



October 2017

COMBATING WILDLIFE TRAFFICKING

Agencies Are Taking
Action to Reduce
Demand but Could
Improve Collaboration
in Southeast Asia

GAO Highlights

Highlights of [GAO-18-7](#), a report to congressional requesters

Why GAO Did This Study

Wildlife trafficking—illegal trade in wildlife—is estimated to be worth \$7 billion to \$23 billion annually and, according to State, continues to push some protected and endangered animal species to the brink of extinction. In 2013, President Obama issued an executive order that established an interagency Task Force charged with developing a strategy to guide U.S. efforts to combat wildlife trafficking.

GAO was asked to review U.S. agencies' CWT efforts. GAO's September 2016 report on wildlife trafficking focused on supply side activities ([GAO-16-717](#)). This report focuses on demand side activities and examines, among other things, (1) what is known about the demand for illegal wildlife and wildlife products in the United States and in Asia and (2) actions agencies are taking to reduce demand for illegal wildlife products in the United States and in Asia. GAO reviewed information from U.S. agencies and international and nongovernmental organizations and interviewed U.S. officials in Washington, D.C., and Miami, Florida, and U.S. and foreign government officials in China, Thailand, and Vietnam.

What GAO Recommends

GAO recommends that Interior, State, and USAID work to clarify roles and responsibilities for staff collaborating on combating wildlife trafficking efforts in Southeast Asia. Agencies agreed with GAO's recommendations.

View [GAO-18-7](#). For more information, contact Kimberly Gianopoulos at (202) 512-8612 or gianopoulosk@gao.gov.

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Agencies Are Taking Action to Reduce Demand but Could Improve Collaboration in Southeast Asia

What GAO Found

In the United States, China, and countries in Southeast Asia, there is diverse demand for illegally traded wildlife, according to data, reports, and various officials. The Department of the Interior's (Interior) U.S. Fish and Wildlife Service (FWS) has seized a variety of wildlife at U.S. ports, such as coral for aquariums, conch meat for food, seahorses for medicinal purposes, and crocodile skin for fashion items. In China and Southeast Asian countries, reports and officials have identified seizures and consumption of illegally traded wildlife products such as rhino horn, elephant ivory, pangolins (shown below), turtles, and sharks, among others, used for purposes such as food, decoration, pets, or traditional medicine.

Live Mother and Baby Pangolins at a Rescue Center in Vietnam (left) and Seized Pangolin Scales and Products at an Education and Awareness Display in Hong Kong (right)



Source: GAO. | GAO-18-7

U.S. agencies are taking actions designed to reduce demand for illegal wildlife, including building law enforcement capacity and raising awareness, but disagreement on roles and responsibilities has hindered some combating wildlife trafficking (CWT) activities in Southeast Asia. FWS inspects shipments in the United States and facilitates law enforcement capacity building with partner nations overseas. The Department of State (State) conducts diplomatic efforts, some of which contributed to a joint announcement by China and the United States to implement restrictions on both countries' domestic ivory trade. The U.S. Agency for International Development (USAID) works with local organizations abroad to support programs intended to reduce wildlife demand, strengthen regional cooperation, and increase law enforcement capacity. Several other agencies also contribute expertise or resources to support various demand reduction activities. Certain practices can enhance and sustain collaborative efforts, such as establishing joint strategies, defining a common outcome, and agreeing on roles and responsibilities. GAO found that agencies applied the first two practices but could improve with regard to agreement on roles and responsibilities in Southeast Asia. For example, although the *National Strategy for Combating Wildlife Trafficking Implementation Plan* designates various Task Force agencies to lead or participate in achieving CWT strategic priorities, it does not define specific roles and responsibilities at the working level. Agencies have different views on roles and responsibilities in Southeast Asia. According to some officials, this disagreement resulted in inappropriate training activities and hindered U.S. cooperation with a host nation. More clearly defining roles and responsibilities would enhance agency collaboration.

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Abbreviations

ARREST	Asia's Regional Response to Endangered Species Trafficking
CBP	U.S. Customs and Border Protection
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CWT	combating wildlife trafficking
DOI	Department of the Interior
DOJ	Department of Justice
FWS	U.S. Fish and Wildlife Service
Homeland Security	Department of Homeland Security
HSI	Homeland Security Investigations
ICE	U.S. Immigration and Customs Enforcement
Implementation Plan	<i>National Strategy for Combating Wildlife Trafficking Implementation Plan</i>
INL	Bureau of International Narcotics and Law Enforcement Affairs
INTERPOL	International Criminal Police Organization
ITAP	International Technical Assistance Program
MEL Plan	Monitoring, Evaluation, and Learning Plan
NGO	nongovernmental organization
NOAA	National Oceanic and Atmospheric Administration
State	Department of State
National Strategy	<i>National Strategy for Combating Wildlife Trafficking</i>
Task Force	Presidential Task Force on Wildlife Trafficking
UNEP	United Nations Environment Programme
UNODC	United Nations Office on Drugs and Crime
USAID	U.S. Agency for International Development

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October 12, 2017

The Honorable Bob Corker
Chairman
Committee on Foreign Relations
United States Senate

The Honorable Christopher A. Coons
Ranking Member
Subcommittee on Financial Services and General Government
Committee on Appropriations
United States Senate

The Honorable Ted Poe
Chairman
The Honorable William Keating
Ranking Member
Subcommittee on Terrorism, Nonproliferation, and Trade
Committee on Foreign Affairs
House of Representatives

According to the Department of State (State), wildlife trafficking is a multibillion-dollar transnational criminal activity that is both a conservation issue and a security threat. Conservative estimates place it among the top-ranked illicit types of trade. Wildlife trafficking undermines conservation efforts, can fuel corruption, and destabilizes communities that depend on wildlife for biodiversity and ecotourism revenues. Poaching and the illegal trade in wildlife—both of which are part of wildlife trafficking—continue to push some protected and endangered species to the brink of extinction. Wildlife trafficking is fueled by unchecked demand for exotic pets, culinary delicacies, and traditional medicines. The capture and slaughter of animals is devastating wild populations of elephants, rhinoceroses, tigers, pangolins, turtles, exotic birds, and many other species.

In 2013, President Obama issued an executive order that established an interagency Presidential Task Force on Wildlife Trafficking (Task Force) and charged it with developing a strategy to guide U.S. efforts to combat wildlife trafficking.¹ The Task Force is co-chaired by the Departments of

¹Exec. Order No. 13648 (July 1, 2013).

the Interior (DOI), Justice (DOJ), and State, and the White House released the Task Force's *National Strategy for Combating Wildlife Trafficking* (the National Strategy) in February 2014. In February 2015, the Task Force released the *National Strategy for Combating Wildlife Trafficking Implementation Plan* (Implementation Plan), which identifies specific objectives and steps supported by programs overseen by Task Force agencies.

You asked us to review U.S. efforts aimed at combating wildlife trafficking (CWT). In September 2016, we issued a report focused on wildlife trafficking in Africa and supply side CWT activities that addressed security implications, agency actions, and effectiveness.² We recommended that agencies work with the Task Force to develop performance targets. The agencies agreed and indicated in 2017 that they were working on implementing the recommendation.

This report focuses on demand reduction efforts and examines (1) what is known about the demand for illegal wildlife and wildlife products in the United States and in Asia; (2) actions agencies are taking to reduce demand for illegal wildlife products in the United States and in Asia; and (3) the extent to which the U.S. Fish and Wildlife Service (FWS) within DOI, State, and the U.S. Agency for International Development (USAID) are assessing the effectiveness of their CWT activities.

We limited the scope of this review to the United States and Asia—identified as major markets for illegal wildlife demand—to complement our 2016 report and to provide geographic diversity in our work. We selected these geographic areas based on our review of reports on demand for illegally traded wildlife and discussions with U.S. government agencies.

To address our objectives, we analyzed agency documentation and met with officials from DOI, DOJ, State, USAID, and the Department of Commerce's National Oceanic and Atmospheric Administration (NOAA), which have designated roles in the Implementation Plan to lead or participate in efforts to reduce illegal wildlife demand; the Department of Homeland Security (Homeland Security), which has a role in enforcement and capacity-building efforts; and nongovernmental organizations (NGO) that focus on combating wildlife trafficking. We conducted fieldwork in

²GAO, *Combating Wildlife Trafficking: Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance Targets for Assessing Progress*, [GAO-16-717](#) (Washington, D.C.: Sept. 22, 2016).

