

**WRITTEN TESTIMONY OF
WORLD WILDLIFE FUND
AND TRAFFIC
ON
H.R. 3086
GLOBAL WILDLIFE CONSERVATION, COORDINATION, AND ENHANCEMENT ACT OF 2009
FOR THE
COMMITTEE ON NATURAL RESOURCES
SUBCOMMITTEE ON INSULAR AFFAIRS, OCEANS & WILDLIFE
U.S. HOUSE OF REPRESENTATIVES**

JULY 28, 2009

Madam Chairwoman, Mr. Ranking Member, and members of the Subcommittee, thank you for the opportunity to testify today. My name is Carter Roberts, and I am the CEO of World Wildlife Fund (WWF). For more than 45 years, WWF has been protecting the future of nature. Today we are the largest multinational conservation organization in the world. WWF's unique way of working combines global reach with a foundation in science, involves action at every level from local to global, and ensures the delivery of innovative solutions that meet the needs of both people and nature. We currently sponsor conservation programs in more than 100 countries, thanks to the support of 1.2 million members in the United States and more than 5 million members worldwide. I am also testifying on behalf of TRAFFIC, WWF's wildlife trade monitoring program. TRAFFIC works to ensure that trade in wild plants and animals is not a threat to the conservation of nature. Over the past 30 years, TRAFFIC has gained a reputation as a reliable and impartial organization and a leader in the field of conservation as it relates to wildlife trade. It is a global network, with 25 offices around the world.

WWF and TRAFFIC congratulate the Subcommittee on H.R. 3086, the Global Wildlife Conservation, Coordination, and Enhancement Act of 2009. The intent behind this bill to garner additional government resources and coordination to the benefit of global biodiversity conservation is to be applauded. WWF and TRAFFIC have worked hand in hand with the U.S. government for decades in efforts to protect species and habitats worldwide. The U.S. has been a leader in international conservation efforts for over 100 years, and that leadership has been greatly appreciated by governments, conservation groups and – most importantly – the local people in those countries that have directly benefited from it.

We highlight here the key messages that WWF and TRAFFIC hope our comments on H.R. 3086 will convey:

- Greater coordination and cooperation amongst U.S. agencies investing in biodiversity conservation are needed to ensure an effective and efficient effort. However, this coordination should not come at the cost of agency flexibility and autonomy; added layers of bureaucracy will not alone resolve this issue. The structures proposed in H.R. 3086 must be clarified and carefully evaluated, and the most streamlined approach possible should be used which will still achieve the greatest conservation impact.
- Resources should be focused on saving wild species in wild places, working in close cooperation with local communities and range State governments.

- Adequate authorization levels must be included, and appropriations allocated, to ensure that the programs proposed in H.R. 3086 can achieve any level of success in positively affecting conservation initiatives on a global scale.

WWF and TRAFFIC have provided this Subcommittee with testimony related to these issues on several occasions, including on previous legislative proposals to expand U.S. Fish and Wildlife Service (FWS) international programs and on efforts to address trafficking in illegal wildlife and wildlife products and the U.S. role as consumer in the international wildlife trade. Efforts to expand the U.S. role in protecting species and habitats around the world are driven by an urgent crisis affecting our planet's biodiversity. Species are now disappearing at an unprecedented rate – 100 to 1,000 times more quickly than the 'normal' extinction rate that we find in the fossil record. Scientists estimate that approximately 10% of the world's known biological diversity is presently in danger of extinction, including at least 1/4 of all mammals, 1/3 of all primates, 1/3 of all amphibians, and 1/8 of all birds. Scientists believe that we are in the initial stages of a major worldwide extinction event that could result in the permanent loss of up to 2/3 of the world's plant and animal species by the end of this century. Such an outcome would have unfathomable consequences for the future of our society, our economy and our planet.

This biodiversity crisis is being felt most acutely in developing nations, where approximately 75% of the world's terrestrial plant and animal species reside, in whole or in part. In many cases, poor management of natural resources and lack of local capacity to promote conservation and sustainable development in these countries has exacerbated the threat of extinction to many species and directly harmed local communities. Conservation is often vital to alleviating poverty for many in the developing world who depend on these resources for their livelihoods, food, shelter, medicines, and other necessities. There are also significant risks to the global and U.S. economies from the loss of species and habitats around the world and the valuable services they provide.

