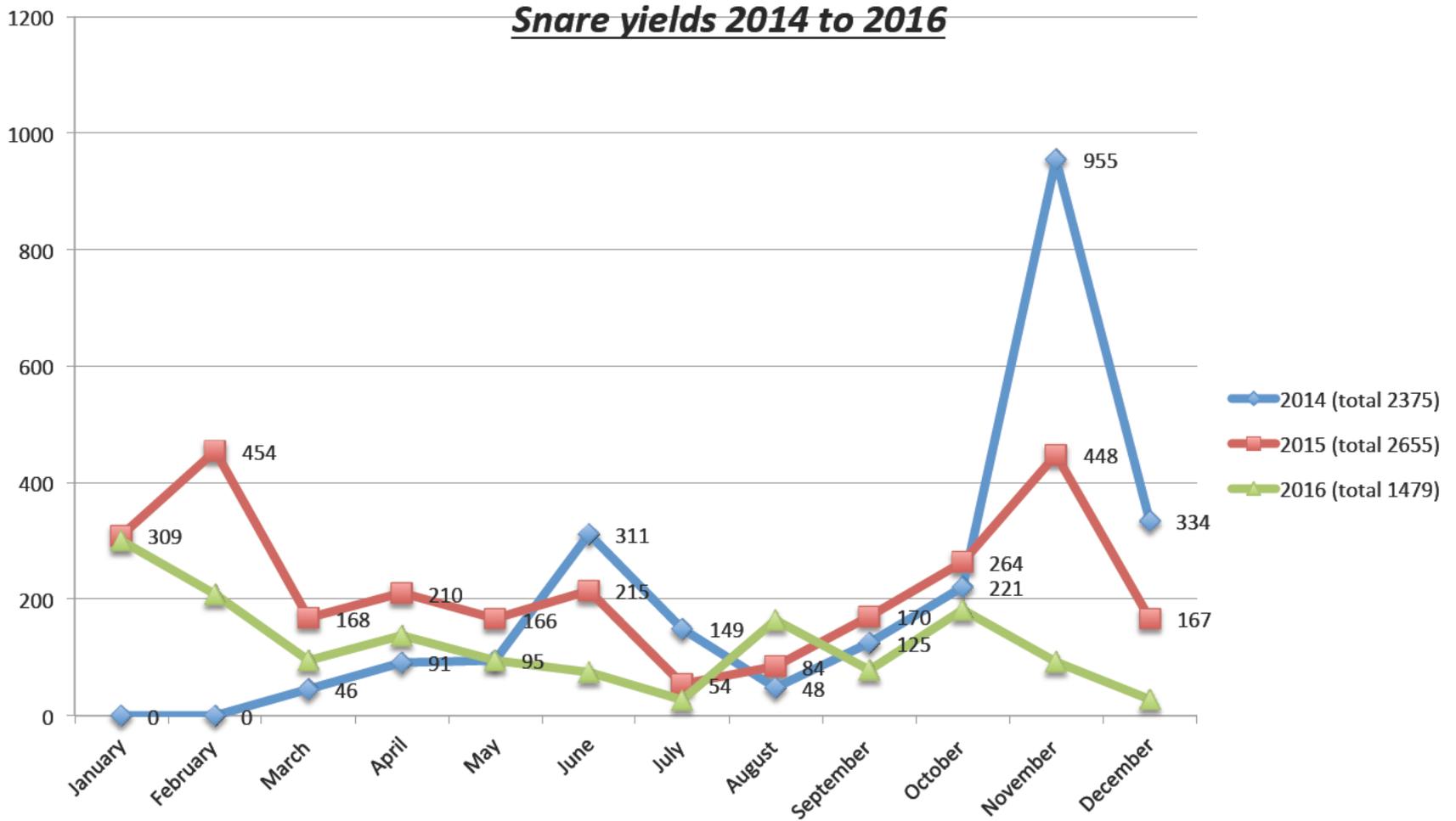
We found when we began in 2010 that the “community scouts” were thoroughly discouraged as often they went up to a year without any pay. Immediately we began support of the community scouts (10 to begin with) in Dande East. The ward paid them half their salary and we paid the other half as well as fed and equipped them. The results were gratifying and almost immediately the poachers were on the back foot and thousands of snares had been picked up and dozens of poachers were arrested.

DAPU has;

1. Two full time “managers” employed.
2. Two dedicated land cruisers allocated.
3. 22 “community scouts” under DAPU control.
4. Access to 18 “Council Scouts”.
5. Access to 18 “Parks Rangers”.

3 year poaching trend 2014 , 2015 and 2016 (indexed in snares found).

You will notice a gradual downwards trend and also a massive decrease during the hunting season



Elephant poaching statistics
(90% accurate)

Year	No of Carcasses
2010	40
2011	36
2012	16
2013	4
2014	9
2015	4
2016	7

DAPU Reward for Anti Poaching efforts/incentive

Category 1 - elephant poaching (all rewards paid on conviction ONLY)

	Reward/ Tariff	Paid to
"Gunner" or shooter ea.	500	Scouts involved in arrests
Accomplices ea.	250	Scouts involved in arrests
Informer/Information	100	To informers/informant
Sergeant/Manager per "gunner"	150	CMS Manager (Bongi/ Muno)
Sergeant/Manager per "accomplice"	100	CMS Manager (Bongi/ Muno)

Category 2 - meat poaching (all rewards paid on conviction ONLY)

	Reward/ Tariff	Paid to
Poacher ea.	100	Scouts involved in arrests
Dogs ea.	10	Scouts involved in arrests
Snare ea.	2	Scouts involved
Informer/Information	50	To informers/informant
Sergeant/Manager (per poacher)	50	CMS Manager (Bongi/ Muno)

- **Category 3 - fish poaching (all rewards on conviction ONLY)**

	Reward/ Tariff	Paid to
Poacher ea.	100	Scouts involved in arrests
Dogs ea.	10	Scouts involved in arrests
Snare ea.	2	Scouts involved
Informer/Information	50	To informers/informant
Sergeant/Manager (per poacher)	50	CMS Manager (Bongi/ Muno)

2014 Successes

	No. Snares	Dogs shot	Meat poachers convicted	Elephant poachers convicted	Weapons retrieved	Nets retrieved	Poached elephants	Canoes confiscated	Rewards paid
March	46	2	5	0	2	1	0	1	422
April	91	1	0	0	4	0	0	0	212
May	95	1	2	0	4	0	0	0	670
June	311	0	6	0	5	0	0	0	1597
July	149	0	1	0	1	0	0	0	503
August	48	0	0	0	0	0	0	0	96
September	125	1	0	0	0	0	0	0	250
October	221	2	2	0	1	0	0	0	597
November	955	2	2	2	2	0	0	0	4190
December	334	0	1	2	3	0	0	0	1065
	<u>2375</u>	<u>9</u>	<u>19</u>	<u>4</u> <u>(1Deceased)</u>	<u>22</u>	<u>1</u>	<u>9</u>	<u>1</u>	<u>\$9,602</u>

2015 Successes

	No. Snares	Dogs shot	Meat poachers convicted	Elephant poachers convicted	Weapons retrieved	Nets retrieved	Poached Elephants	Canoes confiscated	Rewards paid
January	309	0	5	0	0	0	0	0	1518
February	454	0	0	0	0	0	2	0	908
March	168	1	1	0	0	0	1	0	336
April	210	1	1	0	0	0	0	0	420
May	166	0	0	0	0	0	0	0	166
June	161	0	0	0	0	0	0	0	176
July	54	0	0	0	0	0	0	0	97
August	84	0	0	0	0	0	0	0	135
September	172	7	0	0	9	0	0	0	386
October	264	6	2	0	0	0	0	0	899
November	448	5	1	5	2	0	1	0	3493
December	167	0	1 (leopard)	0	0	0	0	0	710
	<u>2655</u>	<u>20</u>	<u>11</u>	<u>5</u>	<u>11</u>		<u>4</u>		<u>\$9,244.00</u>

2016 successes

	No. Snares	Dogs shot	Meat poachers convicted	Elephant poachers convicted	Weapons retrieved	Nets retrieved	Poached Elephants	Canoes confiscated	Rewards paid
January	300	0	3	0	0	0	0	0	821
February	208	0	0	2	0	0	2	0	978
March	95	0	0	0	0	0	1	0	97
April	137	0	1	0	2	0	0	0	321
May	94	0	5	0	4	0	0	0	1310
June	75	0	0	0	0	0	4	0	83
July	27	0	0	0	2	0	0	0	67
August	164	1	0	0	0	0	0	0	254
September	78	0	1	0	1	0	0	0	97
October	181	0	2	0	1	0	0	0	447
November	92	0	0	0	0	0	0	0	442
December	28	0	0	0	0	0	0	0	532
	<u>1479</u>	<u>1</u>	<u>12</u>	<u>2</u>	<u>10</u>	<u>25</u>	<u>7</u>	<u>7</u>	<u>\$5,499.00</u>

DAPU 2014,2015,2016 Budgets

<u>DAPU actual 2016 BUDGET and proposed 2017.</u>						
	<u>2017 Budget</u>	<u>% Variance</u>	<u>2016 actual</u>	<u>2016 (proposed)</u>	<u>2015 (actual)</u>	<u>2014 (actual)</u>
<u>Receipts</u>	-		-		-	-
From Sylvarnus Trust, SCI & clients	US\$50,571	48%	US\$50,571	US\$34,056.00	US\$34,956.00	US\$35,904.00
Charlton McCallum Safaris	US\$44,435	-5%	US\$44,435	US\$46,653.00	US\$49,756.70	US\$36,064.00
	US\$95,006	18%	US\$95,006	US\$80,709	US\$84,713	US\$71,968
<u>Less Expenses</u>			-			
Wages (scouts)	US\$14,300	0%	US\$14,300	US\$14,300.00	US\$14,300.00	US\$13,075.00
Management	US\$20,865	15%	US\$20,865	US\$18,200.00	US\$18,200.00	US\$18,200.00
Rations (from January x 22 scouts).	US\$9,240	0%	US\$9,240	US\$9,240.00	US\$9,240.00	US\$7,980.00
Rewards	US\$5,449	-43%	US\$5,449	US\$9,582.00	US\$9,582.00	US\$9,602.00
Equipment	US\$14,937	76%	US\$14,937	US\$8,500.00	US\$2,603.00	US\$6,861.00
Landcruiser operating costs	US\$30,215	45%	US\$30,215	US\$20,888.00	US\$20,888.00	US\$16,250.00
	US\$95,006	18%	US\$95,006	US\$80,710.00	US\$74,813.00	US\$71,968.00
<u>Shortfall</u>	US\$0	0%	US\$0	-US\$1.00	US\$0.00	US\$0.00

Biggest Challenges

1. Financial-With by far the biggest area to look after and with the most challenges I am sure I join the list of all other organizations here pleading poverty. We really are under-staffed and short of kit but are doing our best with what we can afford.
2. Short leases – are a challenge as there is little incentive to plough back in to Anti poaching and communities.
3. Meddling foreign politicians i.e the communities and National Parks lost \$452,274.00 in 2015 and 2016 (compared to 2014). This is a direct result of the elephant and lion import ban to the USA. We expect a further drop in 2017. All this affects us (who no one cares about) as well as the communities – who people ought to care about. Ultimately at a time when we all need to be spending more money on anti poaching, that ability has been eroded by the EU and USFWS.
4. We have a border with Mozambique of over 100Km's and poaching there is rife and out of control. This directly affects our operations.
5. We have a porous 15km border with Zambia – which is a common threat with other folk here.
6. Human population increases.
7. Often times hugely lenient sentences by the judiciary.

Conclusion

Generally in Dande we are quite pleased with our results. I think especially if one takes into account the immense size of the area and other complicating factors I have already mentioned.

With the help of all our hunting clients, together with DAPU, National Parks and the Mbire RDC we have managed to:

- Keep safe the habitat in key areas.
- Improve game populations by approximately 50 – 100% in seven years.
- Improve the lives of the local people.
- Reduce poaching to an all time low.

All this has been achieved on a sustainable, long term basis. However if the district is to catapult itself into the next category up, then we will need funding for sure. There is huge potential for much greater game populations and that will lead to much better economies long term.

MBIRE POPULATION
(ORANGE ARE WARDS RELATED TO CAMPFIRE)

ward	Males	Females	Total	House holds
1	1558	1622	3180	705
2	2337	2514	4851	1149
3	3073	3033	6106	1337
4	3529	3587	7116	1578
5	2608	2681	5289	1192
6	1950	2112	4062	900
7	1293	1256	2549	569
8	4182	4235	8417	1751
9	2462	2437	4899	1126
10	3414	3503	6917	1489
11	829	809	1638	332
12	3292	3493	6785	1508
13	2820	2925	5745	1258
14	1235	1174	2409	553
15	2464	2698	5162	1224
16	1493	1503	2996	624
17	1920	1892	3812	834
Total	40459	41474	81933	18129

PAC HISTORY TO DATE 2015

ANIMALS KILLED ON PAC

Animal	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Elephant	9	16	14	11	12	7	8	6	2	7	8	4	5
Buffalo	10	9	15	12	12	8	6	1	0	1	1	1	0
Crocodile	0	2	0	0	0	4	1	2	1	0	1	1	2
Lion	0	0	0	0	0	2	1	12	1	0	1	2	1
Hippo	1	0	0	0	1	3	2	0	0	1	1	1	0

DOMESTIC ANIMALS KILLED BY LIONS JAN 2010 TO 2015

Ward	Cattle	Donkey	Goat	Dog	Chicken	
1. Kanyemba		1	0	60	6	0
2. Angwa		25	10	48	0	0
3. Shange		22	8	30	0	0
4. Gonono		20	10	20	0	0
7. Hambe		30	5	15	0	0
8. Mhokwe		30	0	10	0	0
9. Mushumbi		12	0	10	0	0
10. Chitsungo		60	12	35	1	0
11. Masoka		0	2	20	103	74
TOTAL		200	47	248	110	74

HUMAN AND WILDLIFE CONFLICT/DEATHS

Animal	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Elephant	1	0	2	0	2	0	0	2	0	1	1	0	1
Buffalo	1	1	1	0	3	2	2	0	1	0	0	1	0
Crocodile	1	1	0	0	4	2	1	6	1	0	0	1	2
Lion	0	0	0	0	0	3	1	3	0	0	0	0	1
Hippo	0	0	0	0	0	1	0	0	0	0	0	0	0
Snake	0	0	0	0	0	0	3	6	4	1	0	1	1
Bee	0	0	0	0	0	0	1	3	0	0	0	0	1
Jackal	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	3	2	3	0	9	8	8	20	6	2	1	3	6

HUMAN AND WILDLIFE CONFLICT/INJURIES

Animal	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Lion	0	0	2	0	0	1	0	1	1	0	0	0	0
Buffalo	0	2	1	2	0	2	1	0	0	0	0	1	0
Crocodile	0	2	2	0	2	2	4	7	6	2	4	5	5
Snake	0	0	0	0	0	0	0	4	6	0	0	0	4
Hippo	0	0	0	0	0	0	0	1	0	0	1	2	0
Jackal	0	0	0	0	0	0	0	0	1	0	0	2	0
Elephant	0	0	0	0	0	0	0	0	2	4	2	2	0
TOTAL	0	4	5	2	2	5	5	13	16	6	7	12	9



THE HUMANE SOCIETY
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November 24, 2017

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Council Designated Federal Officer
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Mr. Timothy Van Norman
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Re: Comments Opposing the Establishment of an International Wildlife Conservation Council (Docket No. FWS-HQ-R-2017-N118)

Dear Mr. Winchell and Chief Van Norman,

The Humane Society of the United States (“HSUS”), Humane Society International (“HSI”), Humane Society Legislative Fund (“HSLF”), and the twenty-two undersigned organizations strongly urge the U.S. Fish and Wildlife Service (“Service”) not to establish the euphemistically-named International Wildlife Conservation Council (“IWCC”), as establishing the IWCC as proposed would violate the Federal Advisory Committee Act (“FACA”, 5 U.S.C. App. 2) and would be arbitrary and capricious and not in accordance with law. *See* 82 Fed. Reg. 51,857 (Nov. 8, 2017).

The Service Proposes to Create a Duplicative and Biased Advisory Council

The Service is proposing to establish the IWCC for the purpose of “**increasing public awareness** domestically regarding the **conservation**, wildlife law enforcement, and **economic benefits that result from U.S. citizens traveling to foreign nations to engage in hunting**. Additionally, the Council shall **advise the Secretary on the benefits international hunting** has on foreign wildlife and habitat conservation, anti-poaching and illegal wildlife trafficking programs, and other ways in which international hunting benefits human populations in these areas.” *Id.* (emphasis added).

The duties of the IWCC would include:

- developing a plan for public engagement and education on the benefits of international hunting;
- reviewing and making recommendations for changes, when needed, on all Federal programs, and/or regulations, to ensure support of hunting as: (a) An enhancement to foreign wildlife conservation and survival, and (b) an effective tool to combat illegal trafficking and poaching;
- recommending strategies to benefit the U.S. Fish and Wildlife Service's permit office in receiving timely country data and information so as to remove barriers that impact consulting with range states;
- recommending removal of barriers to the importation into the United States of legally hunted wildlife;
- ongoing review of import suspension/bans and providing recommendations that seek to resume the legal trade of those items, where appropriate;
- reviewing seizure and forfeiture actions/practices, and providing recommendations for regulations that will lead to a reduction of unwarranted actions;
- reviewing the Endangered Species Act's foreign listed species and interaction with the Convention on International Trade in Endangered Species of Wild Flora and Fauna [*sic*], with the goal of eliminating regulatory duplications; and
- recommending methods for streamlining/expediting the process of import permits.

Id.

As detailed herein, the IWCC is unnecessary, duplicative, not in the public interest, and designed to be inappropriately influenced by the trophy hunting industry in a manner that undermines the Service's statutory duties under the Endangered Species Act (16 U.S.C. § 1531 *et seq.*) and FACA. Therefore, the IWCC cannot lawfully be established.

Requirements for Establishing a Federal Advisory Committee

The FACA provides that “new advisory committees should be established only when they are determined to be essential and their number should be kept to the minimum necessary.” 5 U.S.C. App. 2 § 2(b)(2). Further, “[n]o advisory committee shall be established unless such establishment is determined...to be in the public interest in connection with the performance of duties imposed on that agency by law.” *Id.* § 9(a)(2). Advisory committees can only be used “solely for advisory functions” (*id.* § 9(b)) and must serve a “clearly defined purpose” (*id.* § 5(b)(1)). The membership of an advisory committee must “be fairly balanced in terms of the points of view represented and the functions to be performed by the advisory committee” (*id.* § 5(b)(2)), and must “not be inappropriately influenced by... any special interest” (*id.* § 5(b)(3)). Agency actions contrary to the requirements of FACA are subject to judicial review under the Administrative Procedure Act (APA). *See, e.g., Fertilizer Institute v. U.S. E.P.A.*, 938 F.Supp. 52, 54-55 (D.D.C., 1996); 5 U.S.C. § 702. *See also Food Chem. News, Inc. v. Davis*, 378 F. Supp. 1048, 1049 (D.D.C. 1974) (enjoining agency from convening advisory committee meetings unless conducted in full compliance with FACA).

Establishing the IWCC Would Violate FACA

A. The IWCC Is Duplicative and Not Essential

The purpose of FACA is “to enhance the public accountability of advisory committees established by the Executive Branch and to reduce wasteful expenditures” that result only in “worthless committee meetings and biased proposals.” *Pub. Citizen v. U.S. Dep’t of Justice*, 491 U.S. 440, 453, 459 (1989). To this end, it is unlawful for FWS to establish an advisory committee that exceeds the minimum number of committees necessary or to establish a committee that is not needed to advance an agency’s statutory duties and regulatory agenda. *See* 5 U.S.C. App. 2 § 2(b)(2). The IWCC wholly fails to meet these standards – indeed, the IWCC raises the precise concerns that FACA was designed to guard against.

Notably, there already exists an advisory council entitled the Wildlife and Hunting Heritage Conservation Council (“WHHCC”), which has the authority to address the matters included in the IWCC’s proposed purview. *See* 75 Fed. Reg. 6,056 (Feb. 5, 2010); <https://www.fws.gov/whhcc/>. Like the IWCC, the WHHCC’s mission explicitly includes providing “advice on wildlife and habitat conservation endeavors that (1) **benefit recreational hunting**; (2) benefit wildlife resources; and (3) encourage partnerships among the public, the sporting conservation community, wildlife conservation groups, the States, Native American Tribes, and the Federal government.” 75 Fed. Reg. 6,056 (Feb. 5, 2010) (emphasis added). To achieve that goal of promoting recreational hunting, the WHHCC focuses in part on “Providing appropriate access to hunting and recreational shooting on Federal lands” and “Providing recommendations to improve implementation of Federal conservation programs that benefit wildlife, hunting and outdoor recreation on private lands.” *Id.* Consistent with these broad purposes, the WHHCC has multiple times discussed and formed recommendations on international trophy hunting issues.

For example, in July 2012, the WHHCC sent a letter to the Service on behalf of “millions of hunters and anglers nationwide, including many who hunt internationally and seek to import and export their trophies into and out of the United States.” (Attached). That letter included criticism of the process the Service uses to interpret and apply restrictions on the import and seizure of hunting trophies, and provided eight particular recommendations relating to “1) amendments to CITES resolutions and/or decision documents; 2) modifications to FWS manuals, policies, Directors’ Orders, guidance documents and/or practices; and 3) coordinating efforts with representative organizations of the international hunting community.” *Id.* Similarly, in July 2014, the WHHCC sent another letter to the Service, this time urging the Service to reverse its decision to suspend the import of elephant hunting trophies from Tanzania and Zimbabwe, noting the WHHCC’s “efforts on behalf of the hunting community.” (Attached). That latter letter followed a June 2014 meeting of the WHHCC where Safari Club International (“SCI”) presented “updates on African Lion and Elephant” trophy hunting.¹ At its March 2016 meeting, WHHCC again discussed the topic of international trophy hunting, specifically focusing on African lion import issues and including a presentation from SCI.² These are the precise tasks identified

¹<https://www.facadatabase.gov/committee/historymeeting.aspx?mid=123631&cid=2299&fy=2014>.

²<https://www.facadatabase.gov/committee/historymeetingdocuments.aspx?flr=135324&cid=2299&fy=2016>.

in the IWCC notice, demonstrating that there already exists a forum for trophy hunters to attempt to influence FWS policy on these matters.

Indeed, the WHCC currently includes members that represent international trophy hunting interests, such as the Congressional Sportsmen's Foundation.³ The WHCC also currently includes representatives from the Boone & Crockett Club, Backcountry Hunters & Anglers, Ducks Unlimited de Mexico, and Urban American Outdoors, many of whose members trophy hunt in the U.S.—and likely abroad. Further, the IWCC seeks representation from “the firearms or ammunition manufacturing industry,” but a representative from the National Shooting Sports Foundation – a national trade association for the firearms industry – already serves as a member of the WHCC. The incredibly slight differences in the membership these councils maintain/are seeking, demonstrate the duplicative nature of the IWCC.

Therefore, it would be wholly duplicative for the Service to establish the IWCC, whose proposed purpose and tasks are matters that can and are already being carried out by another advisory group.

Similarly, the Service has failed to demonstrate that establishing the IWCC is *essential*. For example, in 2013 the Service established a Wildlife Trafficking Advisory Council to combat issues of illicit wildlife trade and to improve enforcement of wildlife trade laws. 78 Fed. Reg. 45,555 (Jul. 29, 2013). That committee discussed issues of international trophy hunting as a type of wildlife trade.⁴ However, that advisory council was deemed inessential and discontinued pursuant to Executive Order No. 13811 (September 29, 2017).⁵ It is arbitrary and capricious for the Service to now establish the IWCC to take on activities that were previously covered by the Wildlife Trafficking Advisory Council, which was deemed unnecessary by this Administration. Further, the duplicative nature of the IWCC is further demonstrated by the fact that the IWCC would include a representative from the U.S. Department of State – the Presidential Task Force on Wildlife Trafficking established pursuant to Executive Order No. 13,648 (July 1, 2013) already provides a forum for the Service and the State Department to discuss issues of international wildlife trade, including trade in hunting trophies.

Thus, there are already multiple fora for detailed discussion of the issues the IWCC is tasked with providing advice to the Service on, meaning that establishing the IWCC is not essential, as required by law. This is especially true given the broader statutory context, as discussed further below – the Endangered Species Act already provides the opportunity for the trophy hunting industry to submit applications for import permits that demonstrate the alleged benefit of trophy hunting and to submit comments on other permit applications and foreign species listing petitions. *See* 16 U.S.C. § 1539(c). Thus, there is no functional need

³ *See, e.g.*, Congressional Sportsmen's Foundation. Press Release. Aug. 7, 2013. *Sportsmen's Priorities Moving in Congress* (supporting bill allowing import of polar bear trophies hunted in Canada), <http://sportsmenslink.org/the-media-room/news/sportsmens-priorities-moving-in-congress>.

