

Written testimony to the U.S. House of Representatives, Committee on Natural Resources,  
regarding  
Poaching American Security: Impacts of Illegal Wildlife Trade  
submitted by  
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in Endangered Species of Wild Fauna and Flora (CITES)  
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Mr Chairman and Members of the Committee, thank you for inviting the CITES Secretariat to submit testimony on what we believe to be an important subject.

The Convention on International Trade in Endangered Species of Wild Fauna and Flora is a multi-lateral environmental agreement that entered into force in 1975. There are currently 172 Parties to the Convention. It is widely known throughout the world by its acronym of CITES. However, it is also often referred to (very appropriately with regard to your Committee Hearing) as the Washington Convention, since that it where it was concluded and first signed in 1973. The United States of America ratified CITES on 14 January 1974.

CITES is a treaty that regulates international commercial and non-commercial trade in animals and plants, including their parts and derivatives. The Convention provides differing degrees of protection and regulation to animal and plant species, depending on their conservation status. CITES works by subjecting international trade in specimens of selected species to certain controls. All import, export, re-export and introduction from the sea of species covered by the Convention has to be authorized through a licensing system. About 30,000 species are listed in the three Appendices of the Convention. The aim of CITES is to ensure that international trade in specimens of wild animals and plants does not threaten their survival.

We can provide more detailed information regarding the Convention and its operation if required but, with regard to this submission, we will hereafter confine ourselves to illicit trade issues, particularly serious illegal activities. We presume that the Committee will have a general understanding of what constitutes 'illegal wildlife trade' and, therefore, we do not intend to provide examples of what wildlife is traded illegally or the nature of the markets.

Illegal trade in wildlife has many aspects that may be relatively obvious, such as the criminality involved, but we are conscious that there are others that may not be so apparent. For example, when considering this subject and especially its 'impacts', it is important to take account of the potential risks that illegal trade includes, such as the spread of diseases (some of which are extremely hazardous to humans) and the impact of 'invasive alien species'.

#### The scale of illegal wildlife trade

The CITES Secretariat's greatest difficulty in assessing the scale of illegal trade in wildlife is that the reporting of seizures of smuggled specimens of CITES-listed species or of the related illegal harvesting or dealing in such specimens tends to be very haphazard. Whilst we created a computerized database in the late 1990s to store such information, relatively few of the Parties to the Convention submitted data on a regular basis. The lack of resources in the Secretariat prevented us from taking action to increase the collection, input or analysis of information, and input of data was suspended in 2007.

ICPO-Interpol and the World Customs Organization each have similar databases but seem to experience similarly inconsistent levels of reporting. The European Union also has its own database regarding illegal trade in wildlife.

It is, therefore, extremely difficult to gauge the levels of wildlife crime around the world and the nature of such criminal activities. Even in many developed countries, there is no central collection of information on the subject; primarily because wildlife crime is regarded as a low priority for law enforcement agencies. We have noted that the increase in efforts to detect and combat terrorist activity around the world in recent years has pushed the subject even further onto the sidelines.

At its 14th meeting (The Hague, 2007), the Conference of the Parties to CITES noted that this lack of detailed information was a problem and instructed that a body of relevant individuals (known as the CITES Enforcement Expert Group) be convened to study this and other enforcement-related issues. The Group is likely to meet in 2009.

It should also be noted that, in many parts of the world, the enforcement of wildlife legislation is the task of officials whose focus is on in-field protection (such as anti-poaching work) and these will be game scouts and wardens, forest guards, rangers, fishery protection officers and others who often do not have the training, authority or resources of their Customs and Police counterparts. This affects their ability to gather, store and communicate information. This situation has other law enforcement-related implications that we will return to later.

#### The role of organized crime in illegal wildlife trade

As noted above, the Secretariat does not have as much accurate information as it would wish regarding the scale of illegal trade, the nature of such trade or the persons involved. However, through the reports that we do receive, the regular contacts we have with law enforcement officials and agencies, and the assessment and verification missions we have undertaken, the Secretariat has no doubt whatsoever that organized crime, certainly within the definition used in the United Nations Convention against Transnational Organized Crime, is engaged in or linked to illegal trafficking in protected wildlife species.