The U.S. has an opportunity to lead expanded global efforts to forestall the biodiversity crisis. The wildlife and natural resource experts at the Department of Interior (DOI) and FWS are well positioned as leaders of those endeavors given their long history of successfully collaborating in developing nations and with private partners to protect international wildlife, to mitigate cross-cutting global threats to biodiversity including trade in illegal wildlife and wildlife products, and to build local on-the-ground capacity for conservation.

H.R. 3086 builds upon highly successful existing programs within FWS to create a more broad-based and comprehensive approach to international wildlife conservation within DOI. In this way, the bill attempts to address the full range of threats and pressures affecting global wildlife in a more concerted and coordinated fashion. The legislation includes programs to promote improved law enforcement, outreach and education, and new opportunities for public-private partnerships. It also codifies the existing Global, Regional and Species programs within FWS into a new, overarching Wildlife Without Borders program.

Overall, WWF and TRAFFIC believe there are several key considerations that should guide this legislation to ensure it achieves its core purposes. It should be broad-based and flexible; focus heavily on international programs in developing countries; include clearly defined, scientifically-based systems for establishing conservation priorities while retaining administrative flexibility; encourage but not require grant recipients to obtain matching funds from public and private partners; require host country approval and encourage local support for programs and projects; provide for coordination among Federal agencies with overlapping jurisdictions; allow for outside review of program implementation;

and provide adequate funding commensurate with conservation objectives, including sufficient fees to enable FWS to meet administrative costs. Priorities for such work should also emphasize the role of the U.S. as a consumer and agent for change, where the U.S. has a responsibility to mitigate the impact of its influence on conservation around the world, particularly in respect to utilization of wildlife resources.

The Institute and The Council

WWF and TRAFFIC note the attention paid to a consolidated U.S. conservation strategy and a cooperative effort between all sectors of the U.S. government contributing to or affecting global conservation. This ratcheted-up effort and coordination are what is required to facilitate the kind of efforts required – both on the ground and at the highest political levels – and is what has been called for by WWF, TRAFFIC and many of our conservation partners. However, while we embrace the intent, we have some serious concerns with the execution – for example:

- How will the Institute fit within the current structure of the FWS and its International Affairs Division?
- Why will international treaties fall under the purview of the Wildlife Without Borders program?
- What kind of authority, if any, will the Global Wildlife Coordination Council ('the Council') have over the conservation work of DOI and other Departments?
- What is the interface between the Institute for International Wildlife Conservation's ('the Institute') Action Plan and the Council's Action Strategy?

These are just some of the concerns the breadth and scope of this bill raises. An organizational chart of what is envisioned by this legislation would be extremely useful in trying to put some of these pieces together and would help clarify what is intended in this legislation. It would also be useful in helping to determine if the scale of this bill is actually what is required to achieve the desired outcomes, or if a leaner approach could more efficiently accomplish the same.

A coordination mechanism is certainly needed within the federal government on global wildlife conservation, but we have heard concerns, including from within government, that the creation of various new bodies may create unnecessary layers of bureaucracy. It is unclear, as currently written, what authority, if any, the Council would have over the actions of the Department of the Interior, as well as other government bodies. While we strongly agree that coordination is needed to ensure that federal agencies make efficient use of available resources and avoid duplication of effort, we are also wary of hindering any agency's effectiveness or flexibility in responding to rapidly emerging conservation issues. More clarity would be helpful with respect to the defined roles and responsibilities in the legislation to ensure that any new structure will be of true conservation benefit and not create new hurdles to agencies carrying out their missions. We appreciate that mandating cooperation while allowing a necessary level of autonomy is a fine line to walk, but we also believe that finding the proper balance will be critical to avoiding bureaucratic stalemate.

The Institute would be responsible for developing an Action Plan in consultation with various stakeholders inside DOI and with civil society. However, for the International Wildlife Conservation Action Plan to have the necessary buy-in and coordination from other Federal agencies, it would seem that providing them an opportunity for consultation on development of the Action Plan would be

required. Additionally, it is unclear what, if any, link is intended between the Action Plan and the Global Wildlife Action Strategy to be developed by the Council. WWF and TRAFFIC would suggest that perhaps the Action Plan be developed by the Secretary of the Interior in consultation with other relevant government agencies and NGOs, and that the Council then review that Plan and develop a subsequent Strategy which outlines the actions and resources necessary to implement the Plan, including domestic policies, international diplomacy, and financial and in-kind resources. If government agencies outside of Interior are expected to invest resources in any Plan or Strategy, there must be some kind of ownership in it to achieve success, and there must be linkages between these two documents; otherwise, the U.S. government is operating under two parallel conservation processes, which is exactly what the apparent intent of this bill is seeking to avoid.