Miami, Florida; China; Hong Kong; Thailand; and Vietnam. This sample is not generalizable to all the countries or areas in which the United States has CWT-related programs. While in each location in Asia, we interviewed officials who played a role in CWT activities, which included officials from DOI, State, USAID, and Homeland Security. We also interviewed officials from host governments and representatives from NGOs.

To describe what is known about the demand for illegal wildlife and wildlife products in the United States and Asia, we reviewed reports on wildlife trafficking, surveys about purchasing behaviors for wildlife products, and other information from U.S. agencies. We reviewed the methodologies described in the reports and surveys and determined they were sufficiently reasonable for the findings we report. However, it was beyond the scope of this review to determine the reliability of the underlying data. We also analyzed national seizure data from the FWS's Law Enforcement Management Information System to report on wildlife and wildlife products confiscated in the United States. To assess the reliability of these data, we interviewed agency officials, reviewed documentation about the data, and conducted basic logical tests. We determined the data are sufficiently reliable for the purposes of reporting seizures of wildlife and wildlife products. To gather perspectives on demand for illegally traded wildlife during our field visits to China, Hong Kong, Vietnam, and Thailand, we interviewed U.S. government and foreign government officials; representatives from NGOs that are implementing partners for U.S. agencies or have cooperated with U.S. agencies on CWT activities; and one company for illustrative purposes.

To examine actions agencies are taking to reduce demand for illegal wildlife products in the United States and Asia, we interviewed relevant officials and reviewed information, including agency and implementing partner documentation of CWT-related projects, programs, and grants. We also analyzed how agencies combating wildlife trafficking in Southeast Asia are applying selected practices that can enhance and sustain collaborative efforts. As we have previously reported, such practices include establishing mutually reinforcing or joint strategies, defining and articulating a common outcome, and agreeing on roles and responsibilities.³ In addition, we conducted fieldwork at the Port of Miami,

³GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005). We selected these practices because they were the most relevant to agency CWT efforts in Southeast Asia.

Florida, and interviewed U.S. government officials at this location to obtain insights on U.S. government activities. We selected the Port of Miami because it has been the site of large-scale CWT operations, and agency officials identified Miami as a hub for wildlife trade and an illustrative example of U.S. government CWT operations. We also conducted fieldwork in Vietnam and China, where we visited animal rescue centers and interviewed host government officials and NGO representatives.

To examine the extent to which FWS, State, and USAID are assessing the effectiveness of their CWT activities, we reviewed program documentation and spoke with agency officials. To assess agency monitoring practices, we analyzed agency guidance and examined selected programs as illustrative examples of how agencies applied their own guidance. We included programs that had started, finished, or been ongoing from the beginning of fiscal year 2015 to the end of fiscal year 2016 and programs that are or were solely dedicated to CWT. To assess evaluation practices, we assessed a USAID midterm evaluation against key elements of quality.⁴ Appendix I provides a detailed discussion of our objectives, scope, and methodology.

We conducted this performance audit from October 2016 to October 2017 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁴We have previously reported that addressing or requiring certain elements provides the basis for a high-quality evaluation. See, for example, GAO, *Foreign Assistance: Agencies Can Improve the Quality and Dissemination of Program Evaluations*, [GAO-17-316](#) (Washington, D.C.: Mar. 3, 2017), and *Foreign Assistance: Selected Agencies' Monitoring and Evaluation Policies Generally Address Leading Practices*, [GAO-16-861R](#) (Washington, D.C.: Sept. 27, 2016).

Background

The National Strategy for Combating Wildlife Trafficking and Reducing Demand

The 2014 National Strategy defines wildlife trafficking as including all aspects of the trade, from poaching and transit through consumer use.⁵ The National Strategy outlines the guiding principles and strategic priorities for U.S. efforts to stem illegal trade in wildlife, and one of the top three priorities identified is to “Reduce Demand for Illegally Traded Wildlife.” Specifically, the National Strategy states that, as a strategic priority, reducing demand for illegally traded wildlife calls for raising public awareness of the harms done by wildlife trafficking through outreach in the United States and public diplomacy abroad. The National Strategy also states that the Task Force will seek to enlist individual consumers in this fight through education and outreach to reduce demand for these products and change consumption patterns that drive wildlife trafficking.

While the Implementation Plan outlines a unique set of activities to reduce demand, other activities under the plan’s objectives may indirectly affect demand. For example, one of the objectives under “Reduce Demand for Illegally Traded Wildlife” is to raise public awareness and recognition of wildlife trafficking and its negative impacts and *associated risks of prosecution* (emphasis added) as a means to change harmful consumption patterns. Implementing robust legal frameworks and effective enforcement increases the risk of prosecution, which may deter not only wildlife traffickers but also consumers, who may risk legal penalties. For the purposes of this report, we consider efforts to reduce consumption of wildlife and law enforcement efforts to prevent illegal use of wildlife as demand reduction-related activities.

The Implementation Plan designates various U.S. agencies to lead or participate in achieving the strategic priority of reducing demand for illegally traded wildlife, which are outlined in table 1.

⁵In this report, we use the definition of wildlife from FWS import/export guidance, which states that wildlife is any living or dead wild animal, its parts, and products made from it. Wildlife includes mammals, birds, reptiles, amphibians, and fish, as well as invertebrates such as insects, crustaceans, arthropods, and coelenterates. For the purposes of this report, illegal or illegally traded wildlife refers to wildlife that has been imported, exported, or sold in violation of U.S. laws, foreign laws, or the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Table 1: U.S. Agencies Identified as Leading and Participating in Efforts to Reduce Illegal Wildlife Demand in the *National Strategy for Combating Wildlife Trafficking Implementation Plan*

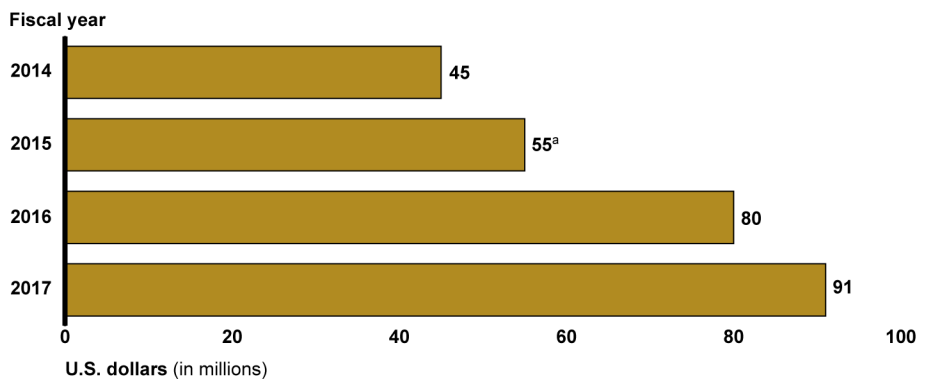
Objective	Lead agencies ^a	Participating agencies
Raise public awareness and change behavior	Department of State (State)	Department of Justice
	U.S. Fish and Wildlife Service (FWS)	
	U. S. Agency for International Development (USAID)	
	National Oceanic and Atmospheric Administration (NOAA)	
Build partnerships to reduce domestic demand	FWS	State
		Department of Defense
		NOAA
Promote demand reduction efforts globally	State	Department of Agriculture's Forest Service
	FWS	
	USAID	
	NOAA	

Source: National Strategy for Combating Wildlife Trafficking Implementation Plan. | GAO-18-7

^aLead agencies are tasked with ensuring that progress remains on track for each objective.

In fiscal years 2014 through 2017, Congress directed that not less than certain specified amounts, totaling \$271 million over the 4 fiscal years, be made available to combat wildlife trafficking (see fig. 1).