⁴ *See* <https://www.fws.gov/International/advisory-council-wildlife-trafficking/pdf/acwt-meeting-minutes-march-20.pdf>.

⁵ *See* <https://www.whitehouse.gov/the-press-office/2017/09/29/presidential-executive-order-continuance-certain-federal-advisory>.

for an advisory committee dedicated to promoting propaganda of the trophy hunting industry.

Because the IWCC is per se inessential and duplicative, chartering the IWCC would violate FACA.

B. The IWCC Is Not in the Public Interest

Chartering the IWCC would further violate FACA because its purpose is inconsistent with the public interest and the “performance of duties imposed on [the Service] by law.” 5 U.S.C. App. § 9(a)(2).

The primary stated purpose of the IWCC is to *promote* trophy hunting of foreign species and to relax the legal restrictions for importing trophies of threatened and endangered species, accepting as incontrovertible fact the notion that trophy hunting promotes the conservation of wildlife species. However, this is a highly controversial and hotly debated topic, with ample scientific evidence to the contrary, and the notice of IWCC creation patently reveals the biased and unsupported positions that the council would advance.

The FACA was specifically adopted to avoid such a circumstance. *See, e.g., Moss v. C.A.B.*, 430 F.2d 891, 893 (1970) (when the “subject matter of” a FACA council’s “involve[s] serious and much-debated...issues...[t]he Government’s consideration of such sensitive issues must not be unduly weighted by input from the private commercial sector, lest the Government fall victim to the devastating harm of being regulated by those whom the Government is supposed to regulate in the public interest.”); H.R. REP. 92-1017, 1972 U.S.C.C.A.N. 3491, 3496 (“One of the great dangers in th[e] unregulated use of advisory committees is that special interest groups may use their membership on such bodies to promote their private concerns. Testimony received [on the passage of the FACA] pointed out the danger of allowing special interest groups to exercise undue influence upon the Government through the dominance of advisory committees which deal with matters in which they have vested interests.”).

Thus, forming the IWCC as proposed would be unlawful.

1. Trophy hunting undermines conservation efforts

As detailed in numerous documents in the Service’s possession (*e.g.*, petitions to list African lions, elephants, and leopards as endangered under the ESA; letters submitted with respect to the import of lions and elephants from Tanzania, Zimbabwe, Zambia, and South Africa, as well as the expert declarations in support thereof; and comments opposing the import of endangered bontebok, cape mountain zebra, and black rhinoceros trophies, attached), there is ample scientific evidence that trophy hunting of threatened and endangered species does not in fact enhance the survival of the species in the wild. With respect to three of the so-called “Big Five” species targeted by trophy hunters, a summary of that evidence is as follows.

Trophy Hunting of African Lions

With the world's preeminent lion scientist as the lead author, Packer et al. (2009)⁶ and Packer et al. (2010)⁷ identify trophy hunting as the likely cause of multiple lion population declines in Africa.⁸ In addition to direct population reduction through lethal take, trophy hunting poses a threat to lions because it can weaken a population's genetic constitution (e.g. Allendorf et al. 2008⁹). Because hunters target the biggest and strongest males, trophy hunting removes these animals from the breeding pool and unnaturally selects for smaller or weaker animals (Allendorf and Hard, 2009¹⁰). In this way, trophy hunting can decrease genetic variation, shift the population structure, and cause unnatural evolutionary impacts. This effect has already been documented in other species. For example, selective hunting likely increased the occurrence of mature female African elephants (*Loxodonta africana*) lacking tusks from 10% to 38% in parts of Zambia over 20 years (Jachmann et al. 1995¹¹), and recent studies of bighorn sheep suggest that horn size and body weight decreased over time as a result of trophy hunting (e.g. Coltman et al., 2003¹²; Festa-Bianchet et al., 2013¹³). Further, when trophy hunting is sanctioned, poaching activity increases, likely due to the perception that species authorized for hunting are of diminished value and the perception that legal killing increases the acceptability of poaching.¹⁴ Moreover, trophy hunting of lions has cascading lethal impacts on lion populations, as the social instability created by removing dominant males leads to infanticide of cubs sired by the male killed for a trophy (Packer et al. 2009).

⁶ Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L., and Nowell, K. (2009). Sport Hunting, Predator Control and Conservation of Large Carnivores. *PLoS ONE*, 4(6): e5941. DOI:10.1371/journal.pone.0005941

⁷ Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., and Caro, T. (2010) Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology*, 25, 142–153.

⁸ See also Bauer H, Henschel P, Packer C, Sillero-Zubiri C, Chardonnet B, Sogbohossou EA, et al. (2017) Lion trophy hunting in West Africa: A response to Bouché et al. *PLoS ONE*12(3): e0173691. <https://doi.org/10.1371/journal.pone.0173691>.

⁹ Allendorf, F.W., England, P.R., Luikart, G., Ritchie, P.A., and Ryman, N. (2008). Genetic effects of harvest on wild animal populations. *Trends in Ecology and Evolution*, 23, 327-337. doi:10.1016/j.tree.2008.02.008

¹⁰ Allendorf, F.W. and Hard, J.J. (2009). Human-induced evolution caused by unnatural selection through harvest of wild animals. *Proceedings of the National Academy of Sciences of the United States of America*, 106, 9987-9994. See also Coltman, D. W., et al. (2003). Undesirable evolutionary consequences of trophy hunting. *Nature* 426(6967): 655-658.; Palazy, L., et al. (2012). Rarity, trophy hunting and ungulates. *Animal Conservation* 15(1): 4-11.; Darimont, C. T., et al. (2015). The unique ecology of human predators. *Science* 349(6250): 858-860.

¹¹ Jachmann, H., Berry, P.S.M., and Imae, H. (1995). Tuskslessness in African Elephants: a future trend. *African Journal of Ecology*, 33, 230-235. DOI: 10.1111/j.1365-2028.1995.tb00800.x

¹² Coltman, D.W., O'Donoghue, P., Jorgenson, J.T., Hogg, J.T., Strobeck, C., and Festa-Bianchet, M. (2003). Undesirable evolutionary consequences of trophy hunting. *Nature*, 426, 655-658. doi:10.1038/nature02177

¹³ Festa-Bianchet, M., Pelletier, F., Jorgenson, J.T., Feder, C., and Hubbs, A. (2013). Decrease in Horn Size and Increase in Age of Trophy Sheep in Alberta Over 37 Years. *Journal of Wildlife Management*, 78, 133-141.

¹⁴ Chapron, G. and Treves, A., *Blood does not buy goodwill: allowing culling increases poaching of a large carnivore*, Proc. R. Soc. B 283 (2016), <http://dx.doi.org/10.1098/rspb.2015.2939>.

Lion scientists have produced a steady drumbeat of warnings that trophy hunting across African range states is unsustainable and is a threat to survival of the species:

African Continent:

- Rosenblatt (2014)¹⁵: “...overharvesting of lions has been well-documented throughout Africa”, recognize trophy hunting as one of the reasons for the decline of the lion throughout its range.
- Hunter et al. (2014)¹⁶: “there is considerable scientific evidence of negative population impacts associated with poorly-managed trophy hunting of lions.” The authors state “there have been documented negative impact on lion populations resulting from trophy hunting” and call for lion trophy hunting reform.
- Lindsey et al. (2013)¹⁷ stated that, regarding the recent decline of lion populations, “Most of the factors that contribute to this decline are now well understood, although evidence of the impacts of trophy hunting on lions has only emerged relatively recently.” The authors also state, “lion quotas remain higher than the 0.5/1,000 km² recommended by [Packer et al. (2011)] in all countries except Mozambique” and “in all countries where data are available, harvests appear too high in a proportion of hunting blocks.”

Zambia:

- Rosenblatt et al. (2014): found a declining lion population in South Luangwa National Park with low recruitment, low sub-adult and adult survivorship, depletion of adult males and an aging adult female population and attributed this to the “severe male depletion” caused by trophy hunting.
- Lindsey et al. (2014)¹⁸: numerous problems identified with trophy hunting in Zambia including that the Zambia Wildlife Authority establishes trophy quotas arbitrarily and “quotas of lions have been particularly excessive”.
- Lindsey et al. (2013): “Excessive offtake from trophy hunting also lowered population density of lions and altered sex-ratios of lions in Hwange National Park, Zimbabwe, South Luangwa, Kafue and Lower Zambezi national parks in Zambia, and the Bénoué Complex in Cameroon.” The authors also said that mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Zambia.

Tanzania:

- Dolrenry et al. (2014)¹⁹: populations in Tanzania are declining in part due to “overexploitation due to poor management of trophy hunting”.

¹⁵ Rosenblatt, E., Becker, M. S., Creel, S., Droge, E., Mweetwa, T., Schuette, P. A., & Mwape, H. (2014). Detecting declines of apex carnivores and evaluating their causes: An example with Zambian lions. *Biological Conservation*, 180, 176-186.

¹⁶ Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H. ...White, P., Whitman-Gelatt, K. (2014). Urgent and comprehensive reform of trophy hunting of lions is a better option than an endangered listing; a science-based consensus [sic]. Unpublished.

¹⁷ Lindsey, P. A., Balme, G. A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013). The trophy hunting of African lions: Scale, current management practices and factors undermining sustainability. *PloS one*, 8(9), e73808.

¹⁸ Lindsey, P. A., Nyirenda, V. R., Barnes, J. I., Becker, M. S., McRobb, R., Tambling, C. J., ... & t'Sas-Rolfes, M. (2014). Underperformance of African Protected Area Networks and the Case for New Conservation Models: Insights from Zambia. *PloS one*, 9(5), e94109.

- Lindsey et al. (2013): “Trophy hunting has contributed to population declines outside (and inside some) protected areas in Tanzania, a country that holds between 30-50% of Africa’s lion.”

Zimbabwe:

- Groom et al. (2014)²⁰: the low densities of lion populations in Gonarezhou National Park and trophy hunting concessions in Tuli are due to the collapse of these populations in the past due to “unsustainably high trophy hunting within Tuli and in the concessions around Gonarezhou ...” The authors concluded, “hunting has probably had a strong negative effect on lion abundance in both reserves.”
- Lindsey et al. (2013): “Excessive offtake from trophy hunting also lowered population density of lions and altered sex-ratios of lions in Hwange National Park, Zimbabwe, South Luangwa, Kafue and Lower Zambezi national parks in Zambia, and the Bénoué Complex in Cameroon.”
- Lindsey et al. (2013): mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Zimbabwe.

Namibia:

- Lindsey et al. (2013): mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Namibia.

Cameroon:

- Lindsey et al. (2013): “Excessive offtake from trophy hunting also lowered population density of lions and altered sex-ratios of lions in Hwange National Park, Zimbabwe, South Luangwa, Kafue and Lower Zambezi national parks in Zambia, and the Bénoué Complex in Cameroon.”

Burkina Faso:

- Lindsey et al. (2013): mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Burkina Faso.

Benin:

- Sogbohossou et al. (2014)²¹: the low lion density and small group size found in Pendjari Biosphere Reserve in Benin is due to human disturbance and mortality through trophy hunting, the Pendjari lion hunting quota is three times higher than recommended by Packer et al. (2011), and the existing age limit for ‘old males’ is not enforced.

Trophy Hunting of African Elephants

Similarly, trophy hunting is documented to undermine the conservation of African elephants. As explained in a recent scientific study, range states from which the Service

¹⁹ S. Dolrenry, J. Stenglein, L. Hazzah, R.S. Lutz, and L. Frank (2014). A metapopulation approach to African lion (*Panthera leo*) conservation. Plos One 9 (2), e88081.

²⁰ R.J. Groom, P.J. Funston and R. Mandisodza (2014). Surveys of lions *Panthera leo* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx 2014: 1-9.

²¹ Sogbohossou, E. A., Bauer, H., Loveridge, A., Funston, P. J., De Snoo, G. R., Sinsin, B., & De Iongh, H. H. (2014). Social Structure of Lions (*Panthera leo*) Is Affected by Management in Pendjari Biosphere Reserve, Benin. *PloS one*, 9(1), e84674.

currently allows trophy imports (such as South Africa) may be setting unsustainably high hunting quotas: in the Greater Mapungubwe Transfrontier Conservation Area scientists found that, in contrast to current hunting allowances, “only a small number of bulls (<10/year) could be hunted sustainably. At current rates of hunting, under average ecological conditions, trophy bulls will disappear from the population in less than 10 years.”²²

Researchers have found that the selective nature of trophy hunting causes changes in desirable phenotypic traits in harvested species. In particular, trophy sizes for wild herbivores experienced temporal decline in South Africa and Tanzania. “Declines in trophy size over time due to selective harvesting could be attributed to phenotypic plasticity that may result due to a decline in abundance of big tuskers and individuals with big horns or tusks as these are mostly selected by hunters.”²³ Again, because hunters target the biggest and strongest male elephants, trophy hunting removes these animals from the breeding pool and unnaturally selects for smaller or weaker animals.²⁴ In this way, trophy hunting can decrease genetic variation, shift the population structure, and cause unnatural evolutionary impacts. For example, selective hunting likely increased the occurrence of mature female African elephants (*Loxodonta africana*) lacking tusks from 10% to 38% in parts of Zambia over 20 years.²⁵ Additionally, trophy hunting has been shown to disrupt family groups and social stability, negatively impacting elephant survival.²⁶

Another study reviewed the functioning of Zambia’s protected areas and game management areas (GMAs), where trophy hunting occurs.²⁷ The authors found numerous problems that pertain to management of trophy hunting in GMAs including: uncontrolled human immigration and open access to wildlife; the Zambia Wildlife Authority (ZAWA) retains most of income derived from trophy hunting, little of this income goes to people living in GMAs with affluent community members benefiting most, and there are frequent financial

²² S. Selier et al. (2014), Sustainability of elephant hunting across international borders in southern Africa: A case study of the greater Mapungubwe Transfrontier Conservation Area. *The Journal of Wildlife Management*, 78: 122–132.

http://www.researchgate.net/publication/259539652_Sustainability_of_elephant_hunting_across_international_borders_in_southern_Africa_A_case_study_of_the_greater_Mapungubwe_Transfrontier_Conservation_Area.

²³ Muposhi VK, Gandiwa E, Bartels P, Makuza SM, Madiri TH, *Trophy Hunting and Sustainability: Temporal Dynamics in Trophy Quality and Harvesting Patterns of Wild Herbivores in a Tropical Semi-Arid Savanna Ecosystem*, *PLoS ONE* 11(10) (2016), <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0164429>.

²⁴ Allendorf, F.W. and Hard, J.J. (2009). Human-induced evolution caused by unnatural selection through harvest of wild animals. *Proceedings of the National Academy of Sciences of the United States of America*, 106, 9987-9994.

²⁵ Jachmann, H., Berry, P.S.M., and Imae, H. (1995). Tuskllessness in African Elephants: a future trend. *African Journal of Ecology*, 33, 230-235. DOI: 10.1111/j.1365-2028.1995.tb00800.x

²⁶ Milner J.M., Nielsen E.B., Andreassen HP, *Demographic side effects of selective hunting in ungulates and carnivores*, *Conservation Biology* Vol. 21:36-47 (2007), doi: 10.1111/j.1523-1739.2006.00591.x (“Such selective harvesting can destabilize social structures and the dominance hierarchy and may cause loss of social knowledge, sexually selected infanticide, habitat changes among reproductive females, and changes in offspring sex ratio.”)

²⁷ Lindsey, P. A., Nyirenda, V. R., Barnes, J. I., Becker, M. S., McRobb, R., Tambling, C. J., ... & t’Sas-Rolfes, M. (2014). Underperformance of African Protected Area Networks and the Case for New Conservation Models: Insights from Zambia. *PLoS one*, 9(5), e94109.

irregularities associated with the distribution of this income; scouts employed in anti-poaching in GMAs are poorly and irregularly paid, insufficiently trained and equipped, and inadequate in number; ZAWA is poorly funded, has an inadequate number of staff to protect elephants against poaching, has increased hunting quotas to unsustainable levels in GMAs in order to raise money (the authors state that ZAWA ‘are sometimes forced to make decisions to achieve financial survival at the expense of the wildlife they are mandated to conserve’), establishes trophy quotas arbitrarily, and does not monitor wildlife populations or trophies; and hunting concession agreements are not effectively enforced and unscrupulous concession operators are not adequately punished. The authors blame these many failures for the low numbers and diversity of wildlife, including elephants.

Thus, it is not surprising that elephant densities are lower in trophy hunting areas compared to a national park where trophy hunting is not permitted.²⁸ The Service itself acknowledged such impacts in 2014 when it suspended the issuance of elephant trophy imports from Tanzania and Zimbabwe.²⁹

The Service has previously rejected attempts to import trophies from Zambia due to similar concerns of mismanagement including inconsistencies in reported elephant population estimates, failure to comply with monitoring requirements, absence of government funding for elephant protection, and lack of effective anti-poaching measures.³⁰ Further, the Service has not made enhancement findings for elephant trophy imports from either Mozambique or Cameroon even though elephant trophy hunting is allowed there.³¹

Trophy Hunting of African Leopards

Balme et al. (2010)³² demonstrated the impact of trophy hunting on infanticide in a population of leopards in South Africa; high trophy hunting offtake resulted in particularly high male leopard mortality and high levels of male turnover; females cannot successfully raise cubs because of immigration into the population of new males; the consequences were low cub survival rates, delayed age at first parturition, reduced conception rates, and low annual litter production; the combined impact of high mortality and low reproductive

²⁸ Crosmary, W. G., S. D. Cote, and H. Fritz. (2015). Does trophy hunting matter to long-term population trends in African herbivores of different dietary guilds?. *Animal Conservation*, 18, 117-130.

²⁹ See 80 Fed. Reg. 42524 (July 17, 2015); 79 Fed. Reg. 44459 (July 31, 2014) (“Without management plans with specific goals and actions that are measurable and reports on the progress of meeting these goals, the Service cannot determine if..Zimbabwe is implementing, on a national scale, appropriate management measures for its elephant populations.”). Note that the Service’s November 2017 decision to reverse this suspension was put “on hold” by President Trump and Secretary Zinke on November 17, 2017.

³⁰ See *Marcum v. Salazar*, 810 F.Supp.2d 56, 63 (D.D.C. 2011); *Marcum v. Salazar*, 694 F.3d 123 (D.C.Cir. 2012). Note that the Service’s November 2017 decision to allow elephant trophy imports from Zambia was put “on hold” by President Trump and Secretary Zinke on November 17, 2017.

³¹ See <https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies-elephants.html>.

³² Balme, G.A., Hunter, L.T., Goodman, P., Ferguson, H., Craigie, J. and Slotow, R., 2010. An adaptive management approach to trophy hunting of leopards *Panthera pardus*: a case study from KwaZulu-Natal, South Africa. *Biology and conservation of wild felids*. Oxford University Press, Oxford, pp.341-352. See also Brackowski, A. R., et al. (2015). Who Bites the Bullet First? The Susceptibility of Leopards *Panthera pardus* to Trophy Hunting. *PLOS ONE* 10(4).

output led to a negative population growth rate. Further, the 2016 IUCN assessment for *Panthera pardus* specifically notes that “concern about unsustainable trophy hunting has lately increased” and cites studies concretely demonstrating that “trophy hunting was a key driver of Leopard population decline” (Stein et al. 2016).³³

Moreover, few of the potential benefits from hunting are consistently realized by local communities that live amongst lions, elephants, leopards, and other species targeted by trophy hunters. According to an IUCN analysis from 2009, big-game hunting only provided one job for every 10,000 inhabitants in the area studied,³⁴ and many of these jobs were temporary seasonal positions like opening the trails at the start of the hunting season (IUCN 2009³⁵). Trophy hunting fails to create a significant number of permanent jobs (and those that it does create do not automatically benefit conservation), but ecotourism offers a possible solution. Consider the Okavango in Botswana where, as of 2009, a safari ecotourism tourism park provided 39 times the number of jobs than would big-game hunting on an area of equal size (IUCN 2009). Another example is the Luangwa National Park in Zambia, which produced twice the number of jobs provided by Benin and Burkina Faso’s trophy hunting sector combined in 2007 (IUCN 2009).

The IUCN also found that Africa’s 11 main big-game hunting countries only contributed an average of 0.6% to the national GDP as of 2009 (IUCN 2009). Of this marginal profit, studies suggest that as little as 3-5% of trophy hunting revenues are actually shared with local communities (Economists at Large 2013³⁶; IUCN 2009; Sachedina 2008³⁷). Perhaps because of this, locals do not always view trophy hunting as the positive economic driver that hunting advocates portray it as. For example, villagers in Emboreet village in Tanzania characterized hunting as “destructive, exploitative, and disempowering,” and blame hunting for jeopardizing village revenues (Sachedina 2008). The same study presents an interview with the Village Executive Officer, who explained that villagers feel more closely partnered with photographic tour operators than with hunters because hunters “are finishing off the wildlife before we’ve had a chance to realize a profit from it,” and because villagers never see the 5% of revenue they are supposed to receive from trophy hunting (Sachedina 2008).

A 2017 report from Economists at Large³⁸ found that in Botswana (where trophy hunting is now prohibited since 2014), Ethiopia, Mozambique, Namibia, South Africa, Tanzania,

³³ Stein, A.B., Athreya, V., Gerngross, P., Balme, G., Henschel, P., Karanth, U., Miquelle, D., Rostro, S., Kamler, J.F. and Laguardia, A. 2016. *Panthera pardus*. The IUCN Red List of Threatened Species 2016: e.T15954A50659089. Downloaded on 11 July 2016. <http://www.iucnredlist.org/details/full/15954/0>

³⁴ South Africa, Namibia, Tanzania, Botswana, Cameroon, Central African Republic, Burkina, and Benin.

³⁵ IUCN. (2009). Programme Afrique Centrale et Occidentale. Big Game Hunting in West Africa. What is its contribution to conservation?

³⁶ Economists at Large. (2013). The \$200 million question: How much does trophy hunting really contribute to African communities? A report for the African Lion Coalition, prepared by Economists at Large, Melbourne, Australia.

³⁷ Sachedina, H.T. 2008. “Wildlife Is Our Oil: Conservation, Livelihoods and NGOs in the Tarangire Ecosystem, Tanzania.” University of Oxford. PhD. Thesis.

³⁸ Economists at Large. (2017). The Lion’s Share? On The Economic Benefits Of Trophy Hunting. A report for the Humane Society International, prepared by Economists at Large, Melbourne,

Zambia and Zimbabwe, trophy hunting brings in less than \$132 million in tourism spending to the eight study countries out of \$17 billion annual tourism spending, or just 0.78 percent. And trophy hunting has only a marginal impact on employment in these eight countries, contributing only between 7,500-15,500 jobs or 0.76 percent or less of nearly 2.6 million overall tourism jobs.

On average, American trophy hunters import more than 126,000 trophies every year.³⁹ While not all of these species are protected under the U.S. Endangered Species Act, it is an unfounded and sweeping generalization to assert that trophy hunting always provides a biological or economic benefit to the conservation of the species, as asserted in the IWCC notice. Therefore, an advisory council designed solely to *educate* the public on the *benefits* of trophy hunting is not in the public interest, as those alleged benefits are not supported by the best available science. Nor is that conclusion supported by the American public – indeed, in the last week alone, over 435,121 members of the public have voiced their opposition to American trophy hunters killing African lions and elephants threatened with extinction, and nearly 2 million people worldwide have taken action in opposition to elephant trophy hunting in another call to action.⁴⁰

2. Using taxpayer dollars to promote the commercial interests of trophy hunting industry is not in the public interest

The purpose of the FACA is “to eliminate useless advisory committees, strengthen independence of remaining advisory committees, and prevent advisory groups from becoming self-serving.” *Consumers Union of U.S., Inc. v. Department of Health, Ed. and Welfare*, 409 F.Supp. 473, affirmed 551 F.2d 466 (D.D.C.1976). Establishing the IWCC would require the Service to expend resources on convening and participating in the council, unnecessarily diverting resources from an already strapped agency. Indeed, the Fiscal Year 2018 budget proposes to decrease funds spent on foreign species protection by \$1,000,000.⁴¹ To use precious agency resources to create a self-serving platform for trophy hunters to amplify their voice, especially while funds are already provided for other FACA advisory committees addressing these same topics, does not meet the FACA requirements for actions in the public interest.

Therefore, the IWCC is not in the public interest and cannot be lawfully chartered.

C. The IWCC Is Designed to Undermine the Implementation of the ESA and the Service’s Other Legal Obligations

The IWCC represents an effort by a commercial industry to undermine the statutory duties of an agency, and as such the establishment of the IWCC would be patently *ultra vires*.

Australia.