U.S. investment in the Eastern Himalayas region (India and Nepal) illustrates how a cooperative multi-agency conservation strategy would allow various government programs to support each other effectively to not only conserve flagship species such as the one-horned rhinoceros and tigers, but also encourage community based involvement and sustainable livelihoods. Survival of rhinos and tigers in these countries is critical to their ecological balance and also to the well being of local people. Thanks to support from various U.S. government agencies, important aspects of conservation in the region – ranging from technical support to control of illegal wildlife trade to development of regional strategies to meeting needs of local people – are being addressed. FWS is supporting the Government of Assam, India, in its ambitious vision of creating a population of 3,000 wild rhinos by the year 2020 in seven of Assam's protected areas. USAID through its Global Conservation Program has been supporting activities in the Terai Arc Landscape that are targeted towards mitigating threats to rhino and tiger conservation while also supporting local communities and sustainable livelihoods. Support from the Department of State to improve South Asia's wildlife enforcement capacity and cooperation has also recently been established to secure rhino and tiger populations from the devastating effects of poaching for trade. This funding to establish a Wildlife Enforcement Network in the region will ensure that the criminal networks involved are broken down or seriously disrupted. This tapestry of support has played a critical role in ensuring long term survival of South Asia's rhinos and tigers in particular and contributing to conservation and sustainable development throughout the region. These efforts have been coordinated, and thus successful, due in large part to WWF's comprehensive conservation strategies for the region and these species, which have ensured that each funding opportunity has complemented the other. Were the U.S. government to have consolidated conservation strategies, as well as a coordination mechanism for all agencies investing in biodiversity, much greater conservation results could be achieved, even with the same level of funding.

To further the buy-in of government agencies in the Plan and the Strategy, the bill could go further in stressing the links to the agendas of Council members to draw their attention to the significance of the Council and the need for them to engage. Making references to the links between biodiversity conservation and risks for security, agriculture, human health and development goals related to community livelihoods and sustainability would help reinforce this. It needs to be clear to the Secretaries tagged in this legislation why biodiversity conservation is linked to their mission and why it should be included in their agenda.

Center for International Wildlife Recovery Partnerships

WWF and TRAFFIC have worked over the years to build positive and cooperative relationships with both the U.S. government and other governments across the globe, and have offered our expertise to help

further their conservation efforts. We have seen that these cooperative efforts can result in increased conservation benefits by compiling broad expertise, capacity and resources.

Both of our organizations work to ensure that wildlife populations and habitats are preserved for future generations, and have prioritized our work to save the most critically threatened species and places around the globe. We also note that captive breeding for conservation purposes can provide a vital reservoir of genetic material to help repopulate, where feasible, when wild populations are depleted. However, it is important that this legislation ensures there is an adequate balance of resources within the proposed Center for International Wildlife Recovery Partnerships between conservation efforts to preserve wild species and wild places, and efforts focused on captive breeding and reintroduction. It is our experience that it is most efficient, economical and effective to conserve species in their natural habitats and that *ex situ* conservation should only be considered a last resort if, not when, *in situ* has failed.

We strongly endorse the need for more formalized partnerships between civil society and the U.S. government to implement conservation programs, and would encourage that this legislation expand upon this idea. Many other governments around the world actually sign formal Memoranda of Understanding (MOU) with national and international conservation NGOs on specific subject areas, which have proven to successfully cement relations to produce more profound results. Examples of such formal agreements were the signing of an MOU between TRAFFIC and the Wildlife Enforcement Division of the Canadian Wildlife Service this year. The MOU set forth mechanisms for collaboration particularly in respect to capacity building, policy review and information sharing. Similarly in 2005, WWF Mexico and TRAFFIC signed a highly fruitful MOU with the Mexican government's Attorney General for the Protection of the Environment (PROFEPA), on collaborative efforts for capacity building, information sharing and public outreach. We therefore welcome the proposal for multiyear cooperative agreements between Federal agencies and other stakeholders in wildlife conservation based in the U.S. and internationally.