Figure 1: Minimum Amounts Directed in Appropriations Acts for Combating the Transnational Threat of Wildlife Poaching and Trafficking, Fiscal Years 2014 through 2017



Source: GAO analysis of annual appropriations acts for fiscal years 2014 to 2017. | GAO-18-7

^aContinuing and Consolidated Appropriations Act, 2015 (Pub. L. No. 113-235), further directed that not less than \$10 million of the funds made available to combat the transnational threat of wildlife poaching and trafficking be made available for programs to combat rhinoceros poaching.

Global Efforts to Reduce Wildlife Trafficking

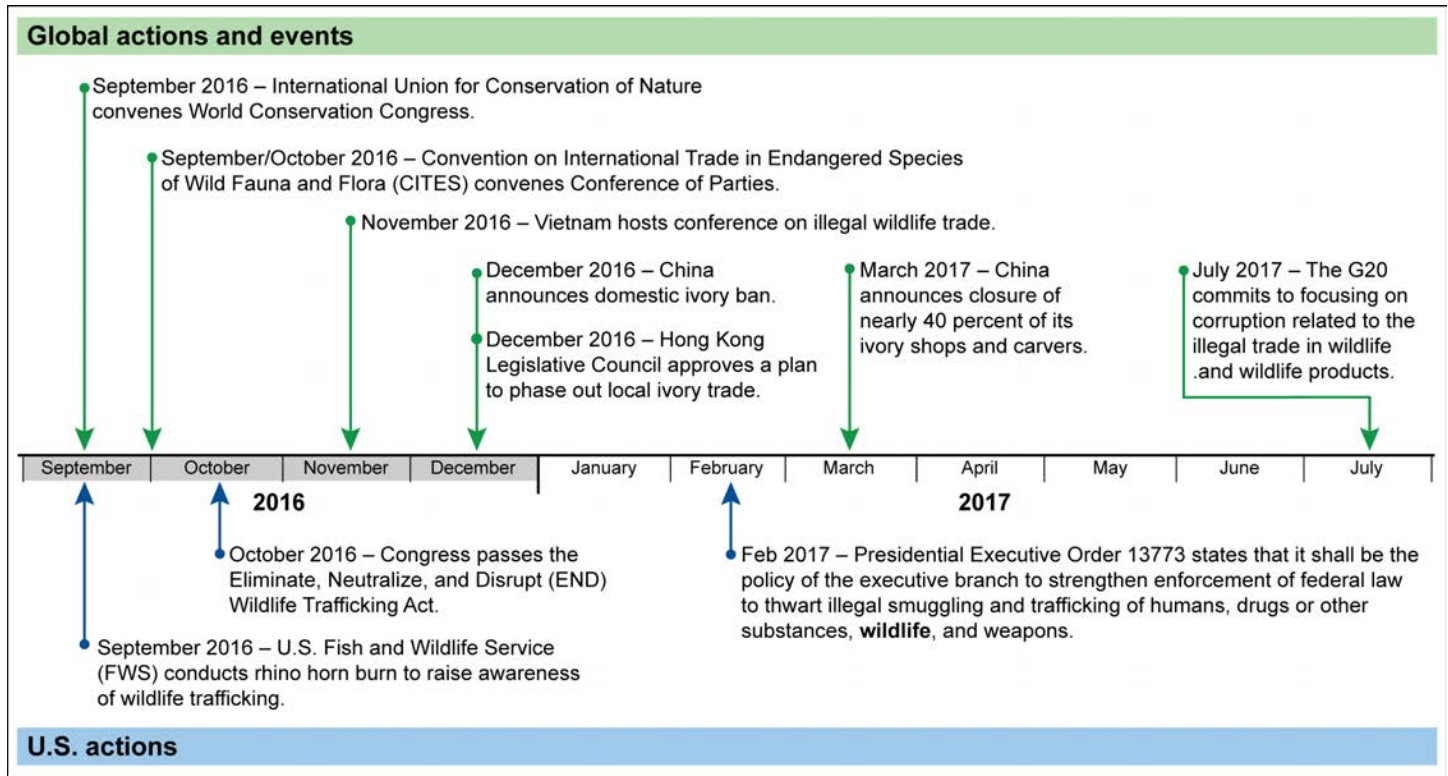
Since September 2016, U.S. agencies and global stakeholders have taken a range of actions to address CWT issues (see fig. 2). For example, in October 2016, Congress passed the Eliminate, Neutralize, and Disrupt (END) Wildlife Trafficking Act of 2016.⁶ Among other things, the act calls for the Secretary of State, in consultation with the Secretaries of the Interior and Commerce, to submit an annual report that lists each country determined by the Secretary of State to be a focus country and a country of concern.⁷ The act also directs the Task Force to submit an annual strategic assessment of its work and provide a briefing to Congress. Additionally, the 17th Meeting of the Conference of the Parties for the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) took place September 24, 2016, to October 5, 2016.⁸ In December 2016, China announced that it would close its domestic ivory market by the end of 2017, and in March 2017, China announced closure of 67 ivory carving entities and retail outlets across the country.

⁶Pub. L. No. 114-231 (Oct. 7, 2016).

⁷The END act defines “focus country” as a foreign country determined by the Secretary of State to be a major source of wildlife trafficking products or their derivatives, a major transit point of wildlife trafficking products or their derivatives, or a major consumer of wildlife trafficking products. The act defines “country of concern” as a foreign country specially designated by the Secretary of State as a major source of wildlife trafficking products or their derivatives, a major transit point of wildlife trafficking products or their derivatives, or a major consumer of wildlife trafficking products in which the government has actively engaged in or knowingly profited from the trafficking of endangered or threatened species. The act states that these annual reports will be submitted for 5 years after the date of the act’s enactment.

⁸CITES is an international agreement between 183 parties, including the United States, that offers varying degrees of protection to more than 5,000 fauna species and 30,000 flora species by providing a framework to regulate international trade of these species.

Figure 2: Selected Recent Global and U.S. Actions and Events Undertaken to Combat Wildlife Trafficking



Source: GAO analysis of official documentation and event information. | GAO-18-7

Estimates of the Illegal Wildlife Trade

As reported by the United Nations, the International Criminal Police Organization (INTERPOL), and other sources, wildlife trafficking networks span the globe. Although sources have attempted to measure trade flows, there is no precise estimate of illegally traded wildlife, and available estimates are subject to uncertainty. In 2014, the United Nations Environment Programme (UNEP) reported that various sources estimate the global scale of illegal wildlife trade is between \$7 billion and \$23 billion annually.⁹ In 2016, UNEP and INTERPOL estimated that the scale of wildlife crime may have increased, based on a rise in environmental crime. They estimate that environmental crime increased by 26 percent

⁹C. Nellemann et al., eds., *The Environmental Crime Crisis—Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources* (Nairobi, Kenya: United Nations Environment Programme, 2014).

since 2014 and continues to increase by 5 to 7 percent annually.¹⁰ Illegal, unreported, and unregulated (IUU) fishing often are not included in these estimates since discussion of wildlife trafficking, as it relates to marine species, focuses on those species protected under CITES and under statutes such as the Endangered Species Act and the Marine Mammal Protection Act, according to NOAA. While IUU fishing targets commercially harvested marine species, as the Implementation Plan outlines, the trafficking of fisheries products is a form of wildlife trafficking. In 2016, UNEP and INTERPOL estimated that the global scale of IUU fishing ranges from \$11 billion to \$24 billion annually.¹¹

Demand for Illegal Wildlife and Wildlife Products Is Difficult to Measure, but Data and Reports Indicate Range of Species and Products Is Diverse

The United States, China, and countries in Southeast Asia consume many types of legal and illegal wildlife for diverse purposes.¹² It is difficult to measure demand for illegal wildlife and wildlife products due to the illicit nature of the trade, but various data sources and reports provide examples of the range of wildlife demand by illustrating types of wildlife that are seized by governments and purchased by consumers.

Illegal Wildlife Demand and Trade Are Diverse in the United States

U.S. trade in wildlife and wildlife products includes a variety of wildlife such as live reptiles, birds, mammals, and elephant ivory, according to law enforcement information, reports, and government and NGO officials. FWS and NOAA data on wildlife products seized at U.S. ports provide examples of the diversity of illegally traded wildlife in the United States. FWS and NOAA may seize wildlife products for a variety of reasons that

¹⁰C. Nellemann et al., eds., *The Rise of Environmental Crime—A Growing Threat to Natural Resources, Peace, Development, and Security* (Nairobi, Kenya: United Nations Environment Programme, 2016).