³⁹ http://www.hsi.org/assets/pdfs/report_trophy_hunting_by_the.pdf;
<http://www.hsi.org/assets/pdfs/trophy-madness-report.pdf>;
http://www.ifaw.org/sites/default/files/IFAW_TrophyHuntingReport_UK_v2.pdf.

⁴⁰ <https://www.thepetitionsite.com/takeaction/721/417/558/>;
https://secure.avaaz.org/campaign/fr/trump_vs_elephants/.

⁴¹ <https://www.fws.gov/budget/2018/FY2018-FWS-Greenbook.pdf>

As an initial matter (and to be discussed further in comments submitted on or before December 8, 2017), the proposed makeup of the IWCC is inherently biased – it would include up to eighteen members who represent “Wildlife and habitat conservation/management organizations; U.S. hunters actively engaged in international and/or domestic hunting conservation; The firearms or ammunition manufacturing industry; Archery and/or hunting sports industry; and Tourism, outfitter, and/or guide industries related to international hunting.” There is no suggestion that objective conservation biologists will be invited to have a roll on this committee that would make recommendations on the management of threatened and endangered species. Indeed, even the reference to participation by conservation and management organizations is so vague that it could even include biased groups like Safari Club International/Safari Club International Foundation or the National Rifle Association, groups that have filed lawsuits against the Service to assert the interests they now seek to address via the IWCC.

The IWCC is inherently designed to allow the trophy hunting industry to have an amplified voice, with an air of formality, on the question of whether killing threatened and endangered species enhances the survival of the species as required under the Endangered Species Act. 16 U.S.C. § 1539(a)(1)(A); 50 C.F.R. § 17.40. Specifically, the IWCC would be charged with:

- recommending removal of barriers to the importation into the United States of legally hunted wildlife;
- ongoing review of import suspension/bans and providing recommendations that seek to resume the legal trade of those items, where appropriate;
- reviewing seizure and forfeiture actions/practices, and providing recommendations for regulations that will lead to a reduction of unwarranted actions;
- reviewing the Endangered Species Act's foreign listed species and interaction with the Convention on International Trade in Endangered Species of Wild Flora and Fauna [*sic*], with the goal of eliminating regulatory duplications; and
- recommending methods for streamlining/expediting the process of import permits.”

The ESA mandates that the Service itself make enhancement findings and determine whether listing a species is warranted, and these are not tasks that can be delegated to the regulated industry. 16 U.S.C. §§ 1533, 1539. Indeed, even without the creation of the IWCC the trophy hunting industry has had undue influence on such decisions of the Service, as evidenced by the fact that Safari Club International announced the recent decisions to allow elephant trophy imports from Zimbabwe and Zambia before such findings were even announced by the Service⁴² (and before such announcements were called into question by the President).⁴³

The IWCC would also apparently take on “recommending strategies to benefit the U.S. Fish and Wildlife Service's permit office in receiving timely country data and information so as to remove barriers that impact consulting with range states.” But it would be inappropriate

⁴² <https://www.safariclub.org/detail/news/2017/11/14/u.s.-now-allows-elephants-from-zimbabwe-zambia-to-be-imported?from=groupmessage&isappinstalled=0>

⁴³ Statement of President Trump, Nov. 17, 2017 at 8:47 pm, <https://twitter.com/realDonaldTrump/status/931685146415255552>; Statement of President Trump, Nov. 19, 2017 at 6:57 pm, <https://twitter.com/realDonaldTrump/status/932397369655808001>.

for such bilateral governmental discussions to be mediated by a third party with a financial stake in affecting the outcome of those communications. It is clear that the trophy hunting industry is aiming to minimize the impact of the ESA (indeed, they are currently arguing both in federal court⁴⁴ and before Congress that the ESA should add no more protections than what exists under CITES, even though that treaty explicitly calls for member countries to adopt national measures⁴⁵). The IWCC would give the regulated industry a special seat at the table, to the disadvantage of conservation and animal protection groups seeking to prevent species extinction in furtherance of the statutory mandate of the ESA.

With the establishment of the ESA, Congress created “a program for the conservation of such endangered species and threatened species” and mandated federal agencies to “utilize their authorities in furtherance of the purposes of” the ESA by committing “to conserve to the extent practicable the various species of fish or wildlife and plants facing extinction . . .” 16 U.S.C. § 1531(a)(4), (b), (c)(1). The ESA defines the term “conserve” to mean “to use all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to [the Act] are no longer necessary.” 16 U.S.C. § 1532(3). It is critical that any decisions to list species or allow imports of listed species are made based on the best available science, not pursuant to the commercial interests of the trophy hunting industry as envisioned by the IWCC.

Likewise, the IWCC would be charged with reviewing ESA listed and CITES listed species. Again, the criteria for listing species (or delisting them as the case may be) in either arena are specifically inscribed. Under the ESA, species listings/delisting are reviewed using five factors and decisions are made “solely on the basis of the best scientific and commercial data,” 16 U.S.C. § 1533(b)(1)(A), and CITES uses the best information available and specific biological criteria and reliance upon the precautionary principle that the Parties to CITES act in “best interest of the conservation of the species.” Res. Conf. 9.24 (Rev'd CoP17). Consideration of species listing proposals is done through a public process and by the agency, a FACA committee is unnecessary and risks abdicating the Service's responsibilities.

Equally concerning, is the IWCC delineated duty to “review[] seizure and forfeiture actions/practices.” 82 Fed. Reg. at 51,858. Seizure and forfeiture actions are entirely within the Service's prosecutorial discretion – an arena in which courts generally do not tread. See *Heckler v. Chaney*, 470 U.S. 821 (1985) (finding agencies have unreviewable prosecutorial discretion unless a statute or agency policy says otherwise). It is difficult to imagine how a FACA committee could “review” what a federal court may not.

⁴⁴ *SCI et al. v. Zinke*, Case No. 1:14-cv-00670-RCL (D.D.C. 2017).

⁴⁵ This international law sets the floor, expressly providing that parties may adopt “stricter domestic measures” for species covered by CITES (as well as those that are not). CITES, Art. XIV, para. 1. See also FWS, *Ensuring the Future of the Black Rhino* (Nov. 25, 2014), at <http://www.fws.gov/news/blog/index.cfm/2014/11/25/Ensuring-the-Future-of-the-Black-Rhino> (acknowledging that the ESA enhancement standard is in addition to the CITES non-detriment standard and that trophy import permits should only be issued if the Service finds “that the [animal] is taken as part of a well-managed conservation program that contributes to the long-term survival of the species”).

Therefore, the establishment of the IWCC is not in accordance with either the FACA or the ESA and must not be finalized. If the IWCC is finalized, HSUS, HSI, and one or more of the undersigned organizations will consider seeking legal review of this unlawful agency action. We will submit separate comments on the composition of the IWCC on or before December 8, 2017.

Sincerely,



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Annamiticus
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Lilongwe Wildlife Trust
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One More Generation
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AFWA Committee Roster 2016-2018



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Threatened & Endangered Species Policy

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Wildlife Resource Policy

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September 7, 2017

Mr. Greg Sheehan
Acting Director
United States Fish & Wildlife Service



Invitation to the 15th African Wildlife Consultative Forum
Mt. Meru Hotel, Arusha, Tanzania 13-17 November 2017

The Government of Tanzania and Safari Club International Foundation (SCI Foundation) are pleased to invite you to the 15th African Wildlife Consultative Forum (AWCF) being held at the Mt. Meru Hotel in Arusha, Tanzania from 13-17 November 2017.

We would be honored to have you participate as Acting Director of the U.S. Fish & Wildlife Service. Your attendance will greatly contribute to the success of this meeting and encourage high-ranking government officials from Africa to attend. The AWCF meeting is an opportunity to discuss African wildlife management issues with the local experts and stakeholders.

Please see the attached draft agenda for your use in requesting travel approval. The meeting will begin with private meetings between the Professional Hunting Associations and government delegates, followed by sessions focusing on African lion and leopard research and management, international trade, sustainable use policy, and other topics such as anti-poaching and human-wildlife conflict.

If you are able to attend, please be prepared to discuss the topics included in the attached draft agenda. A more complete agenda with a list of presentations will be circulated closer to the meeting date.

SCI Foundation is not able to sponsor the accommodation of meals and conference expenses for representatives of the U.S. Fish & Wildlife Service. Travel arrangements to and from Arusha, Tanzania must be made independently.

Please complete the attached registration form and RSVP to Joseph Goergen, SCI Foundation Conservation & Research Program Coordinator, at jgoergen@safariclub.org by September 28, 2017.

We look forward to your participation in discussing the future of Africa's wildlife.

Respectfully,

A handwritten signature in black ink, appearing to read "Warren A. Sackman III".

Warren Sackman III
President, Safari Club International Foundation

CC. Tim van Norman



AFWA Committee Handbook 2015

The Voice of Fish & Wildlife Agencies

Introduction

Thank you for volunteering to chair or participate in one or more of the Association's committees, subcommittees and working groups.

Long-term conservation success requires the active involvement of an assembly of agencies, organizations and individuals with diverse backgrounds, visions and values. Committees are the crucial mechanisms by which members and stakeholders are able to collaborate and coordinate on cross-cutting fish and wildlife conservation issues including funding, legislation, science-based management, species-based interests, public outreach and professional development. Indeed, Committees are *the* vital source of the collective views of the Association and the engine driving the future of natural resource conservation.

This Committee Handbook provides a concise look at the Association's Committee structure and responsibilities while offering some helpful hints based on past experience. The document is broken up into sections that should make it easy to find what you're looking for at-a-glance. Please note that the Handbook is intended primarily as a reference, and does not purport to cover all circumstances.

Did you know...

Almost without exception, the accomplishments of which our Association are most proud, began within our Committees.

For example, the report of the Legislative Committee at the Annual General Meeting held in New Orleans in 1918, proudly reported our first legislative success with the enactment of the Migratory Bird Treaty Act. The Act put in effect the Association's first international success of two years earlier – The Migratory Bird Convention with Great Britain.

Committee Structure

The Association maintains 29 Standing Committees and approximately 35 Subcommittees, Technical Subcommittees and Working Groups, which are composed of more than 1,000 professionals from the United States, Canada and Mexico.

Standing Committees are those that are not expected to change much over time and are often responsible for the creation of important national conservation actions and positions. The Association's bylaws require that a list of all Standing Committees be made and published annually (Appendix).

Frequently, chairs appoint small work groups to address problems facing the committee. These groups often meet between regularly scheduled committee meetings and work on the committee's behalf. Use of **Subcommittees** or **Work Groups** is the prerogative of the Chair and is typically part of an efficient and successful committee. Only fish and wildlife agency members are permitted to chair a subcommittee or work group within a committee.

Formal Subcommittees or **Ad Hoc Committees** are the prerogative of the President. For the most part, these groups are established for a limited duration. Most Presidents avoid the proliferation of formal subcommittees, preferring to work within the established committee structure instead.

The **Technical Subcommittee** is a relatively new phenomenon. It is a small subgroup of a

Substance Committee, comprised solely of state government members, and created to provide a venue to work with the federal government. The Federal Advisory Committee Act (FACA) specifically provides for pre-action consultation with state officials and Technical Subcommittees enable the Association to offer a way to facilitate this collaboration.

Currently, Technical Subcommittees exist within the Fur Resources Committee for trap testing and negotiations with Europe and within The International Affairs Committee on matters relating to the Convention on International Trade in Endangered Species (CITES).

A list of committees including links to specific committee descriptions can be found on the Association's web site at www.fishwildlife.org in the Committee section.

Appointments and Committee Selections

State fish and wildlife agency leaders, appointed by the President of the Association, lead each committee. All appointments — Chair, Vice-Chair and Standing Committee members — serve for a term that is decided by the Executive Committee, usually one year.

It's a fact...

The Association Bylaws require employment by a Governmental, Affiliate or Contributing Member; or status as an Associate or Life Member, as a prerequisite to obtaining appointment to a committee.

See Appendix for Membership

Selection Process

The Association issues a request for nominations for committee assignments in late Spring to member agencies and organizations and for volunteer assignments by Associate members. From these nominations, the incoming President makes the selections shortly after the Association's Annual Meeting considering a variety of factors such as geographical representation and committee size. The goal is to ensure all committees are fully staffed and functional at the beginning of the new Association administration.

State fish and wildlife agency directors are asked to consider chairing or vice-chairing only one committee and to discuss priorities with the President. At the suggestion of the Executive Committee, and in the belief that each state director should be actively involved, directors without committee assignments will be assigned to a committee.

In addition, because committees should reflect the policy and position of **Governmental Members**, each governmental member is requested to nominate a policy-level person and a subject matter specialist to each committee with which they are concerned.

To keep the committees to a manageable size, **Affiliate and Contributing Members** are asked to officially assign only one person per organization to a committee, though additional representatives are welcome to attend meetings. Recognizing the value of their participation, **Associate Members** are invited to volunteer for committee work. Finally, **individuals** should not be nominated to more than two committees since members will be expected to spend time on committee work.

■ **IMPORTANT: Committee members must reaffirm their interests by re-nomination or re-volunteering annually.**

The Executive Director of the Association will assign Association staff to each committee.

Committee chairs should feel free to engage assigned staff members in any process of committee work when staff can be of assistance.

In general, staff can assist with developing meeting agendas, minutes and reports; creating email lists; setting up conference calls; and facilitating communication between the Chair and the committee.

Committee Notifications

Once an incoming President appoints the committees for his or her year in office, Chairs receive a list of members from the Association's Washington office. This list contains available phone numbers, addresses and ideally e-mail addresses. Most Chairs find that taking a few minutes at the beginning to set up group e-mail and fax programs are a great way to begin their Chairmanship.

As Chair, your first responsibility is to review the committee's charge and to understand and prepare to implement it. This is a good time to review the personnel assignments and make additional recommendations as appropriate.

Once you receive the master committee list, you should send a welcome note to members acknowledging their selection, confirming their contact info and encouraging them to provide input on pertinent issues in the committee's focus area. The Committee charge that was sent to you by the President with your appointment is useful for all and is an appropriate attachment to your letter of welcome.

Effective Committees Communicate...

The best way to ensure that your committee is committed to its charge for the long haul is to get in touch as soon as the annual committee list is available to welcome members on board.

■ **IMPORTANT:** There is no single mailing from the Washington office to all committee appointees although the list is posted on the web site. Many Federal and Affiliate Members will not receive a notification unless you contact them. It is the state directors' responsibility to notify their employees of committee appointments; however, the note provides a personal welcome as well as a notification back-up.

Executive Committee

The Executive Committee consists of the three elected officers of the Association, eight additional members and the previous year's or immediate past President. The eight additional members are elected to the Executive Committee at the Association's Annual Business Meeting by the voting members present or by proxy. The President of each regional association serves as an ex officio, voting member of the Executive Committee as well as one representative from Canada and one from Mexico.

The Executive Committee (Board of Directors) manages the affairs of the corporation. All matters not especially provided for in the Constitution and Bylaws are determined by the Executive Committee, until specially passed upon at a regular meeting. The Executive Committee is also responsible for approving the Association's annual budget.

Committee Meetings

Committees meet when the Association convenes for its Annual Meeting in September, and again in conjunction with the North American Wildlife Conference convened in March of each year by The

Wildlife Management Institute. Some committees, however, meet quarterly while many Chairs find a call-in teleconference several times a year helpful in keeping members current or to provide a venue to sound out the committee on a pending issue. Use of fax, e-mail and list-servs is increasingly used to involve Committee members. Convening extra meetings is the sole prerogative of the Chair.

Meeting Planning

Several months prior to a regularly scheduled meeting, Chairs are contacted by an Association representative, member of the hosting state or province or the Wildlife Management Institute to determine your meeting needs. You will be asked for five pieces of information — a request that should receive immediate attention:

- ① Do you plan on holding a meeting at the upcoming Meeting?
- ② How many persons are expected to attend?
- ③ How you would like the room configured?
- ④ What are your audio-visual requirements?
- ⑤ What is the duration of your meeting — 2 hours, 4 hours, other?

When planning a meeting, Chairs should be sensitive to the other obligations of committee members. This is especially true of coordination issues when one or more committees need to be contacted. Chairs are also responsible for keeping in contact with the President and Executive director and keeping them updated.

Meeting Agendas

It is standard practice for each Committee to provide members with a copy of the agenda, a draft is fine using the Association's template (Appendix), for the upcoming Meeting at least 30 days in advance. In addition, Association staff assigned to the Committee will ensure that the Agenda is posted on the Association's web site.

Call your meeting to order...

It is up to Committee Chairs to determine how formal or informal to conduct meetings. Consistency is key and making sure everyone knows the rules.

Past practice has shown that a "Call for Agenda Topics" from the Chair several weeks in advance is helpful in creating this agenda. Alternately, some Chairs assemble a proposed agenda

and circulate it for comment and amendment. The choice of procedure is the prerogative of the Chair.

Running Meetings

Reasonable formality and decorum are important in conducting committee meetings. The Association prides itself on the professional and business-like way our meetings are conducted, the careful manner in which decisions are made, and ultimately the soundness of committee recommendations.

Committee Chairs do have great discretion in running the meeting; but, they must be convened promptly when scheduled and conducted according to rules of procedure. While some meetings are informal, others, because of the size of the group or the contentiousness of the issues to be discussed, are kept very structured. Some meetings are guided by Robert's Rules and others are quite informal, relying on discussion and consensus to reach positions.

In the meeting space, always make sure committee members get priority seating around the table. Once members are assured of priority seats, you may invite visitors to sit at the table or not if you feel that the members' interests are best served by maintaining a clear distinction between members and other attendees. Some committee chairs make name tags for each member thus subtly, but clearly, identifying members. Proper action is a function of the size of group and potential debate.

While the Association has established these guidelines, generally the procedure for the conduct of committee meetings is left to the individual Chair. This is a decision you can make based on what best suits your committee. Your responsibility as Chair is to provide the opportunity for all members to participate and that recommendations reached reflect the view of the majority of the members present. If there are a lot of visitors present and a vote is necessary, you may want to have a roll call vote to verify that only members vote. What is most important is that everyone in attendance knows, at the beginning of the meeting, the rules by which your meeting will operate.

Meeting Attendance List & Handouts

At the start of each meeting, you should circulate an attendance list (Appendix) to log who participated in the meeting and the capture current contact information. The list is important for Association records and of great help to staff trying to keep information up to date.

Chairs should bring copies of the agenda and any other handouts to the meeting. If you require copying assistance, contact your assigned staff person. Often Chairs will include in the room configuration a table for attendees to place materials of interest to committee members.

When You Can't Be There

Occasionally, Chairs have to miss a meeting due to other important commitments. However, it remains the responsibility of the Chair to ensure that the Committee has a productive meeting. This makes it of great consequence for the Vice-chair to be fully involved in the committee's activities so that someone is ready and able to stand in.

Vice-chairs are appointed by the President, but usually nominations are discussed with would-be Chairs during the selection process. The Vice-chair is a very important person to the committee, not only as a stand-in; but, as someone who assumes leadership for special projects that occur between meetings of the Committee.

Post-Meeting Duties

After the meeting, the Chair or an assigned committee member is responsible for drafting and distributing meeting minutes/the committee report (Appendix). Your staff person can coordinate to have the minutes posted online in the Committee section of AFWA's web site.

Meeting Tasks...

1. Solicit and determine meeting agenda.
2. Send Resolutions Committee any items to go before the membership.
3. Send Association staff person final agenda.
4. Arrange to have someone take meeting minutes and type up the minutes post-meeting.
5. Chair meeting and direct discussion.
6. Present proposed Resolution and/or committee report at Business Meeting if appropriate.
7. Submit meeting minutes to Association staff person.
8. Follow and complete Action Items.

Committee Functions & Reports

The function of each committee is to consider carefully the merits of every proposal brought before it — a project, program, position, resolution or other type of action — and to judge whether or not the proposal should be submitted to the full Association membership for consideration.

The committee's responsibility is to create a report stating the members' standpoint that may include a strong endorsement or a mild recommendation, but should highlight enough factual data, pro and con, to permit other fish and wildlife directors to make a fair and responsible independent judgment about the proposal. Chairs are also encouraged to make recommendations to guide future committee activities.

Committee reports should contain the following (Appendix):

- 1 Introductory statement briefly listing the committee charge
- 2 Section listing deliberations and substantive conclusions
- 3 Progress and opportunities made toward achievement of goals in Association's Strategic Plan
- 4 Conclusion or recommendation section (if appropriate) outlining necessary steps or action to be taken by the Association to implement the committee's recommendation

Types of Committee Actions & Reports

Committees typically make recommendations and pass motions, or draft letters adopting certain positions. All of these types of committee actions go to the members' business meeting for adoption before they become official action on the part of the Association. The Association's Bylaws also provide that the Executive Committee has authority to act for the Association until the matter is specially passed upon at a regular meeting of the Association. Committees should use a motion when formally proposing that an action be taken.

Association Approval...

Committee recommendations or positions must be brought to the membership if they are to be adopted as the Association's position.

Resolutions are used when the committee wishes to formally express an opinion. All resolutions must be submitted to the Resolution Committee before the membership acts on the resolution.

The Resolution Committee is responsible for soliciting resolutions from other Association committees or for developing resolutions from other appropriate sources. All proposed resolutions must be reviewed by the appropriate subject matter committee. The subject matter committees make recommendations to the Resolutions Committee. Resolutions should be aimed at establishing Association policy accomplishing a specific purpose and be designed in such a way as to permit follow-up by the Washington office. The membership only considers resolutions during its annual business meeting. It does not consider resolutions during the March North American Wildlife Conference meeting.

Committees making **requests for approval of programs or projects requiring funds** must first seek the approval of the Executive Committee prior to voting by the membership during the Association's business meetings. The Association's Bylaws give the Executive Committee oversight of budgetary matters and all funding requests must have a cost estimate attached to the proposal or recommendation.

■ **IMPORTANT: Any Committee recommendations to instruct or direct Association staff must be coordinated with the Executive Director who is responsible for staff supervision under the Bylaws.**

A Committee may *draft a letter or propose language for a piece of legislation* that is to be considered by members during the business meeting. While input from nongovernmental members may be considered, it is important to remember that only a letter drafted by a fish and wildlife agency committee member may be used as a proposed position of the Association.

Submitting Reports

Generally, committee recommendations or positions must be brought to the membership if they are to be adopted as the Association's position. Committee reports, if any, are presented at the annual business meeting in September (also to the March meeting if appropriate). If there are sensitive or controversial issues requiring attention by the Executive Committee or the general membership, the Chair is responsible for requesting agenda time. With either group, brevity is always appreciated since those meeting agendas are so full. When the report is fairly routine, written reports suffice.

Committee reports should be made available either at the end of a meeting, or shortly afterward for submission to the Executive Director and the Association Proceedings editor. Reports from committee meetings are published annually in 'The Proceedings of Annual Meetings.' As such, it is not uncommon for the Washington office to receive requests for information from long past meetings. This makes coherent and well-drafted committee reports very important.

Publications & Finance

Some committees author reports and studies or sponsor publications. In the world of furbearer management for instance, the definitive work in the testing of traps is in the process of being developed by the Fur Resources Committee (FRC). The FRC has published several works that have been seminal in their area of expertise and are widely sought for reference and guidance.

Activities like publications and research require dollars and committees are encouraged to apply for grants from a variety of available sources. Committees occasionally seek appropriated dollars as well. The FRC for example is currently working with a budget of close to a million dollars for the current triennium and has staff support of 1.75 FTE's for the period. Committees are not allowed to pursue outside funding, however, without the approval of the Executive Committee. Ask your assigned for guidance.

Other Committee Chair Responsibilities

As a Committee Chair, you have become a part of the Association's leadership. In the period between annual meetings... the Executive Committee and Committee Chairs *are* the Association!

In addition to the obvious responsibilities within the assigned area of your committee, it is not unusual for a Chair to be asked by federal agencies or non-government organizations for reactions or advice on various issues. You may also be contacted by the Washington office to help respond to a media inquiry surrounding a fish and wildlife conservation issue. Be mindful that in these situations that your "opinion" could be misinterpreted as an official position of the Association. If

you are unsure in any of these situations, ask or refer the query to the President or the Executive Director.

If you would like to send a request for information to the states or respond to a request for comments from members of Congress, Governors or by federal agencies, contact your assigned staff person first. The Washington office will coordinate such correspondence and obtain required policy clearance if necessary.

Thank you again for your contribution to the Association and its mission to protect and support state, provincial and territorial authority for fish and wildlife conservation in the public interest!