Global Wildlife Conservation Advisory Committee

In previous testimony, WWF and TRAFFIC suggested the need to develop an advisory committee of experts from government, civil society and industry to help guide the conservation work led by the United States internationally. We therefore strongly endorse the development of the Global Wildlife Conservation Advisory Committee. While our organizations have developed informal, though fruitful, relationships over the years with FWS, a more formalized mechanism that would allow for more holistic input would be a useful line of communication for the government and NGO sectors to learn what the other is doing and how we can better work together. We recommend that the Advisory Committee, which reports to the Institute, not include Institute employees as members. WWF and TRAFFIC would both welcome the opportunity to participate in and contribute to such an Advisory Committee, should one be authorized. WWF and TRAFFIC have a breadth of knowledge and engagement on wildlife conservation issues internationally to help advise the Committee, including leveraging our global networks and programs working in 100 countries.

Outreach/Education/Awareness

WWF and TRAFFIC welcome the focus on outreach and education in the bill, and the fact that the scope of the outreach aims at various sectors, including consumers, vendors, transporters, and other relevant businesses and commercial enterprises, as well as range States. We have highlighted the need for such

an effort in the past, particularly an effort inclusive of industry, and are pleased to see this planned for so prominently in the bill. The U.S. is one of the top two consuming nations for wildlife globally and its buying power is having a dramatic impact on the wildlife and livelihoods of the most biodiverse countries. The role of the U.S. in supporting source countries, informing its own consumer market, and enforcing and regulating that market is a complex one that requires significant resources and internal and external cooperation and coordination, and we are pleased that this bill attempts to address it.

We would encourage the U.S. in its efforts to first consider the numerous conservation outreach programs already in existence, and urge that this wheel not be completely reinvented; many successful campaigns and programs exist which the U.S. could build upon and learn from. For instance, TRAFFIC, which has partnered with the FWS over the years on the *Buyer Beware* campaign, is preparing new outreach materials that will help inform cruise ship tourists about which wildlife souvenirs to avoid. The goal of our *Make a Good Buy* campaign is to reduce the negative impacts of wildlife trade caused by cruise ship tourism in the Caribbean, Mexico, and Central America by allowing the tourist industry, local communities and the cruise line industry to make informed choices. To date, we have produced brochures, wallet cards, luggage tags and tote bags to carry our message of sustainable tourism, and welcome any interest or cooperation from the U.S. in these and other targeted efforts.

Trade in wildlife invariably involves transport of wildlife merchandise as it moves from the supplier to the consumer, often across international borders. A commodity may be transported by a number of different means on its journey from source to consumer – in the air, on land, or by sea; in a crate, in luggage, or even in an express mail pouch. Because of this, the transport industry can play a constructive role in helping to counter illegal trade, and we value any efforts to increase awareness of the illegal wildlife trade and the importance of biodiversity conservation in this key sector. We also call on commercial airlines, shipping companies, courier services and other relevant industries to cooperate with the U.S. in curtailing illegal trade.

Also, when dealing with awareness programs related to the sustainable trade and consumption of wildlife and their products, it is vital that the U.S. work in collaboration with retailers involved in the trade, as suggested in this bill. Partnerships should be encouraged with companies that can have the most significant influence on the availability of wildlife and wildlife products for sale and in influencing the demand of consumers by providing sustainable and legal wildlife products. Just one example of such conservation leadership is the Global Forest & Trade Network (GFTN), WWF's initiative to eliminate illegal and unsustainable logging and transform the marketplace into a force for saving the world's most valuable and threatened forests, while providing benefits to the businesses, communities and wildlife that depend on them. This is particularly important given the passage of the amended Lacey Act, a groundbreaking law prohibiting the import and sale of illegally harvested wood and plant products into the United States. With more than 30 regional offices worldwide, the GFTN provides the tools and expertise needed to assist more than 360 companies from across the forest industry supply chain to obtain wood and paper products from forests that have been responsibly managed. A key component of its effort to protect the world's forests is to provide information and education to the private sector to raise awareness of the negative environmental and social impacts associated with illegal and unsustainable logging, and the need for companies – including partners like Wal-Mart, Procter & Gamble, Johnson & Johnson, and Williams-Sonoma – to use their purchasing power to support a more sustainable global forest products industry. Through the GFTN, WWF is making a real and lasting difference protecting, managing and restoring one of the world's most vital natural resources essential to sustaining all life on Earth.