We have, for example, noted the following features in wildlife crime and illicit wildlife trade cases, many of which bear the classic hallmarks of organized crime or organized criminal groups. These are not listed in any particular order of importance or occurrence.

1. The organized nature to the illegal harvesting of some endangered species is revealed by the recruitment and payment of poachers and the provision to such persons of firearms, ammunition, vehicles and other supplies necessary for them to remain in the species' habitat for prolonged periods and for the specialized processing and extraction of species (or their parts) once they have been killed.

One practical example of this is on the Tibetan Plateau of China where groups sometimes numbering up to 15-20 poachers have been arrested, who were equipped with firearms, several 4x4 vehicles, food stocks sufficient for one month, and where members of the poaching gangs had specific roles, i.e. marksmen, cooks, drivers and skinners. The arrested persons have admitted to being recruited for this work by individuals who would then arrange the further processing of the Tibetan antelope skins obtained and their subsequent smuggling out of China. The fact that shawls made from the wool of Tibetan antelope (called shahtoosh) can each retail for the equivalent of up to USD 30,000 illustrates what motivates such activities.

2. Similar approaches to the poaching (including the capture of live animals) of elephants, great apes, musk deer, the saiga antelope, sturgeon, the tiger and many other species of conservation concern, although each with its own specialized characteristics, have been noted for decades.
3. As part of the activities described in paragraphs 1 and 2 above, members of local communities (often living in conditions of near abject poverty) are regularly exploited by

organized crime groups and are, thus, exposed to personal risk of injury or death from the hazardous terrain in which a lot of poaching takes place, similar risks from some of the target species (which can be extremely dangerous creatures) and finally are put at personal risk from arrest, imprisonment, injury or death during encounters with law enforcement personnel.

4. The quick attendance to persons, who have no visible means of financial support, arrested for poaching and the subsequent representation of such persons in courts by high-quality criminal trial lawyers, whose fees would normally be far beyond the reach of such low-level criminals, demonstrates an input from wealthy persons behind-the-scenes in a classic manner of organized crime groups 'looking after their own'. This is regularly seen with regard to persons arrested in India and prosecuted in relation to the killing of tigers and leopards and the smuggling of their skins and bones. A tiger skin currently retails for at least USD 10,000 in parts of China.
5. There have been several instances where the court process involving poachers or traders appears to have been corruptly subverted, leading to bail being granted where it would not normally be expected, long-term delays whereby cases never reach conclusion, and even complete dismissal of charges by apparently corrupt prosecutors or judges. In a similar vein, the involvement of persons of high political or social status to corruptly influence law enforcement has been noted, often discouraging any enforcement action whatsoever or subsequently interfering in the judicial process. Diplomats have also been known to engage in the smuggling of wildlife, claiming immunity from normal border controls and baggage searches.
6. The threatening of, harassment of, acts of violence towards and murder of officials tasked with the protection of species and anti-poaching work has been observed. One example of this was in the late 1990s in the Russian Federation, where the office and accommodation complex of a Federal Border Guard unit was bombed and it is understood that almost 50 officers, their wives and children were killed or injured. This attack is believed to have been the work of the 'Russian Mafia' in retaliation for an increase in enforcement operations against sturgeon poachers. Every year, many anti-poaching officers are killed in the execution of their duties. Anti-poaching patrols around the world are regularly faced with gangs equipped with semi- and automatic firearms and some patrols in Africa have encountered criminal groups armed with rocket-propelled grenade weapons.
7. Poaching is seen to increase in countries experiencing civil unrest or wars and the profits from poaching or subsequent trade (such as in ivory) is apparently used to fund rebel activities. Whether such persons and groups are truly acting in a politically-motivated manner or whether they are more representative of organized criminal groups is, however, often unclear.  
Disturbingly, it is not uncommon for such poaching and illicit trade to be conducted or facilitated by 'peacekeeping' and other military or para-military forces that are supposedly in the country or geographical area to restore or maintain law and order. In such instances, military command units and structures may actually become extremely large and highly organized criminal groups. Local police commanders have also been known to control poaching and smuggling activities. It is in this type of scenario that over 200 rangers have lost their lives in the Democratic Republic of the Congo in recent years.
8. It has been noted, particularly in parts of Asia and Africa, that rebel groups sometimes impose a 'tax' on illicit cross-border wildlife trade. Whether such taxes flow to political causes, fund terrorism, or whether this is simply criminal profiteering is unclear.
9. The processing and subsequent marketing of illegally-harvested wildlife specimens will often be complex and require a financial base or entail 'start-up' costs beyond the means of 'ordinary' local citizens. This can be seen, for example, in the case of sturgeons where: the caviar must be extracted and processed carefully if it is to later pass as a genuine high-