ASSOCIATION *of*
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AGENCIES

Association of Fish & Wildlife Agencies Standing Committees

Agricultural Conservation	International Relations
Angler/Boating Participation	Invasive Species
Annual Meeting/Awards/Nominating	Law Enforcement
Audit	Leadership/Professional Development
Bird Conservation	Legal
Budget	Legislative & Federal Budget
Climate Change	National Grants
Education, Outreach & Diversity	Ocean Resources Policy
Energy & Wildlife Policy	Resolutions
Executive	Science & Research
Federal & Tribal Relations	Sustainable Wildlife Use
Fish & Wildlife Health	Teaming with Wildlife
Fish & Wildlife Trust Funds	Technology
Fisheries & Water Resources Policy	Threatened & Endangered Species Policy
Hunting & Shooting Sports Participation	Wildlife Resource Policy

Subcommittees & Working Groups

Amphibian & Reptile Subcommittee	Conservation Stewardship Program Working Group
Biofuels Working Group	Diversity Working Group
Coal Energy Subcommittee	Drug Approval Working Group
Conservation Compliance Working Group	Education Working Group
Conservation Effects Assessment Project (CEAP) Working Group	Environmental Quality Incentives Program (EQIP) Working Group
Conservation Reserve Program (CRP) Working Group	ESA & Climate Change Working Group

Farm Bill Strategy Working Group
Federal Assistance Working Group
Federal Lands Access Working Group
Federal/State CITES Working Group
Forestry Working Group
Furbearer Conservation Technical Working Group
Grasslands Reserve Program
Human/Wildlife Conflict Working Group
Interstate Wildlife Violator Compact
Lead & Fish and Wildlife Health Working Group
Migratory Shore and Upland Game Bird Working Group
Natural Resource Damages Working Group
Onshore Oil & Gas and Oil Shale & Tar Sands Subcommittee

Outreach Working Group
Partners in Flight/Shorebird/Waterbird Working Group
President's Task Force on Wildlife Diversity Funding
Public Access Working Group
Resident Game Bird Working Group
Waterfowl Working Group
Wetlands Reserve Program (WRP) Working Group
White Nose Syndrome in Bats Working Group
Wildlife Habitat Incentives Program (WHIP) Working Group
Wildlife Viewing & Nature Tourism Working Group
Wind Energy & Transmission Subcommittee



ASSOCIATION of
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AGENCIES

Association of Fish & Wildlife Agencies Membership Levels

Governmental Membership

Eligible Government Members include:

- 1) Each state of the United States;
- 2) Each agency of the United States Government;
- 3) Each small province or territory of Canada and each large province of Canada;
- 4) Each agency of the government of Canada, the Republic of Mexico, the Commonwealth of Puerto Rico and the District of Columbia.

Regional Association Membership

Currently, we have four Regional Association Members — The Western Association of Fish and Wildlife Agencies, the Association of Midwest Fish and Wildlife Agencies, the Northeast Association of Fish and Wildlife Resource Agencies and the Southeastern Association of Fish and Wildlife Agencies.

Affiliated Organizational Membership

An Affiliated Organizational Member must be an *organization* of international, national, regional or statewide origin whose objectives are similar to, or supportive of, one or more of the objectives of the Association and whose membership is made up of individuals officially engaged in conservation of natural resources through their employment in public agencies.

Contributing Membership

A Contributing Member requires that you must be a non-governmental organization, institution, foundation, society, corporation or person that supports the objectives of the Association.

Associate Membership

To become an Associate Member, as an *individual*, you must be a past or present state, provincial, or territorial game and fish or conservation official; any federal, state, provincial or local game, fish or conservation official or employee regularly employed and under salary. You can also become an Associate Member if you are a delegate, officer or staff member of national, regional, state, provincial or local game, fish, wildlife or forest protective and conservation association or organization devoted to the conservation of renewable natural resources.

Life Membership

To become a Life Member, you must already be an Associate Member.

Honorary Life Membership

Honorary Life Members are elected by the Association and represent life members or persons who have rendered distinguished service in the cause of conservation administration. Honorary life member status is awarded during the Association's Annual Meeting.



ASSOCIATION *of*
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AGENCIES

[Committee Name]

Chair: [Name]

Co-Chair: [Name]

[Date]

[Time]

[Venue Location]

[City, State]

Agenda

Time	Agenda Item	Presenter
	Call to Order	
	Reading of Minutes from Previous Meeting; Corrections to Minutes; Vote Minutes Stand	
	Reports	
	Unfinished Business and General Orders	
	New Business	
	Announcements	
	Adjournment	



ASSOCIATION *of*
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AGENCIES

[Committee Name] **Committee Report**

Chair: [Name]

Meeting of [Date]

[Venue Location]

[City, State]

-
Committee Charge

Meeting convened during (insert start and end times), chaired by (insert name). (insert number) participants in attendance, including (insert number) current Committee members:

-
Scheduled Discussion Items

(Provide bulleted list with brief annotation about nature of each discussion item and substantive conclusions)

-
Other Discussion items

(Provide bulleted list with brief annotation about nature of each deliberation and conclusion)

-
Progress and Opportunities

Progress made toward achievement of goals in Association's Strategic Plan (identify specific goal and progress):

-
Threats and Emerging Issues Identified:

-
New Opportunities Identified:

-
Action Items

(Include brief specific action statement in bold type and briefly describe the action requested and outline the necessary steps)

-
Submitted by: (insert Committee Chair name)

*This is a draft document subject to change

Sunday 12 November

- 1500 Registration
Welcome Reception
- 1900 Dinner at Hotel

Monday 13 November

- 0900 Government Meetings
Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa
Coordinator
 - National and Multilateral Issues
 - Finalize AWCF Agenda
- 0900 PH Association Business Meeting
Moderator: OPHASA Chair, SCI Guides & Outfitters Liaison
- 1230 Lunch
- 1330 Meetings Continue
- 1600 Private Meetings TBD
- 1900 Dinner meetings between Government and PH Associations

Tuesday 14 November

- 0900 **Session 1: Official Opening**
 - Tanzania Official: Ministry of Natural Resources
 - Tanzania Professional Hunting Associations
 - SCI Foundation President
 - SCI Foundation Conservation Chairman

Review of 2015 Action Items
Approval of Minutes from the 15th AWCF in South Africa
- 1000 **Session 2: African Lion Symposium**
Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa
Coordinator
Presentation:



Tanzania Lion Project

Mississippi State University, Carnivore Ecology Laboratory

Tanzania Lion Project

Tanzania Wildlife Research Institute

1230 Lunch

1330 Session 2: African Lion Symposium Continued

Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa

Coordinator

Presentation:

Zambia Lion Project

University of California Los Angeles, Center for Tropical Research

1530 Break

1600 Session 2: African Lion Symposium Continued

Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa

Coordinator

Presentation:

Discussion on Implementation of Research Results

1700 Close Day

1900 Dinner

Wednesday 15 November

0800 Session 3: African Leopard Symposium

Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa

Coordinator

Presentation:

Zimbabwe Parks

1015 Break

1030 Session 3: African Leopard Symposium Continued

Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa

Coordinator

Presentation:

1230 Lunch



1330 Session 4: International Trade and CITES

Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa

Coordinator

Presentation:

U.S. Endangered Species Act and Importation Law

United Nations Environment Program

CITES MIKE Program

1515 Break

1530 Session 4: International Trade and CITES Continued

Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa

Coordinator

Presentation:

Zimbabwe Lion Quotas

Mozambique Hippo Quotas

1700 Close Day

1900 Dinner

Thursday 16 November

0900 Session 5: Country Reports

Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa

Coordinator

Presentation:

Tanzania

Botswana

Burkina Faso

Cameroon

Congo

Ethiopia

Malawi

1015 Break

1030 Session 5: Country Reports Continued

Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa

Coordinator

Presentation:



Mozambique
Namibia
South Africa
Uganda
Zambia
Zimbabwe

1230 Lunch

1330 Session 6: Anti-Poaching & Human-Wildlife Conflict

Moderator: Tanzania Ministry of Natural Resources, SCI Foundation Africa

Coordinator

Presentation:

Namibia Human-Wildlife Conflict Policy

Namibia Ministry of Environment & Tourism

**Mitigating Human-Wildlife Conflict and Increasing Community Benefits:
A Zimbabwe CAMPFIRE Case Study**

CAMPFIRE

IUCN Sustainable Use & Livelihoods Specialist Group

IUCN SULi Chair

Tanzania Selous Game Reserve Anti-Poaching Project

College of African Wildlife Management, Mweka

Namibia Anti-Poaching Project

Namibian Association of Conservancy Support Organizations

1515 Break

1530 Session 7: Discussion and Closing

1700 Close Day

1900 Dinner

Friday 17 November

0900 Field Trip: local community or hunting concession for discussion on management issues, wildlife challenges, quotas, anti-poaching, or other topics.

Travel





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November 24, 2017

Mr. Joshua Winchell
Council Designated Federal Officer
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041-3803
joshua_winchell@fws.gov

Mr. Timothy Van Norman
Chief, Branch of Permits
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041

Re: Comments Opposing the Establishment of an International Wildlife Conservation Council (Docket No. FWS-HQ-R-2017-N118)

Dear Mr. Winchell and Chief Van Norman,

The Humane Society of the United States (“HSUS”), Humane Society International (“HSI”), Humane Society Legislative Fund (“HSLF”), and the twenty-two undersigned organizations strongly urge the U.S. Fish and Wildlife Service (“Service”) not to establish the euphemistically-named International Wildlife Conservation Council (“IWCC”), as establishing the IWCC as proposed would violate the Federal Advisory Committee Act (“FACA”, 5 U.S.C. App. 2) and would be arbitrary and capricious and not in accordance with law. *See* 82 Fed. Reg. 51,857 (Nov. 8, 2017).

The Service Proposes to Create a Duplicative and Biased Advisory Council

The Service is proposing to establish the IWCC for the purpose of “**increasing public awareness** domestically regarding the **conservation**, wildlife law enforcement, and **economic benefits that result from U.S. citizens traveling to foreign nations to engage in hunting**. Additionally, the Council shall **advise the Secretary on the benefits international hunting** has on foreign wildlife and habitat conservation, anti-poaching and illegal wildlife trafficking programs, and other ways in which international hunting benefits human populations in these areas.” *Id.* (emphasis added).

The duties of the IWCC would include:

- developing a plan for public engagement and education on the benefits of international hunting;
- reviewing and making recommendations for changes, when needed, on all Federal programs, and/or regulations, to ensure support of hunting as: (a) An enhancement to foreign wildlife conservation and survival, and (b) an effective tool to combat illegal trafficking and poaching;
- recommending strategies to benefit the U.S. Fish and Wildlife Service's permit office in receiving timely country data and information so as to remove barriers that impact consulting with range states;
- recommending removal of barriers to the importation into the United States of legally hunted wildlife;
- ongoing review of import suspension/bans and providing recommendations that seek to resume the legal trade of those items, where appropriate;
- reviewing seizure and forfeiture actions/practices, and providing recommendations for regulations that will lead to a reduction of unwarranted actions;
- reviewing the Endangered Species Act's foreign listed species and interaction with the Convention on International Trade in Endangered Species of Wild Flora and Fauna [*sic*], with the goal of eliminating regulatory duplications; and
- recommending methods for streamlining/expediting the process of import permits.

Id.

As detailed herein, the IWCC is unnecessary, duplicative, not in the public interest, and designed to be inappropriately influenced by the trophy hunting industry in a manner that undermines the Service's statutory duties under the Endangered Species Act (16 U.S.C. § 1531 *et seq.*) and FACA. Therefore, the IWCC cannot lawfully be established.

Requirements for Establishing a Federal Advisory Committee

The FACA provides that “new advisory committees should be established only when they are determined to be essential and their number should be kept to the minimum necessary.” 5 U.S.C. App. 2 § 2(b)(2). Further, “[n]o advisory committee shall be established unless such establishment is determined...to be in the public interest in connection with the performance of duties imposed on that agency by law.” *Id.* § 9(a)(2). Advisory committees can only be used “solely for advisory functions” (*id.* § 9(b)) and must serve a “clearly defined purpose” (*id.* § 5(b)(1)). The membership of an advisory committee must “be fairly balanced in terms of the points of view represented and the functions to be performed by the advisory committee” (*id.* § 5(b)(2)), and must “not be inappropriately influenced by... any special interest” (*id.* § 5(b)(3)). Agency actions contrary to the requirements of FACA are subject to judicial review under the Administrative Procedure Act (APA). *See, e.g., Fertilizer Institute v. U.S. E.P.A.*, 938 F.Supp. 52, 54-55 (D.D.C., 1996); 5 U.S.C. § 702. *See also Food Chem. News, Inc. v. Davis*, 378 F. Supp. 1048, 1049 (D.D.C. 1974) (enjoining agency from convening advisory committee meetings unless conducted in full compliance with FACA).

Establishing the IWCC Would Violate FACA

A. The IWCC Is Duplicative and Not Essential

The purpose of FACA is “to enhance the public accountability of advisory committees established by the Executive Branch and to reduce wasteful expenditures” that result only in “worthless committee meetings and biased proposals.” *Pub. Citizen v. U.S. Dep’t of Justice*, 491 U.S. 440, 453, 459 (1989). To this end, it is unlawful for FWS to establish an advisory committee that exceeds the minimum number of committees necessary or to establish a committee that is not needed to advance an agency’s statutory duties and regulatory agenda. *See* 5 U.S.C. App. 2 § 2(b)(2). The IWCC wholly fails to meet these standards – indeed, the IWCC raises the precise concerns that FACA was designed to guard against.

Notably, there already exists an advisory council entitled the Wildlife and Hunting Heritage Conservation Council (“WHHCC”), which has the authority to address the matters included in the IWCC’s proposed purview. *See* 75 Fed. Reg. 6,056 (Feb. 5, 2010); <https://www.fws.gov/whhcc/>. Like the IWCC, the WHHCC’s mission explicitly includes providing “advice on wildlife and habitat conservation endeavors that (1) **benefit recreational hunting**; (2) benefit wildlife resources; and (3) encourage partnerships among the public, the sporting conservation community, wildlife conservation groups, the States, Native American Tribes, and the Federal government.” 75 Fed. Reg. 6,056 (Feb. 5, 2010) (emphasis added). To achieve that goal of promoting recreational hunting, the WHHCC focuses in part on “Providing appropriate access to hunting and recreational shooting on Federal lands” and “Providing recommendations to improve implementation of Federal conservation programs that benefit wildlife, hunting and outdoor recreation on private lands.” *Id.* Consistent with these broad purposes, the WHHCC has multiple times discussed and formed recommendations on international trophy hunting issues.

For example, in July 2012, the WHHCC sent a letter to the Service on behalf of “millions of hunters and anglers nationwide, including many who hunt internationally and seek to import and export their trophies into and out of the United States.” (Attached). That letter included criticism of the process the Service uses to interpret and apply restrictions on the import and seizure of hunting trophies, and provided eight particular recommendations relating to “1) amendments to CITES resolutions and/or decision documents; 2) modifications to FWS manuals, policies, Directors’ Orders, guidance documents and/or practices; and 3) coordinating efforts with representative organizations of the international hunting community.” *Id.* Similarly, in July 2014, the WHHCC sent another letter to the Service, this time urging the Service to reverse its decision to suspend the import of elephant hunting trophies from Tanzania and Zimbabwe, noting the WHHCC’s “efforts on behalf of the hunting community.” (Attached). That latter letter followed a June 2014 meeting of the WHHCC where Safari Club International (“SCI”) presented “updates on African Lion and Elephant” trophy hunting.¹ At its March 2016 meeting, WHHCC again discussed the topic of international trophy hunting, specifically focusing on African lion import issues and including a presentation from SCI.² These are the precise tasks identified

¹<https://www.facadatabase.gov/committee/historymeeting.aspx?mid=123631&cid=2299&fy=2014>.

²<https://www.facadatabase.gov/committee/historymeetingdocuments.aspx?flr=135324&cid=2299&fy=2016>.

in the IWCC notice, demonstrating that there already exists a forum for trophy hunters to attempt to influence FWS policy on these matters.

Indeed, the WHCC currently includes members that represent international trophy hunting interests, such as the Congressional Sportsmen's Foundation.³ The WHCC also currently includes representatives from the Boone & Crockett Club, Backcountry Hunters & Anglers, Ducks Unlimited de Mexico, and Urban American Outdoors, many of whose members trophy hunt in the U.S.—and likely abroad. Further, the IWCC seeks representation from “the firearms or ammunition manufacturing industry,” but a representative from the National Shooting Sports Foundation – a national trade association for the firearms industry – already serves as a member of the WHCC. The incredibly slight differences in the membership these councils maintain/are seeking, demonstrate the duplicative nature of the IWCC.

Therefore, it would be wholly duplicative for the Service to establish the IWCC, whose proposed purpose and tasks are matters that can and are already being carried out by another advisory group.

Similarly, the Service has failed to demonstrate that establishing the IWCC is *essential*. For example, in 2013 the Service established a Wildlife Trafficking Advisory Council to combat issues of illicit wildlife trade and to improve enforcement of wildlife trade laws. 78 Fed. Reg. 45,555 (Jul. 29, 2013). That committee discussed issues of international trophy hunting as a type of wildlife trade.⁴ However, that advisory council was deemed inessential and discontinued pursuant to Executive Order No. 13811 (September 29, 2017).⁵ It is arbitrary and capricious for the Service to now establish the IWCC to take on activities that were previously covered by the Wildlife Trafficking Advisory Council, which was deemed unnecessary by this Administration. Further, the duplicative nature of the IWCC is further demonstrated by the fact that the IWCC would include a representative from the U.S. Department of State – the Presidential Task Force on Wildlife Trafficking established pursuant to Executive Order No. 13,648 (July 1, 2013) already provides a forum for the Service and the State Department to discuss issues of international wildlife trade, including trade in hunting trophies.

Thus, there are already multiple fora for detailed discussion of the issues the IWCC is tasked with providing advice to the Service on, meaning that establishing the IWCC is not essential, as required by law. This is especially true given the broader statutory context, as discussed further below – the Endangered Species Act already provides the opportunity for the trophy hunting industry to submit applications for import permits that demonstrate the alleged benefit of trophy hunting and to submit comments on other permit applications and foreign species listing petitions. *See* 16 U.S.C. § 1539(c). Thus, there is no functional need

³ *See, e.g.*, Congressional Sportsmen's Foundation. Press Release. Aug. 7, 2013. *Sportsmen's Priorities Moving in Congress* (supporting bill allowing import of polar bear trophies hunted in Canada), <http://sportsmenslink.org/the-media-room/news/sportsmens-priorities-moving-in-congress>.

⁴ *See* <https://www.fws.gov/International/advisory-council-wildlife-trafficking/pdf/acwt-meeting-minutes-march-20.pdf>.

⁵ *See* <https://www.whitehouse.gov/the-press-office/2017/09/29/presidential-executive-order-continuance-certain-federal-advisory>.

for an advisory committee dedicated to promoting propaganda of the trophy hunting industry.

Because the IWCC is per se inessential and duplicative, chartering the IWCC would violate FACA.

B. The IWCC Is Not in the Public Interest

Chartering the IWCC would further violate FACA because its purpose is inconsistent with the public interest and the “performance of duties imposed on [the Service] by law.” 5 U.S.C. App. § 9(a)(2).

The primary stated purpose of the IWCC is to *promote* trophy hunting of foreign species and to relax the legal restrictions for importing trophies of threatened and endangered species, accepting as incontrovertible fact the notion that trophy hunting promotes the conservation of wildlife species. However, this is a highly controversial and hotly debated topic, with ample scientific evidence to the contrary, and the notice of IWCC creation patently reveals the biased and unsupported positions that the council would advance.

The FACA was specifically adopted to avoid such a circumstance. *See, e.g., Moss v. C.A.B.*, 430 F.2d 891, 893 (1970) (when the “subject matter of” a FACA council’s “involve[s] serious and much-debated...issues...[t]he Government’s consideration of such sensitive issues must not be unduly weighted by input from the private commercial sector, lest the Government fall victim to the devastating harm of being regulated by those whom the Government is supposed to regulate in the public interest.”); H.R. REP. 92-1017, 1972 U.S.C.C.A.N. 3491, 3496 (“One of the great dangers in th[e] unregulated use of advisory committees is that special interest groups may use their membership on such bodies to promote their private concerns. Testimony received [on the passage of the FACA] pointed out the danger of allowing special interest groups to exercise undue influence upon the Government through the dominance of advisory committees which deal with matters in which they have vested interests.”).

Thus, forming the IWCC as proposed would be unlawful.

1. Trophy hunting undermines conservation efforts

As detailed in numerous documents in the Service’s possession (*e.g.*, petitions to list African lions, elephants, and leopards as endangered under the ESA; letters submitted with respect to the import of lions and elephants from Tanzania, Zimbabwe, Zambia, and South Africa, as well as the expert declarations in support thereof; and comments opposing the import of endangered bontebok, cape mountain zebra, and black rhinoceros trophies, attached), there is ample scientific evidence that trophy hunting of threatened and endangered species does not in fact enhance the survival of the species in the wild. With respect to three of the so-called “Big Five” species targeted by trophy hunters, a summary of that evidence is as follows.

Trophy Hunting of African Lions

With the world's preeminent lion scientist as the lead author, Packer et al. (2009)⁶ and Packer et al. (2010)⁷ identify trophy hunting as the likely cause of multiple lion population declines in Africa.⁸ In addition to direct population reduction through lethal take, trophy hunting poses a threat to lions because it can weaken a population's genetic constitution (e.g. Allendorf et al. 2008⁹). Because hunters target the biggest and strongest males, trophy hunting removes these animals from the breeding pool and unnaturally selects for smaller or weaker animals (Allendorf and Hard, 2009¹⁰). In this way, trophy hunting can decrease genetic variation, shift the population structure, and cause unnatural evolutionary impacts. This effect has already been documented in other species. For example, selective hunting likely increased the occurrence of mature female African elephants (*Loxodonta africana*) lacking tusks from 10% to 38% in parts of Zambia over 20 years (Jachmann et al. 1995¹¹), and recent studies of bighorn sheep suggest that horn size and body weight decreased over time as a result of trophy hunting (e.g. Coltman et al., 2003¹²; Festa-Bianchet et al., 2013¹³). Further, when trophy hunting is sanctioned, poaching activity increases, likely due to the perception that species authorized for hunting are of diminished value and the perception that legal killing increases the acceptability of poaching.¹⁴ Moreover, trophy hunting of lions has cascading lethal impacts on lion populations, as the social instability created by removing dominant males leads to infanticide of cubs sired by the male killed for a trophy (Packer et al. 2009).

⁶ Packer, C., Kosmala, M., Cooley, H.S., Brink, H., Pintea, L., Garshelis, D., Purchase, G., Strauss, M., Swanson, A., Balme, G., Hunter, L., and Nowell, K. (2009). Sport Hunting, Predator Control and Conservation of Large Carnivores. *PLoS ONE*, 4(6): e5941. DOI:10.1371/journal.pone.0005941

⁷ Packer, C., Brink, H., Kissui, B.M., Maliti, H., Kushnir, H., and Caro, T. (2010) Effects of trophy hunting on lion and leopard populations in Tanzania. *Conservation Biology*, 25, 142–153.

⁸ See also Bauer H, Henschel P, Packer C, Sillero-Zubiri C, Chardonnet B, Sogbohossou EA, et al. (2017) Lion trophy hunting in West Africa: A response to Bouché et al. *PLoS ONE*12(3): e0173691. <https://doi.org/10.1371/journal.pone.0173691>.

⁹ Allendorf, F.W., England, P.R., Luikart, G., Ritchie, P.A., and Ryman, N. (2008). Genetic effects of harvest on wild animal populations. *Trends in Ecology and Evolution*, 23, 327-337. doi:10.1016/j.tree.2008.02.008

¹⁰ Allendorf, F.W. and Hard, J.J. (2009). Human-induced evolution caused by unnatural selection through harvest of wild animals. *Proceedings of the National Academy of Sciences of the United States of America*, 106, 9987-9994. See also Coltman, D. W., et al. (2003). Undesirable evolutionary consequences of trophy hunting. *Nature* 426(6967): 655-658.; Palazy, L., et al. (2012). Rarity, trophy hunting and ungulates. *Animal Conservation* 15(1): 4-11.; Darimont, C. T., et al. (2015). The unique ecology of human predators. *Science* 349(6250): 858-860.

¹¹ Jachmann, H., Berry, P.S.M., and Imae, H. (1995). Tuskeness in African Elephants: a future trend. *African Journal of Ecology*, 33, 230-235. DOI: 10.1111/j.1365-2028.1995.tb00800.x

¹² Coltman, D.W., O'Donoghue, P., Jorgenson, J.T., Hogg, J.T., Strobeck, C., and Festa-Bianchet, M. (2003). Undesirable evolutionary consequences of trophy hunting. *Nature*, 426, 655-658. doi:10.1038/nature02177

¹³ Festa-Bianchet, M., Pelletier, F., Jorgenson, J.T., Feder, C., and Hubbs, A. (2013). Decrease in Horn Size and Increase in Age of Trophy Sheep in Alberta Over 37 Years. *Journal of Wildlife Management*, 78, 133-141.

¹⁴ Chapron, G. and Treves, A., *Blood does not buy goodwill: allowing culling increases poaching of a large carnivore*, Proc. R. Soc. B 283 (2016), <http://dx.doi.org/10.1098/rspb.2015.2939>.

