Office of Law Enforcement
Strategic Plan 2006-2010

Protecting Our Wildlife Resources
Federal law enforcement officers have helped the Nation conserve wildlife for more than a century now. Our mission is – and always has been – to protect wildlife resources.

This Strategic Plan will help us meet this overarching goal. It reaffirms our mission and its importance to the conservation work of the U.S. Fish and Wildlife Service.

The plan identifies strategic goals and objectives for the Office of Law Enforcement and shows how our efforts contribute to conservation in this country and around the world. For the first time, it defines performance indicators that we will use to monitor our performance and measure our success.

We developed this plan by drawing on the collective knowledge and experience of our managers and our officers and staff in the field. We worked with guidance from the Service management team and received valuable input from State fish and game agencies, our Federal law enforcement counterparts, and non-governmental groups that share our commitment to wildlife conservation.

This Strategic Plan will guide our enforcement efforts through the end of the decade. It will help our officers and those who assist us serve the American people and protect the living legacy we treasure. It will help us use our resources effectively to safeguard the animals and plants entrusted to our stewardship.

In short, it will ensure that we continue to make a difference for wildlife.

Sincerely,

Kevin R. Adams
Chief, Office of Law Enforcement
Our mission is to protect wildlife resources. Through the effective enforcement of Federal laws, we contribute to Fish and Wildlife Service efforts to recover endangered species, conserve migratory birds, preserve wildlife habitat, safeguard fisheries, combat invasive species, and promote international wildlife conservation.

We focus on potentially devastating threats to wildlife resources – illegal trade, unlawful commercial exploitation, habitat destruction, and environmental hazards. We investigate wildlife crimes; regulate wildlife trade; help Americans understand and comply with wildlife protection laws; and work in partnership with international, Federal, State, and Tribal counterparts to conserve wildlife resources.

This work includes:

- Breaking up international and domestic smuggling rings that target imperiled animals;
- Preventing the unlawful commercial exploitation of U.S. species;
- Protecting wildlife from environmental hazards and safeguarding habitat for endangered species;
- Enforcing Federal migratory game bird hunting regulations and working with States to protect other game species and preserve legitimate hunting opportunities;
- Inspecting wildlife shipments to ensure compliance with laws and treaties and detect illegal trade;
- Working with international counterparts to combat illegal trafficking in protected species;
- Training other Federal, State, Tribal, and foreign law enforcement officers;
- Using forensic science to analyze evidence and solve wildlife crimes; and
- Conducting outreach to industry, trade groups, and others to promote wildlife conservation and secure voluntary compliance with wildlife laws.
Why Protect Wildlife?

In the preamble to the 1973 Endangered Species Act, Congress declared that fish, wildlife, and plants “are of esthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people,” recognizing that our natural heritage is an invaluable and irreplaceable resource.

America’s wildlife enriches the Nation in a multitude of ways. Many of us enjoy recreational activities that depend on wildlife or wildlife habitat. In 2001, for example, 34 million Americans went fishing; 13 million of us hunted; and over a third of us (66 million) watched or photographed wildlife.

But we need not be anglers, hunters, bird watchers, or amateur photographers to treasure wildlife and the wonders of the outdoor world. Millions of us hike, bike, climb mountains, camp, boat, canoe, shoot rapids, and sail, finding renewal and relaxation in the places that hundreds of animal and plant species call home.

We turn to “wild things” and “wild places” for esthetic pleasure, spiritual inspiration, and a way to connect with nature. Some of us find religious meaning in the animals and plants that are the Nation’s living legacy or express our cultural heritage by using species to celebrate, pray, heal, or sustain health. Others see intrinsic value in all life and life forms and define conservation as a moral or ethical imperative.

Our economy and the job market benefit from consumer spending on wildlife-related recreation and from the sustainable harvest and sale of native species. In 2001, for example, Americans spent $108 billion on wildlife-related recreation; trips alone cost us $28 billion while we bought $64 billion worth of equipment for fishing, hunting, and watching wildlife.

Americans who make their living from wildlife not only include hunting guides, outfitters, and eco-tour companies but also an array of businesses that supply fish, wildlife, and plants to markets here and abroad. Watermen harvest crabs from the Chesapeake Bay, lobsters off the coast of Maine, and abalone from the Pacific. The Great Lakes commercial fishing industry hauls in perch, chub, and whitefish, while in Alaska wild-caught salmon dominate the catch. Mussels from U.S. rivers provide shell for buttons and the production of cultured pearls; American paddlefish caviar competes with imported varieties in the gourmet marketplace; and U.S. trappers supply furs to clothing manufacturers. We harvest alligators to produce leather goods and export hundreds of thousands of turtles for the pet and food trades. Ginseng, goldenseal, and more than 170 other plants native to North America stock the over-the-counter medicinal market, a U.S. business worth more than $3 billion a year.

The health and vitality of fish, wildlife, and plant populations provide a telling barometer of the quality of the environment we share. We function with the millions of other species that inhabit the planet as part of a complex, delicately balanced, and infinitely diverse network of life – a network so tightly interrelated that the loss of any single species can set off a chain reaction with long-term consequences that are virtually impossible to predict.

In the preamble to the 1973 Endangered Species Act, Congress declared that fish, wildlife, and plants “are of esthetic, ecological, educational, historical, recreational, and scientific value to the Nation and its people,” recognizing that our natural heritage is an invaluable and irreplaceable resource. Our quality of life — and that of future generations — depends on our wise stewardship and effective protection of this inheritance.
Challenges Ahead

The increasing proximity of people and wildlife threatens the viability of species and presents challenges for wildlife law enforcement officers.

The U.S. Fish and Wildlife Service Office of Law Enforcement is responsible for enforcing U.S. laws that protect the Nation’s – and the world’s – wildlife resources. Those laws promote the conservation of such federally protected resources as endangered species, migratory birds, and marine mammals. They help States and tribes safeguard “wild things” and “wild places” and support global efforts to preserve Earth’s living legacy.

In the years ahead, we will confront new and growing threats to wildlife resources and mounting obstacles to accomplishing our mission. This section outlines four areas of concern to the long-term viability of wildlife populations and to the near-term success of our efforts to stem illegal wildlife trafficking, preserve wildlife habitat, and work as effective partners with Federal, State, Tribal, and international counterparts.