quality product; tins and jars identical to those used by genuine traders must be counterfeited; the attachment of labels matching those used by genuine traders must be accomplished; the caviar must be refrigerated during storage periods; and the caviar must be smuggled across several international borders before its final sale and distribution in consumer countries.

However, the profits justify such expenditure. An investigation in 2001 showed that caviar with a wholesale value of USD 20 million had been laundered through one Middle East country in a ten-month period.

10. The inviolability displayed by some sections of the caviar trade, with regard to law enforcement and attention from other criminals, demonstrates either their ownership by organized crime groups or their payment to organized crime for 'protection'. The brazen and threatening nature of some activities will also discourage 'clients' from reporting suspicions or observations to law enforcement agencies. For example, in one incident in the Middle East a prospective customer was taken to a warehouse to inspect the 'goods' and was astonished to see seven tons of caviar, which was being guarded by a large group of Russian males, all armed with automatic weapons.
11. The international smuggling of wildlife specimens, often involving the crossing of several borders and journeys of many thousands of miles, necessitates the concealment of specimens against what may be repeated inspections by border control officials and which involves sophisticated techniques to hide the true nature of the specimens or prevent their detection during inspections.

This has included hiding illicit goods deep inside or underneath genuine cargo, the wrapping of goods in aluminium foil in the expectation that it will hinder viewing by X-ray machines, the painting of goods to hide their natural appearance, the construction of 'false bottoms' and other hidden compartments in baggage, cargo containers, trains, boats and motor vehicles, and the covering of, for example, ivory carvings in an outer casing of clay or wood. The variety and sophistication of smuggling techniques demonstrate a requirement to engage the assistance of specialists and a need for finance to enable this to occur. Narcotics and firearms have also been smuggled alongside wildlife.

12. The duration of some smuggling operations illustrates the need for 'management' of specimens and the route, from country origin to destination (and sometimes in transit) that requires the involvement of many persons. This may involve human couriers or 'mules', recruited and paid to smuggle wildlife specimens, often by air transport, concealed on their body or in luggage. This has included the use of airline personnel, who may be less likely to be inspected by border control staff. Some couriers may be from the poorest levels of society and are exploited in a manner similar to that of poachers. One courier gang involved in smuggling caviar from an eastern European country was 'managed' by a corrupt Deputy Chief of Police.
13. The complex routing of initially *bona fide* shipments that will, at some point during international movements, be replaced by illegally-acquired specimens, and then continue to the destination, accompanied by genuine CITES permits or certificates and are, thus, laundered into domestic markets.
14. The sophisticated forgery and alteration of genuine permits and certificates authorizing trade in wildlife and of the security stamps used on CITES documents by some countries. Additionally, the use of forged and altered documents and other fraud related to applications for CITES permits and certificates. The threatening, bribery and harassment of officials responsible for the issuance of CITES permits and certificates, including the use of prostitutes to provide sexual favours in return for the issuance of trade authorization documents, is not unknown.