Lion scientists have produced a steady drumbeat of warnings that trophy hunting across African range states is unsustainable and is a threat to survival of the species:

African Continent:

- Rosenblatt (2014)¹⁵: “...overharvesting of lions has been well-documented throughout Africa”, recognize trophy hunting as one of the reasons for the decline of the lion throughout its range.
- Hunter et al. (2014)¹⁶: “there is considerable scientific evidence of negative population impacts associated with poorly-managed trophy hunting of lions.” The authors state “there have been documented negative impact on lion populations resulting from trophy hunting” and call for lion trophy hunting reform.
- Lindsey et al. (2013)¹⁷ stated that, regarding the recent decline of lion populations, “Most of the factors that contribute to this decline are now well understood, although evidence of the impacts of trophy hunting on lions has only emerged relatively recently.” The authors also state, “lion quotas remain higher than the 0.5/1,000 km² recommended by [Packer et al. (2011)] in all countries except Mozambique” and “in all countries where data are available, harvests appear too high in a proportion of hunting blocks.”

Zambia:

- Rosenblatt et al. (2014): found a declining lion population in South Luangwa National Park with low recruitment, low sub-adult and adult survivorship, depletion of adult males and an aging adult female population and attributed this to the “severe male depletion” caused by trophy hunting.
- Lindsey et al. (2014)¹⁸: numerous problems identified with trophy hunting in Zambia including that the Zambia Wildlife Authority establishes trophy quotas arbitrarily and “quotas of lions have been particularly excessive”.
- Lindsey et al. (2013): “Excessive offtake from trophy hunting also lowered population density of lions and altered sex-ratios of lions in Hwange National Park, Zimbabwe, South Luangwa, Kafue and Lower Zambezi national parks in Zambia, and the Bénoué Complex in Cameroon.” The authors also said that mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Zambia.

Tanzania:

- Dolrenry et al. (2014)¹⁹: populations in Tanzania are declining in part due to “overexploitation due to poor management of trophy hunting”.

¹⁵ Rosenblatt, E., Becker, M. S., Creel, S., Droge, E., Mweetwa, T., Schuette, P. A., & Mwape, H. (2014). Detecting declines of apex carnivores and evaluating their causes: An example with Zambian lions. *Biological Conservation*, 180, 176-186.

¹⁶ Hunter, L., Lindsey, P., Balme, G., Becker, M., Begg, C., Brink, H. ...White, P., Whitman-Gelatt, K. (2014). Urgent and comprehensive reform of trophy hunting of lions is a better option than an endangered listing; a science-based consensus [sic]. Unpublished.

¹⁷ Lindsey, P. A., Balme, G. A., Funston, P., Henschel, P., Hunter, L., Madzikanda, H., ... & Nyirenda, V. (2013). The trophy hunting of African lions: Scale, current management practices and factors undermining sustainability. *PloS one*, 8(9), e73808.

¹⁸ Lindsey, P. A., Nyirenda, V. R., Barnes, J. I., Becker, M. S., McRobb, R., Tambling, C. J., ... & t'Sas-Rolfes, M. (2014). Underperformance of African Protected Area Networks and the Case for New Conservation Models: Insights from Zambia. *PloS one*, 9(5), e94109.

- Lindsey et al. (2013): “Trophy hunting has contributed to population declines outside (and inside some) protected areas in Tanzania, a country that holds between 30-50% of Africa’s lion.”

Zimbabwe:

- Groom et al. (2014)²⁰: the low densities of lion populations in Gonarezhou National Park and trophy hunting concessions in Tuli are due to the collapse of these populations in the past due to “unsustainably high trophy hunting within Tuli and in the concessions around Gonarezhou ...” The authors concluded, “hunting has probably had a strong negative effect on lion abundance in both reserves.”
- Lindsey et al. (2013): “Excessive offtake from trophy hunting also lowered population density of lions and altered sex-ratios of lions in Hwange National Park, Zimbabwe, South Luangwa, Kafue and Lower Zambezi national parks in Zambia, and the Bénoué Complex in Cameroon.”
- Lindsey et al. (2013): mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Zimbabwe.

Namibia:

- Lindsey et al. (2013): mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Namibia.

Cameroon:

- Lindsey et al. (2013): “Excessive offtake from trophy hunting also lowered population density of lions and altered sex-ratios of lions in Hwange National Park, Zimbabwe, South Luangwa, Kafue and Lower Zambezi national parks in Zambia, and the Bénoué Complex in Cameroon.”

Burkina Faso:

- Lindsey et al. (2013): mean lion harvests are higher than Packer et al. (2011) 0.5/1,000 km² threshold in Burkina Faso.

Benin:

- Sogbohossou et al. (2014)²¹: the low lion density and small group size found in Pendjari Biosphere Reserve in Benin is due to human disturbance and mortality through trophy hunting, the Pendjari lion hunting quota is three times higher than recommended by Packer et al. (2011), and the existing age limit for ‘old males’ is not enforced.

Trophy Hunting of African Elephants

Similarly, trophy hunting is documented to undermine the conservation of African elephants. As explained in a recent scientific study, range states from which the Service

¹⁹ S. Dolrenry, J. Stenglein, L. Hazzah, R.S. Lutz, and L. Frank (2014). A metapopulation approach to African lion (*Panthera leo*) conservation. Plos One 9 (2), e88081.

²⁰ R.J. Groom, P.J. Funston and R. Mandisodza (2014). Surveys of lions *Panthera leo* in protected areas in Zimbabwe yield disturbing results: what is driving the population collapse? Oryx 2014: 1-9.

²¹ Sogbohossou, E. A., Bauer, H., Loveridge, A., Funston, P. J., De Snoo, G. R., Sinsin, B., & De Iongh, H. H. (2014). Social Structure of Lions (*Panthera leo*) Is Affected by Management in Pendjari Biosphere Reserve, Benin. *PloS one*, 9(1), e84674.

currently allows trophy imports (such as South Africa) may be setting unsustainably high hunting quotas: in the Greater Mapungubwe Transfrontier Conservation Area scientists found that, in contrast to current hunting allowances, “only a small number of bulls (<10/year) could be hunted sustainably. At current rates of hunting, under average ecological conditions, trophy bulls will disappear from the population in less than 10 years.”²²

Researchers have found that the selective nature of trophy hunting causes changes in desirable phenotypic traits in harvested species. In particular, trophy sizes for wild herbivores experienced temporal decline in South Africa and Tanzania. “Declines in trophy size over time due to selective harvesting could be attributed to phenotypic plasticity that may result due to a decline in abundance of big tuskers and individuals with big horns or tusks as these are mostly selected by hunters.”²³ Again, because hunters target the biggest and strongest male elephants, trophy hunting removes these animals from the breeding pool and unnaturally selects for smaller or weaker animals.²⁴ In this way, trophy hunting can decrease genetic variation, shift the population structure, and cause unnatural evolutionary impacts. For example, selective hunting likely increased the occurrence of mature female African elephants (*Loxodonta africana*) lacking tusks from 10% to 38% in parts of Zambia over 20 years.²⁵ Additionally, trophy hunting has been shown to disrupt family groups and social stability, negatively impacting elephant survival.²⁶

Another study reviewed the functioning of Zambia’s protected areas and game management areas (GMAs), where trophy hunting occurs.²⁷ The authors found numerous problems that pertain to management of trophy hunting in GMAs including: uncontrolled human immigration and open access to wildlife; the Zambia Wildlife Authority (ZAWA) retains most of income derived from trophy hunting, little of this income goes to people living in GMAs with affluent community members benefiting most, and there are frequent financial

²² S. Selier et al. (2014), Sustainability of elephant hunting across international borders in southern Africa: A case study of the greater Mapungubwe Transfrontier Conservation Area. *The Journal of Wildlife Management*, 78: 122–132.

http://www.researchgate.net/publication/259539652_Sustainability_of_elephant_hunting_across_international_borders_in_southern_Africa_A_case_study_of_the_greater_Mapungubwe_Transfrontier_Conservation_Area.

²³ Muposhi VK, Gandiwa E, Bartels P, Makuza SM, Madiri TH, *Trophy Hunting and Sustainability: Temporal Dynamics in Trophy Quality and Harvesting Patterns of Wild Herbivores in a Tropical Semi-Arid Savanna Ecosystem*, *PLoS ONE* 11(10) (2016), <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0164429>.

²⁴ Allendorf, F.W. and Hard, J.J. (2009). Human-induced evolution caused by unnatural selection through harvest of wild animals. *Proceedings of the National Academy of Sciences of the United States of America*, 106, 9987-9994.

²⁵ Jachmann, H., Berry, P.S.M., and Imae, H. (1995). Tuskllessness in African Elephants: a future trend. *African Journal of Ecology*, 33, 230-235. DOI: 10.1111/j.1365-2028.1995.tb00800.x

²⁶ Milner J.M., Nielsen E.B., Andreassen HP, *Demographic side effects of selective hunting in ungulates and carnivores*, *Conservation Biology* Vol. 21:36-47 (2007), doi: 10.1111/j.1523-1739.2006.00591.x (“Such selective harvesting can destabilize social structures and the dominance hierarchy and may cause loss of social knowledge, sexually selected infanticide, habitat changes among reproductive females, and changes in offspring sex ratio.”)

²⁷ Lindsey, P. A., Nyirenda, V. R., Barnes, J. I., Becker, M. S., McRobb, R., Tambling, C. J., ... & t’Sas-Rolfes, M. (2014). Underperformance of African Protected Area Networks and the Case for New Conservation Models: Insights from Zambia. *PLoS one*, 9(5), e94109.

irregularities associated with the distribution of this income; scouts employed in anti-poaching in GMAs are poorly and irregularly paid, insufficiently trained and equipped, and inadequate in number; ZAWA is poorly funded, has an inadequate number of staff to protect elephants against poaching, has increased hunting quotas to unsustainable levels in GMAs in order to raise money (the authors state that ZAWA ‘are sometimes forced to make decisions to achieve financial survival at the expense of the wildlife they are mandated to conserve’), establishes trophy quotas arbitrarily, and does not monitor wildlife populations or trophies; and hunting concession agreements are not effectively enforced and unscrupulous concession operators are not adequately punished. The authors blame these many failures for the low numbers and diversity of wildlife, including elephants.

Thus, it is not surprising that elephant densities are lower in trophy hunting areas compared to a national park where trophy hunting is not permitted.²⁸ The Service itself acknowledged such impacts in 2014 when it suspended the issuance of elephant trophy imports from Tanzania and Zimbabwe.²⁹

The Service has previously rejected attempts to import trophies from Zambia due to similar concerns of mismanagement including inconsistencies in reported elephant population estimates, failure to comply with monitoring requirements, absence of government funding for elephant protection, and lack of effective anti-poaching measures.³⁰ Further, the Service has not made enhancement findings for elephant trophy imports from either Mozambique or Cameroon even though elephant trophy hunting is allowed there.³¹

Trophy Hunting of African Leopards

Balme et al. (2010)³² demonstrated the impact of trophy hunting on infanticide in a population of leopards in South Africa; high trophy hunting offtake resulted in particularly high male leopard mortality and high levels of male turnover; females cannot successfully raise cubs because of immigration into the population of new males; the consequences were low cub survival rates, delayed age at first parturition, reduced conception rates, and low annual litter production; the combined impact of high mortality and low reproductive

²⁸ Crosmary, W. G., S. D. Cote, and H. Fritz. (2015). Does trophy hunting matter to long-term population trends in African herbivores of different dietary guilds?. *Animal Conservation*, 18, 117-130.

²⁹ See 80 Fed. Reg. 42524 (July 17, 2015); 79 Fed. Reg. 44459 (July 31, 2014) (“Without management plans with specific goals and actions that are measurable and reports on the progress of meeting these goals, the Service cannot determine if...Zimbabwe is implementing, on a national scale, appropriate management measures for its elephant populations.”). Note that the Service’s November 2017 decision to reverse this suspension was put “on hold” by President Trump and Secretary Zinke on November 17, 2017.

³⁰ See *Marcum v. Salazar*, 810 F.Supp.2d 56, 63 (D.D.C. 2011); *Marcum v. Salazar*, 694 F.3d 123 (D.C.Cir. 2012). Note that the Service’s November 2017 decision to allow elephant trophy imports from Zambia was put “on hold” by President Trump and Secretary Zinke on November 17, 2017.

³¹ See <https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies-elephants.html>.

³² Balme, G.A., Hunter, L.T., Goodman, P., Ferguson, H., Craigie, J. and Slotow, R., 2010. An adaptive management approach to trophy hunting of leopards *Panthera pardus*: a case study from KwaZulu-Natal, South Africa. *Biology and conservation of wild felids*. Oxford University Press, Oxford, pp.341-352. See also Brackowski, A. R., et al. (2015). Who Bites the Bullet First? The Susceptibility of Leopards *Panthera pardus* to Trophy Hunting. *PLOS ONE* 10(4).

output led to a negative population growth rate. Further, the 2016 IUCN assessment for *Panthera pardus* specifically notes that “concern about unsustainable trophy hunting has lately increased” and cites studies concretely demonstrating that “trophy hunting was a key driver of Leopard population decline” (Stein et al. 2016).³³

Moreover, few of the potential benefits from hunting are consistently realized by local communities that live amongst lions, elephants, leopards, and other species targeted by trophy hunters. According to an IUCN analysis from 2009, big-game hunting only provided one job for every 10,000 inhabitants in the area studied,³⁴ and many of these jobs were temporary seasonal positions like opening the trails at the start of the hunting season (IUCN 2009³⁵). Trophy hunting fails to create a significant number of permanent jobs (and those that it does create do not automatically benefit conservation), but ecotourism offers a possible solution. Consider the Okavango in Botswana where, as of 2009, a safari ecotourism tourism park provided 39 times the number of jobs than would big-game hunting on an area of equal size (IUCN 2009). Another example is the Luangwa National Park in Zambia, which produced twice the number of jobs provided by Benin and Burkina Faso’s trophy hunting sector combined in 2007 (IUCN 2009).

The IUCN also found that Africa’s 11 main big-game hunting countries only contributed an average of 0.6% to the national GDP as of 2009 (IUCN 2009). Of this marginal profit, studies suggest that as little as 3-5% of trophy hunting revenues are actually shared with local communities (Economists at Large 2013³⁶; IUCN 2009; Sachedina 2008³⁷). Perhaps because of this, locals do not always view trophy hunting as the positive economic driver that hunting advocates portray it as. For example, villagers in Emboreet village in Tanzania characterized hunting as “destructive, exploitative, and disempowering,” and blame hunting for jeopardizing village revenues (Sachedina 2008). The same study presents an interview with the Village Executive Officer, who explained that villagers feel more closely partnered with photographic tour operators than with hunters because hunters “are finishing off the wildlife before we’ve had a chance to realize a profit from it,” and because villagers never see the 5% of revenue they are supposed to receive from trophy hunting (Sachedina 2008).

A 2017 report from Economists at Large³⁸ found that in Botswana (where trophy hunting is now prohibited since 2014), Ethiopia, Mozambique, Namibia, South Africa, Tanzania,

³³ Stein, A.B., Athreya, V., Gerngross, P., Balme, G., Henschel, P., Karanth, U., Miquelle, D., Rostro, S., Kamler, J.F. and Laguardia, A. 2016. *Panthera pardus*. The IUCN Red List of Threatened Species 2016: e.T15954A50659089. Downloaded on 11 July 2016. <http://www.iucnredlist.org/details/full/15954/0>

³⁴ South Africa, Namibia, Tanzania, Botswana, Cameroon, Central African Republic, Burkina, and Benin.

³⁵ IUCN. (2009). Programme Afrique Centrale et Occidentale. Big Game Hunting in West Africa. What is its contribution to conservation?

³⁶ Economists at Large. (2013). The \$200 million question: How much does trophy hunting really contribute to African communities? A report for the African Lion Coalition, prepared by Economists at Large, Melbourne, Australia.

³⁷ Sachedina, H.T. 2008. “Wildlife Is Our Oil: Conservation, Livelihoods and NGOs in the Tarangire Ecosystem, Tanzania.” University of Oxford. PhD. Thesis.

³⁸ Economists at Large. (2017). The Lion’s Share? On The Economic Benefits Of Trophy Hunting. A report for the Humane Society International, prepared by Economists at Large, Melbourne,

Zambia and Zimbabwe, trophy hunting brings in less than \$132 million in tourism spending to the eight study countries out of \$17 billion annual tourism spending, or just 0.78 percent. And trophy hunting has only a marginal impact on employment in these eight countries, contributing only between 7,500-15,500 jobs or 0.76 percent or less of nearly 2.6 million overall tourism jobs.

On average, American trophy hunters import more than 126,000 trophies every year.³⁹ While not all of these species are protected under the U.S. Endangered Species Act, it is an unfounded and sweeping generalization to assert that trophy hunting always provides a biological or economic benefit to the conservation of the species, as asserted in the IWCC notice. Therefore, an advisory council designed solely to *educate* the public on the *benefits* of trophy hunting is not in the public interest, as those alleged benefits are not supported by the best available science. Nor is that conclusion supported by the American public – indeed, in the last week alone, over 435,121 members of the public have voiced their opposition to American trophy hunters killing African lions and elephants threatened with extinction, and nearly 2 million people worldwide have taken action in opposition to elephant trophy hunting in another call to action.⁴⁰

2. Using taxpayer dollars to promote the commercial interests of trophy hunting industry is not in the public interest

The purpose of the FACA is “to eliminate useless advisory committees, strengthen independence of remaining advisory committees, and prevent advisory groups from becoming self-serving.” *Consumers Union of U.S., Inc. v. Department of Health, Ed. and Welfare*, 409 F.Supp. 473, affirmed 551 F.2d 466 (D.D.C.1976). Establishing the IWCC would require the Service to expend resources on convening and participating in the council, unnecessarily diverting resources from an already strapped agency. Indeed, the Fiscal Year 2018 budget proposes to decrease funds spent on foreign species protection by \$1,000,000.⁴¹ To use precious agency resources to create a self-serving platform for trophy hunters to amplify their voice, especially while funds are already provided for other FACA advisory committees addressing these same topics, does not meet the FACA requirements for actions in the public interest.

Therefore, the IWCC is not in the public interest and cannot be lawfully chartered.

C. The IWCC Is Designed to Undermine the Implementation of the ESA and the Service’s Other Legal Obligations

The IWCC represents an effort by a commercial industry to undermine the statutory duties of an agency, and as such the establishment of the IWCC would be patently *ultra vires*.

Australia.

³⁹ http://www.hsi.org/assets/pdfs/report_trophy_hunting_by_the.pdf;
<http://www.hsi.org/assets/pdfs/trophy-madness-report.pdf>;
http://www.ifaw.org/sites/default/files/IFAW_TrophyHuntingReport_UK_v2.pdf.

⁴⁰ <https://www.thepetitionsite.com/takeaction/721/417/558/>;
https://secure.avaaz.org/campaign/fr/trump_vs_elephants/.

⁴¹ <https://www.fws.gov/budget/2018/FY2018-FWS-Greenbook.pdf>

As an initial matter (and to be discussed further in comments submitted on or before December 8, 2017), the proposed makeup of the IWCC is inherently biased – it would include up to eighteen members who represent “Wildlife and habitat conservation/management organizations; U.S. hunters actively engaged in international and/or domestic hunting conservation; The firearms or ammunition manufacturing industry; Archery and/or hunting sports industry; and Tourism, outfitter, and/or guide industries related to international hunting.” There is no suggestion that objective conservation biologists will be invited to have a roll on this committee that would make recommendations on the management of threatened and endangered species. Indeed, even the reference to participation by conservation and management organizations is so vague that it could even include biased groups like Safari Club International/Safari Club International Foundation or the National Rifle Association, groups that have filed lawsuits against the Service to assert the interests they now seek to address via the IWCC.

The IWCC is inherently designed to allow the trophy hunting industry to have an amplified voice, with an air of formality, on the question of whether killing threatened and endangered species enhances the survival of the species as required under the Endangered Species Act. 16 U.S.C. § 1539(a)(1)(A); 50 C.F.R. § 17.40. Specifically, the IWCC would be charged with:

- recommending removal of barriers to the importation into the United States of legally hunted wildlife;
- ongoing review of import suspension/bans and providing recommendations that seek to resume the legal trade of those items, where appropriate;
- reviewing seizure and forfeiture actions/practices, and providing recommendations for regulations that will lead to a reduction of unwarranted actions;
- reviewing the Endangered Species Act's foreign listed species and interaction with the Convention on International Trade in Endangered Species of Wild Flora and Fauna [*sic*], with the goal of eliminating regulatory duplications; and
- recommending methods for streamlining/expediting the process of import permits.”

The ESA mandates that the Service itself make enhancement findings and determine whether listing a species is warranted, and these are not tasks that can be delegated to the regulated industry. 16 U.S.C. §§ 1533, 1539. Indeed, even without the creation of the IWCC the trophy hunting industry has had undue influence on such decisions of the Service, as evidenced by the fact that Safari Club International announced the recent decisions to allow elephant trophy imports from Zimbabwe and Zambia before such findings were even announced by the Service⁴² (and before such announcements were called into question by the President).⁴³

The IWCC would also apparently take on “recommending strategies to benefit the U.S. Fish and Wildlife Service's permit office in receiving timely country data and information so as to remove barriers that impact consulting with range states.” But it would be inappropriate

⁴² <https://www.safariclub.org/detail/news/2017/11/14/u.s.-now-allows-elephants-from-zimbabwe-zambia-to-be-imported?from=groupmessage&isappinstalled=0>

⁴³ Statement of President Trump, Nov. 17, 2017 at 8:47 pm, <https://twitter.com/realDonaldTrump/status/931685146415255552>; Statement of President Trump, Nov. 19, 2017 at 6:57 pm, <https://twitter.com/realDonaldTrump/status/932397369655808001>.

for such bilateral governmental discussions to be mediated by a third party with a financial stake in affecting the outcome of those communications. It is clear that the trophy hunting industry is aiming to minimize the impact of the ESA (indeed, they are currently arguing both in federal court⁴⁴ and before Congress that the ESA should add no more protections than what exists under CITES, even though that treaty explicitly calls for member countries to adopt national measures⁴⁵). The IWCC would give the regulated industry a special seat at the table, to the disadvantage of conservation and animal protection groups seeking to prevent species extinction in furtherance of the statutory mandate of the ESA.

With the establishment of the ESA, Congress created “a program for the conservation of such endangered species and threatened species” and mandated federal agencies to “utilize their authorities in furtherance of the purposes of” the ESA by committing “to conserve to the extent practicable the various species of fish or wildlife and plants facing extinction . . .” 16 U.S.C. § 1531(a)(4), (b), (c)(1). The ESA defines the term “conserve” to mean “to use all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to [the Act] are no longer necessary.” 16 U.S.C. § 1532(3). It is critical that any decisions to list species or allow imports of listed species are made based on the best available science, not pursuant to the commercial interests of the trophy hunting industry as envisioned by the IWCC.

Likewise, the IWCC would be charged with reviewing ESA listed and CITES listed species. Again, the criteria for listing species (or delisting them as the case may be) in either arena are specifically inscribed. Under the ESA, species listings/delisting are reviewed using five factors and decisions are made “solely on the basis of the best scientific and commercial data,” 16 U.S.C. § 1533(b)(1)(A), and CITES uses the best information available and specific biological criteria and reliance upon the precautionary principle that the Parties to CITES act in “best interest of the conservation of the species.” Res. Conf. 9.24 (Rev'd CoP17). Consideration of species listing proposals is done through a public process and by the agency, a FACA committee is unnecessary and risks abdicating the Service's responsibilities.

Equally concerning, is the IWCC delineated duty to “review[] seizure and forfeiture actions/practices.” 82 Fed. Reg. at 51,858. Seizure and forfeiture actions are entirely within the Service's prosecutorial discretion – an arena in which courts generally do not tread. See *Heckler v. Chaney*, 470 U.S. 821 (1985) (finding agencies have unreviewable prosecutorial discretion unless a statute or agency policy says otherwise). It is difficult to imagine how a FACA committee could “review” what a federal court may not.

⁴⁴ *SCI et al. v. Zinke*, Case No. 1:14-cv-00670-RCL (D.D.C. 2017).

⁴⁵ This international law sets the floor, expressly providing that parties may adopt “stricter domestic measures” for species covered by CITES (as well as those that are not). CITES, Art. XIV, para. 1. See also FWS, *Ensuring the Future of the Black Rhino* (Nov. 25, 2014), at <http://www.fws.gov/news/blog/index.cfm/2014/11/25/Ensuring-the-Future-of-the-Black-Rhino> (acknowledging that the ESA enhancement standard is in addition to the CITES non-detriment standard and that trophy import permits should only be issued if the Service finds “that the [animal] is taken as part of a well-managed conservation program that contributes to the long-term survival of the species”).