¹¹C. Nellemann et al., eds., *The Rise of Environmental Crime*.

¹²We describe the consumption of illegal wildlife as diverse due to the wide range of species and forms identified within the data and reports we reviewed and the anecdotal information conveyed to us by government and NGO officials. For example, the species identified range from elephants to seahorses. The forms identified range from live animals to parts of dead animals in products like medicine and leather goods.

include import,¹³ export, or sale of endangered or threatened species protected under U.S. laws and regulations.¹⁴ For example, FWS may seize a shipment due to invalid documentation needed to clear the shipment. From 2007 to 2016, the top 10 wildlife shipments—by species or species group—seized nationally by FWS were coral, crocodile, conch, deer, python, sea turtle, mollusks, ginseng, clam, and seahorse.¹⁵ These seized wildlife were in a variety of forms when confiscated, as shown in table 2. For example, more than half of seized seahorse shipments were dead whole animals, and a smaller percentage were medicinal parts or products. During the past 10 years, more than one-third of the wildlife shipments seized by FWS were confiscated while being imported from or exported to Mexico (13.6 percent), China (13 percent), Canada (8.6 percent).¹⁶ Additional examples of wildlife seized by FWS are shown in figure 3 and in appendix II.

¹³About 90 percent of seized wildlife shipments recorded by FWS from 2007 to 2016 were seized upon import into the United States.

¹⁴FWS may seize products in violation of wildlife protection laws that regulate the taking, possession, transportation, sale, purchase, barter, exportation, and importation of wildlife. As described at 50 C.F.R. § 10.1, these include The Bald and Golden Eagle Protection Act (16 U.S.C. § 668 *et seq.*); The National Wildlife Refuge System Administration Act (16 U.S.C. § 668dd *et seq.*); The Migratory Bird Treaty Act (16 U.S.C. § 703 *et seq.*); The Migratory Bird Hunting and Conservation Stamp Act (16 U.S.C. § 718 *et seq.*); The Airborne Hunting Act (16 U.S.C. § 742j-1); The Black Bass Act (16 U.S.C. § 851 *et seq.*); The Marine Mammal Protection Act (16 U.S.C. § 1361 *et seq.*); The Endangered Species Act (16 U.S.C. § 1531 *et seq.*); and The Lacey Act (18 U.S.C. §§ 43-44) and The Lacey Act Amendments of 1981 (16 U.S.C. § 3371 *et seq.*). As described at 15 C.F.R. § 904.1, NOAA's enforcement authority includes federal statutes but, according to NOAA, the majority of cases fall under The Endangered Species Act (16 U.S.C. § 1531 *et seq.*); The Lacey Act Amendments of 1981 (16 U.S.C. § 3371 *et seq.*); The Marine Mammal Protection Act (16 U.S.C. § 1361 *et seq.*); the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. §§ 1801-1882); and the National Marine Sanctuaries Act (16 U.S.C. §§ 1431-1439).

¹⁵Our analysis compares seizures as number of shipments seized. There are many ways to quantify the wildlife in a shipment, such as the number, size, or weight of specimens, according to FWS. A shipment may consist of only one item or hundreds of items and as the information about shipment quantity was measured differently, we did not attempt to estimate the overall quantity of wildlife involved in this analysis. FWS assigns a control number to each seizure documented in its law enforcement information system. This control number is equivalent to one shipment according to FWS officials.

¹⁶The country where an illegal wildlife shipment is being imported from is not necessarily the same as the country from which the wildlife in the shipment exists in the wild. FWS officials explained that in some cases they are unable to identify the country of origin.

Table 2: Top Wildlife Shipments Seized from 2007 to 2016 Recorded by the U.S. Fish and Wildlife Service (FWS)

Generic name of seized wildlife	Number of seized shipments	Example type of product	Primarily seized as an import or export	Primarily seized being imported from or exported to
Coral	3,442	Live specimen and raw coral	Import	Indonesia
Crocodile	1,652	Small manufactured leather products ^b and shoes	Import	Mexico
Conch	1,528	Meat and shells	Import	Haiti
Deer	1,516	Horns and feet	Import	Mexico
Python	1,284	Small manufactured leather products ^b and shoes	Import	Italy
Sea turtle	1,200	Jewelry and shells	Import	Federated States of Micronesia
Mollusks ^a	1,177	Jewelry and shells	Import	China
Ginseng	1,137	Root (dead)	Export	China
Clam	1,019	Meat and shells	Import	Marshall Islands
Seahorse	829	Dead whole animal and medicinal part or product	Import	China

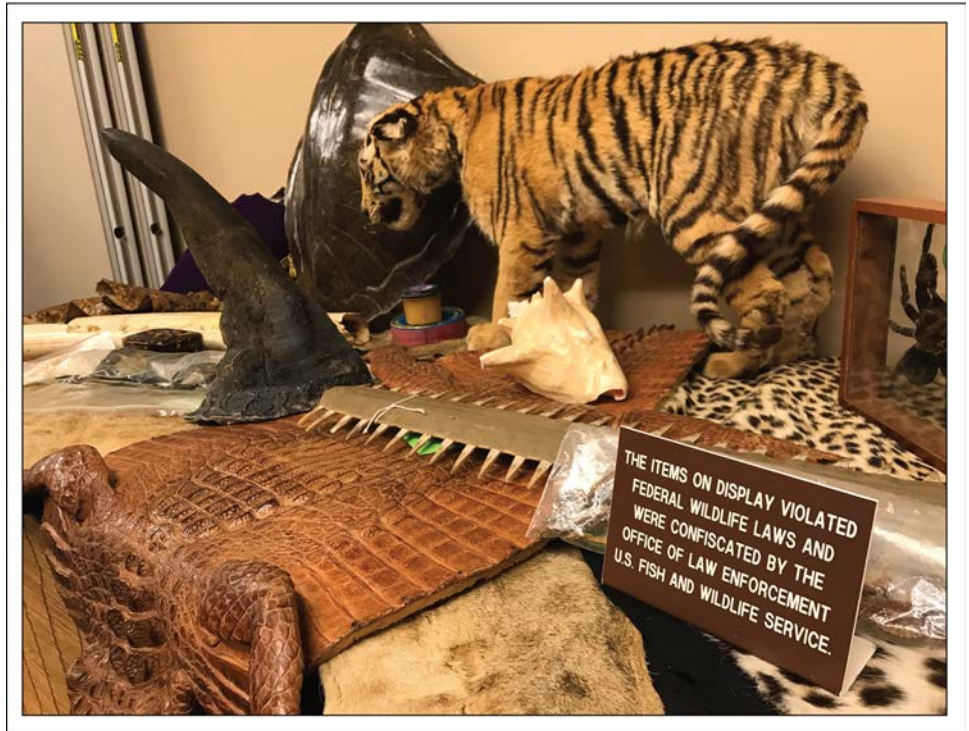
Source: GAO analysis of FWS seizure data. | GAO-18-7

Note: For 183 of the records we reviewed, there was no generic name provided. As a result, those shipments are not included in the results.

^aFWS officials explained that they generally cannot sort and classify at the most specific taxonomic level every wildlife product seized due to time constraints and the need to prioritize their inspections. As a result, in some cases, FWS will categorize the wildlife according to the highest taxonomic level. For many seized shells, FWS will identify them as mollusks. Mollusks can refer to a variety of wildlife such as snails, squid, and clams.

^bIncludes belts, wallets, watchbands, and other similar items.

Figure 3: Wildlife Products Seized by the U.S. Fish and Wildlife Service at the Port of Miami



Source: GAO. | GAO-18-7

Seizure data from NOAA Fisheries' Office of Law Enforcement show that it has also seized a variety of marine wildlife products. From 2007 to 2016, confiscated shipments have included whale teeth and meat, seal oil pills, shark fins, and seal fur products like mittens and boots, according to NOAA's seizure data. Seizure data from FWS and NOAA provide a helpful illustration of wildlife that has been confiscated at U.S. ports but may not be fully reflective of the illegal wildlife trade and consumption.