While WWF and TRAFFIC are grateful that the issue of education and outreach has taken such a prominent role in this bill, we are concerned with the proposed approach to develop *and* implement a program within 180 days after enactment of the bill. It is our experience that if an outreach program is not set up adequately from the start it will muddy the waters with consumers and partners. Incorrect or unclear messaging can be harmful and can result in a backlash and even legal action from industry. There needs to be an initial strategic review of the priorities to target, including which market sectors (e.g. food, medicine, pets, tourist souvenirs, fashion, travelers, trade and industry etc.) and which locales (e.g. ports, markets and places); and approaches need to be developed that are going to resonate with each target audience – one size will not fit all. These research and planning efforts alone will likely require more than the 180 days currently allowed for development *and* implementation in the bill; therefore, we would encourage allowing more time.

Also, the list of partners for these programs needs to include governments in source countries; there is potential for greater impact if these campaigns have key government buy-in. For example, a U.S.-China partnership on wildlife trade awareness would be a groundbreaking approach, particularly if it could also set up an awareness program between U.S. and Chinese industry on wildlife trade and fisheries and timber trade. Bilingual materials and showing the practical benefits of working together to stop illegal and unsustainable trade would be a powerful and innovative approach.

WWF and TRAFFIC are keenly aware of the vast resources required to ensure that an outreach campaign be effective and achieve tangible benefits. Therefore, a sufficient funding authorization should be included in Sec. 122(a) and Sec. 122(b) of the bill, as it is for Sec. 122(c).

Law Enforcement

The U.S. has comprehensive policies and enforcement mechanisms for regulating wildlife trade and for prohibiting international and interstate trade of endangered, threatened, and protected species. Nonetheless, illegal wildlife trade continues to take place on a significant scale. Implementation of existing regulations is still lacking, in large part because many of the agencies responsible are severely under-resourced. Given the proper resources, undercover investigations, inspections, and other programs can be highly successful.

WWF and TRAFFIC have strongly urged more focus on and resources for enforcement in previous testimony and in numerous of our reports. However, H.R. 3086 does not authorize the increased resources necessary to fund enhanced enforcement efforts. We are concerned with the specificity of the directives regarding a revision of the FWS Office of Law Enforcement's (OLE) Strategic Plan, particularly in light of the fact that these elements are not subject to the availability of appropriations. While we agree that some of these elements would be beneficial, we also believe that OLE should determine where their resources would be best utilized to affect positive change in the arena of illegal wildlife trade. We would not like to see the elements outlined in this bill mandated at the expense of other vital programs such as special investigations and inspections.

Therefore, WWF and TRAFFIC would like to see an authorization for funding in Subtitle D of the bill. Additionally, the language in Sec. 141(b) should be changed to read, "The revised Strategic Plan shall *consider* as objectives, *subject to the availability of appropriations*, the following elements," to allow those with the appropriate expertise and experience the flexibility to assign their program priorities.

Another area of concern for WWF and TRAFFIC is the mandate for development of a wildlife cybercrime unit. There is no question that illegal wildlife trade is facilitated through the Internet. However, this medium is a communication tool that is abused for illegal activity but that in itself does not merit a distinct unit to address it. The preponderance of the most serious illegal wildlife trade is not conducted via Internet, but by well-organized crime syndicates. WWF and TRAFFIC would prefer to see any additional resources allocated to the FWS's existing Special Intelligence Unit, which already works to address wildlife cybercrime, so that they can better address this mode of illegal trade as well as others, as demanded by current trends, evidence, and investigations.

The bill's focus on U.S. efforts to build law enforcement capacity abroad is highly significant. Countries impacted by U.S. consumer demand need assistance with implementing and enforcing their own wildlife trade laws. To this end, the U.S., with the support of conservation partners including TRAFFIC, has already been engaged for many years in capacity-building efforts around the globe. The Central America - Dominican Republic (CAFTA-DR) Free Trade Agreement CITES Support Program is a good example of a medium-term capacity building program established by the U.S. to reduce illegal and unsustainable trade. CAFTA-DR member countries encompass a wide variety of ecosystems and a spectacular diversity of wildlife but face chronic threats to biodiversity, which often derive from unsustainable natural resource management practices. As demand for exotic leather, corals, parrots, fisheries products and an array of other wildlife products continues to grow, it is important for government agencies and industry to meet the implementation requirements of CITES and support enforcement. TRAFFIC, funded by the Department of State, has supported this program since 2006, in partnership with the FWS and the DOI's International Technical Assistance Program. WWF and TRAFFIC have therefore seen the benefits of this collaborative and cooperative approach and applaud the intent to further U.S. investment in addressing illegal wildlife trade abroad.