This overview provides a context for the strategic framework that follows (p. 9). The goals we have set and our strategies for achieving them show how we will respond to the forces, trends, and threats outlined below.

Population Pressures

The U.S. population grew by 10 percent during the 1990s, and similar growth rates are projected each decade for the next 50 years. Even more rapid growth occurred in the West (where some State populations increased by more than 20 percent) and parts of the South (Texas, Georgia, and Florida) – a trend that is also expected to continue. Some of the States recording the fastest growth rates (Arizona, Colorado, Idaho, Nevada, and Utah) also contain much of the wilderness and wildlife left in the lower 48.

Population growth, of course, brings development and puts new pressures on wildlife populations. Animal and plant species increasingly compete with people for the same resources. Development encroaches on the land available for wildlife habitat; creates competition for water; and results in the proliferation of manmade hazards to wildlife. Industrial activities and waste disposal increasingly expose wildlife to contaminants that range from pesticides and offshore oil spills to the growing presence of chemicals, pharmaceuticals, and other pollutants in our rivers, oceans, and groundwater.

The increasing proximity of people and wildlife threatens the viability of species and presents challenges for wildlife law enforcement officers. U.S. Fish and Wildlife Service biologists already estimate that hundreds of thousands of migratory birds die each year in encounters with communication towers, electric power lines, and wind turbines. In 2001, the Coast Guard’s National Response Center logged 34,360 chemical and oil spills. As of 2002, 48 States had advisories in place warning against consumption of fish from State waters. In 2003, scientists reported high levels of antidepressants in fish and resistance to antibiotics in species across the animal kingdom while the Federal government officially advised the public to limit consumption of some fish because of mercury levels.

Efforts to safeguard wildlife all too often create conflicts with communities. Oceanfront towns in the Northeast chafe at beach closures that protect nesting birds; transportation departments in the Midwest see road work detoured to preserve insect breeding grounds; and developers in California, Colorado, and other States put project plans on hold because the land at stake is some of the last remaining habitat for endangered butterflies, birds,
or rodents. A dispute over water pitting the needs of fish against those of farmers prompts months of protest at an Oregon dam, while communities from Washington State to New Mexico grapple with the mandate to ensure that irrigation and other human use of water does not further imperil already threatened fish.

Americans, however, legitimately want housing, roads, electricity, cell phone service, new energy sources, water, and food. The companies and other entities that provide these goods and services serve the public and contribute jobs and profits to the U.S. economy.

The Office of Law Enforcement must find innovative, flexible ways to mitigate conflicts and secure compliance with wildlife protection laws. We can look to partnerships, agreements, and other voluntary safeguards. But when consultation and cooperation fail, we must be prepared to document violations, engage prosecutors, and seek appropriate penalties. And we must do so with the support of a public that joins us in demanding that all Americans serve as stewards of our wildlife resources.

Globalization

The past decade witnessed the emergence of a truly global economy – an economy that benefited the United States, the world’s largest trading nation. From 1990 to 2001, the value of U.S. trade more than doubled, rising from $891 billion to over $2 trillion.

During this period, improved air cargo and international express mail services made overnight delivery of almost everything a reality virtually any place in the world. The transformation of the internet into a universally available medium for “real time” communication gave Americans instantaneous access to information, companies, and products around the globe. Larger disposable incomes and expanded transportation services spurred international travel to and from the United States.

Improvements in international communication, shipping, and transport services; government efforts to promote trade; and the rise in international passenger traffic erased borders that once defined markets. These developments fueled multi-national enterprises and global commerce in goods and services – including wildlife.

From 1992 through 2002, reported U.S. wildlife trade grew by more than 65 percent, with declared shipments increasing from 74,620 in 1992 to more than 123,700 in 2002. By 2004, that number had jumped to more than 150,000.

As U.S. demand for wildlife and wildlife products escalated, black market profiteers increasingly saw opportunities to make money at the expense of protected species. The profits associated with such trade skyrocketed and the ease of travel, transport, and transaction removed barriers that previously helped keep illegal wildlife trafficking in check. Inbound contraband ranged from live reptiles (some fetching as much as $30,000 per specimen), exotic orchids, and unlawfully collected coral to caviar, elephant ivory, and tribal artifacts made from endangered species.

Given the Nation’s overall affluence, its role as a major market for high-value wildlife commodities during the 1990s and beyond should come as no surprise. The continued “globalization” of the U.S. population and culture during this period also bolstered the country’s role as a consumer of the world’s wildlife. Growing communities of immigrants from Central America, for example, created a demand for sea turtle eggs and meat to which enterprising smugglers readily responded. Wildlife medicinals and herbal
The Office of Law Enforcement will be challenged to make the United States a less porous market for wildlife by more effectively using investigative, inspection, and intelligence gathering resources to detect, disrupt, and deter wildlife trafficking.

remedies once confined to use in Asian cultures gained new adherents as more and more Americans became interested in non-traditional medicine and alternative therapies.

Growth in wildlife trade in the United States and around the world added additional pressures to animal and plant populations that were already struggling to survive in the face of habitat degradation and loss. From 1992 through 2002, listings under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) – listings that often cover entire biological “families” consisting of tens or even hundreds of different species – increased from 723 to 1,264 (up 75 percent). The number of CITES member nations rose from 115 to more than 160 as countries increasingly recognized unrestrained global trade as a threat to their natural resources.

As a major consumer of wildlife and wildlife products and a CITES member nation, the United States must exercise global leadership in the effort to shut down illegal trafficking in the world’s animal and plant species. The Office of Law Enforcement will be challenged to make the United States a less porous market for wildlife by more effectively using investigative, inspection, and intelligence gathering resources to detect, disrupt, and deter wildlife trafficking.

To meet this goal, we must work harder to forge and maintain effective working relationships with Customs and Border Protection and other Federal agencies that share responsibility for policing the goods and people moving into and out of the United States. Expanded cooperation with other enforcement agencies around the world will also be needed to improve the global policing of wildlife trade.