Therefore, the establishment of the IWCC is not in accordance with either the FACA or the ESA and must not be finalized. If the IWCC is finalized, HSUS, HSI, and one or more of the undersigned organizations will consider seeking legal review of this unlawful agency action. We will submit separate comments on the composition of the IWCC on or before December 8, 2017.

Sincerely,



Anna Frostic
Managing Attorney, Wildlife Litigation
The Humane Society of the United States



Teresa M. Telecky, Ph.D.
Senior Director, Wildlife Department
Humane Society International



Keisha Sedlacek
Senior Regulatory Specialist, Federal Affairs
Humane Society Legislative Fund

On behalf of the following organizations:

Animal Defenders International
Animal Welfare Institute
Animals Asia Foundation
Annamiticus
Big Cat Rescue
Center for Biological Diversity
Cetacean Society International
EMS Foundation
Environmental Investigation Agency
Fondation Brigitte Bardot
FOUR PAWS International
Japan Tiger and Elephant Fund
Lilongwe Wildlife Trust
Natural Resources Defense Council
One More Generation
Pegasus Foundation
Pettus Crowe Foundation
Pro Wildlife
Rainbow Eco-Farm and Training Center (South Africa)
Shark Research Institute
The Pan African Sanctuary Alliance
World Animal Protection



United States Department of the Interior

FISH AND WILDLIFE SERVICE

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NOV 8 2017

MEMORANDUM

To: Chief, Division of Management Authority

From: Chief, Division of Scientific Authority *Rosemary Green*

Subject: General Advice on Importation of Sport-hunted Trophies of African Elephants taken in Zambia in the Calendar Year 2018

This General Advice represents our Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) finding for permit applications that you have received, or may receive in the future, for the import of sport-hunted trophies of African elephants (*Loxodonta africana*) taken in Zambia in the calendar year 2018.

Please be advised that, based on the available information as of the date of this finding, we are able to determine that the importation of sport-hunted trophies of African elephants taken in Zambia in the calendar year 2018, will be for purposes that are not detrimental to the survival of the species. This General Advice applies only to African elephant sport-hunted trophies lawfully taken in Zambia during calendar year 2018 (i.e., January 1 through December 31), provided that they are to be imported by the persons who hunted them for personal use or personal display.

This finding is based on the best available biological information and is made consistent with the requirements at 50 CFR § 23.61. In making this finding, the U.S. Fish and Wildlife Service (Service) would have reviewed any pending applications to import sport-hunted trophies of African elephants taken in Zambia in 2018 for any new or additional information to consider. However, as of the date of this finding, no applications have been received for trophies to be taken in 2018. The Service also considered trade information, including trade demand, and other scientific management information available to the Service on the status and management of African elephant populations in Zambia.

This finding does not establish any conditions that must be satisfied for a permit to be granted. The Service monitors the status and management of African elephant populations in Zambia and retains

discretion to replace this finding at any time when it no longer reflects the best available biological information consistent with the requirements at 50 CFR § 23.61. In addition, this finding is subject to new analysis in the context of individual permit applications for import of sport-hunted trophies of African elephants taken in Zambia. The Service reviews and evaluates each individual application to determine whether it includes new or additional information regarding the status of elephants in Zambia such that the requirements of 50 CFR § 23.61 are satisfied. Each application for import also needs to meet all other applicable permitting requirements before it may be granted.

BASIS FOR ADVICE:

On September 12, 2017, we issued a General Advice on the import of sport-hunted trophies of African elephants from Zambia for the calendar years 2016 and 2017. In that finding, we found that, based on the available information as of the date of the finding, the importation of sport-hunted trophies of African elephants taken in Zambia in the calendar years 2016 and 2017 would be for purposes that are not detrimental to the survival of the species.

On November 7, 2017, the Division of Management Authority issued a positive finding indicating that permits for sport-hunted elephants taken from Zambia on or after January 1, 2016 and on or before December 31, 2018, meet the enhancement requirements under 50 CFR 17.32 and 50 CFR 17.40(e)(6)(i)(B).

Given that the Division of Management Authority's recently issued enhancement finding for sport-hunted elephants taken in Zambia is valid through 2018, the Division of Scientific Authority decided to review the best available information and issue a finding on the import of sport-hunted trophies of African elephants from Zambia for the calendar year 2018.

Conclusion

Based on the information currently available and detailed in our General Advice on the import of sport-hunted trophies of African elephants from Zambia for the calendar years 2016 and 2017, we believe that the status of the African elephant population in Zambia and the management efforts of the Government of Zambia are adequate to ensure that the sport hunting of African elephants does not adversely affect the status of the species in Zambia.

Furthermore, we expect that Zambia will make progress on the following issues raised in our 2016 - 2017 finding:

- 1) The Department of National Parks and Wildlife have notified us that they have submitted a revised Statutory Instrument on Elephant Sport Hunting to the Ministry of Justice for finalization, in light of the transformation of wildlife management in Zambia. DNPW has indicated that once the draft Statutory Instrument is finalized, the document will be made available to the Service. We await receipt of this revised Statutory Instrument on Elephant Sport Hunting from Zambia.

- 2) The 2005 National Strategy for Elephant Management in Zambia officially expired in 2012. Although the Government of Zambia still implements most of the strategies identified in the plan, the Strategy is scheduled for review this year. We strongly encourage Zambia to complete the review process and develop a new or revised Strategy. We would also like to request that Zambia provide us with a copy of the new or revised National Strategy for Elephant Management or Elephant Management Plan, once it is developed and finalized.
- 3) Given the possible decline in the Lower Zambezi elephant population and the drastic decline in the Sioma Ngwezi NP population (and an ecosystem carcass ratio of 85.5%), as well as a carcass ratio for Kafue National Park that increased from 1% in 2008 to 7% in 2015, we believe more effort is needed in these areas to address poaching, particularly in Sioma Ngwezi. Although we recognize that Zambia has greatly improved its anti-poaching activities, the levels of illegal activity need to be reduced as a first priority, and we will continue to monitor this situation.
- 4) In 2010, the Panel of Experts' analysis showed a steady decline in average tusk weight from 23.1 kg in 2005 to 19.6 kg in 2009. As such, the Panel raised some concern that the 2009 trophies were the smallest on record in terms of maximum weight, average weight and length, despite being above (on average) the minimum legal requirements. Then, in 2011 and 2012, the average trophy weight declined even further to 17 kg and 17.2 kg respectively. However, an analysis of trophy quality showed that the average trophy weight increased to 19.2 kg between 2015 and 2016. Although the further decline in trophy quality in 2011 and 2012 was very concerning, the increase in trophy quality in 2015 and 2016 is very promising and brings the current trophy quality level close to that of 2009. We would like to see the average tusk weight continue to increase and remain at a high level, and therefore, we encourage Zambia to continue to monitor trophy quality, especially in locations where illegal offtake is relatively high.

Therefore, we are able, at this time, to find that the importation of sport-hunted trophies of African elephants taken in Zambia in the calendar year 2018 will be for purposes that are not detrimental to the survival of the species. However, we will continue to monitor the status and management of African elephant populations in Zambia and retain discretion to replace this finding at any time when it no longer reflects the best available biological information consistent with the requirements at 50 CFR § 23.61.

Status of Lion and elephant Trophy Imports 2009-Present				
Country	Lions 2009-16*	Lions Current	Elephants 2009-2016	Elephants Current
Mozambique	Yes (until Jan. 22, 2016)	No***	No	No***
Namibia	Yes (until Jan. 22, 2016)	No***	Yes	Yes
South Africa	Yes (no for captive lions since Jan. 22, 2016)	Yes (no for captive lions)	Yes	Yes
Tanzania	Yes (until Jan. 22, 2016)	No***	Yes (no since 2014)	No***
Zambia**	Yes	Yes	Yes (2012; January 2016 to present)	Yes
Zimbabwe	Yes	Yes	Yes (no for 2014-January 20, 2016)	Yes (Jan. 21, 2016 – November 14, 2017; Hold after that date)

*Lions were listed under the ESA beginning January 22, 2016; prior to that no ESA permit or authorization was required.

**Zambia voluntarily closed elephant hunting during 2013-15 despite positive US finding under the ESA.

***Currently being evaluated. No finding in place.

Trophy hunting TPs

Q. How does the U.S. engage in conservation of African wildlife and wildlife around the world?

A. The U.S. is committed to the conservation of endangered and threatened wildlife globally. We employ a comprehensive strategy that includes scientific monitoring and research, international law enforcement collaboration to eliminate poaching, funding for conservation programs that protect habitat, and support for local in-country education programs.

The U.S. is one of 183 nations (plus the European Union) that is signatory to the Convention on the International Trade in Endangered Species of Wild Fauna and Flora (CITES), a global treaty that protects species from illegal or unsustainable international trade.

Q. Why do we allow the import of hunted elephants and other iconic species at all?

A. Well managed trophy hunting has also been demonstrated as a valuable conservation tool. It can provide much needed funds to stop poaching to supply for the illegal wildlife trade, protect valuable habitat from deforestation and unregulated grazing practices, and generate millions of dollars to benefit conservation and support for local economies. All these benefits help the long-term conservation of elephants and other threatened and endangered iconic animals. Independent organizations such as the Wildlife Society and the International Union for Conservation of Nature (IUCN) have stated that well-managed hunting can benefit species.

Q. How do you know that hunting in these countries is well-managed?

A. In order for U.S. citizens to bring elephant and lion trophies back from these countries into the U.S., we require those countries to provide detailed documentation demonstrating where the money from the hunter fees goes and are obligated to determine that the activity showing how it improves or enhances the conservation of the species in the wild. These are called enhancement findings and are made by Fish and Wildlife Service biologists. These findings are often made at a national level, based on information provided by the government of that country and other sources documenting that status of the species, population trends, how the species and hunting program is managed, how revenues generated from hunting are put back into conservation, and other relevant information.

Q. Many people have a visceral reaction to hunting lions and elephants. Shouldn't we just stop supporting it altogether?

A. We recognize that there are some people who feel strongly whose immediate gut reaction is that hunting elephants and lions is unnecessary and incompatible with their values. We do not dismiss those concerns; however, our mission is to conserve species in the long term so that our children and future generations can live on a planet where elephants, and lions and other animals still roam. Well-managed trophy hunting programs can help achieve that goal and help combat the real threats to elephants and lions – habitat loss and poaching for the illegal wildlife trade.

Q. The President described trophy hunting as a horror show. Today's decision does little to change that. What does the President think of this decision?

A. [DOI to respond]

Q. What was the President's role in today's decision?

A. The decision to suspend the positive finding for the import of trophy elephants and lions from Zimbabwe was made by Service ~~personnel~~biologists concerned that the political instability there makes it uncertain whether the Zimbabwe government can implement the conservation and management activities that formed the basis for the decision to allow trophy imports into the U.S. Like the positive findings made initially, this was a scientific decision, not a political one.

Q. Donald Trump Jr. is a trophy hunter. What influence did he/the President have on the original decision to allow elephant trophy imports from Zimbabwe and Zambia?

A. None. This was a decision made solely by Service ~~personnel~~biologists.

Q. Why did this Administration reverse the Obama-era ban on trophy ~~elephant~~ imports from Zimbabwe to begin with?

A. There was no Obama-era "ban" and it was not reversed. Fish and Wildlife Service biologists periodically review information from nations around the world to determine whether their hunting programs provide conservation benefits to the species that are being hunted. In 2014, the Service did not receive sufficient information from Zimbabwe to demonstrate that their elephant hunting program enhanced the survival of the species in the wild. ~~As such, imports of elephant trophies were suspended pending subsequent review.~~ Since we made our negative finding~~then~~, the country provided ~~more~~ information demonstrating that their conservation and management program for elephants was providing a benefit, and so Service biologists were able to ~~make once more provide~~ a "positive enhancement finding" for elephants in that country. Unfortunately, between the time that this finding was made and the publication of the finding in the Federal Register, there was a change in the government in Zimbabwe ~~and leading to~~ political instability, prompting the Service to ~~today,~~ suspend that positive finding until such time as we can be certain that the Zimbabwe government is able to carry out the conservation measures that formed the basis of the Service's finding.

Q. Why is the finding only being reversed for Zimbabwe elephants and lions and not Zambian elephants and lions or other species in other countries too?

A. The finding for Zimbabwe was suspended due to political instability there. There has been no change in the governance or wildlife conservation and management programs in any other country, and so no changes are being made to any other findings. We continue to closely monitor the political situation and management activities of other countries to ensure they are carrying out the conservation measures that formed the basis of our positive findings.

Q. How many permits have been issued for Zimbabwe since the finding was made, before it was suspended today? How many are pending? What about Zambia?

A. We have not yet issued any permits since the positive finding was made for Zimbabwe elephants. We have 33 permit applications pending. Other permits have been issued as follows:

Zambia lions: 18 issued; 1 pending

Zambia elephants: 7 issued; 1 pending

Zimbabwe lions: 19 issued; 5 pending

The vast majority of these permits apply to hunts that have already taken place.

Q. What is the elephant population/trend in Africa? Zimbabwe? Zambia?

A. Overall, the African elephant population has been declining, almost exclusively to do commercial poaching to supply the illegal ivory trade. Most of these losses have been in Tanzania and Central Africa.

The Zambia elephant population was estimated at 18,000 in 1989, 25,000 in 2002; 26,400 +/- 4400 in 2008; and 21,760 +/- 4523 in 2014.

The Zimbabwe elephant population was estimated at 99,107, with 84,416 classified as definite in 2007; 100,291, with only 47,366 classified as definite in 2012; and 82,630 +/- 8,589 in 2016.

Q. Why is there no public process for enhancement findings?

A. The enhancement findings are made on the basis of information from the country. We verify that information, but there is no requirement for public input in this process. Enhancement findings are made for dozens of species from dozens of countries for a variety of reasons, including hunting, scientific research, museums, etc. Each permit application is posted in the Federal Register at which time the public can provide input.

Q. At the same time that the Service made a negative finding for elephants hunted in Zimbabwe, it also made a negative finding for elephants from Tanzania. Is a revised finding likely to be forthcoming for Tanzania any time soon?

A. We are currently reviewing information provided by Tanzania and expect to make a finding in coming weeksmonths.

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A. Well managed trophy hunting has been demonstrated as a valuable conservation tool. It can provide much needed funds to stop poaching to supply illegal wildlife trade, protect habitat from deforestation and unregulated grazing practices, and generate millions of dollars to benefit conservation and support local economies. All these benefits help the long-term conservation of elephants and other threatened and endangered animals. Independent organizations such as the Wildlife Society and the International Union for Conservation of Nature (IUCN) have stated that well-managed hunting can benefit species.

Q. How do you know that hunting in these countries is well managed?

A. In order for U.S. citizens to bring elephant and lion trophies back from these countries into the U.S., we are obligated to determine that the activity enhances the conservation of the species in the wild. These are called enhancement findings and are made by Fish and Wildlife Service biologists. These findings are often made at a national level, based on information provided by the government of that country and other sources documenting that status of the species, population trends, how the species and hunting program is managed, how revenues generated from hunting are put back into conservation, and other relevant information.

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Since we made our negative findings, the country provided information demonstrating that their conservation and management program for elephants was providing a benefit, and so Service biologists were able to make a "positive enhancement finding" for elephants in that country. Unfortunately, between the time that this finding was made and the publication of the finding in the Federal Register, there was a change in the government in Zimbabwe leading to political instability, prompting the Service to suspend that positive finding until such time as we can be certain that the Zimbabwe government is able to carry out the conservation measures that formed the basis of the Service's finding.

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The vast majority of these permits apply to hunts that have already taken place.

Q. What is the elephant population/trend in Africa? Zimbabwe? Zambia?

A. According to the IUCN African Elephant Specialist Group, overall, the African elephant population has been declining, almost exclusively due to commercial poaching to supply the illegal ivory trade. Most of these losses have been in Tanzania and Central Africa. The Zambia elephant population was estimated at 18,000 in 1989, 25,000 in 2002; 26,400 +/- 4400 in 2008; and 21,760 +/- 4523 in 2014.

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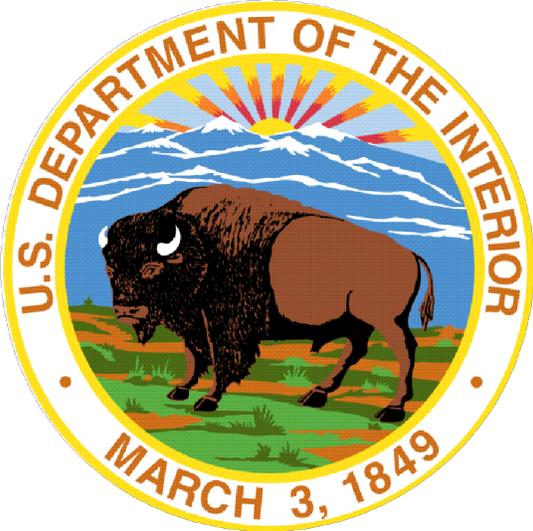
A. The enhancement findings are made as part of the review of permit applications received by the Service and is based on information from applicants and the country where the proposed activity would take place. We verify that information, but there is no requirement for public input in this process. Enhancement findings are made for dozens of species from dozens of countries for a variety of reasons, including hunting, scientific research, museums, etc.

Q. At the same time that the Service made a negative finding for elephants hunted in Zimbabwe in 2014 and 2015, it also made a negative finding for elephants from Tanzania. Is a revised finding likely to be forthcoming for Tanzania any time soon?

A. We are currently reviewing information provided by Tanzania and expect to make a finding in coming weeks.

Recommendations to the U.S. Fish and Wildlife Service on the National Strategy for Combating Wildlife Trafficking

October 2017



I. Introduction

Wildlife trafficking is a multi-billion dollar illicit business that is decimating Africa's iconic animal populations, enriching transnational organised criminal networks, destabilising nation-states and undermining stability, development, and democratic governance on the continent. Many species - most notably elephants and rhinoceroses - now face the prospect of significant decline or even extinction. Like other forms of illicit trade, wildlife trafficking threatens security across nations as well-armed, well-equipped and well-organised networks of poachers, terrorists, middlemen, and corrupt officials exploit porous borders and weak institutions to profit from trading in illegally taken wildlife products. The United States is committed to combating wildlife trafficking, related corruption, and money laundering, and the serious consequences of these illegal activities. With our international partners we are working to reduce demand, strengthen enforcement, and build capacity to address these challenges bilaterally, regionally, and multilaterally. However, in all of the policies and initiatives that have been developed, none to date have involved a full consideration of protected and commercially viable conservancies in large areas that are home to the most endangered wildlife species.

In addition, large tracts of land that might nominally be national parks or conservation areas, straddle international borders in remote, hard-to-reach places where infrastructure and security are limited or non-existent. This allows easy cross-border smuggling of all kinds of contraband, including weapons and drugs as well as human and wildlife trafficking. Bringing some sense of legality and orderly governance to these areas, providing for sustainable conservation programs, and generating revenue to develop them, requires the kind of multidimensional interventions that have been absent in many of the most affected parts of the continent. Well-intended conservation initiatives that are too narrowly focused, and lack the kind of integrated, comprehensive solutions to the multiple challenges they face, are often destined to fail as they struggle to be sufficiently self-sustaining for longer term survival.

The reality is that ecotourism on its own cannot ensure the conservation of Africa as a whole. There are areas that cannot support high-end, mid-range or even low-end photographic ecotourism. It is in these areas especially that hunting—conducted ethically, responsibly and sustainably—has a role to play. This has been true even in stable developed tourism industries like South Africa's, and is certainly true in less mainstream destinations like the Central African Republic, Burkina Faso, and Gabon.

This white paper seeks to describe in practical terms the how the objectives of security, conservation, and economic development can be better achieved through the promotion of secure conservancies that can be used for responsible hunting as an economic and political incentive in Africa. It is by no means an exhaustive or comprehensive review of the extensive literature regarding the U.S. Fish and Wildlife Service's involvement or effectiveness on the continent in counter-poaching and conservation. Rather, the focus of this white paper is to describe the importance a pro-hunting Fish and Wildlife Service can play in conservation and battling insecurity, and to recommend some immediate steps that can be taken to strengthen sustainable hunting as a means of conservation on the continent.

II. The Case for Hunting: South Africa as Example

Fifty years ago, South Africa had no hunting industry at all; there were no wildlife populations to support one. Without hunting, there was no incentive for investing in game, and without hunting many species in South Africa would already be extinct or on the verge of extinction. Hunting now takes place over a large area of the country where cattle ranching has given way to the farming of wildlife species that previously occupied the land. South Africa wouldn't have white rhino today if it wasn't for hunting. Despite the relentless poaching epidemic, South Africa is still home to almost 90% of the world's rhino population. Additionally, thanks to hunting, the sable, bontebok, wild ostrich, Cape mountain zebra, black wildebeest and many other species have been brought back from the brink of extinction and have successfully been reintroduced into areas where they had become locally extinct.

South Africa's success story is a tribute to the public conservation agencies and landowners who built up wildlife populations on secure private land from an estimated 575,000 in 1966 to at least 18.6 million by 2007. Game ranches in South Africa have increased from fewer than 5,000 in 2002 to more than 12,000 in 2013 and generate revenue from a combination of ecotourism, the sale of live animals and several forms of hunting, with meat production as a by-product. Hunting makes by far the largest contribution, earning 7.7-billion South African rand in 2011: 3.1-billion rand from 250,000 South African biltong-producing hunters; 2.1-billion rand from 15,000 foreign hunters; and the balance from add-on services, guiding, accommodation and food.

Hunting was able to flourish thanks to government and private land owners carving out safe, secure tracts of land where hunters and eco-tourists could visit without fear of crime, kidnapping, assault, or other effects of instability. It was the single most important element in South Africa's success as a tourist and hunting destination: the fact that the areas hunters and tourists visited were safe enough to visit. Other countries in Africa have not been as successful in carving out land concessions that are safely and securely governed, and the risks associated with the lack of law and order have strongly deterred hunting and tourism to the detriment of the entire economy.

Government-owned national parks and reserves cannot effectively conserve all the wildlife in South Africa and have to rely on non-governmental game ranches for assistance. There are nearly four times as many hectares of privately-owned land dedicated to wildlife conservation and development as state-owned land. For example, a quarter of the country's 20,900 rhinos – more than the entire rhino population in the rest of Africa – are on private land. The hunting industry has been responsible for species like rhino, sable and roan being bred by game farmers and returned to where they once occurred in healthy numbers – and has helped to generate the income needed for sustained breeding programs. Furthermore, a move away from agriculture brings with it an increase in the diversity of other animals and plants.

Hunting has not only quantifiably improved conservation in South Africa, it has been a serious aid for economic development. More than 70,000 jobs have been created on newly established game farms in recent years and by 2020 the industry will have generated an additional 220,000. Many of those jobs are in remote areas not considered part of the mainstream tourism circuit, and it injects much needed spending into those rural impoverished regions. Individuals whose livelihoods depend on the hunting and tourism industry in turn reinforce the cultural attitude

among local populations that animals must be protected rather than poached. The change in cultural attitude that stems from a direct economic incentive to protect animals is far more powerful than any money spent on messaging or awareness campaigns.