WWF and TRAFFIC would like to highlight the need to address laws and policy, prosecution and adequate sentencing within any U.S. capacity building or funding efforts. Without adequate laws in place, no country can begin to address illegal or unsustainable wildlife trade; without a knowledgeable and sufficiently resourced judiciary, no country can successfully prosecute wildlife crimes; and, lastly, without sentences adequate to deter wildlife crime, no country – including the U.S. – can dissuade would-be poachers and wildlife traffickers. We have seen in Southeast Asia, for example, an increase in the number of seizures of illegal wildlife through successful training programs for enforcers; however, most of those seizures do not result in prosecution, as there is an apparent disconnect between law enforcement and the judiciary in the region. Compounding the problem are, again, insufficient laws, insufficient understanding of those laws, and insufficient sentences. The U.S. Department of Justice (DOJ) and USAID, through support to the Association of Southeast Asian Nations Wildlife Enforcement Network (ASEAN-WEN), have been working in cooperation with TRAFFIC and other partners to address these issues, and WWF would encourage further efforts by the U.S. government to ensure that any capacity building efforts be inclusive of these judicial aspects of the enforcement chain.

Over the years, TRAFFIC has worked closely with OLE, as well as DOJ, in gathering and sharing information to assist in investigations and prosecutions combating illegal wildlife trade both in the U.S. and abroad. We look forward to continuing in this spirit of cooperation and will provide whatever assistance we can to further U.S. conservation efforts.

Wildlife Without Borders

H.R. 3086 would bring three elements of FWS international programs together, merging the existing Species Programs, Regional Programs, and Global Programs into a new, three-tiered program to be known henceforth as the Wildlife Without Borders program. Up until now, *Wildlife Without Borders* has generally referred solely to the Regional Programs of FWS International Affairs. H.R. 3086 would expand the definition of Wildlife Without Borders to encompass all of the international programs of FWS – including the Multinational Species Conservation Funds (MSCF), the Wildlife Without Borders Regional Program, and several cross-cutting global initiatives.

We see the new Wildlife Without Borders Program authorized by H.R. 3086 as an effort to bring the three functions together under a single title, to supplement existing sources of funding for these activities, to codify the Regional Programs as a grant program distinct from the administrative functions of the International Affairs Division, and to set the stage for a broader global program that would provide greater flexibility for FWS to respond to conservation needs that are outside the realm of the Species Programs or the Regional Programs.

One concern we have with this approach is confusion with the legacy of the current *Wildlife Without Borders* and the proposed Wildlife Without Borders program. One simple solution to avoiding such confusion would be to rename the program. In addition to clarifying that this is a new program with a new remit, it could also clarify the intent of the program more globally. The current name may not translate well abroad, thus we would suggest a more straightforward name along the lines of *Global Wildlife Conservation Program*, which clearly speaks to the work and mission of the program. Additionally, it would be useful to outline how the current structure of Wildlife Without Borders would change, and what the new program would look like to accommodate these new responsibilities.

We also see value in this approach as part of a more concerted funding effort by FWS to address the full spectrum of issues affecting international wildlife conservation, provided that the legislation retains and builds upon the already existing programs, which are often highly successful and have strong constituent support, and enhances them by providing FWS with additional flexibility and resources to fill existing gaps and expand the range of species and locations where it can carry out its vital work. It is also important as part of those efforts that FWS coordinate strongly with other agencies, including USAID, which also work on biodiversity conservation in many of the same places around the world and often have greater resources to bring to bear. The legislation provides for such coordination, which we believe is essential to ensuring that available resources be used as efficiently and effectively as possible to achieve the U.S.'s international conservation goals. We also recommend that the grant programs authorized as part of the Wildlife Without Borders program be implemented in partnership with nongovernmental organizations and other stakeholders, including a provision for consultation and cooperation with stakeholders on the establishment of conservation priorities eligible for assistance under the Program.

The Wildlife Without Borders program is the section of the bill that authorizes the on-the-ground conservation work that is so crucial to saving our world's most threatened places and most vulnerable species. The success of the existing FWS international programs makes a good case for their expansion and codification under the proposed bill, and some of the successful partnerships that WWF has participated in with FWS, particularly through the individual Species Programs and the Regional Programs, are highlighted below.