Foiling multinational wildlife trafficking enterprises will require stepped-up intelligence sharing and the pursuit of complex, cooperative investigations that stretch across continents. Building enforcement infrastructure in Africa, Asia, and South America will remain a priority, but we must find more efficient and effective ways to share our wildlife enforcement expertise with global counterparts. New or expanded partnerships with nonprofit conservation groups can provide opportunities for educating Americans about illegal wildlife trade and reducing the demand for wildlife and plant products made from species that cannot sustain such exploitation.

Bioinvaders
Illegal wildlife trade not only undermines the viability of animal and plant populations, it also threatens to jeopardize the health of ecosystems and industries. Enforcement resources are increasingly needed to keep U.S. borders closed to invasive species – species that could wreak havoc with U.S. livelihoods and lives.

The United States has long recognized the need to prevent the importation of “injurious” species. In 1900, for example, the Lacey Act banned the entry of mongooses, fruit bats, English sparrows, starlings, and a handful of other species that could harm U.S. crop production and horticulture. Today, that law empowers the Secretary of the Interior to prohibit the importation of any wildlife species deemed harmful to human beings, wildlife, or the interests of agriculture, horticulture, and forestry.

Unfortunately, some of those species have already taken a tremendous toll. In Guam, for example, the brown tree snake has wiped out native birds, driving 12 endemic species to extinction, changing virtually every ecological relationship on the island, and leaving it vulnerable to a host of insect pests. This devastation testifies to the extreme vulnerability of island ecosystems. But the mainland and its resources are as much at risk.
In less than 10 years, zebra mussels (a Eurasian “import” first sighted in 1988) “took over” the Great Lakes and moved from there into the Mississippi, Tennessee, Hudson, and Ohio River basins. These prolific clams, which accumulate on virtually every available surface, not only compete with native species (setting the stage for long-term ecological change), they also cause major economic problems by colonizing water supply pipes of hydroelectric and nuclear power plants, public water supply facilities, and industrial operations. U.S. and Canadian water users within the Great Lakes region alone will spend an estimated $5 billion dealing with zebra mussels over the decade.

Mitten crabs – a Chinese species that continues to be smuggled live into the United States for the food trade – gained a foothold in San Francisco Bay in the early 1990s and have already spread into the adjacent Suisun Marsh and its tributaries. As their numbers increase, mitten crabs will displace native invertebrates, damage plants, block fish passage, accelerate bank and levee erosion, and disrupt commercial fisheries.

Scientists report that the pace of “bio-immigration” is accelerating worldwide (another byproduct of globalization). In San Francisco Bay, for example, a new exotic animal, plant, or microbe now “moves in” every 14 weeks on average (compared to one every 55 weeks in the period from 1851 through 1960). While many bioinvaders arrive here “by accident” (sucked into the ballast of cargo ships, for example), others have been deliberately imported to be eaten, kept as pets, displayed in home aquariums, or used for predator control by U.S. fish farms.

Such trafficking has prompted new listings of species as injurious under the Lacey Act (recent additions include the brushtail possum and all snakehead fish). Listing proposals now under consideration would regulate black carp and bighead carp.

Increased enforcement efforts by both Federal and State wildlife agencies will be needed to stem the deliberate introduction of injurious species into the United States and their subsequent movement in interstate commerce.

Increased coordination will also be required with agencies (such as the Centers for Disease Control and the U.S. Department of Agriculture) that are responsible for addressing linkages between wildlife trade and the cross-border spread of human and animal diseases (diseases that include monkeypox, bird flu, and chronic wasting disease).

Calls for greater regulation of live wildlife trade; extended quarantine requirements; new listings under the Lacey Act and other authorities; and increased coordination and cooperation among regulatory agencies may bring new responsibilities and challenges to wildlife law enforcement.

**Changes in Wildlife Crime**

Wildlife crime in the 21st century benefits from many of the same organizing principles and business
techniques, tools, and technologies that support legitimate commerce. According to a 2003 United Nations report, wildlife criminals today increasingly include “networks...that consist of organized criminal enterprises and a myriad of subsidiary actors and associates” profiteering at the expense of U.S. and global species. Those who commit wildlife crimes, however, also include a growing number of industries and groups whose activities affect rather than target wildlife. The presence of organized criminal elements, their skillful utilization of technology and other resources, and the complexities of dealing with “non-traditional” violators add to the challenges faced by wildlife law enforcement.

Recent Service investigations spotlight the growing scope, sophistication, and organization of wildlife crime. Special agents increasingly work on wildlife trafficking cases that involve multiple suspects in multiple locations committing multiple felonies – felonies that include not only violations of wildlife laws but crimes such as conspiracy, smuggling, money laundering, and wire fraud. Defendants have included globally connected suppliers of exotic animals and plants, upscale art galleries, guiding operations offering illegal hunts, interstate networks of taxidermists and wildlife dealers, and seven of the 10 major caviar importers operating on the East Coast (companies that did millions of dollars worth of black market business each year).

The profits associated with wildlife trafficking will ensure the continued presence and proliferation of organized groups and networks conducting “business” across State lines and international borders. Such groups enjoy ample financing, the latest computer and communications technology, and overnight air cargo shipping services to virtually any place in the United States and beyond. They are quick to identify new markets and capitalize on both new trafficking techniques and new technologies.

The advent of the internet, the growth of “e-commerce,” and the increased accessibility of computer technology have transformed virtually every U.S. business – including those profiting from the take, trade, and sale of protected animals and plants. Internet auction sites provide a global shopping venue with everything from sea turtle shell jewelry to frozen tiger cubs available to the highest bidder.

But the list of wildlife “e-entrepreneurs” only begins with such postings. Deals featuring high-value wildlife contraband – from live exotics and ivory carvings to the finest caviar and tribal art from around the world – are brokered online. Like legitimate businessmen, wildlife criminals use computers to contact customers, negotiate deals, transfer money, and keep track of inventory, sales, and profits.

The caseload of a Service special agent today also typically includes investigations of companies whose operations harm wildlife and the environment. Such potentially contentious, high-profile investigations will surely become even more common as wildlife and people increasingly inhabit the same space and depend on the same resources.