Seizure data show the types of wildlife confiscated at ports of entry in a country, but there are limits to what these data can tell us about the demand for products like illegally traded wildlife. Various factors influence the number of seizures at any given time or in any location such as the level of illicit trade and the level and efficacy of enforcement efforts. For example, as part of their enforcement, both NOAA and FWS conduct inspections of shipments at U.S. ports. In some cases, they conduct targeted inspections that may be based on information they have about a

particular species or market, which may influence detection and seizures of illegal products. NOAA and FWS officials indicated that they can increase their enforcement efforts by targeting investigations on specific species or products. This additional effort may result in the seizure of more shipments than would be made using routine inspection processes.

In 2016, the NGO WildAid published a baseline survey conducted by KRC Research to inform a public awareness campaign effort with FWS. The survey reported that roughly 1 in 10 respondents in the United States indicated that they had purchased or knew someone who had purchased live animals such as iguanas, parrots, parakeets, or tortoises.¹⁷ A smaller proportion of those that responded (roughly 1 in 20) reported that they had purchased or knew someone who had purchased ivory. Reporting by the International Fund for Animal Welfare in 2013 also identifies the United States as a key end market for reptiles such as crocodiles, pythons, and caimans and for wildlife products such as ivory.¹⁸

Based on reporting and discussions with U.S. government officials, there may be varying reasons for the demand for wildlife and wildlife products. Potential drivers of demand in the United States—in particular demand for illegal wildlife from Latin America— may include a desire for rare and exotic plants and animals, according to reporting by Defenders of Wildlife.¹⁹ FWS officials in Miami told us that some of the wildlife products they confiscate—such as products from cruise passengers— were purchased by travelers who were unaware of the restrictions on the wildlife product. FWS and U.S. Customs and Border Protection (CBP) officials told us that consumers use wildlife for many different purposes, including as pets, trophies, jewelry, food, religious items, and for medicinal purposes. For example, FWS officials in Miami told us that coral is often smuggled as part of the pet trade for use in aquariums. At the Port of Miami, an FWS official told us that FWS has also seized queen conch meat, which is exported from the Caribbean as a delicacy,

¹⁷The survey question did not refer specifically to illegally or legally traded wildlife. According to DOI officials, there is significant legal trade in the wildlife that survey respondents were considering.

¹⁸Marina Ratchford, et al., *Criminal Nature: The Global Security Implications of the Illegal Wildlife Trade* (Washington, D.C.: International Fund for Animal Welfare, June 2013).

¹⁹Alejandra Goyenechea and Rosa A. Indenbaum, *Combating Wildlife Trafficking from Latin America to the United States: The Illegal Trade From Mexico, the Caribbean, Central America and South America and What We Can Do to Address It* (Washington, D.C.: Defenders of Wildlife, 2015).

according to FWS.²⁰ During investigations, FWS has found wildlife intended to be used as art or trophies. During the course of their investigations, FWS officials in Miami have found a rhino bust being sold for \$80,000 and a giraffe bust being sold for \$100,000. FWS has also seized scarlet macaw feathers being used in jewelry, elephant ivory carved as decorative pieces, and taxidermy big cats seized as hunting trophies.

Illegal Wildlife Demand and Trade Are Diverse in China and Countries in Southeast Asia

Demand for illegally traded wildlife in China and countries in Southeast Asia includes many wildlife species and end uses, according to reports and government and NGO officials in the region. For example, iconic wildlife such as elephants and rhinos are often cited in reports and by officials in the field as examples of wildlife consumption in China and Southeast Asia, but other wildlife, such as pangolins, bears, sharks, and sea turtles are also named among the wildlife being consumed.²¹

China is a consumption country for illegal wildlife, while Hong Kong, Thailand, and Vietnam are consumption and transit locations, according to officials we spoke with from the U.S. government, foreign governments, international organizations, and NGOs in these locations. Thailand often serves as a transshipment point for illegal wildlife due to its land borders with China, Laos, and Cambodia, according to government of Thailand officials. Government officials in Vietnam stated a similar claim, explaining that the country is often a transshipment point due to its land borders with China and Laos. Table 3 displays examples of wildlife consumed and trafficked in China, Hong Kong, Thailand, and Vietnam, according to U.S. government, foreign government, and NGO officials in-location and at DOI Headquarters.

²⁰Queen conch is listed as a protected species in CITES. According to FWS, as of 2012, queen conch from certain countries, such as Haiti and Honduras, is banned until these countries implement specific, long-term conservation measures to sustainably manage queen conch populations in their waters.

²¹We reviewed the methodologies of those reports we cited, which we determined were sufficiently reasonable for providing examples of wildlife and wildlife products traded and consumed and drivers for consumption in China and countries in Southeast Asia, but it was beyond the scope of this report to assess their underlying data sources.

Table 3: Examples of Wildlife Consumed and Trafficked in China and Southeast Asian Countries, according to U.S. Government, Foreign Government, and Nongovernmental Organization Officials

Country	Decorative (e.g., antique, jewelry, fashion)	Pet trade	Traditional medicine	Food	No category identified
China	- Coral - Ivory - Sea turtles	- Amphibians and reptiles such as frogs, snakes, tortoises, and lizards - Birds - Coral - Small mammals such as slow loris (lemur)	- American ginseng - Bear bile - Manta ray gills - Pangolin scales - Rhino horn - Seahorses	- Pangolins - Shark fin	- Crocodiles
Hong Kong	- Ivory - Reptiles	- Birds - Reptiles	- American ginseng - Bear bile - Rhino horn - Seahorses	- Humphead wrasse (a marine fish) - Shark fin	- Turtles
Thailand	- Ivory - Tiger	- Birds - Small mammals - Turtles	None reported ^a	None reported ^a	N/A
Vietnam	- Ivory	- Exotic birds - Small primates	- Bear bile - Pangolin scales - Rhino horn - Tiger bone	Pangolins	- Civets - Turtles

Source: GAO analysis of anecdotal information reported by various officials. | GAO-18-7

Note: This table is a compilation of perspectives from officials GAO spoke with at the following U.S. and foreign government agencies and organizations: the U.S. Department of Interior Headquarters; U.S. Fish and Wildlife Service in China; the U.S. Department of State in China, Thailand, and Vietnam; the U.S. Department of Homeland Security's Customs and Border Protection in Hong Kong; a Chinese company; five foreign government entities in China, Hong Kong, and Vietnam; and 12 nongovernmental organizations in China, Hong Kong, Thailand, and Vietnam.

^aOfficials did not report examples of wildlife being consumed in these categories, but lack of reporting does not indicate that there is no consumption for these purposes in these locations.

The International Fund for Animal Welfare has reported that China is the world's largest consumer of illegal wildlife products due to its demand for ivory, rhino horn, pangolin scales, bear bile, tiger bone, and shark fin soup.²² According to analysis by the United Nations Office on Drugs and Crime (UNODC) of seizure data from the World Wildlife Seizure

²²Marina Ratchford et al., *Criminal Nature*.

database, China was the destination for about 40 percent of the ivory shipments that had reported destinations from 2006 to 2015.²³

Reports also identify Thailand as a part of the illegal ivory trade. INTERPOL's 2015 investigation, Operation Worthy II, resulted in seizures of several tons of elephant ivory in Thailand and Singapore. TRAFFIC, the wildlife trade monitoring network, visited retail outlets in Bangkok, Thailand, during certain periods in 2013 and 2014 and, through covert surveys of vendors, found bangles, rings, toothpicks, hairpins, chopsticks, sculptures, and other products made of ivory for sale.²⁴ TRAFFIC reports that for seven consecutive months, from November 2013 to May 2014, their surveys found more than 10,000 ivory items openly on display for sale in Bangkok.

An NGO official we spoke with in China told us that part of the NGO's efforts includes targeting Chinese tourists traveling to Africa and Southeast Asia to prevent purchasing of ivory as well as rhino horn. UNODC has reported that more than two-thirds of rhino horns seized from 2006 to 2015 were destined for China or Vietnam.