15. The payment to organized crime groups for the use of their already-established smuggling routes or methods. For example, persons engaged in illicit trade in tiger and bear products between the Russian Federation and China are known to have paid the 'Russian Mafia' to have items smuggled across the border.
16. The establishment and use of fake or 'front' companies to distribute and market wildlife products. Also, the fraudulent advertising of wildlife for sale, involving widespread use of the Internet and 'spam' email advertising, where no wildlife is possessed and it is simply intended to encourage customers to pay in advance but where there is no intention to deliver. Various forms of wildlife crime lend themselves to money-laundering activities and, thus, will attract the involvement of organized criminal groups.
17. The involvement of persons clearly associated with organized crime. A surveillance operation at an Italian Mafia party noted that inordinate amounts of caviar were being served. Leaders of South American drug cartels have been known to collect exotic species. For instance, the now deceased Colombian drug baron, Pablo Escobar, is known to have had a collection of zoo-like proportions, including several animal species from Africa and Asia that must have been smuggled into Colombia.
18. Instances of 'revenge' violence. For example, the murder of a trader in North America is thought to have been motivated by the fact that he allegedly supplied pig gall bladders to a group in Asia, claiming them to be bear gall bladders. Several senior law enforcement officers, responsible for directing operations against wildlife criminals, have been murdered in execution-style killings.
19. Law enforcement organizations have noted that persons involved in serious wildlife crime and illicit trade often have previous convictions for other forms of crime, many times involving violence.
20. The relatively low risk of detection and low level of penalties imposed upon those convicted of wildlife crime or illicit trade make these activities attractive to the 'professional' and 'organized' criminal. The massive profits that can be gained from some forms of wildlife, often worth more than the same quantity of gold, diamonds or narcotics, are, in themselves, appealing to organized crime groups and networks since this, after all, is what motivates their activities.

Several of the examples above are of a nature where those involved require criminal experience to conduct their activities and could not be carried out simply by specialized wildlife traders or collectors.

It should be recognized that some of the activities above would be regarded by the Convention against Transnational Organized Crime as 'serious crime' because the Parties to CITES in which they occurred have legislation that provides for 'a maximum deprivation of liberty of at least four years or a more serious penalty'. Courts in China, for example, have the power to sentence some wildlife criminals to death and have done so on several occasions. However, many Parties do not have such a length of incarceration available as a sentencing option. Indeed, in some countries violations of CITES are not criminal offences and will simply be dealt with by way of administrative penalty and confiscation of specimens.

Some Parties to CITES, the United Kingdom of Great Britain and Northern Ireland and the United States of America for example, have established sentencing guidelines for wildlife crime and we believe this is a good example to follow. We understand the European Community is also examining the concept of harmonizing penalties throughout its Member States.

With regard to trends in wildlife crime, once again, the lack of sufficient data makes it almost impossible to measure these. What is often very apparent, however, is the fact that certain types of wildlife trade move in and out of fashion. It is also noted that increased enforcement effort against illicit trade in one species can lead to traders exploiting another. It may be that because law enforcement agencies are gradually more conscious of wildlife crime, they are simply detecting what has always been there. However, there does appear to be an increasing level of sophistication in criminal activities in this field. This appears, in part, to be due to the increasing efforts by some law enforcement agencies to combat such crimes, using modern policing techniques (including regular use of forensic science). This, in turn, appears to have sometimes prompted very serious levels of violence to be directed towards wildlife law enforcement officials.

#### The rule of law

The majority of the wildlife that is affected by illegal trade is found in developing countries or countries with economies in transition. Many of such countries face major problems relating to governance and criminals exploit this, as illustrated in some of the examples above. However, whether they exploit an already-existing situation or whether they create it is difficult to assess.

It is certainly true that, on occasions, wildlife criminals will undermine what was previously a law-abiding and corruption-free situation. This was the case when a particular country in the Middle East became, for a period, the primary location for the laundering of illegal-origin caviar. There, civil servants were allegedly corrupted using bribes involving cash, gifts and prostitutes in order to persuade them to issue genuine CITES permits, so that the caviar could enter into international markets. Some of these government officials were also threatened with violence or were told that their families would be subjected to violence if they did not cooperate.

Probably more common is when poorly-paid officials are bribed with money or goods to 'turn a blind eye' or otherwise facilitate an illegal activity. Any criminal activity, including wildlife crime, will, of course, be easier to conduct where there is a climate of corruption. It is the Secretariat's experience that wherever we see large-scale illegal trade in wildlife we also see widespread, almost institutional-level, corruption.