Recent Service investigations have documented violations of wildlife and environmental statutes by utilities, chemical manufacturers, oil shipping firms, land developers, agribusinesses, oil and gas production operations, mines and mineral processing facilities, and other commercial enterprises. Even such public entities as water management authorities, irrigation and transportation districts, and State highway and forestry departments violate wildlife protection laws, introducing new complexities and complications to Service efforts to fight wildlife crime.
Bringing a wildlife case to fruition can now require months or years of investigative effort as well as extensive coordination with Federal prosecutors and with other Federal, State, and international law enforcement officers. Some violations are better addressed through laborious and time-intensive consultations and negotiations that secure improved compliance and long-term conservation benefits without ever going to court.

Access to timely, accurate intelligence and state-of-the-art investigative equipment and techniques will become increasingly important to Service efforts to stem wildlife trafficking. Sophisticated forensics capabilities (such as expanded DNA and computer analysis capabilities) will be needed as will increased on-the-ground forensics support (including on-site assistance with crime scene analysis and expert witness testimony to explain complex scientific points).

The Office of Law Enforcement must meet the many challenges outlined here if we are to respond effectively to changes in wildlife crime and the world at large – changes that include population growth, globalization, and the growing threat of “bioinvaders.” We have weighed these issues and the complexities they add to our mission in developing the strategy that will guide and empower our enforcement efforts over the rest of this decade and beyond.

Sophisticated analyses of evidence conducted at the National Fish and Wildlife Forensics Laboratory will be critical to the Office of Law Enforcement’s efforts to respond to changes in wildlife crime. USFWS
This section presents the Office of Law Enforcement’s strategic framework. This framework identifies our mission and our strategic goals and objectives, which together portray what we will accomplish and how we will achieve these results. This strategy will guide and inform our planning and decision-making over the next five years.

We use the following terms to frame our strategy:

**Mission:** the guiding and overarching purpose of the Office of Law Enforcement, which provides the basis and rationale for all that we do.

**Strategic Goals:** the concrete, broad-reaching accomplishments or overall outcomes of our work that will allow us to fulfill our mission. These accomplishments represent the most significant results of our work – results that show a direct relationship between what we do and the external realities or conditions that we must affect or change in achieving our mission.

**Overall Performance Indicators:** objective metrics that we will use to measure and report on the achievement of our strategic goals.

**Objectives:** the intermediate accomplishments that are both necessary and sufficient for meeting our strategic goals. Our strategy assumes that if we are successful in accomplishing our objectives, then we will also be successful in achieving our strategic goals.

**Cross-cutting Objectives:** objectives that directly contribute to the accomplishment of more than one strategic goal.

**Key Strategies:** the first and most immediate actions we must take in order to achieve our objectives.

**Performance Indicators:** metrics that will be used to measure and report on our success in meeting our objectives and implementing our key strategies.

Taken together, our goals, objectives, strategies, and indicators define what we ultimately want to accomplish, identify how we will do so, and provide us a system for objectively measuring and reporting our success.

**Strategic Goals**
The Office of Law Enforcement has four strategic goals:

- Protect the Nation’s fish, wildlife, and plants from unlawful exploitation and industrial hazards.
- Prevent the unlawful import/export and interstate commerce of foreign fish, wildlife, and plants.
- Facilitate the expeditious movement of legal wildlife.
- Create a strong management system and culture to improve program performance.
Each of these goals is explained separately in this section along with relevant objectives, strategies, and performance indicators (p. 11-17). Performance indicators are provided in most cases at both the strategic goal and objective level.

**Cross-cutting Objectives**

In crafting this strategy, we recognized that meeting two cross-cutting objectives will be essential to accomplishing our mission. We must create and maintain effective partnerships with other law enforcement agencies, and we must work to increase compliance with wildlife laws through outreach to groups that use or interact with wildlife resources. We list these cross-cutting objectives under the goals they support and show performance indicators for them on p. 18.

We have also identified two support functions that are critical to the success of our mission. The contributions of the National Fish and Wildlife Forensics Laboratory and our Intelligence Unit are briefly discussed later in this plan (p. 19). Their work is addressed in two of the key strategies that will help us meet a number of our objectives.

The chart below presents our strategy, including our mission, our strategic goals, and our objectives. Information about indicators and key strategies can be found in the pages that follow.

**Office of Law Enforcement Strategic Framework**

**Mission:** Our mission is to protect wildlife resources. Through the effective enforcement of Federal laws, we contribute to FWS efforts to recover endangered species, conserve migratory birds, preserve wildlife habitat, safeguard fisheries, combat invasive species, & promote international wildlife conservation.

**Strategic Goals:**

- Protect the nation’s fish, wildlife, and plants from unlawful exploitation and industrial hazards
- Prevent the unlawful import/export and interstate commerce of foreign fish, wildlife, and plants
- Facilitate the expeditious movement of legal wildlife
- Create a strong management system and culture to improve program performance

**Objectives:**

- Disrupt or dismantle criminal enterprises involved in illegal commercialization of wildlife
- Improve effectiveness in intercepting shipments containing illegal or injurious wildlife
- Increase the efficiency of clearing wildlife imports/exports
- Install a strategic planning & performance management system
- Install a strategic human capital management system
- Install IT systems to support achievement of business & operational results
- Strengthen the professional integrity of the workforce

**Cross-cutting Objectives:**

- Increase cooperation with law enforcement partners on information sharing and investigations
- Provide outreach and education to increase compliance with wildlife laws
The Office of Law Enforcement investigates crimes that involve the unlawful exploitation of federally protected resources, including endangered and threatened animals and plants native to the United States, migratory birds, and marine mammals. We work in partnership with industries to reduce the effect of their activities and facilities on wildlife resources.

We team with State, Tribal, and other Federal enforcement agencies to improve protections for fish, wildlife, and plants nationwide, including resources under State and Tribal stewardship. We also work to promote compliance with wildlife laws through outreach to hunters, landowners, industry, and others.