Government officials in Hong Kong told us that they have also seized a variety of wildlife products such as pangolin scales and turtles. Examples of wildlife products seized by the government of Hong Kong are shown in figure 4 and in appendix II. Hong Kong's government has also seized elephant ivory, though as of March 2017, certain registered ivory can be legally traded in Hong Kong under a license.

²³The World Wildlife Seizure database is a compilation of data submitted by the parties to CITES and the Customs Enforcement Network of the World Customs Organization.

²⁴Naomi Doak, *Polishing Off the Ivory: Surveys of Thailand's Ivory Market* (Cambridge, UK: TRAFFIC, 2014).

Figure 4: Seized Wildlife Products Displayed at Hong Kong's Agriculture, Fisheries, and Conservation Department



Clockwise from top left: pangolin products, bear bile products, American ginseng, and elephant ivory carvings.

Source: GAO. | GAO-18-7

The Organisation for Economic Co-operation and Development reports that high economic growth may fuel consumer demand for status goods such as art from elephant ivory and traditional medicine using rhino horn. According to NGO officials we met with in Vietnam and China, consumers purchase illegal wildlife products as a status symbol or to demonstrate

wealth. Wildlife is considered to be expensive and exotic in these countries, and there is conspicuous consumption in some areas, according to State officials in Vietnam and an FWS attaché. UNODC reports that a survey of 18 restaurants— identified as high end by UNODC— in Vietnam found that all of these restaurants sold pangolin meat. UNEP and INTERPOL describe a similar phenomenon of a culture of conspicuous consumption for wildlife products that indicate wealth.²⁵ These organizations report that buyers place higher value on illegal wildlife products when they are considered rare and uncommon and thus drive up prices for illegal wildlife. Higher prices and the perception of luxury associated with products such as tiger pelts and shark fin soup may attract consumers who want to display their wealth, according to Global Financial Integrity.²⁶

Additional Examples of Wildlife Reportedly Consumed in Vietnam, Thailand, and China

According to a 2016 survey in Hanoi, Vietnam, conducted under USAID's Asia's Regional Response to Endangered Species Trafficking (ARREST) program, roughly one-quarter of survey respondents had bought one or more wildlife products within the past 12 months. Respondents indicated that they mainly purchased these products for medicinal reasons, but other reasons selected included for jewelry or for fashion and for home decoration. Respondents to a similar survey conducted under ARREST in Thailand in 2015 provided similar reasons for purchasing wildlife products as respondents in Vietnam. In another 2015 survey conducted under ARREST in various cities across China, almost one-third of the respondents reportedly bought ivory within the past 12 months. These respondents indicated that among their primary motivations to buy ivory were for decoration, jewelry or fashion, and as an investment.

Source: Rapid Asia Impact Evaluation of ARREST's IThink Surveys for Vietnam (2016), Thailand (2015), and China (2015). | GAO-18-7

Another end use of illegally traded wildlife is in traditional medicine in China and Vietnam, according to State and NGO officials in these countries. They stated that there are beliefs that certain wildlife provide health benefits; for example, pangolin scales are believed to help lactating mothers produce milk. State and NGO officials noted that traditional Chinese medicine has a long history of using various wildlife products. For example, American ginseng root is often consumed as a medicinal ingredient in China, according to FWS. While export of American ginseng is permitted, there are restrictions based on factors such as the age of the root. FWS has seized American ginseng root being exported from the United States to China, and the Hong Kong government has seized American ginseng being smuggled into Hong Kong. For additional examples of how wildlife is consumed, see the side bar for results from surveys conducted by USAID's Asia's Regional Response to Endangered Species Trafficking (ARREST) program.

²⁵Nellemann et al., eds., *The Rise of Environmental Crime*.

²⁶Channing May, *Transnational Crime and the Developing World* (Washington, D.C.: Global Financial Integrity, March 2017).

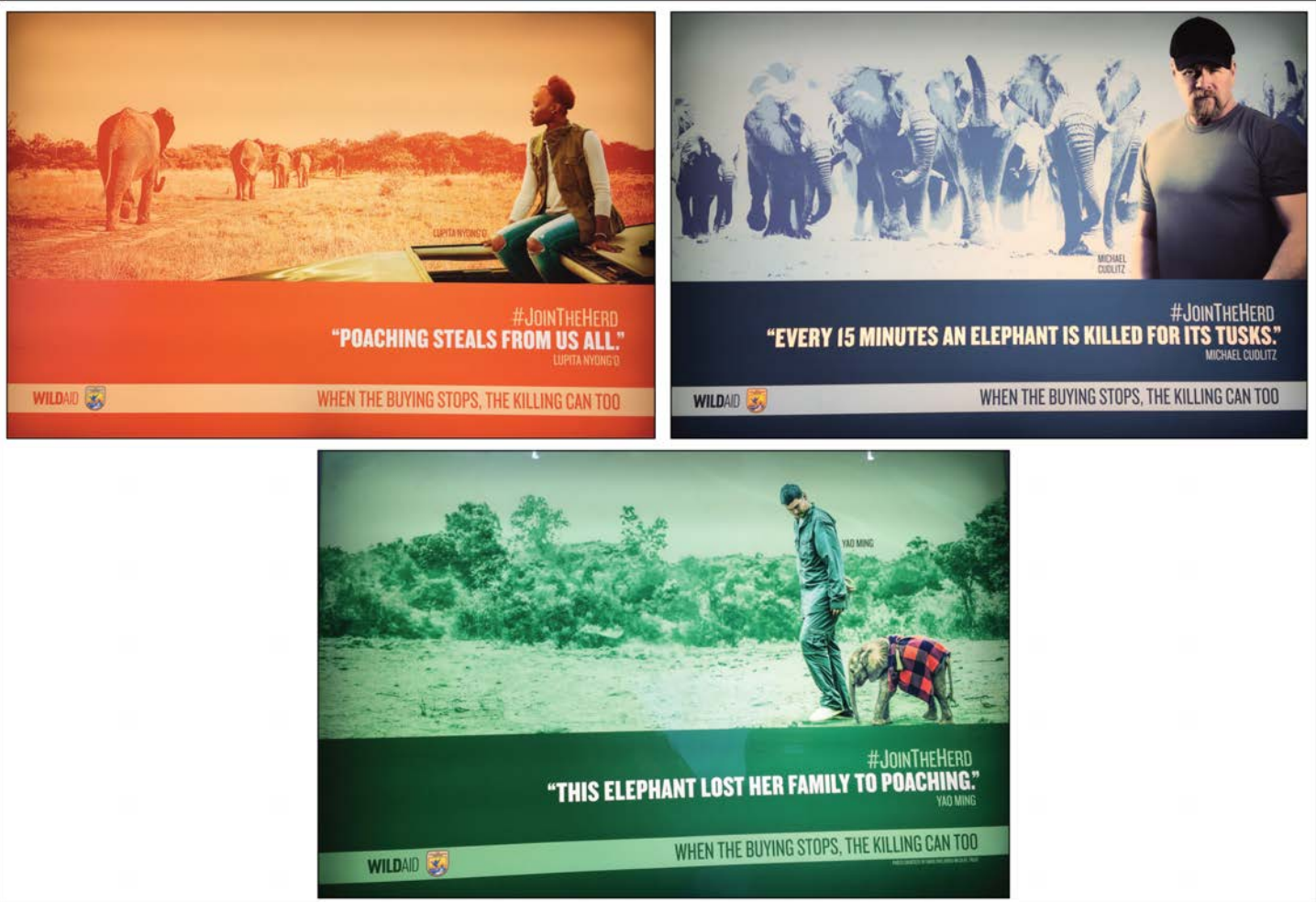
Agencies Are Implementing Demand Reduction Efforts, but Opportunities Exist to Improve Collaboration in Southeast Asia

FWS Raises Awareness and Enforces Laws in the United States and Builds Capacity Abroad

Efforts Undertaken in the United States

In the United States, FWS conducts awareness campaigns and law enforcement efforts to reduce demand for illegal wildlife. For example, in partnership with WildAid, FWS launched the U.S. Illegal Wildlife Demand Reduction Campaign, a public awareness initiative that aims to reduce domestic demand for illegal wildlife and the amount of illegal wildlife products smuggled into the United States. This campaign focuses on educating travelers about illicit wildlife trade and has placed public service announcements at airports in Atlanta, Georgia; Chicago, Illinois; Los Angeles, California; and Miami, Florida, and at bus shelters in Boston, Massachusetts, and Chicago. Examples of these posters are shown in figure 5. Additional public service announcements and infographics are displayed at the Atlanta and Chicago zoos. FWS has also partnered with various organizations to conduct two ivory crush events and one rhino horn burn since 2013. These events were intended to raise awareness on the slaughter of elephants and rhinos in Africa and reinforce U.S. commitment to addressing the illegal wildlife trade, according to FWS officials.