Under the new Wildlife Without Borders program, the Species Program would consist of the five MSCF administered by FWS, which are individually authorized programs providing conservation assistance to specific species or groups of species: African elephants, rhinoceroses and tigers, Asian elephants, great apes, and marine turtles. The Species Program would also incorporate any future species funds approved by Congress, including two that are currently awaiting passage: one to help conserve great cats and rare canids, and another to help conserve several crane species. The MSCF provide funding for grants to support law enforcement, mitigate human-animal conflicts, conserve habitat, prevent poaching, conduct population surveys, and support public education programs.

Ever since the first of these species programs was authorized in 1989 when Congress passed the African Elephant Conservation Act, they have had an incredibly strong track record of using modest resources to achieve real on-the-ground conservation successes. They also have an excellent record of leveraging additional funds from public and private partners: total funding for the MSCF from FY1990 to FY 2008 totaled \$60 million, and was supplemented by \$141 million in matching contributions, a ratio of 2.5 to1. Partners have included other developed countries, private corporations, host country agencies, and non-government organizations like WWF.

Though the Species Program grants can be modest in size, their focused nature and their proven ability to leverage private funding has made them highly effective programs in priority areas. Through the Rhinoceros and Tiger Conservation Fund, WWF has partnered with FWS on a number of projects to protect tiger populations in Asia, including work to update information on populations and habitat in order to determine what areas will be able to support viable tiger populations in the future. Particular effort has been focused on the Indonesian province of Riau on the island of Sumatra, which supports one of the last remaining habitats for the critically endangered Sumatran tiger.

WWF has also partnered with FWS to protect populations of Asian elephants in a number of priority regions through the Asian Elephant Conservation Fund. In Cambodia, WWF has engaged in protected area management and law enforcement patrols, as well as monitoring and research in areas containing important elephant populations. At the same time, WWF has worked to build local capacity for these elephant conservation efforts. In Nepal's Terai Arc region, WWF has used money provided by FWS to restore transboundary biological corridors between Nepal and India, helping to improve elephant habitats, address human and elephant conflicts in the corridor areas, and increase awareness in local communities. Also in Nepal, WWF has used funding from FWS to treat park patrol elephants for tuberculosis, which can appear in domesticated elephants and subsequently put wild populations at risk of transmission.

Given the proven success of MSCF programs in funding the conservation of these and other threatened species in the wild and the significant constituent interest they have generated in Congress and among the general public, we would hope that these independently authorized and funded programs would be clearly grandfathered into the bill as separate programs within the Wildlife Without Borders Species Program.

The existing Regional Programs (the current Wildlife Without Borders programs) augment the individual Species Programs by strengthening local wildlife management capabilities in developing countries and providing flexibility to FWS in regions and habitats not covered under the MSCF. The Regional Programs were initiated in 1995 and have focused on capacity-building and training of wildlife professionals in developing countries. These regional efforts have largely benefited Mexico, Latin America and the Caribbean, with smaller programs in Russia, China and India and a relatively new program for Africa. The

Regional Programs have a successful record of leveraging additional funds from external partners, having awarded a total of \$20 million with more than \$58 million leveraged in partner contributions.

WWF has partnered with FWS through their Regional Programs on a number of initiatives, including a regional *Train-the-Trainer* workshop on protected area management in the tropical Andes and Amazon region, and the MENTOR Program, which supports capacity building, training and career development of emerging African conservation leaders in order to build a network of leading wildlife professionals in East Africa.

The Regional Program has built on the Species Program's decades of proven success and filled a crucial gap by providing flexible international conservation funding not targeted at any one species or habitat. Its focus on local capacity building and education provides a critical component for bringing about a culture of conservation in those developing countries where FWS-funded projects are underway. It is only by creating homegrown capacity and instilling an appreciation of biodiversity and its value to local communities, that any local conservation efforts can be successful over the long-term. WWF strongly supports the intention of H.R. 3086 to codify these FWS Regional Programs into law and ensure dedicated resources to achieve these purposes.