That said, it is also the experience of the CITES Secretariat that, especially in relation to anti-poaching duties, very considerable dedication and bravery are displayed by those whose task it is to guard endangered species and their habitats. Indeed, many of the officers engaged in such duties have to patrol hazardous terrain, in which water- or insect-borne diseases are often present, and have to face poachers that are considerably better armed than them. These same men and women are also often poorly-paid, inadequately trained and equipped, and have seen many of their colleagues seriously wounded or killed in the line of duty. Their commitment is, therefore, highly commendable. We are, frankly, surprised that people continue to apply for such work.

#### Activities to counter illegal trade in wildlife

As has been noted above, it may be very difficult to differentiate between what is a violation of the Convention conducted by: the wildlife trader who simply does not want to conform to its provisions and will, on occasions, seek extra profit or a quicker sale by evading CITES controls; the determined collector of wild exotic plants; the person who wishes a particular species of reptile as a pet; the vacationer who will innocently buy a wildlife souvenir and then import it illicitly to his or her home country; and the 'true criminal' who is motivated purely by profit or the organized criminal group whose activities are driven by greed and who have little interest in the commodity involved.

Very few countries in the world have specialized units devoted to combating wildlife crime. In most countries, this task is delegated to officials who have relatively little training in, or experience of, the 'policing' skills that are so vital to target effectively and bring to justice the organized

criminals who exploit natural resources. It is not uncommon, when those officers seek assistance from Federal, State or local Police agencies, or from Customs authorities, for it to be declined because senior officers simply do not understand the nature of the problem or the seriousness of wildlife crime.

Where specialized and multi-agency wildlife law enforcement units do exist, their success rate is high. We also note the considerable benefits that are gained through sub-regional and regional enforcement networks and groups. For example, the Association of South East Asian Nations Wildlife Enforcement Network (ASEAN-WEN), the European Union Wildlife Trade Enforcement Group, the Lusaka Agreement Task Force and the North American Wildlife Enforcement Group (NAWEG) have each, in their own way, contributed substantially to combating illegal trade in wildlife. The United States of America, through its US-AID programme, has provided significant support to ASEAN-WEN. Of particular success, in relation to the specific projects it has engaged in but especially with regard to facilitating communication, coordination and collaboration between agencies and individual officers, has been the Interpol Wildlife Crime Working Group. We understand the Committee will learn more about this group from other sources.

The CITES Secretariat is obliged, through lack of resources, to focus its enforcement-related work primarily on illegal trade involving those species most at risk and violations of the Convention of a commercial nature. Both these areas may involve organized crime.

Much of the Secretariat's work related to enforcement of the Convention involves increasing the awareness of the Parties and their relevant law enforcement agencies to the serious nature of some illegal trade and, during such activities, the involvement of organized criminal groups is emphasized. Training materials for enforcement officers have been developed and these are delivered both by Secretariat staff, partner organizations and relevant non-governmental organizations. These materials are available in the three working languages of CITES – English, French and Spanish.

The Secretariat also acts as a conduit through which information and intelligence relating to wildlife crime and illegal trade can be received and communicated. Technical advice and support are also provided on a regular basis, involving not only specialized knowledge of the Convention but also expertise in law enforcement itself. The Secretary-General of CITES has a policy of recruiting to the Secretariat staff persons with professional backgrounds in enforcement-related activities. Currently, there are two lawyers (one of whom was previously a prosecutor) and a former police officer in the Secretariat. The Secretariat also issues confidential Alerts, describing current illicit trade and providing targeting intelligence, to the Parties and to law enforcement agencies.

The Secretariat has a long and very close working relationship with ICPO-Interpol and the World Customs Organization, and it has signed memoranda of understanding with both agencies. The three organizations work together strategically and on operational issues. The Secretariat has also established memoranda of understanding with a specialized forensic science laboratory (the U.S. Fish and Wildlife Service's National Fish and Wildlife Forensics Laboratory) and with regional and national enforcement agencies.