**Strategic Goal: Protect the Nation’s fish, wildlife, and plants from unlawful exploitation and industrial hazards**

We will use the following overall performance indicators to measure our progress in meeting this strategic goal:

**Overall Indicators:**

- Future loss of wildlife prevented by disruption of illegal activity *
- Amount of restitution dollars collected to conserve wildlife as a result of investigations

*Data for this overall indicator will reflect total actual loss of wildlife caused by illegal activity and project that at least the same level of loss would have continued to occur if we had not stopped the illegal activity. Data reporting categories for this indicator will include endangered and threatened species; migratory birds; marine mammals; bald and golden eagles; and State-protected wildlife by Class. See Appendix A (p. 21) for a detailed discussion of the utility of this indicator.*

To achieve this strategic goal of protecting the Nation’s fish, wildlife, and plants, we must accomplish the five objectives identified below. We will use the performance indicators shown to measure and monitor our progress in meeting these objectives.

**Objective:** Disrupt or dismantle criminal enterprises involved in illegal commercialization of wildlife

**Indicators:**

- Number of enterprises involved in illegal wildlife activities that are penalized (convicted, fined, or subject to license revocation)
- Value of illegal commercial activity by disrupted enterprises

**Objective:** Apprehend individuals that violate wildlife laws

**Indicators:**

- Number of individuals involved in illegal wildlife activities who are penalized (convicted or fined)
- Value of illegal commercial activity by individuals

Protected species such as bald eagles are subject to threats that range from powerline electrocutions to deliberate shootings and poisonings. Eagles and other U.S. wildlife resources are also subject to unlawful commercial exploitation. Dave Menke/USFWS
Objective: Reduce the impact of industrial hazards

Indicators:
- Number of conservation agreements, plans, or compliance actions by industry involving cooperation with the Office of Law Enforcement
- Number of cases involving companies whose activities unlawfully impact wildlife or wildlife habitat

Objective: Increase cooperation with law enforcement partners on information sharing and investigations (cross-cutting) **

Objective: Provide outreach and education to increase compliance with wildlife laws (cross-cutting) **

**Since these two cross-cutting objectives are essential to the accomplishment of multiple strategic goals, we show the related performance indicators once on p. 18 instead of repeating them in the discussion of each goal.

We have identified three key strategies *** (changes in how we approach our work or improvements to infrastructure) that will help us accomplish these objectives and thus meet our strategic goal.

Key Strategies:
- Increase focus on investigations of illegal activities that pose the greatest conservation risk
- Enhance intelligence support to investigations
- Enhance evidence collection and analysis

*** Although not cited in this document, performance indicators have been developed for each “key strategy” and progress in each of these areas will be monitored and measured.
The United States is one of the world’s largest markets for wildlife and wildlife products – both legal and illegal. Global trafficking remains a significant threat to thousands of animal and plant species around the world.

The Office of Law Enforcement upholds U.S. responsibilities to police wildlife trade and shut down U.S. markets for species that are off limits under the Convention on International Trade in Endangered Species (CITES) and U.S. laws and regulations. We further support global wildlife conservation by barring the importation of wildlife and plants banned from trade under foreign law and working to improve the infrastructure for wildlife law enforcement in other countries. Our efforts also protect U.S. wildlife resources and wildlife habitat by preventing the importation of injurious species.

**Strategic Goal: Prevent the unlawful import/export and interstate commerce of foreign fish, wildlife, and plants**

We will use the following overall performance indicators to measure our success in meeting this strategic goal:

**Overall Indicators:**
- Number of unlawful CITES Appendix I animals interdicted
- Number of unlawful shipments interdicted containing CITES Appendix I wildlife parts and products
- Value of unlawful CITES Appendix II and III shipments interdicted
- Number of injurious animals interdicted

To achieve our strategic goal of preventing illegal trafficking in foreign fish, wildlife, and plants, we must accomplish the five objectives presented below. We will use the performance indicators shown to measure and monitor our progress in meeting these objectives.

**Objective:** Improve effectiveness in intercepting shipments containing illegal or injurious wildlife

**Indicators:**
- Number of declared shipments interdicted
- Number of seizures from undeclared shipments
- Percentage of declared high-risk shipments found to contain illegal wildlife

**Objective:** Disrupt or dismantle international and domestic criminal enterprises

**Indicators:**
- Number of enterprises involved in illegal wildlife activities that are penalized (i.e., convicted, fined, or subject to license revocation)
- Value of illegal commercial activity by disrupted enterprises
Objective: Apprehend individuals that violate wildlife trade laws

Indicators: Number of individuals involved in illegal wildlife activities who are penalized (fined or convicted)

Value of illegal commercial activity by individuals

Objective: Increase cooperation with law enforcement partners on information sharing and investigations (cross-cutting) *

Objective: Provide outreach and education to increase compliance with wildlife laws (cross-cutting) *

* Since these two cross-cutting objectives are essential to the accomplishment of multiple strategic goals, we show the related performance indicators once on p. 18 instead of repeating them in the discussion of each goal.

We have identified four key strategies ** (changes in how we approach our work or improvements to infrastructure) that will help us accomplish these objectives and meet this strategic goal.

Key Strategies:

Increase/maintain focus on high-risk shipments

Increase focus on investigations of illegal activities that pose the greatest conservation risk

Enhance intelligence support to investigations and inspections

Enhance evidence collection and analysis

** Although not cited in this document, performance indicators have been developed for each “key strategy” and progress in each of these areas will be monitored and measured.

The Service’s seizure of this large-scale commercial shipment of queen conch (which was being smuggled into Brownsville, Texas, by boat) benefited from an effective partnership between the agency’s wildlife inspector and counterparts with U.S. Customs and Border Protection. USFWS
Our mandate to enforce wildlife trade laws encompasses a concomitant responsibility to deal fairly and efficiently with the industries, organizations, and individuals whose import/export activities we regulate. Our wildlife inspectors currently process more than 150,000 declared wildlife shipments annually, and we expect that volume to continue to grow. By law, virtually all wildlife imports and exports must be declared to us and cleared by our inspectors. The speed and efficiency of our work affects the ability of businesses to profitably engage in trade; the international movement of wildlife for purposes that range from scientific research to public entertainment; and the ease with which individual Americans can import and export wildlife and wildlife items.

Strategic Goal: Facilitate the expeditious movement of legal wildlife

We will use the overall performance indicator shown below to measure our progress in meeting this strategic goal:

**Overall Indicator:** Number and percentage of low-risk shipments cleared in one day

To achieve this strategic goal, we must accomplish the three objectives identified below. We will use the performance indicators shown to measure and monitor our progress in meeting these objectives.

