



November 24, 2017

Via Federal eRulemaking Portal Docket ID No. FWS-HQ-R-2017-N118

Joshua Winchell
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--via email: joshua_winchell@fws.gov

Re: Comments on the notice of Department of the Interior “International Wildlife Conservation Council Establishment”, Docket No. FWS-HQ-R-2017-N118; Federal Register Vol. 82, No. 215, 51857 (November 8, 2017)

Dear Mr. Winchell,

We write on behalf of the millions of members and supporters of the African Wildlife Foundation (AWF), Wildlife Conservation Society (WCS), World Wildlife Fund (WWF), and the International Rhino Foundation (IRF), in response to the notice of Department of the Interior, “International Wildlife Conservation Council Establishment”, as published as a Notice in the *Federal Register*, Vol. 82, No. 215, on November 3, 2017. In that Notice, the public was invited to submit comments on the establishment of the International Wildlife Conservation Council (IWCC). The undersigned organizations therefore submit the following comments.

The organizations responding to this notice were honored to have had four senior staff as members of the Advisory Council on Wildlife Trafficking, which is now no longer active but provides useful lessons learned on the way forward. We believe that the newly proposed Council would be most effective if its members represent a broad, diverse perspective on wildlife conservation, along with gender and cultural diversity.

Our organizations note that the mission of the proposed IWCC, as stated in the *Federal Register*, is overly narrow, with a disproportionately heavy bias in support of international trophy hunting programs. We recognize that there are hunting programs in a limited number of countries that are science-based, well-managed, and provide sustainable benefits for both wildlife populations and local communities. However, many countries face multiple challenges in this regard and wildlife hunting policies are not yet at that level. Further, any recommendations with regard to trophy hunting must not exacerbate the ongoing international poaching and wildlife trafficking crisis.

We strongly suggest that any such Council look more broadly at a wide range of conservation management strategies, and evaluate how the U.S. Government can work to enhance wildlife conservation across the globe, particularly of threatened and endangered species, without necessarily focusing on a single management strategy such as trophy hunting.

Our group is concerned that the mandate of the proposed Council, as stated in the *Federal Register*, appears to pre-determine the outcome of discussions and public input. We are particularly concerned that the proposed mandate appears to pre-ordain that regulatory or legislative changes are needed, that regulatory duplications exist, or that the listing of foreign species on the Endangered Species Act should change. We believe that any such Council must be open and transparent, and open to public and expert input, without prejudice to the final outcome of deliberations.

Collectively, we believe that a Council focused on the conservation of wildlife must:

- 1) Be broadened to discuss the full range of opportunities for the U.S. Government to benefit wildlife conservation abroad and not limit its mission to hunting;
- 2) Be more global in nature and include a broader geography than those countries with trophy hunting programs, and include a wide range of countries with different approaches to wildlife management, in Africa, Asia, Latin America, the Caribbean, and in both terrestrial and marine environments;
- 3) Address multiple threats to wildlife conservation and potential solutions, including: poaching and wildlife trafficking (in line with President Trump's Executive Order on Enforcing Federal Law with Respect to Transnational Criminal Organizations and Preventing International Trafficking), protected area establishment and management; human/wildlife conflict; habitat loss and degradation; and disease transmission;
- 4) Consider both consumptive and non-consumptive uses of wildlife, and how the U.S. Government and citizens can engage;
- 5) Be comprised of at least 50% of its members representing international conservation organizations with field programs in multiple countries;
- 6) Exclude stakeholders with a direct commercial interest in loosening regulations around hunting and the importation of hunting trophies; and
- 7) Exclude any representation of the firearms and ammunition manufacturing industry, as this is not a constituency that is directly involved in conservation.

Thank you very much for your consideration. If the above changes are made, our respective groups would consider submitting appropriate candidates for the IWCC.

Sincerely,

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Wildlife Conservation Society

Ginette Hemley
Senior Vice President, Wildlife Conservation
World Wildlife Fund

Jeff Chrisfield
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