Figure 5: U.S. Fish and Wildlife Service and WildAid Posters for the U.S. Illegal Wildlife Demand Reduction Campaign in the Hartsfield–Jackson Atlanta International Airport



Source: GAO. | GAO-18-7

FWS also has partnered with private companies to raise awareness about the illegal wildlife trade. FWS collaborated with JetBlue Airlines and has implemented a consumer education and awareness campaign that displays in-flight videos aimed at informing travelers about responsible purchases while in the Caribbean. FWS also has partnered with Discovery Communications to develop a public service announcement that aired on Discovery's networks in the United States. Through coordination with the U.S. Wildlife Trafficking Alliance, FWS supports the

alliance's demand-reduction efforts, which have included the development of a digital toolkit, "Know Before You Go, Ask Before You Buy." The toolkit provides travel and tourism industry leaders with resources to engage tourists to stop wildlife trafficking.

FWS supplements these demand reduction activities through various law enforcement efforts in the United States, which aim to increase the risks for wildlife trafficking crimes and eliminate the market for illegally traded wildlife. FWS inspects shipments at U.S. ports of entry (see fig. 6 and app. II).²⁷ At the Port of Miami, FWS officials explained that they inspect air cargo, passenger baggage, cruise ships, personal boats, commercial sea cargo, and mail. To support border inspections, FWS created the Wildlife Detector Dog Program in 2013. FWS officials at the Port of Miami told us that the K-9 unit allows them to conduct inspections faster and more effectively. The program was expanded in the spring of 2016 and now includes K-9 teams that conduct inspections at seven ports of entry: Anchorage, Alaska; Chicago, Illinois; Honolulu, Hawaii; Houston, Texas; Los Angeles, California; Miami, Florida; and San Juan, Puerto Rico.

²⁷To conduct inspections, during fiscal year 2016, the FWS Office of Law Enforcement reported that it had 124 inspectors to cover 18 designated ports of entry and 20 nondesignated ports of entry in the United States.

Figure 6: U.S. Fish and Wildlife Service Office of Law Enforcement Conducting Routine Shipment Inspections at the Port of Miami



Source: GAO. | GAO-18-7

In addition to inspections at border U.S. ports of entry, FWS leads nationwide investigations of wildlife crimes and participates in global operations. For example, in 2015, FWS conducted a 1-month targeted national investigation, Operation Hammer Tap, that focused on antiques shipments and packages being shipped by auction houses through various U.S. ports. This investigation resulted in seizures of items that included wildlife products such as ivory and coral. In 2017, FWS also participated in a global law enforcement effort, Operation Thunderbird, which FWS reported had more than 60 participating countries and

resulted in the identification of nearly 900 suspects and 1,300 seizures of illicit wildlife products.

FWS collaborates with law enforcement agencies to investigate wildlife crimes across the United States. FWS, CBP, U.S. Immigration and Customs Enforcement's (ICE) Homeland Security Investigations (HSI), and NOAA have liaisons at DHS's Commercial Targeting and Analysis Center (CTAC), which aims to enhance information sharing; expand interagency partnerships; and increase automation to prevent, preempt, deter, and investigate violations of importation laws. FWS officials explained that through the CTAC, a number of cases involving illicit wildlife, such as ivory and caviar, have been initiated. FWS Miami officials told us that at the Port of Miami they have conducted joint operations with CBP, HSI, and NOAA.

Efforts Undertaken in Southeast Asia and China

In Southeast Asia and China, FWS facilitates law enforcement capacity building in and information sharing with partner nations and through grants supporting activities to reduce demand for illegal wildlife. As of July 2017, there were two FWS regional attachés, one based in Bangkok, Thailand, and the other in Beijing, China. Together, the two were responsible for covering a total of 18 countries/territories in Asia.²⁸ Across the region, these two attachés facilitate law enforcement capacity building and collaborate with foreign governments to support wildlife crime investigations in Asia having a U.S. nexus. Both attachés also collaborate with law enforcement counterparts in-country such as officials from State's Bureau of International Narcotics and Law Enforcement Affairs (INL); Environment, Science, Technology, and Health officers; and ICE HSI agents. The aim of this collaboration is to build law enforcement capacity in their host countries and to share intelligence and subject matter expertise. For example, in 2015, the Bangkok regional FWS attaché conducted an INL-funded course on how to properly recognize, handle, document, and interpret evidence in water environments. A total of 36 officers from Vietnam and the Philippines participated in the training.

In 2016, 22 special agents and eight wildlife inspectors provided training to 230 foreign nationals from 26 countries. This training included three

²⁸The regional attaché in Bangkok covers Thailand, Laos, Cambodia, Vietnam, Malaysia, Myanmar, India, Nepal, Sri Lanka, and Bangladesh. The regional attaché in Beijing covers China, Hong Kong, Macau, Taiwan, Japan, South Korea, Mongolia, and Russia. FWS also has attachés in Gaborone, Botswana; Lima, Peru; Mexico City, Mexico; Dar es Salaam, Tanzania; and Libreville, Gabon.

courses related to wildlife trafficking at the International Law Enforcement Academies (ILEA) in Bangkok, Thailand, with classroom studies and mock investigations. FWS special agents, including the FWS attaché in Bangkok, also participated in State's Marine Crime Scene Investigations training. This training included 35 participants from the Philippines's Bureau of Fisheries and Aquatic Resources, the National Bureau of Investigation, the National Police, and the Coast Guard. In 2015, a total of 17 FWS special agents and two FWS inspectors conducted international trainings for 188 foreign nationals from 28 countries.

According to FWS, the two Asia regional attachés' collaboration with other FWS attachés stationed globally and with foreign government enforcement entities has resulted in investigations and prosecutions of wildlife crime. For example, FWS reports that an FWS-led operation that involved the FWS attachés in Asia and Africa led to the arrest of three Chinese nationals who attempted to smuggle eight suitcases of African elephant ivory from Tanzania to China. Additionally, a Hong Kong Customs official told us that through collaboration with the Beijing FWS attaché and FWS officials in the United States, Hong Kong and the United States were able to conduct a joint investigation that resulted in the seizure of 100 sea turtles in China.

FWS also administers grants that support efforts to reduce demand for illegal wildlife and strengthen enforcement in Asia. For example, in fiscal year 2016, FWS supported a grant to an NGO in China for a project aimed at helping to conserve all eight species of pangolin; the project is addressing the impact of consumer demand in China, which FWS identifies as a driver for poaching and trafficking.

State Contributes to CWT-Related Diplomacy, Training, and Outreach

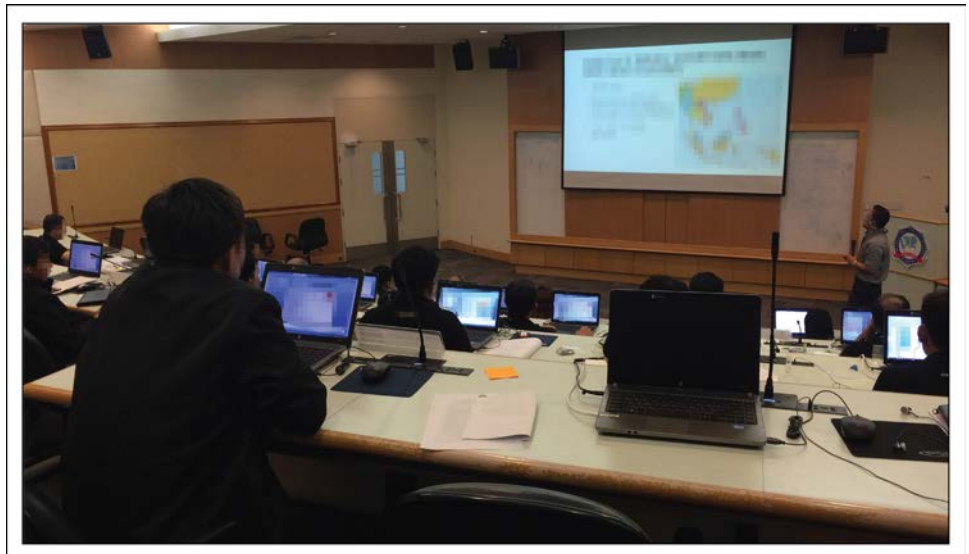
State has led diplomacy efforts and implemented training and outreach programs in Southeast Asia and China.