**Objective:** Increase the efficiency of clearing wildlife imports/exports

**Indicators:** Percentage of declarations filed electronically

Percentage of user fees paid online

**Objective:** Increase cooperation with law enforcement partners on information sharing and investigations (cross-cutting) *

**Objective:** Provide outreach and education to increase compliance with wildlife laws (cross-cutting) *

* Since these two cross-cutting objectives are essential to the accomplishment of multiple strategic goals, we show the related performance indicators once on p. 18 instead of repeating them in the discussion of each goal.

We have identified three key strategies ** (changes in how we approach our work or improvements to infrastructure) that will help us accomplish our objectives and meet this strategic goal.

**Key Strategies:**

Create a screening methodology to distinguish risk levels of wildlife shipments

Improve processes for managing wildlife declarations and for inspection procedures

Increase coordination with brokers, importers, exporters, and other organizations involved in wildlife trade

** Although not cited in this document, performance indicators have been developed for each “key strategy” and progress in each of these areas will be monitored and measured.
Our success in protecting the Nation’s wildlife, stemming global wildlife trafficking, and facilitating legal wildlife trade (the strategic goals presented previously) will depend on how well we manage our “human capital” and use the other resources available to us.

Effective management requires an ongoing strategic planning/performance management effort that provides clear linkages between mission-oriented goals, performance indicators, and performance results as well as a sustained commitment to building and maintaining a highly skilled, well-deployed workforce.

We must leverage technology to support our investigative and inspection efforts and manage our program. Such efforts will include ongoing improvements to our Law Enforcement Management Information System (LEMIS) as well as work to integrate our information technology infrastructure with new Departmental and interagency IT systems.

These systems include the Department of the Interior’s Incident Management, Analysis and Reporting System (IMARS), which will link all of the enforcement bureaus within the Department, and the International Trade Data System (ITDS), a comprehensive multi-agency system that will coordinate the policing and processing all cargo and personal goods moving into and out of the United States.

We must also improve our professional accountability by creating and empowering a Professional Responsibility Unit to respond to public concerns and identify and resolve systemic issues involving the conduct and integrity of law enforcement operations.

**Strategic Goal: Create a strong management system and culture to improve program performance**

To achieve this strategic goal, we must accomplish the four objectives identified below. We will use the performance indicators shown to measure and monitor our progress in meeting these objectives.

**Objective:** Develop and install a strategic planning and performance management system to improve organizational effectiveness

**Indicator:** Milestone scale to measure progress in the design and use of strategic planning and performance management system

**Objective:** Develop and install a workforce planning system to ensure strategic management of human capital

**Indicators:**
- Number of standard position descriptions developed
- Number of standard position descriptions in use
- Percentage of positions with training and development profiles
- Development of standard organizational staffing structure
- Skill gaps identified (in relation to strategic needs) and gaps filled
Objective: Develop and install IT systems to support achievement of business and operational results

Indicators: Milestone scale to measure progress in the development and implementation of improved capabilities for the Law Enforcement Management Information System (LEMIS)

Milestone scale to measure progress in the development and implementation of communication linkage between LEMIS and the Interior Department’s Incident Management, Analysis and Reporting System (IMARS)

Milestone scale to measure progress in the development and implementation of Fish and Wildlife Service interface with the International Trade Data System (ITDS)

Objective: Strengthen the professional integrity of the Office of Law Enforcement workforce

Indicators: Milestone scale to measure progress in establishing a Professional Responsibility Unit

Completion of needs assessment to identify organizational integrity issues

Tracking of resolution of key integrity issues (as identified above)

The Office of Law Enforcement’s efforts to police commercial wildlife trade will benefit from the agency’s participation in the International Trade Data System. This IT project will give Service officers access to detailed shipment information, improving the targeting and interdiction of illegal trade while facilitating the processing of declared wildlife imports and exports. Harry Spencer/USFWS
The Office of Law Enforcement’s efforts to protect U.S. wildlife resources, combat global wildlife trafficking, and facilitate legal wildlife trade (the strategic goals presented on p. 11-15) receive significant support from law enforcement partnerships and outreach to promote compliance with wildlife laws. We seek to foster and maintain cooperative working relationships with a range of other enforcement agencies in the United States and around the world. Examples include Federal entities (such as Customs and Border Protection), State fish and game agencies, and customs and wildlife protection units in other countries.

We also work to help brokers, importers, exporters, hunters, landowners, industry groups, and others to understand and obey Federal laws that protect wildlife resources. Proactive outreach is vital to both securing compliance and promoting cooperative conservation efforts by those whose activities affect wildlife and wildlife habitat.

We must meet the two cross-cutting objectives presented below to accomplish our goals and fulfill our mission. We will use the performance indicators shown to measure and monitor our progress in meeting these objectives. In the case of the first objective, we have also identified a key strategy* that will support our efforts to increase cooperation with law enforcement partners.

Objective: Increase cooperation with law enforcement partners on information sharing and investigations

**Indicators:**
- Number of investigative hours on our cases by enforcement partners (non-FWS)
- Number of deputy game warden agreements with other agencies
- Number of joint investigations
- Number of joint task forces
- Number of law enforcement partner organizations receiving training
- Number of law enforcement partner training sessions conducted
- Number of partner organizations using national communication network

**Key Strategy:** Develop a national communication network with law enforcement partners to facilitate information sharing and alerts

Objective: Provide outreach and education to increase compliance with wildlife laws

**Indicators:**
- Number of customer organizations receiving outreach/training
- Number of customer outreach/training sessions conducted

* Although not cited in this document, performance indicators have been developed for each “key strategy” and progress in each of these areas will be monitored and measured.
As noted in our strategic framework, access to sound intelligence and forensic analysis is critical to our ability to meet our goals and objectives. Our key strategies commit us to enhancing the intelligence support available to our special agents and wildlife inspectors in the field. We also recognize the need to expand our evidence collection and analysis capabilities—an expansion that will in many areas involve our Forensics Laboratory itself. This section describes the current baseline functions of both our Intelligence Unit and the Forensics Laboratory.