The Secretariat sees such links with international, regional and national law enforcement organizations as essential in obtaining what we regard to be the priority in combating wildlife crime and illicit trade; namely, increased cross-border communication, collaboration and cooperation. Law enforcement resources are commonly so limited and so already heavily-burdened that it is vital that modern profiling, risk-assessment and targeting techniques be used to the utmost. We believe that intelligence-led enforcement is the key to countering wildlife crime.

The Secretariat has conducted missions to assess enforcement needs in many Parties, examining both general wildlife trade issues but also those related to specific species. These have included illicit trade in caviar, great apes, ivory, the Tibetan antelope and the tiger. Where

appropriate, restricted-circulation reports are subsequently provided to the Parties (and usually copied to ICPO-Interpol and the World Customs Organization) that contain recommendations regarding the improvement of wildlife law enforcement. Such reports have often referred to organized crime. The Secretariat subsequently monitors the implementation of the recommendations and tries to provide ancillary support through additional technical advice, training and general capacity-building.

Since 1992, the Secretariat has conducted a National Legislation Project that analyses the national laws of Parties to CITES, according to a set of agreed criteria, and determines whether they are adequate for implementation of the Convention. Where they are not, follow-up work that includes the provision of technical advice is undertaken. The Conference of the Parties and its Standing Committee monitor the progress of Parties in enacting adequate legislation. Where necessary, recommendations for a suspension of trade in CITES-listed species will be made and this process has been very successful. Similar recommendations for a suspension of wildlife trade in specific Parties may also be made where the Secretariat identifies significant levels of illicit trade in a Party and where that Party is not responding adequately.

As mentioned previously, the Secretariat, whilst having a high regard for the work done by wildlife law enforcement officials (particularly in developing countries and countries with economies in transition – where the majority of wildlife is harvested) is concerned by the sometimes serious lack of resources and professionalism available to combat wildlife crime and illicit trade, particularly if those involve organized criminal groups. An example of one response we attempted follows.

In 2002, the Secretariat prepared the programme for a two-week training event for wildlife law enforcement personnel. We then collated a range of training materials for delivery at the course but also for use by students in subsequent in-country training. The Sardar Vallabhbhai Patel National Police Academy, Hyderabad, India, agreed to host the course and all tiger range States were invited to nominate students. External funds, amounting to almost USD 100,000, were raised from a number of governments and other donors to enable the training to take place.

The training was delivered at the Academy from 13 to 24 May 2002. Twenty-eight students attended from the following countries; Bangladesh, Cambodia, China, India, Indonesia, the Lao People's Democratic Republic, Malaysia, Myanmar, Nepal, the Russian Federation, Thailand and Viet Nam. Responsibility for the training was divided between staff of the Academy faculty and specialized instructors from the CITES Secretariat, Africa, Europe and North America. The subjects covered included: arrest techniques, border controls, CITES, covert operations, evidence gathering, fraud, forensic science, informants, interview techniques, intelligence, organized crime, personal safety, search and train-the-trainer. The training received high evaluation ratings from the students and the Academy. Together with written training materials, each student also received an electronic version of the presentations to enable him or her to conduct further training.

The course was one of the most intensive ever organized by the Secretariat and, whilst it is regarded as having been highly successful, it placed a heavy burden upon its resources and it would be difficult for us to conduct such training on a regular basis.

Instead, the Secretariat now tends to focus its activities on e-learning materials. We have a variety of capacity-building modules available and the majority is now supplied in a CD-ROM format. These include an inter-active training course for Customs officers and an informative course for enforcers, prosecutors and the judiciary. One of the CD-ROMs incorporates a session relating to ethics in wildlife law enforcement, especially prepared with a view to assisting in anti-corruption work.

## Recommendations



The CITES Secretariat is aware that enforcement alone will never address the problems associated with illegal trade. To do so requires consideration of a wide range of socio-economic issues, especially those relating to enabling local communities to value the natural resources around them and benefit from them, e.g. through eco-tourism or sustainable trade in wildlife.