However, we are concerned with the third component included in the new Wildlife Without Borders program – the Global Program – which would incorporate FWS activities that currently include support for U.S. involvement in CITES, the RAMSAR Convention on Wetlands of International Importance, the Western Hemisphere Migratory Species Initiative, and other international treaties and conventions. Participation in these accords provides important opportunities for the U.S. to lead in shaping international conservation policy. The Global Program would also provide a vehicle for addressing cross-cutting issues not covered by the Species and Regional programs. Given the potentially broad scope of this last authority, including the implementation of global habitat and conservation initiatives, we stress the need for coordination with other federal agencies and existing programs that are working on similar cross-cutting issues on a global scale. Additionally, we express deep concern with rolling implementation of international treaties under this Program, as these involve high level international policy issues with an often separate set of players. There are important diplomatic issues involved in participation in and strategy for U.S. engagement with international treaties, which require close coordination with the Department of State. This policy work merits a distinct body in FWS to oversee it, which should not be buried under another layer of bureaucracy.

International Wildlife Conservation Fund

H.R. 3086 would create a new International Wildlife Conservation Fund to be administered by the National Fish and Wildlife Foundation. We support the non-Federal match requirements for the Fund and the provision for waivers. However, we have concerns that a nonprofit organization is authorized to administer the Fund and believe this function would be more appropriately conducted by FWS through the Institute for International Wildlife Conservation, in line with the funds currently authorized under the Wildlife Without Borders program. WWF and TRAFFIC would suggest that following this established model would more readily allow for a coordinated funding approach between all of these funds. Parallel management of the various funds by two different organizations would do nothing to facilitate the communication needed to avoid duplication of effort and ensure complimentary funding approaches. We also believe this provision would be strengthened by inclusion of a specific funding authorization for carrying out the purposes of the Act, of which penalties and fines would be one component, donations

another, and appropriations a third. Given the incredible and laudable breadth of the conservation activities the Fund would cover, we would recommend it be authorized at a minimum of \$20 million.

Political Will

While H.R. 3086 would do much to further U.S. government efforts to conserve international wildlife, it has become clear to WWF and TRAFFIC over the years that much more is necessary than having adequate laws on the books and having systems in place to implement them. Garnering political will and elevating the issue of biodiversity conservation and illegal wildlife trade as priorities at multilateral meetings and in diplomatic exchanges is also essential to bring about significant change globally. Up to this point, these issues have tended only to capture the attention of those in government tasked with addressing them, whereas to be addressed at the scale needed to be successful, conservation has to be a priority at the highest political levels. The conservation efforts of governments and NGOs around the globe need the backing of legislative bodies and Presidents and Prime Ministers, and the resources and opportunities they can provide, in order to be truly meaningful. Global biodiversity and threats it faces must be raised to a higher level of awareness and prioritization. WWF and TRAFFIC would like express our sincere appreciation to the Subcommittee for the attention it has given to these issues in the 110th and 111th Congresses. We also urge Congress and the administration to utilize every available opportunity to address conservation challenges on the global stage.

With this in mind, we would like to draw your attention to one upcoming opportunity for the U.S. to assert such high level leadership: the Global Tiger Summit that is being planned for the next Year of the Tiger, in 2010. Despite years of conservation efforts on behalf of governments and NGOs, the number of wild tigers continues to decline. Successful conservation of wild tigers requires not only keeping these revered animals safe from threats such as poaching, but also protecting the habitats on which they depend, including critical watersheds and forests. Efforts to insure the health and integrity of these essential tiger habitats also help to protect the multitude of species and the local communities that are equally dependent upon them. Wild tigers are in dire straits, and it will take a truly global effort to save this iconic species for future generations. WWF and TRAFFIC call on the U.S. to be at the forefront of this effort and to make meaningful commitments to ensuring its success.

Conclusion

Finally, TRAFFIC and WWF offer their support and assistance to the U.S. in its efforts to combat illegal trade and conserve biodiversity. WWF has worked with local communities, industry and governments since 1961 and has pioneered education and awareness raising work throughout these sectors. WWF has also built significant partnerships with business and industry in the U.S., and these relationships can provide model approaches for future engagements with businesses engaged in the legal sale of wildlife and wildlife products. TRAFFIC has over 30 years of in-depth insight into wildlife trade, as well as experience in monitoring emerging trends, conducting investigations and trainings, facilitating multiregional enforcement networks, and analyzing data and legislation in every region around the world. Specifically, TRAFFIC holds a wealth of information on illegal and unsustainable wildlife trade and criminal networks in many regions, which we are happy to share with Congress and relevant agencies in order to highlight the problems on the ground and to begin to develop effective and collaborative solutions.