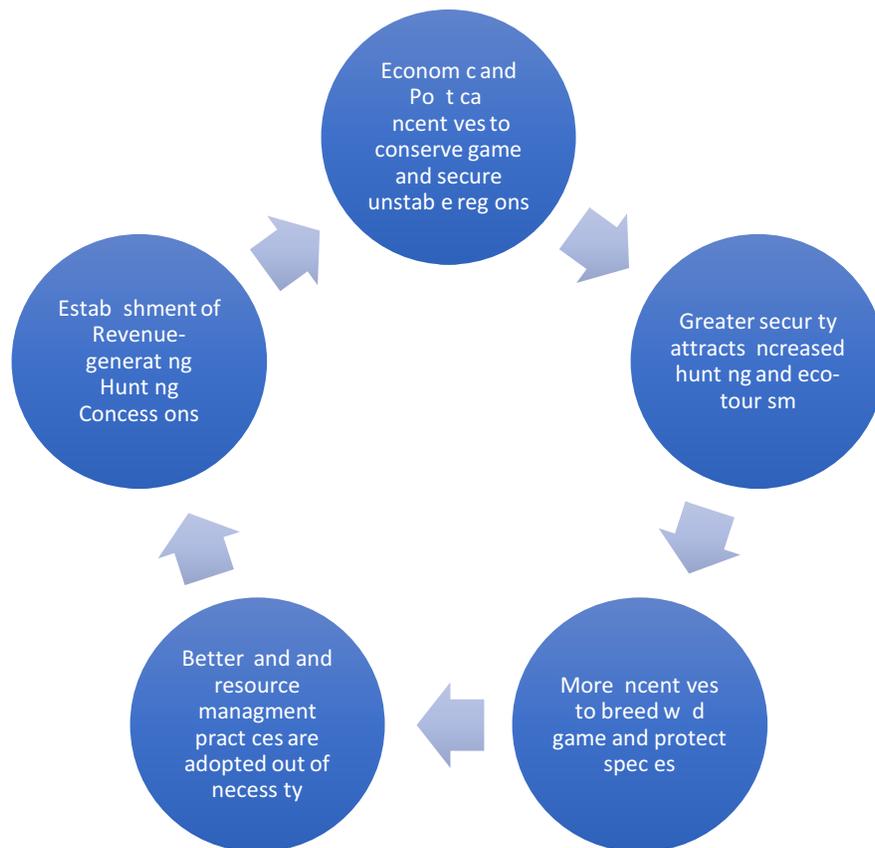
In contrast, Kenya, which imposed a ban on hunting in 1977, has lost 85% of all its game. Kenya is the perfect example of what happens in Africa when there is no incentive for farmers to invest in game, or for local populations to stop poaching. Kenya banned hunting and currently have a huge game poaching problem, so much so that some of their species face total extinction.¹ South Africa has shown that as soon as the hunting of a species is allowed, it leads to the breeding as well as conservation of the particular species. South Africa's wildlife and conservation success story remains unparalleled anywhere in the world, and it's almost entirely due to the safari hunting industry. If hunting were to be banned in South Africa, as the Botswana government has decided to do in their own country, private land owners would stop investing in wildlife and divert their interests to cattle, crops or more financially viable endeavors. Effectively, banning hunting in South Africa would contribute more to the decline of certain animal species than it is currently widely believed hunting does. Commercially, game numbers have surpassed cattle, which now amount to only 14 million. Substantial tracts of land unviable for photographic safaris have been reclaimed from livestock-rearing and farming use for wildlife conservation. The status of South Africa's wildlife today is astonishingly comparable to 100 years ago, and conservationists maintain that this unparalleled development is highly attributed to the impact of hunting. It is a tough fact that, on the African continent, anything that does not pay for itself quickly vanishes. Unless wildlife earns its keep as a renewable resource, it is doomed.

III. Achieving Security, Conservation, and Economic Development through Pro-Hunting Policies

We posit that the U.S. Fish and Wildlife Service can more effectively address illegal poaching, promote sustainable economic development, and counter the forces of instability and conflict that are funded by poaching through the promulgation of secure conservancies and pro-hunting policies in Africa. There is a well-established virtuous cycle that can be supported that should be the underpinning logic for all initiatives undertaken on the continent.

That virtuous cycle describes how successfully securing an area and then restoring and conserving key wildlife species in that area also establishes a foothold for governance, security and stability for surrounding communities.

¹ A well-researched and balanced account of the impact of banning hunting is Glen Martin's *Game Changer: Animal rights and the fate of Africa's wildlife* (University of California Press, 2012), which assesses the Kenyan situation in contrast to developments in Tanzania, Namibia and South Africa. In these countries, hunting by citizens and foreign tourists is an integral part of wildlife management and the sustainable use of wild animals is expanding – as are their populations in Namibia and South Africa. There is now evidence to suggest that the collapse of wildlife in Kenya has been due largely to the explosion of bushmeat poaching in former hunting concessions.



A. Recommendations

a. Carve Out Protected Hunting Concessions

Wildlife and communities benefit from the encouragement of private and public hunting reserves on the African continent. The designation of these areas as reserves to draw revenue-generating hunters prompts the need for greater territorial control and rule of law to ensure the safety of those tourists. FWS can promote the rule of law in these designated areas by its already well-established practice of collaborating on intelligence, logistics, and law enforcement efforts with local authorities.

To accomplish this goal, FWS should establish a pilot program in 2018 by working with an African government and the private sector to create a first of its kind secure concession in an area that has been identified as a poaching and wildlife trafficking hotspot. Gabon, with its pro-conservation Government, competent management, and a serious poaching problem that is a threat to the stability of the State may be an excellent candidate. FWS and the African government can marshal resources to secure the area against poachers and armed paramilitary groups, thereby extending the Government’s controlled territory and ensuring the safety of hunters, tourists, and local populations. Commercial hunting operations can be established, a

high-value business which can become the bastion for economic growth in the area. FWS can work with local authorities to build capacity in resource management and the monitoring of animal populations. The success of this pilot program can become not only the foundation upon which future private-public hunting concessions can be built, but can serve as important evidence of the critical role that secure conservancies and hunting can play in effective, sustainable wildlife conservation.

b. Establish a Conservation Area to Serve as a Pilot Project

- i. It is recommended that FWS selects a conservation area to serve as a pilot project. This pilot project should ideally be in an area that has tourism potential, but has suffered from instability, lack of law and order, and an inability to secure the borders of the territory. FWS can thereby leverage the skills and resources of its organization to have a true pilot project that establishes a new foothold for governance, security, and stability and can serve as a foundation upon which future programs can be based.
- ii. Establish perimeter security, and control of the area where anti-poaching patrols can be conducted. If there are villages in the area, establish communication and cooperation of the local chiefs/headmen. This will call for equipping and training staff to operate effectively in the given circumstances. This could mean additional vehicles, radios, uniforms, firearms, and other basics for extended anti-poaching patrols. Where poaching and other illegal activities are prevalent, there would likely be a requirement for specialized K9 units, and aviation assets (helicopters and light ISR aircraft.) Securing the area in this manner is the first priority: without it, the other initiatives are unlikely to get off the ground;
- iii. Key to this pilot project is implementing a sequence of measures in conjunction with the Government of the country, local and traditional authorities, and the immediate community to ensure there are quantifiable measures of success against which the project will be evaluated.
- iv. Benchmarking the status quo of the region will be a necessary component of establishing those metrics of success. FWS must conduct a wildlife census of the area, and establish a benchmark for its carrying-capacity in terms of numbers and variety of species that would contribute to a healthy wildlife balance. FWS must also collaborate with local intelligence and law enforcement to establish a baseline understanding of the incidents of violence, crime, and other effects of instability. Only with that data will FWS be able to quantify the effect of securing the territory and promoting law and order.
- v. FWS can change the course of conservation in Africa by promoting higher standards of security and park management while successfully restoring

and conserving key wildlife species. Selecting experienced and reputable managers, wildlife biologists, rangers, and support staff is critical to this.

- vi. Part of establishing a secure concession that can attract hunters and tourists is developing infrastructure in the territory. This infrastructure will attract tourists, wildlife researchers, and as many recreational visitors as can be accommodated and can drive much-needed revenue to the park to ensure it is self-sustaining in the years to come.
- vii. Paying visitors will be the primary source of revenue. Other sources could be via specialized breeding programs conducted by expert biologists, and the sale of game animals to other parks and conservation areas; as well as the sale of meat from legally harvested game. Ecotourism is a popular form of wildlife tourism, but on its own it cannot generate adequate revenue to maintain a conservation initiative of any magnitude. The introduction of commercial hunting safaris in parts of Africa has proven to be the most effective way of developing a local industry and raising substantial revenue. Trophy and sport hunters spend much more money, and create more long-term jobs, than any form of ecotourism, by a wide margin. Visiting hunters guided by qualified professional hunters and trackers, also serve an important conservation function by taking off selected numbers of excess species, and provide the revenue that allows for sustainability of the entire conservation effort.

c. Create Capacity Building in Africa around the Responsible Dispensing of Hunting licenses and Concessions

Many of the objections to hunting within Africa are not about the hunting itself, but rather to the abuse, lack of oversight, or outright corruption at the local government level when dispensing hunting licenses. There are many cases of corrupt officials across the continent who have prevented the flow-down of economic benefits to the local populations, and have pocketed the money for themselves. These same corrupt officials dangerously disregard animal population numbers, and don't enforce against abuses from unethical operators who take advantage of the lax oversight to overhunt.

But rather than ignoring the dispensing of hunting licenses and concessions as a tool due to the poor regulation around them, FWS can prioritize capacity-building for countries that lack the infrastructure to support a well-run Fish and Wildlife permitting organization. Working with the local governments to create better, more enforceable regulations around hunting to ensure that the benefits of hunting flow down to local communities and the environment will create a paradigm shift around hunting. This capacity building can include greater financial and personnel management, as demonstrated by improvements in management systems, administrative processes, and skillsets of national staff. This has the additional benefit of training local populations in transferrable skills and fosters true economic development.

Likewise, to ensure that the conservation benefits of animal population management through hunting, FWS can work with African government to ensure that they strictly monitor population numbers and the impact of hunting through continuous research and current statistics, including recommended quotas and data. If data suggests there is a decline in population numbers, the government can adjust the number of permits during the following year. In this way, the hunting operations in Africa can effectively ensure animal welfare, carefully manage hunting quotas, meet wide-ranging conservation objectives, and the development of local communities.

d. Establish Pro-Hunting Policies as a Tool for Conservation

Animal numbers need to be controlled to prevent over-stocking and over-grazing. Surplus animals are harvested for meat but larger males can generate far more revenue if they're taken by a hunter. The taking of animals in such hunting reserves is of limited conservation concern and the money generated helps to pay for the management that is required to keep reserves in good condition. In fact, the impact of hunting depends on the species and the region being considered. As the Cases Study provided before illustrates, the past few decades in South Africa have seen a landscape-level replacement of cattle farming with wildlife farming. With this has come the rejuvenation and reforestation of the land as well as the natural restoration of indigenous flora and fauna. Through the support of certain programs, projects, and organizations, FWS can embrace in its policies and conservation mission the critical importance of hunting in conservation in Africa.

e. Establish Pro-Hunting Policies as a Tool for Sustainable Economic Development

In Africa, privately held game concessions are often better regulated, monitor populations more accurately, and protect against illegal hunting practices far better than government owned national parks that often lack the resources to effectively ensure regulations are enforced and populations are accurately tracked. Poor villagers in these communities near government-run national parks rarely receive a livable portion of the proceeds. FWS can support development and partnerships, including constituency building, community relationships, hunting tourism and other activities that generate revenue for park operations. FWS should build a constituency for pro-hunting conservation with their partners, built among traditional chiefdoms, local government, villages, and other key stakeholders. When local populations see and benefit from the hunting concessions and hunting operations, they will support conservation over competing land uses like agriculture and it will likewise create a decreasing trend for affiliation with armed groups.

f. Address Poaching as a Transnational Crime that Funds Terrorism

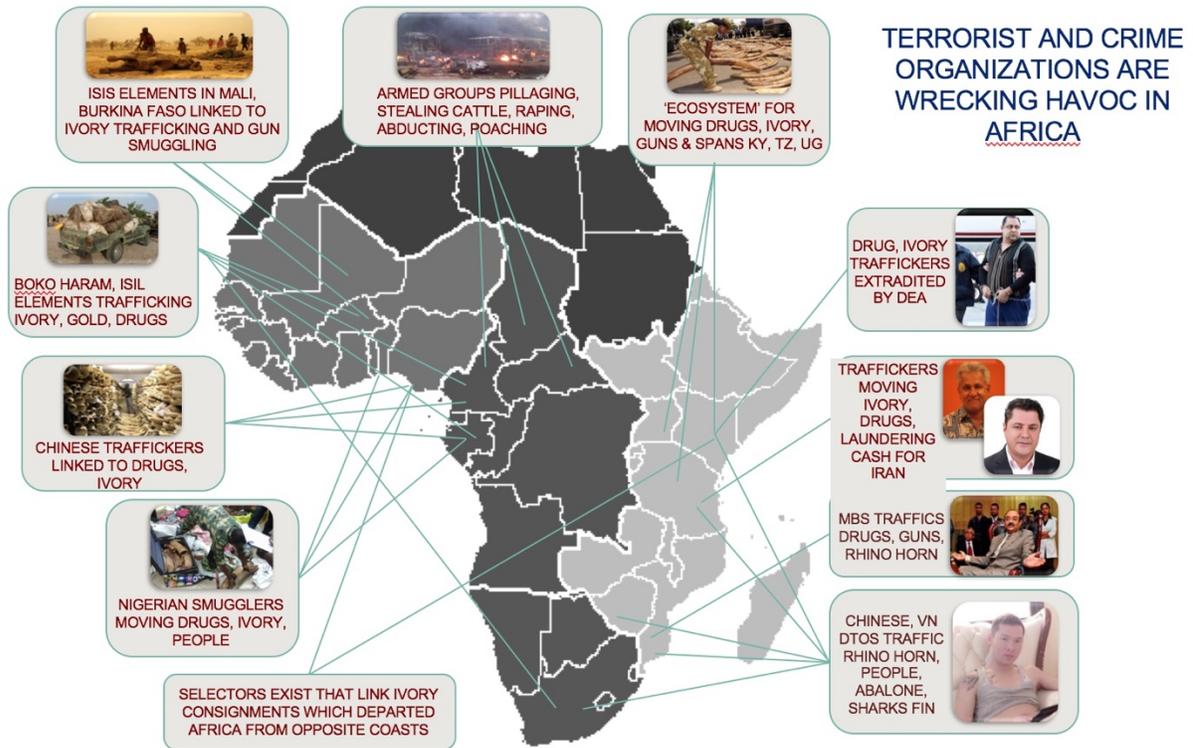
The map below illustrates some of the established links between poaching, trafficking, transnational crime, and the funding of terrorism. The sheer scale of poaching in Africa is often

compared to low intensity warfare. These crime and terror syndicates flourish in the “ungovernable spaces” of Africa, and take advantage of porous borders and remote regions to evade and out-gun the under-funded law enforcement attempting to stop them.

The natural resources spread across Africa have become one of the main causes of insecurity on the continent. The trafficking of weapons, ammunition, and ivory, in combination with rebel forces and police and local villages dictating their own laws, has resulted in major natural resource destruction, particularly with regards to large mammal species. Various armed rebel groups, sometimes in conjunction with local villages who have no other choice but to comply, tap into these resources by force, in search of income, weapons and ammunition. In the process these groups often kidnap and threaten local communities, creating a climate of extreme insecurity.

The role of natural resource exploitation on supporting rebellions, deterioration of governance, and increased insecurity and crime rates is a reality that currently justifies the deployment of national and international forces. For the same reasons, the vision for conservation in Africa cannot be achieved without taking this into account, and without close collaboration with national and international security forces mandated to resolve the situation.

Professional ivory poachers and rebel groups (including the LRA and Designated U.S. Terror Group Boko Haram) use the instability of conflict to facilitate their poaching activities. Poachers are often equipped with new weapons and sophisticated communication channels. Engagements between anti-poaching rangers and armed poaching groups are frequent and extremely dangerous for rangers; from May 2014 to the present in one single park in the Democratic Republic of the Congo, there have been more than 50 contacts with armed poachers resulting in 18 dead and 60 wounded. Eight rangers in that same park were killed, with four lost during one attack.



We recommend that FWS evaluate, identify, and support the organizations and entities that are effectively and professionally training rangers, local law enforcement, and military forces to secure these areas. For rangers to counter poaching and patrol reserves effectively, they must be sufficiently supported, equipped and trained to counter threats to wildlife security.

Legislation in support of this idea has been passed previously, but the effectiveness of its implementation and accountability to results is questionable. In 2016, the U.S. Congress passed the “Eliminate, Neutralize, and Disrupt Wildlife Trafficking Act” which had the following objectives:

- Take immediate actions to stop the illegal global trade in wildlife and wildlife products and associated transnational organized crime;
- Employ appropriate assets and resources for curtailing poaching and disrupting and dismantling illegal wildlife trade networks and the financing of those networks in each foreign country that is a major source or major transit point of wildlife trafficking products or their derivatives, or a major consumer of wildlife trafficking products (focus country)
- Provide assistance in helping focus countries in halting the poaching of imperiled species and ending the illegal trade in wildlife and wildlife products;
- Build upon the "National Strategy for Combating Wildlife Trafficking" published on February 11, 2014, or a successor strategy, to further combat wildlife trafficking; and
- Recognize the ties of wildlife trafficking to broader forms of transnational organized criminal activities, and where applicable, to focus on those crimes.

- The State Department and the U.S. Agency for International Development (USAID) may provide assistance to focus countries for improving the effectiveness of wildlife law enforcement in regions and countries that have demonstrated capacity, willingness, and need for assistance.
- The bill urges the United States to continue providing defense articles (not including significant military equipment), defense services, and related training to appropriate security forces of African countries for countering wildlife trafficking and poaching.
- (Sec. 402) The State Department and USAID may design and implement programs in focus countries for: (1) increasing the capacity of wildlife law enforcement and customs and border security officers in the countries, or (2) combating the transnational trade in illegal wildlife.



Figure 1 African militaries burn confiscated ivory

In support of this Act, the “National Strategy for Combating Wildlife Trafficking: Implementation Plan” was established that identified several key actions in support of the abovementioned objectives. The implementation plan including the following tasks:

- Strengthen Enforcement
 - U.S. Domestic Enforcement
 - Assess and Strengthen Legal Authorities
 - Use Administrative Tools to Quickly Address Current Poaching Crisis
 - Strengthen Interdiction and Investigative Efforts
 - Prioritize Wildlife Trafficking Across U.S. Enforcement Agencies
 - Enhance Coordination Among and Between Enforcement and Intelligence Agencies
 - Take the Profit Out of Wildlife Trafficking
- Global Enforcement
 - Support Governments in Building Capacity
 - Support Community Based Wildlife Conservation
 - Support Development and Use of Effective Technologies and Analytical Tools
 - Enhance Information Sharing with International Partners
 - Participate in Multinational Enforcement Operations
 - Support the Development of an Effective Worldwide Network of Wildlife Enforcement Networks (WENs)
- Address Wildlife Trafficking in Fighting Other Transnational Organized Crime
 - Focus on Corruption and Illicit Financial Flows
 - Reduce Demand for Illegally Traded Wildlife

- Raise Public Awareness and Change Behavior
- Build Partnerships to Reduce Domestic Demand
- Promote Demand Reduction Efforts Globally
- Expand International Cooperation and Commitment
- Use Diplomacy to Catalyze Political Will (multilateral)
- Strengthen International Agreements and Arrangements that Protect Wildlife
- Use Existing and Future Trade Agreements and Initiatives to Protect Wildlife
- Incorporate Provisions to Protect Wildlife in Other International Agreements
- Cooperate with Other Governments (Bilateral and regional)
- Promote Effective Partnerships
- Encourage Development of Innovative Approaches

g. FWS Can and Should take the Lead in this Task Force

This Act was a commendable step forward in coordinating an all of U.S. Government response to combat poaching and wildlife trafficking. However, there are three key problems with the Act and its corresponding implementation plan.

The first is that it designates and empowers USAID and the State Department as the lead agencies to address and combat poaching. But USAID is primarily a disaster and humanitarian response organization that focuses on poverty reduction, climate change, and education. Likewise, the State Department is primarily focused on diplomacy and trade. While both USAID and the State Department can play important roles in the holistic approach necessary to combat poaching and transnational crime, they are both inadequately equipped to coordinate a response that involves professional intelligence gathering, interdiction and counter-terrorism operations, and cooperation with local African militaries and law enforcement. Combating poaching is not merely about “saving animals”—it is a question of stopping transnational crime and fighting the terrorists who use this illicit trade to fund their operations. Without taking a national security approach to this epidemic, poaching and conservation will only ever be treated as mere environmental issues and will never be stopped.

The second issue with the implementation plan is that there is no mention about sustainable land and resource management. It does not address how wildlife should be treated as a renewable resource and managed as such, and that there are ways to sustainably use wildlife to promote and fund its own conservation through hunting concessions. Even in the section “Take the Profit out of Wildlife Trafficking” there is no mention of hunting or hunting concessions which have been some of the most effective and established practices to incentivize the protection and breeding of wildlife and sustainably generate revenue for conservation. As the case study of South Africa has shown, this should be a major cause of alarm to anyone who understands resource management.

Finally, Fish and Wildlife and the Department of the Interior are officially designated the lead agencies to strengthen interdiction and investigative efforts, enhance coordination among and between enforcement and intelligence agencies, and take the profit out of wildlife trafficking. Yet in the previous administration, FWS and DOI have in practice more often than not allowed other agencies like USAID to spear-head those efforts, and have missed an opportunity to show leadership in the global fight against terror, poaching, and transnational crime. And while under

the implementation plan, U.S. Fish & Wildlife Service (FWS) investigative agents were deployed overseas to new posts in high wildlife trafficking regions to facilitate the development of trafficking cases, there has been little to no official coordination with local U.S. embassies or AFRICOM. FWS agents can and should be assuming the mantle of leading the coordination with AFRICOM, DOS, DHS, FBI, and DOJ.



Figure 2 In Africa, both rangers and poachers are heavily armed and willing to battle over ivory, horn, and other wildlife products that sell for thousands of dollars a kilo.

h. Accountability: Need for Performance Targets to Assess Progress

To help combat wildlife trafficking and the transnational and other criminal groups profiting from it, President Obama established a federal task force in 2013. While the task force has helped address trafficking by assisting local law enforcement and supporting conservation efforts, it is difficult to gauge its progress.

The Task Force provides some information about progress, but it lacks performance targets, making effectiveness difficult to determine at the strategic level. A fundamental element in an organization's efforts to manage for results is its ability to set specific targets that reflect strategic goals. Task Force officials identified a range of reasons why they do not have targets, including dependence on global partners, the long time periods needed to document results, and limited data availability. However, Task Force agencies have provided performance targets for

other efforts that face similar challenges. Without targets, it is unclear whether the Task Force's performance is meeting expectations, making it difficult to gauge progress and to ensure that resources are being utilized most effectively in their efforts against wildlife trafficking.

The Government Accountability Office (GAO) Audit of all US Government Anti-Wildlife Trafficking Activities has identified this lack of performance metrics. FWS should work with them and review their report, which recommended that to provide a basis for comparing actual results with intended results that can generate more meaningful performance information, the Secretaries of the Interior and State and the Attorney General of the United States should jointly work with the Task Force to develop performance targets related to the *National Strategy for Combating Wildlife Trafficking Implementation Plan*.

i. Establishing and Re-enforcing Pro-Hunting Leadership in the U.S. Government

The previous administration established a Federal Advisory Council on Wildlife Trafficking comprised of eight individuals with relevant expertise from outside the Government to make recommendations to the Task Force. These individuals have had impressive careers and demonstrated long-standing commitments to conservation. However, this Advisory Council is primarily comprised of academics, media, and NGOs. While there is value in having a holistic approach to conservation, the current Advisory Council seems to lack individuals who understand the role hunting can play in conservation and who have spent time face-to-face with the brutal realities of the war against poaching. FWS should review the current composition of the Board and advocate for the inclusion of individuals who understand the value that well-regulated hunting can have on conservation, as well as individuals who can bring an intelligence, military, and/ or national security lens to the Council. It is also recommended to include on this board members who are actually from Africa, who can bring valuable insight into the realities of land, resource, and animal management on the continent.

IV. Conclusion

The objectives of security, conservation, and economic development can be better achieved through the establishment of secure conservancies on the continent through which the objectives of law and order and wildlife conservation can be achieved. These secure reserves, which will establish safe territories in ungoverned regions, can promote responsible hunting as an economic and political incentive in Africa and globally. The Department of the Interior and the Fish and Wildlife Service have an opportunity to create a paradigm shift for conservation on the continent by deploying this "secure conservancy" model that likewise promotes hunting as an effective tool for stability, economic growth, and incentivized conservation. This paper sought to establish the basic framework for achieving that shift by identifying some initial, practical recommendations that can be taken to implement that change.

Lion and Elephant ESA Listings and the Permitting Process

- Lions (*Panthera leo melanochaita*) and African elephants (*Loxodonta africana*) are both listed as Threatened under the U.S. Endangered Species Act (ESA);
- Import of sport-hunted trophies requires an ESA permit, which can be issued if the Fish and Wildlife Service is able to make a finding that the sport-hunting activity enhances the survival of the species in the wild;
- For elephants, we currently have positive findings and allow the import of such trophies from South Africa and Namibia. We have negative findings for Tanzania and Zimbabwe for 2014 and 2015 and our reevaluating both countries for the 2016 and 2017 hunting seasons. We are completing findings for Mozambique and Zambia, where we do not currently have any finding in place;
- U.S. imports of sport-hunted elephant trophies in 2013: Botswana = 181; Namibia = 30; Tanzania = 34; South Africa = 60; Zambia = 5; Zimbabwe = 188;
- As of July 10, we have 55 permit applications for elephants taken in 2016 or 2017;
- For lions, we have a positive finding for “wild” and “wild-managed” lions from South Africa and a negative finding for “captive” lions for 2016. We are finalizing findings for South Africa for 2017-19 and for Tanzania, Zambia and Zimbabwe in July.
- U.S. imports of sport-hunted lion trophies in 2013: Burkino Faso = 3; Mozambique = 6; Namibia = 9; South Africa = 545 trophies; Tanzania = 3; Zambia = 17; Zimbabwe = 44 trophies.
- As of July 10, we have 66 pending permit applications for lions taken in 2016 or 2017.



IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives

Ver. 1.0 (09 August 2012)

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Section I. Introduction

IUCN has long recognized that the wise and sustainable use of wildlife can be consistent with and contribute to conservation, because the social and economic benefits derived from use of species can provide incentives for people to conserve them and their habitats. This document builds on existing IUCN policies by setting forth SSC guiding principles on the use of “trophy hunting”, as defined in Section II, as a tool for creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources.

Trophy hunting is often a contentious activity, with people supporting or opposing it on a variety of biological, economic, ideological or cultural bases. This document is focused solely on the relevance of trophy hunting for conservation and associated local livelihoods. Nothing in this document is intended to support or condone trophy hunting activities that are unsustainable; adversely affect habitats; increase extinction risks; undermine the rights of local communities to manage, steward, and benefit from their wildlife resources; or foster corruption or poor governance.

Section II. Scope of this guidance

The term “trophy hunting” is here used to refer to hunting that is:

- Managed as part of a programme administered by a government, community-based organization, NGO, or other legitimate body;
- Characterized by hunters paying a high fee to hunt an animal with specific “trophy” characteristics (recognizing that hunters each have individual motivations);
- Characterized by low off-take volume;
- Usually (but not necessarily) undertaken by hunters from outside the local area (often from countries other than where the hunt occurs).

These elements differentiate the hunting at issue here from a broad array of other hunting activities, although it is recognized that what is here defined as trophy hunting may be given a different name in some countries. Thus these guiding principles are not intended to apply to subsistence hunting, to legal hunting of relatively common species, or to management activities undertaken by wildlife management agencies, although some elements of them may be relevant to these activities. Such hunting activities may also generate incentives for conservation, but are beyond the scope of this guidance.

These guiding principles apply specifically to trophy hunting programmes oriented to terrestrial wild animals in their native geographic ranges. Existing IUCN policy does not support moving species outside their native ranges for the primary purpose of trophy hunting¹. In keeping with existing IUCN policy (IUCN Recommendation 3.093, adopted by the IUCN Congress at its 3rd Session in Bangkok, Thailand, 17-25 November 2004, which condemned “the killing of animals in enclosures or where they do not exist as free-ranging”), the IUCN SSC does not support trophy hunting of animals in enclosures where they cannot be considered “free-ranging” and cannot use their natural abilities to escape.

Section III: The policy context

IUCN's formal recognition that the ethical and sustainable use of wildlife can form an integral

¹ See: IUCN Position Statement on Translocation of Living Organisms (<http://www.iucnssc.org/download/IUCNPositionStatement.pdf>) and IUCN Guidelines for the Prevention of Biodiversity Loss Caused by Alien Invasive Species (http://intranet.iucn.org/webfiles/doc/SSC/SSCwebsite/Policy_statements/IUCN_Guidelines_for_the_Prevention_of_Biodiversity_Loss_caused_by_Alien_Invasive_Species.pdf)

and legitimate component of conservation programs dates back to the World Conservation Strategy in 1980, and was affirmed in Recommendation 18.24 at the 1990 IUCN General Assembly in Perth. IUCN's "Policy Statement on Sustainable Use of Wild Living Resources", adopted as Resolution 2.29 at the IUCN World Conservation Congress in Amman in October 2000, affirms that use of wildlife, if sustainable, can be consistent with and contribute to biodiversity conservation. IUCN recognizes that where an economic value can be attached to a wild living resource, perverse incentives removed, and costs and benefits internalized, favourable conditions can be created for investment in the conservation and the sustainable use of the resource, thus reducing the risk of resource degradation, depletion, and habitat conversion. In managing such use to enhance sustainability, the Policy Statement draws attention to the following key considerations:

- the need for adaptive management, incorporating monitoring and the ability to modify management to take account of risk and uncertainty;
- the supply of biological products and ecological services available for use is limited by intrinsic biological characteristics of both species and ecosystems, including productivity, resilience, and stability, which themselves are subject to extrinsic environmental change;
- institutional structures of management and control require both positive incentives and negative sanctions, good governance, and implementation at an appropriate scale. Such structures should include participation of relevant stake-holders and take account of land tenure, access rights, regulatory systems, traditional knowledge, and customary law.

More specifically, and with particular reference to southern Africa, IUCN has recognized that recreational hunting can contribute to biodiversity conservation. The IUCN at the 2004 WCC adopted Recommendation 3.093 stating that it "Supports the philosophy and practice that on state, communal and privately-owned land in southern Africa the sustainable and well-managed consumptive use of wildlife makes a contribution to biodiversity conservation" and further, that it "accepts that well-managed recreational hunting has a role in the managed sustainable consumptive use of wildlife populations".

Further, the IUCN SSC Caprinae Specialist Group adopted a formal position statement in December, 2000, recognizing that hunting, and in particular trophy hunting, can form a major component in conservation programmes for wild sheep and goats. This statement noted that "Trophy hunting usually generates substantial funds that could be used for conservation activities such as habitat protection, population monitoring, law enforcement, research, or management programs. Equally importantly, the revenues from trophy hunting can provide a strong incentive for conservation or habitat protection..."

The Convention on Biological Diversity has developed several statements of principles relevant for the management of trophy hunting. Most importantly, the 7th Conference of Parties to the CBD (Kuala Lumpur, February 2004) adopted the Addis Ababa Principles and Guidelines for the Sustainable Use of Biodiversity (AAPG), and IUCN members party to the CBD were urged to honour these commitments by Resolution 3.074 of the 3rd IUCN World Conservation Congress (Bangkok, October 2004). The AAPG are based on the assumption that it is possible to use biodiversity in a manner in which ecological processes, species, and genetic variability remain above the thresholds needed for long term viability, and that all resource managers and users have the responsibility to ensure that such use does not exceed these. Some key relevant principles from the Addis Ababa Principles and Guidance include:

- Recognizing the need for a governing framework consistent with international/national laws, local users of biodiversity components should be sufficiently empowered and supported by rights to be responsible and accountable for use of the resources concerned (Principle 2);
- Adaptive management should be practiced, based on:

- Science and traditional and local knowledge;
- Iterative, timely and transparent feedback derived from monitoring the use, environmental and socio-economic impacts, and the status of the resource being used; and
- Adjusting management based on timely feedback from the monitoring procedures (Principle 4)
- Sustainable use management goals and practices should avoid or minimize adverse impacts on ecosystem services, structure, and functions as well as other components of ecosystems (Principle 5);
- An interdisciplinary, participatory approach should be applied at the appropriate levels of management and governance related to the use (Principle 9);
- Users of biodiversity should seek to minimize waste and adverse environmental impact, and optimize benefits from uses (Principle 11);
The costs of management and conservation of biological diversity should be internalized within the area of management and reflected in the distribution of the benefits from the use (Principle 13).

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) provides for the authorization of trade of trophies in certain specimens of Appendix I-listed taxa for personal use (Res. Conf. 2.11 (rev. CoP 9)). CITES has adopted a series of Resolutions for certain Appendix I-listed species subject to trophy hunting (Res. Conf 10.14 (rev. CoP 14) on Leopard *Panthera pardus*; Res. Conf 10.15 (rev. CoP 14) on Markhor *Capra falconeri*; and Res. Conf 13.5 (rev. CoP 14) on Black Rhinoceros *Diceros bicornis*), which set out quotas and conditions for such trade.

The European Charter on Hunting and Biodiversity (ECHB), adopted under the European Bern Convention, provides specific guidance on hunting and conservation. In Resolution 4.026, adopted at the 4th World Conservation Congress Barcelona, October 2008), IUCN requested that its members promote the ECHB in the implementation of IUCN's policies and Programme for 2009-2012. While the ECHB explicitly addresses sustainable hunting in Europe, its principles and guidelines are relevant and pertinent in a wider geographic context. Key principles of the ECHB include:

- ensuring that harvest is ecologically sustainable (Principle 3);
- maintaining wild populations of indigenous species with adaptive gene pools (Principle 4);
- maintaining environments that support healthy and robust populations of harvestable species (Principle 5);
- encouraging use to provide economic incentives for conservation (Principle 6); and
- empowering local stakeholders and holding them accountable (Principle 9).

Section IV. Trophy hunting and conservation

Trophy hunting is a form of wildlife use that, when well managed, may assist in furthering conservation objectives by creating the revenue and economic incentives for the management and conservation of the target species and its habitat, as well as supporting local livelihoods. However, if poorly managed, it can fail to deliver these benefits. Although a wide variety of species (many of which are both common and secure) are hunted for trophies, some species that are rare or threatened may be included in trophy hunting as part of site-specific conservation strategies. Examples include Cheetah *Acinonyx jubatus* and Black Rhinoceros in southern Africa, and Straight-Horned Markhor *Capra falconeri megaceros* in the Torghar Valley of Pakistan, all of which are species listed on Appendix I of CITES.

Trophy hunting takes place in both North America and Europe, and in developing countries where wildlife management infrastructure is often less fully developed. These hunts are usually conducted by persons willing and able to pay substantial amounts of money for the opportunity. They typically involve taking small numbers of individual animals and require limited development infrastructure. They are thus high in value but low in impact. In some cases, trophy hunting forms an important component of Community-Based Conservation/Community-Based Natural Resource Management, which aim to devolve responsibility for the sustainable use and management of wildlife resources from distant bureaucracies to more local levels.

Understanding the context within which trophy hunting occurs is critical to understanding its potential to benefit conservation. In many parts of the world, much wildlife exists outside of protected areas. Wildlife shares landscapes with people, and typically competes for space and environmental resources with other forms of economically productive land uses, such as agriculture and pastoralism, upon which the livelihoods of local people depend. Wildlife can impose serious costs on local people, including physical harm, damaging crops, and competing with livestock for forage. Where wildlife provides few benefits to local people and/or imposes substantial costs, it is often killed (legally or illegally) for food, various commercially valuable wildlife products, or as problem animals, and its habitats are degraded or lost to other forms of land use. In some circumstances trophy hunting can address this problem by effectively making wildlife more valuable than, and/or complementary to, other forms of land use. It can return benefits to local people (preferably through effective co-management), encouraging their support for wildlife, and motivating investment at community, private, and government levels for research, monitoring, habitat protection, and enforcement against illegal use (see Annex 1 for examples). Trophy hunting, if well managed, is often a higher value, lower impact land use than alternatives such as agriculture or tourism.

However, where poorly managed, trophy hunting can have negative ecological impacts including altered age/sex structures, social disruption, deleterious genetic effects, and in extreme cases, population declines. It can also be difficult to ensure that benefits from hunting accrue to those in the best position to help conservation.

Section V: The Guiding Principles

The IUCN SSC considers that trophy hunting, as described in Section II above, is likely to contribute to conservation and to the equitable sharing of the benefits of use of natural resources when programmes incorporate the following five components: Biological Sustainability; Net Conservation Benefit; Socio-Economic-Cultural Benefit; Adaptive Management: Planning, Monitoring, and Reporting; and Accountable and Effective Governance

Biological Sustainability

Trophy hunting as described in Section II, can serve as a conservation tool when it:

1. Does not contribute to long-term population declines of the hunted species or of other species sharing its habitat, noting that a sustainably harvested population may be smaller than an unharvested one;
2. Does not substantially alter processes of natural selection and ecosystem function; that is, it maintains “wild populations of indigenous species with adaptive gene pools.”² This generally requires that hunting offtake produces only minor alterations to naturally occurring demographic structure. It also requires avoidance of breeding or culling to deliberately enhance population-genetic characteristics of species subject to hunting that are inconsistent with natural selection;
3. Does not inadvertently facilitate poaching or illegal trade of wildlife;

² Direct quote from Principle 4 of the European Charter on Hunting and Biodiversity.

4. Does not artificially and/or substantially manipulate ecosystems or their component elements in ways that are incompatible with the objective of supporting the full range of native biodiversity.

Net Conservation Benefit

Trophy hunting can serve as a conservation tool when it:

1. Is linked to identifiable and specific parcels of land where habitat for wildlife is a priority (albeit not necessarily the sole priority or only legitimate use); and on which the “costs of management and conservation of biological diversity [are] internalized within the area of management and reflected in the distribution of the benefits from the use³”;

2. Produces income, employment, and/or other benefits that generate incentives for reduction in pressures on populations of target species, and/or help justify retention, enhancement, or rehabilitation of habitats in which native biodiversity is prioritized. Benefits may create incentives for local residents to co-exist with such problematic species as large carnivores, herbivores competing for grazing, or animals considered to be dangerous or a threat to the welfare of humans and their personal property;

3. Is part of a legally recognized governance system that supports conservation adequately and of a system of implementation and enforcement capable of achieving these governance objectives.

Socio-Economic-Cultural Benefit

Trophy hunting can serve as a conservation tool when it:

1. Respects local cultural values and practices (where “local” is defined as sharing living space with the focal wildlife species), and is accepted by (and preferably, co-managed and actively supported by) most members of the local community on whose land it occurs;

2. Involves and benefits local residents in an equitable manner, and in ways that meet their priorities;

3. Adopts business practices that promote long-term economic sustainability.

Adaptive Management: Planning, Monitoring, and Reporting

Trophy hunting can serve as a conservation tool when it:

1. Is premised on appropriate resource assessments and/or monitoring of hunting indices, upon which specific quotas and hunting plans can be established through a collaborative process. Optimally, such a process should (where relevant) include local communities and draw on local/indigenous knowledge. Such resource assessments (examples might include counts or indices of population performance such as sighting frequencies, spoor counts) or hunting indices (examples might include trophy size, animal age, hunting success rates and catch per hunting effort) are objective, well documented, and use the best science and technology feasible and appropriate given the circumstances and available resources;

2. Involves adaptive management of hunting quotas and plans in line with results of resource assessments and/or monitoring of indices, ensuring quotas are adjusted in line with changes in the resource base (caused by ecological changes, weather patterns, or anthropogenic impacts, including hunting offtake);

3. Is based on laws, regulations, and quotas (preferably established with local input) that are transparent and clear, and are periodically reviewed and updated;

4. Monitors hunting activities to verify that quotas and sex/age restrictions of harvested animals are being met;

³ Direct quote from Practical Principle 13 of the Addis Ababa Principles and Guidelines on Sustainable Use of Biodiversity.

5. Produces reliable and periodic documentation of its biological sustainability and conservation benefits (if this is not already produced by existing reporting mechanisms).

Accountable and Effective Governance

A trophy hunting programme can serve as a conservation tool when it:

1. Is subject to a governance structure that clearly allocates management responsibilities;
2. Accounts for revenues in a transparent manner and distributes net revenues to conservation and community beneficiaries according to properly agreed decisions;
3. Takes all necessary steps to eliminate corruption; and
4. Ensures compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

Section VI: Appropriate use of these guiding principles

SSC's intention is that these guiding principles may serve to assist authorities responsible for national and subnational policy, law and planning; managers responsible at the site level; and local communities in designing and implementing trophy hunting programs where biodiversity conservation and equitable sharing of natural resources are objectives.

These guiding principles should not be interpreted as in any way dismissing the values – whether they are biological, social, cultural or economic – of hunting programs that may be truly sustainable, but that do not produce incentives for conservation and associated conservation benefits.

Although IUCN and SSC are not currently engaged in endorsing or certifying trophy hunting programmes, they consider that for any such endorsement or certification to be credible, it should be conducted by a recognized independent body. Nothing in this document is intended to be interpreted in any way as a specific endorsement or criticism of a particular trophy hunting programme.

Annex 1. Examples of trophy hunting as part of a conservation strategy

Note: Due to the varied potential conservation impacts of trophy hunting it is useful to provide a small set of illustrative case studies highlighting both positive and negative conservation impacts. We have here included two illustrations of generally positive conservation impacts. We would welcome suggestions for further examples, both positive and negative, noting that in the case of negative examples we are sensitive to not casting blame or criticizing member groups and member states.

Case study 1: Trophy hunting in Namibian communal Conservancies

Namibia's communal Conservancy programme is widely viewed as a conservation and rural development success story, and trophy hunting plays a central role in this success. Innovative legislative reforms in the mid-1990s devolved conditional rights to use and manage wildlife on communal lands to communities, if they organized to form a Conservancy. The intent of this approach was to devolve rights and benefits from wildlife to communities – people often viewed by colonial conservationists as “poachers” - to create incentives for communities to live with, value, and benefit from wildlife. Forming a Conservancy requires that the community defines its membership, borders, and management committee; develops a Constitution; agrees a method for equitable distribution of benefits; and develops a sustainable game management and utilization plan. Conservancies can use wildlife consumptively in various ways, including trophy hunting, own-use hunting game cropping, and live sales; and organize nonconsumptive use through tourism. Conservancies retain all the revenue gained from utilization and management.

The spread of the conservancy movement has been rapid, and conservation impacts extensive and widespread. Today there are 71 registered communal Conservancies covering 14.98 million ha (with another 20 conservancies under development) and include around 240 000 members. Current communal Conservancies alone mean that 18.2% of Namibia's land surface is under conservation management. This is a contrast from the previous status of these areas as subject to long-term human-wildlife conflict, uncontrolled poaching, and low levels of wildlife.

Sustainable use of wildlife has been a strong catalyst to the recovery of wildlife in communal areas. Prior to the introduction of conservancies, wildlife in Namibia's communal areas had been decimated and was at historic lows in many instances. Wildlife was perceived by communities mainly as a threat to livelihoods, with its best use being illegal poaching for meat for the pot. The advent of Conservancies drastically altered this attitude. Wildlife is now increasingly seen as a valued asset, with growing wildlife populations meaning more income for conservancies, more jobs for conservancy members, more game meat at the household level, and more funds to support rural development. As a result, poaching has become socially unacceptable and game numbers have staged remarkable recoveries in most areas where Conservancies have operated for a period of time. For instance, on communal lands in northeast Namibia, from 1994 to 2011, elephant have increased from 12,908 to an estimated 16,993; sable from 724 to an estimated 1,474; and common impala from 439 to 9,374. In northwest Namibia⁴, from the early 1980s to today, desert elephants have increased from approx. 150 to approx. 750; Hartmann's Mountain Zebra from est. <1,000 to > 27,000; and black rhino have more than tripled, making it the biggest free-roaming population of rhino in the world. From 1995, the population of lion in this area has increased from an est. 20 to an est. 130, with exponential range expansion. Game populations have been re-established in Conservancies that have low densities of specific species or species that have gone locally extinct. This support has allowed for the re-establishment of a large number of species, including giraffe, red hartebeest, black faced impala and black rhino. Further, Conservancies, a large proportion of which are located adjacent or

⁴ Game guard programs, precursors of the current model, were introduced in this area in the early 1980s.

close to protected areas, strengthen Namibia's protected area system by ensuring wildlife friendly environments adjacent to protected areas and through the creation of movement corridors between them.

Trophy hunting has been a central driver of this transformation. It is by far the largest generator of benefits from sustainable consumptive wildlife use, with 41 Conservancies hosting 40 trophy hunting concessions during 2011. Since registration of the first four communal conservancies in 1998, a total of 97 948 km² have been opened to trophy hunting concessions under community management. Benefits from consumptive use of wildlife (cash, employment, and in-kind [largely meat]) received by Conservancies and their members from 1998-2009 amounted to N\$76.5 million (US\$10.17 million) (NACSO Database, 2011). As the benefits from consumptive use have driven recovery of wildlife populations through reduction of poaching, these recoveries have in turn paved the way for non-consumptive tourism, more than doubling the returns from wildlife to communities. In 2011 more than 30 joint venture tourism lodges and 24 community campsites were functioning in communal Conservancies, generating Conservancy benefits (including cash, employment and in-kind benefits) of N\$102.8 million (US\$13.64 million) from 1998-2009. Tourism enterprises have proven to be strong, complementary additions to consumptive use options, with consumptive use (primarily trophy hunting) generating the majority of cash income to Conservancies (which can be put toward wildlife management activities and community development purposes), and tourism operations providing the greater individual employment benefits to Conservancy members. Benefits from consumptive use are critical because these can start to flow when wildlife populations are initially too low to support tourism, stimulating recoveries of wildlife to levels at which photographic tourism can become viable.

Community development activities paid for by benefit streams from sustainable use, among others, include improvements to schools or school facilities and equipment; improvements to rural health clinics; support to pensioners; scholarship funds; transport for the sick or injured; mitigation of human / wildlife conflict; and sponsoring of community sports teams. Finally, the hunting operations provide meat to community members (many very marginalized): meat provided from trophy hunting and own-use harvesting was valued at N\$17,413,120 (US\$2.29 million) between 1998 and 2009⁵ (NACSO, 2010).

A number of cutting edge tools and practices have been developed by the Namibia CBNRM Programme to ensure sustainable hunting is playing a key conservation role, including:

- annual quota setting procedures for sustainable harvest offtake rates: jointly carried out by the MET, NGOs, and the Conservancies, and based upon annual game counts, hunting operator reports, and local knowledge of conservancy/MET/NGO staff;
- trophy hunting tender procedures for Conservancy hunting concessions: these aim to attain market values for game in a transparent manner, and strengthen relationships between the Conservancy committee and the hunting operator;
- trophy hunting contracts: through the Conservancy movement communities have been empowered to become meaningful partners in the development and support of hunting activities, although many remain on a steep learning curve; and
- Conservancy management plans and practices: funds generated from wildlife use are used by conservancies to employ community game guards and implement game management and monitoring systems, allowing communities to proactively counter poaching threats and mitigate increasing incidents of human/wildlife conflict.

Sources:

⁵ The value of distributed meat is calculated by using market values and average meat yields of game animals from which the meat was distributed, as recorded by conservancies in the Event Book.

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Case study 2: Conservation and trophy hunting in the Torghar Valley, Pakistan

Torghar (black mountains/hills in Pushtoo) is in the province of Balochistan in Pakistan. In the early 1980s, wild Straight-horned Markhor *Capra falconeri megaceros* and Afghan Urial *Ovis orientalis* were close to being extirpated from this region due to uncontrolled hunting and competition for grazing with domestic herds. Enforcement efforts against hunting were poor due to weak institutional capacity and lack of political will. In the mid-1980s, a tribal decree banning hunting was issued by a local leader, but could not be enforced. Local Jazalai (a Pathan tribe) leaders, with support from the United States Fish and Wildlife Service (USFWS), launched a community-based conservation programme in 1986, the Torghar Conservation Project (later managed by STEP, the Society for Torghar Environmental Protection). This project used limited and monitored trophy hunting, initially of Urial only and later also of Markhor, to provide revenue to fund the employment of local people as game guards and to provide community benefits. The hypothesis was that development of local livelihoods based on trophy hunting would change the attitude of local people toward wildlife, demonstrating that conservation could be an economically viable land use, and providing incentives for enforcement. In line with its commitment to conservation, the trophy hunting has been conservative, with 1-2 Markhor and 1-4 Urial taken per year.

After careful consideration, tribesmen accepted a ban on their traditional hunting in return for the economic benefits of the conservation programme. Illegal hunting virtually ceased. While exact population numbers cannot be ascertained in the difficult terrain, use of repeated standardized survey protocols have found that the Torghar populations of Markhor and Urial have steadily increased since the project started. Surveys at Torghar by USFWS-sponsored biologists found the estimated population of Markhor grew from less than 100 in 1990 to 2,541 in 2005, with estimated Urial populations increasing from 1173 in 1994 to 3,146 in 2005.

Over this period, the programme has continually faced a lack of regulatory support, including government reluctance to recognize local involvement in conservation, bans on hunting imposed by the national Conservation Council, and the listing of Markhor on Appendix I of CITES, making export of trophies to major market countries such as the United States problematic. Despite these obstacles the programme has grown, attracting further support from the United Nations Development Programme, WWF-Pakistan, the Global Environment Facility and others. While other means of raising revenue such as ecotourism based on photography have been considered, the region is remote and attracts few visitors.

TCP/STEP has also generated considerable benefits for the approx. 400 families of the local area. Revenues raised by trophy hunting and donor grants pay salaries for ca. 82 game guards, and have been used for community needs such as construction of water tanks, dams and irrigation channels (to provide water during droughts), supply of young fruit trees, a medical camp and emergency drought relief.

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Division of Management Authority

Import permits issued for following species in 2015, 2016, and 2017:

Species		2015	2016	2017
African elephant				
Namibia	*		37	60
South Africa	*		30	46
Tanzania		0	0	1 (an amended permit for a 2013 trophy)
Zimbabwe	*		3	17 (all trophies taken prior to May 12, 2014)
Zambia		0	0	4 (one re-issuance permit for 2012 trophy, one
lion				
South Africa	**		6	8 (all wild/wild-managed lions; no captive-bred)
Zambia	**		0	18
Zimbabwe	**		0	18
All other countries	**		0	0
leopard		398	345	343
Southern white rhino		2	1	2
Black rhino		2	0	0
Argali		135	116	140
markhor		4	5	10
bontebok		94	63	41

* no permits were needed prior to the 2016 amendment to 4(d) rule

** no permits were needed prior to the 2016 listing of the species

one for 2016 trophy, two for 2017 trophy)

total specimens)