We presume, however, that these are not matters that the Committee will consider on this occasion and we will, thus, restrict our comments accordingly. The Secretariat is also conscious that many of the recommendations that we might be inclined to make are more properly matters for the international community as a whole to address and, consequently, we will restrict our comments here too.

1. The CITES Secretariat is very conscious that the U.S. Fish and Wildlife Service (on occasions in conjunction with other federal, State and local agencies) has undertaken, and continues to undertake, enforcement activities that impact upon the criminals who engage in illegal international trade in wildlife. We value the manner in which the Service looks beyond the borders of the United States. In such work, it has been very ably assisted by its National Fish and Wildlife Forensics Laboratory. The Service as a whole has been willing to share its intelligence and expertise with other enforcement bodies around the world, both at an operational level but also through the provision of technical support and training. We trust that the Service will continue such activities and, as much as possible, extend them with regard to the international community.
2. The Secretariat makes the very same remarks as in paragraph 1 above in relation to the U.S. Department of Justice. The importance of effective prosecution can sometimes be overlooked. Here too, the United States provides a first-class example to other nations. In 2004, the CITES Secretary-General's Certificate of Commendation was awarded to the Service and the Department for their work in relation to combating and prosecuting illegal trade in caviar. The Secretariat hopes that the Department will continue to provide support to the international community and, where possible, extend its activities in this field.
3. The Secretariat believes that attracting greater political will and achieving a higher law enforcement priority in relation to combating illegal trade in wildlife will not be possible until wildlife crime is viewed as 'mainstream' crime. For this to happen, we believe that wildlife crime must appear more regularly on the agendas of relevant meetings of senior law enforcement officials, such as the Interpol General Assembly, and political level meetings, such as the Conference of the Parties to the UN Convention against Transnational Organized Crime. We believe that the United States of America is well placed to influence such agendas, both at home and abroad, and we hope that the Committee may seek to suggest to the Government of the United States that it do so.
4. The Secretariat is of the opinion that our work, and that of the Parties to CITES, in the field of combating serious illegal trade in wildlife has been relatively successful. However, the Secretariat's resources are very limited and, in recent years, our attempts to seek additional funding for such work have not been successful. We seek the support of the United States, as the major contributor to the Trust Fund of CITES, to provide additional finance to the budget of the Convention and to encourage other Parties to do likewise.

### Concluding remarks

The CITES Secretariat welcomes the initiative by the U.S. House of Representatives, Committee on Natural Resources, to examine illegal trade in wildlife. We believe it is a subject that deserves to be considered more widely in similar fora.

Many of the violations of the Convention on International Trade in Endangered Species of Wild Fauna and Flora are of a minor or technical nature. It is also important to acknowledge that the majority of wildlife trade conducted around the world each year complies with the provisions of the Convention, i.e. it is both legal and sustainable in nature. The United States is probably the most significant 'consumer country' with regard to trade in specimens of CITES-listed species and we are aware that research by the Fish and Wildlife Service has confirmed most imports to be of a lawful nature. Citizens of the United States also play a significant role within many wildlife range States, especially through trophy hunting, and this provides important revenue to many local communities. It is important, therefore, that trade in wildlife should not attract a negative image.

However, we trust that our submission has made plain that there are certainly serious levels of crime associated with the trade in wildlife and that these are deserving of special and targeted attention. Such attention is, in the main, still missing, despite CITES having been in existence for over 30 years and the serious nature of wildlife crime having been widely known for a similar period. For some reason, crimes involving natural resources continue to fall outside 'mainstream crime' and it continues to be extremely difficult to obtain the interest or consideration of the wider law enforcement community in this subject.

There are many issues that impact upon species of conservation concern, particularly loss of habitat. But poaching and illegal trade are undoubtedly issues that have had, and continue to have, major impacts upon many of the world's most endangered species. Some of these species are literally on the brink of extinction and, for them, time is running out.

The CITES Secretariat repeats its sincere appreciation for the invitation to contribute to the work of the Committee. If we can provide additional information to assist the Committee as it determines how to proceed with this subject, we shall be only too happy to help.