**Intelligence Unit**
The Office of Law Enforcement’s Intelligence Unit collects and analyzes information on all aspects of wildlife trafficking to support Service investigations, inspections, and smuggling interdiction efforts. The Unit also coordinates intelligence sharing with other law enforcement agencies and maintains liaison with U.S. and international conservation groups.

This work has become increasingly important given the global scope and growing sophistication and organization of wildlife crime. Intelligence support is vital to our efforts to identify, penetrate, and break up wildlife trafficking networks. Access to comprehensive, well-analyzed intelligence data also helps our managers identify threats to species and plan and prioritize investigative efforts and smuggling interdiction operations.

**Wildlife Forensics**
The National Fish and Wildlife Forensics Laboratory, located in Ashland, Oregon, is the world’s only full-service crime laboratory devoted exclusively to supporting wildlife law enforcement. Scientists at the Laboratory identify the species of wildlife parts and products seized as evidence. They link suspect, “victim,” and crime scene through the examination and comparison of physical evidence; determine the cause of death of wildlife crime victims; help analyze crime scenes; and recover evidence from seized computers.

Laboratory scientists also conduct research to develop new analytical techniques needed in wildlife forensics. They provide training on species identification and evidence handling to Service law enforcement officers and their global counterparts. The Laboratory holds accreditation from the American Society of Crime Laboratory Directors—a professional status attained by only half the crime laboratories in the United States.

A mammalogist at the National Fish and Wildlife Forensics Laboratory examines bone specimens. The Laboratory’s work is critical to Service investigations of wildlife crime. USFWS
Appendix A. “Future Loss” Performance Indicator for Wildlife Protection Strategic Goal

The Office of Law Enforcement’s efforts to investigate wildlife crimes and enforce U.S. wildlife protection laws help preserve the Nation’s fish, wildlife, and plant resources. Specifically, our investigations disrupt illegal activity that negatively affects wildlife populations—activity such as unlawful take and commercial exploitation.

We recognize that other law enforcement organizations often measure their success by counting closed cases, calculating crime rates, and claiming deterrence as their long-term benefit to the communities they serve. As officers dedicated to wildlife law enforcement, we maintain that the best way to measure our contribution to wildlife conservation is to assess, to the extent possible, our impact on the resource itself. We have focused, therefore, on looking at the unlawful activity we disrupt and the effect of that disruption on fish, wildlife, and plant resources to develop an overall performance indicator for our wildlife protection strategic goal.

Meaning of the “Future Loss” Measure: While it can be difficult (if not impossible) to calculate the contribution that law enforcement makes to the recovery and conservation of species, we can usually document with reasonable accuracy the wildlife death toll or loss associated with any single investigation. We know, for example, how many dead migratory birds are recovered from an open pit at an oil production facility or how many dead bald eagles were used to supply the eagle parts seized in a wildlife trafficking case. We can count the number of headless walrus carcasses left behind by hunters engaged in the illegal ivory trade and estimate the number of paddlefish illegally harvested to provide a caviar trafficker a specific tonnage of contraband roe.

It can reasonably be assumed that a comparable level of loss (i.e., wildlife mortality or, in the case of live wildlife trafficking, removal of specimens from the wild) would continue each year from the illegal activity if it had not been disrupted. For example, a network of reptile dealers who profited from the unlawful interstate sale of 766 protected snakes and turtles would presumably continue to collect and sell reptiles at the same rate in subsequent years if this illegal enterprise had not been disrupted. Similarly, a farmer who spread Furadan-laced wheat seed over his fields and poisoned 26,961 migratory birds would likely use this same approach to prevent crop depredation in subsequent years if a Service investigation had not detected and stopped this illegal activity.

In the first case, the “future loss of wildlife prevented” can be extrapolated as “766 reptiles” for the year, while in the second, our work can reasonably be said to have forestalled the loss of 26,961 protected birds that otherwise would have died. Collectively then, in the simplest terms, the total “future loss of wildlife prevented by disruption of illegal activity” in a given year would equal the sum of all animals killed or removed from the wild by commercial enterprises, industrial operations, and individuals convicted of wildlife crimes in that year.

In our actual performance reports, of course, we will present “future loss prevented” in terms that better reflect our specific statutory responsibilities and contributions to Service mission goals. Instead of a total number of animals in aggregate, we will report totals for endangered and threatened species; migratory birds; marine mammals; bald and golden eagles; and State-protected species by Class (reptiles, mammals, etc.). This indicator will provide a measure of how our work supports the conservation of federally protected resources; it will also document our shared stewardship under the Lacey Act for an even greater diversity of fish and wildlife species.

The “Big Picture” Mandate: We recognize that this approach does not attempt to directly quantify the actual impact of our work on the population levels of specific species, and that this omission may raise questions among those accustomed to formulating such metrics for evaluating conservation programs. Assessments of “impact on populations,” however, are simply not practical given the diversity of species involved in our investigations and the time, resources, and research that would be needed to complete such analyses for each of our cases each year. Nor would the preparation of such assessments fall within our field of expertise. Enforcement of wildlife protection laws is, afterall, only one of many factors that affect the viability of populations. Even the extent to which up-to-date population data may be available from other Service programs or external sources varies considerably for different species.

The significance of a successful wildlife crime investigation in terms of its impact on species populations will differ from case to case. We acknowledge that the information we plan to collect and report does not take population-specific “significance” into account and that the full importance of any “future loss prevented” cannot be completely captured with summary data alone. The “loss” of one California condor, for example, obviously carries far more
significance for the wild population of these birds than does the loss of 30 Canada geese, even though both species are protected under Federal law. But once again, developing and implementing such a calculus quickly becomes unwieldy, impractical, and logistically overwhelming, particularly since our officers routinely close thousands of cases each year involving an array of species.

It should be noted that our numbers will represent a relatively conservative accounting of the level of loss our enforcement efforts prevent. We will report wildlife totals associated with a particular case only once, even though in many instances, our disruption of illegal activity may have forestalled years of continued take. We will not attempt to address the greater loss sustained by a population over generations when breeding specimens are removed. Nor will we try to estimate the extent to which our investigative activities prevent future loss by reducing the incentive for others to commit similar crimes or motivating them (in the case of industrial hazards) to take voluntary action to limit or remove threats to wildlife.

The Deterrence “Dilemma:” Given the obstacles to linking enforcement and the status of wild populations, why not directly address “deterrence” as an indicator and set up annual goals such as “reduce the number of wildlife crimes affecting species of concern by xx percent”?

To be sure, research involving traditional law enforcement agencies has shown that successful enforcement activity correlates with lower crime rates. Such studies arguably document the deterrent effect of law enforcement, but meaningful crime rates can only be developed for crimes that are known. While crimes against people are not always reported to the police, traditional crime statistics for such offenses are typically adjusted using information from other sources to account for unreported crimes.

Such adjustments between the number of crimes reported and the number of crimes committed are not, however, made for wildlife violations. In the arena of wildlife law enforcement, unreported crimes go uncounted. Here, a “crime rate” would reflect only the number of crimes that happen to be discovered – a number that most agree will always fall short of the number committed.

We thus have no basis for determining a baseline number for wildlife crimes since the number detected and investigated is only a subset of this larger figure. When police forces add officers, crime rates typically drop. In contrast, when we add officers, we investigate more crimes; when Service special agents retire or transfer and vacancies go unfilled, case numbers fall. Under this flawed measurement system, our most “effective” strategy for “reducing the number of wildlife crimes” would be to reduce the number of officers available to investigate them!

We do, however, recognize the limits of the approach we have taken with this performance indicator; the concept of “future loss prevented” is neither intuitive nor easy to grasp. But prolonged and sincere grappling with the problem of measuring our performance in a meaningful way has lead us to conclude that such extrapolations are as close as we can reasonably come to quantifying the impact of our work on the resource. Tracking the amount of future loss that has been prevented from occurring by our disruption of illegal activity will provide the best indicator of the extent to which we are meeting our stated goal of protecting the Nation’s fish, wildlife, and plants from unlawful exploitation and industrial hazards.
Appendix B. Linkages with the Department of the Interior Strategic Plan

Resource Protection

*Department of the Interior Strategic Goal:* Protect the Nation’s natural, cultural, and heritage resources

*DOI End Outcome Goal 2:* Sustain biological communities on DOI managed and influenced lands and waters

*Office of Law Enforcement Strategic Goal:* Protect the Nation’s fish, wildlife, and plants from unlawful exploitation and industrial hazards

*Office of Law Enforcement Strategic Goal:* Prevent the unlawful import/export and interstate commerce of foreign fish, wildlife, and plants

Management Excellence

*Department of the Interior Strategic Goal:* Manage the Department to be highly skilled, accountable, modern, functionally integrated, citizen-centered and result-oriented

*DOI End Outcome Goal 1:* Workforce has job-related knowledge and skills necessary to accomplish organizational goals

*Office of Law Enforcement Strategic Goal:* Create a strong management system and culture to improve program performance

**Objective:** Develop and install a workforce planning system to ensure strategic management of human capital

*DOI End Outcome Goal 3: Modernization*

*Office of Law Enforcement Strategic Goal:* Create a strong management system and culture to improve program performance

**Objective:** Develop and install information technology systems to support the achievement of business and operational results

*DOI End Outcome Goal 5: Customer value*

*Office of Law Enforcement Strategic Goal:* Facilitate the expeditious movement of legal wildlife
Appendix C. Notes on Implementation

This appendix outlines “next steps” for the Office of Law Enforcement’s strategic planning effort. We recognize that success in meeting our goals will require full utilization of this plan as the basis for program management – utilization that must include a sustained commitment to performance monitoring and program evaluation.

Implementation of Strategic Framework, Phase I (FY 2005)

Program Management: The Office of Law Enforcement will begin managing its investigative, inspection, and field support functions to address the strategic goals and objectives identified in this plan.

Data Collection Modifications: Although some of the information that will be used as performance indicators is already being collected in our Law Enforcement Management Information System (LEMIS), a number of modifications are needed to provide all of the data required to monitor program performance under this strategic plan.

For example, many of the performance indicators developed for our strategic goals that address protecting the Nation’s wildlife from unlawful exploitation and industrial hazards and preventing global wildlife trafficking require that investigative records identify whether the wildlife involved in a case consists of domestic or foreign species. Such a data field did not previously exist in LEMIS.

LEMIS modifications will be undertaken and collection of new data elements will begin during FY 2005. For some performance indicators, FY 2005 performance results will reflect only a partial data set. Narrative accomplishment reporting will be used to supplement incomplete or missing data.

Infrastructure Improvements: Some of our key strategies require that we make certain “infrastructure” enhancements. For example, to measure whether we have successfully increased our focus on investigations of wildlife crimes that represent the greatest threat to the resource, we must refine and validate our investigative priorities, communicate them to officers in the field, and begin designating cases based on this priority system. Similarly, efforts to improve our effectiveness in intercepting illegal wildlife shipments (an objective under our global trafficking strategic goal) and meet our goal of facilitating the expedient movement of legal wildlife both require the development and implementation of a methodology for classifying the risk levels of shipments. These efforts will begin during FY 2005.

Implementation of Strategic Framework, Phase II (FY 2006)

Initial Performance Assessment: After the close of FY 2005, available data will be gathered and analyzed for each performance indicator. Senior managers will meet to review FY 2005 performance results to assess progress and identify management adjustments needed to improve performance in FY 2006. Status of data collection modifications and infrastructure improvements will also be reviewed.

Data Collection Modifications: Additional changes to LEMIS and other Office of Law Enforcement tracking systems will be implemented during FY 2006 to complete development of a performance monitoring data collection infrastructure.

Baseline Performance Monitoring: Data collection modifications should allow the collection of full-year baseline data for most performance indicators during FY 2006.

Implementation of Strategic Framework, Phase III (FY 2007 and beyond)

The Office of Law Enforcement will compile annual data for each performance indicator and evaluate progress in meeting strategic goals and objectives. Baseline data assembled in FY 2006 will support comparative monitoring of program performance over time. Senior managers will be responsible for evaluating yearly performance and progress over time to identify areas for improvement or increased effort based on actual results. Objectives, key strategies, and performance indicators will be modified if needed so that the strategic plan remains a viable, responsive tool for directing and assessing the Office of Law Enforcement’s contributions to wildlife conservation.