- **Diplomacy:** State's diplomatic CWT efforts have included coordinating discussions between the U.S. and Chinese presidents in 2015 that, according to State, contributed to China and the United States jointly committing to further restrict ivory exports and imports. In June 2016, State and China's State Forestry Administration also led the breakout session on wildlife trafficking during the eighth round of the U.S.-China Strategic and Economic Dialogue in Beijing. In December 2016, China announced that it would implement a domestic ivory ban, and in March 2017, China announced the closure

of approximately one-third of the country's licensed ivory stores and carvers.

- **Training programs:** State's INL works to build law enforcement capacity abroad by supporting various trainings and workshops. For example, in 2015, Thailand INL funded training in wildlife trafficking and environmental crimes for 179 participants. In 2016, ILEA Bangkok sponsored two FWS-led CWT training courses and one environmental crimes course led by officials of the U.S. Environmental Protection Agency. During our field visit to Bangkok, we observed an ILEA course on combating wildlife trafficking for law enforcement officers, which is shown in figure 7. Through the United Nations Office on Drugs and Crime, INL funds Border Liaison Offices in Burma, Cambodia, Laos, Thailand, and Vietnam, intended to enhance interdiction and investigation capacity at land borders to prevent illicit trafficking. At these offices, INL has supported training for officials on wildlife trafficking detection and investigations.

Figure 7: March 2017 Combating Wildlife Trafficking Course at the International Law Enforcement Academy in Bangkok, Thailand



Source: GAO. | GAO-18-7

- **Outreach efforts:** State has supported and implemented activities to raise awareness about wildlife trafficking in Southeast Asia and China.

For example, State collaborated with USAID and the government of Vietnam to implement Operation Game Change, a 2015 awareness-raising effort designed to inform the Vietnamese public about wildlife trafficking issues such as the trade in rhino horn. In 2016, for World Wildlife Day, State's Acting Assistant Secretary of State for Oceans and International Environmental and Scientific Affairs published an opinion editorial for the South China Post in Hong Kong to raise awareness about the illegal trade in elephant ivory.

Four Major Initiatives Frame USAID CWT Efforts in Asia

USAID conducts a range of CWT activities that are part of biodiversity, conservation, or other initiatives, but it has four major initiatives explicitly dedicated to CWT in Asia.

- **Asia's Regional Response to Endangered Species Trafficking:** ARREST was a multiyear program completed in 2016. The program was designed to curb wildlife trafficking by reducing consumer demand, strengthening law enforcement capacity, and boosting regional learning networks. As part of ARREST's demand reduction objective, the program implemented various awareness-raising efforts such as the iThink campaign, which developed and displayed public service announcements in airports and subways in China, Thailand, and Vietnam and on television stations in China and Vietnam. Through the initiative dubbed "Wildlife Friendly Skies," the ARREST program raised awareness among airline and airport staff in transport hubs identified as hotspots for wildlife trafficking, which included Bangkok, Thailand; Guangzhou, China; Hanoi, Vietnam; Nairobi, Kenya; and Nanning, China. The ARREST program also held various courses aimed at strengthening capacity across Asia. For example, the program held 14 courses for 195 trainees who were from Cambodia, Indonesia, Lao People's Democratic Republic, Thailand, and Vietnam to train participants on completing wildlife crime investigations.
- **Saving Species:** This USAID project began in 2016 and is a 5-year, \$9.9 million effort to combat wildlife trafficking in Vietnam. The project specifically aims to reduce consumer demand for and consumption of illegal wildlife and wildlife products, strengthen wildlife law enforcement and prosecution, and improve and harmonize the legal framework for prosecuting wildlife crimes in Vietnam. Some of the project's planned activities for the first year include market surveys focused on demand for wildlife such as elephant ivory, rhinos, pangolins, and tigers. The project plans to use the survey results to inform its awareness campaign messaging. The project also plans to conduct capacity assessments of enforcement agencies in Vietnam to

inform development of targeted training curricula, modules, and materials.

- **Wildlife Asia:** This USAID activity, in collaboration with the Association of Southeast Asian Nations, aims to reduce the demand for wildlife products and to improve regional action to end wildlife crime in Southeast Asia and China. As of August 2016, USAID has issued one contract, with an estimated value of \$22.9 million, to implement this activity.
- **Protect Wildlife:** This USAID project began in 2016 and is a 5-year, \$24.5 million effort to reduce threats to biodiversity in the Philippines such as poaching and the illegal trade of wildlife and wildlife products as well as to sustain healthy ecosystems. USAID is working with public and private partners in the Philippines to strengthen conservation policies and improve habitat management and on-site and off-site enforcement systems.

USAID also conducts biodiversity and conservation initiatives that have CWT-related objectives but are not dedicated solely to CWT. For example, USAID implemented the Ecosystems Improved for Sustainable Fisheries project in the Philippines, designed to conserve marine biodiversity, enhance ecosystem productivity, and improve law enforcement at fisheries to combat illegal, unreported, and unregulated fishing.²⁹

Other Agencies Also Contribute to CWT

DOJ, NOAA, and Homeland Security also support efforts to combat wildlife trafficking in the United States and Asia. DOJ prosecutes criminals and publicizes through press releases the results of criminal convictions to encourage public awareness of this issue. DOJ also has participated in capacity-building workshops in Burma, Laos, Thailand, and Vietnam and CWT events such as the 2016 Hanoi Conference on Illegal Wildlife Trade and the annual U.S.–China Joint Liaison Group on law enforcement, in which DOJ, State’s INL, and other agencies participate in the Anti-smuggling Working Group. According to DOJ officials, DOJ also regularly advocates the use of the United Nations Transnational Organized Crime Convention as a legal basis for international cooperation to combat wildlife trafficking.

²⁹For the purposes of this report, we focused on programs whose primary mission was to combat wildlife trafficking, such as ARREST.

Domestically, NOAA inspects and seizes shipments at U.S. ports, investigates cases of wildlife trafficking, and raises awareness about wildlife crimes.³⁰ NOAA has a liaison at Homeland Security's CTAC and, according to NOAA officials, the CTAC has allowed NOAA to more proactively target shipments and improve coordination with FWS and CBP through daily interaction and more information sharing. As part of their efforts to raise awareness about wildlife trafficking, NOAA also works with DOJ, FWS, and State's Bureau of Public Affairs to publicly report information on and raise awareness about law enforcement efforts such as seizures. Internationally, NOAA provides technical assistance, conducts capacity-building, and serves as a resource in international policy discussions. For example, in collaboration with USAID, an analysis unit from NOAA assisted the Philippines in developing an intelligence assessment of illegal trade and trafficking in marine species. In November 2015, NOAA Office of Law Enforcement officers participated in the Association of Southeast Asian Nations Trade and Environmental Dialogue in Malaysia, providing presentations on illegal, unreported, and unregulated (IUU) fishing and ways to combat the trade in IUU fish and fish products.

DHS's CBP supports and coordinates with FWS and NOAA to interdict illegal wildlife shipments at U.S. ports. ICE HSI investigates wildlife crime in the United States, and in Asia it supports foreign government CWT efforts through capacity building and information sharing. For example, in Vietnam, ICE HSI regularly shares information on wildlife seizures with the host government to support investigations. In 2015, in Thailand, ICE HSI conducted a 5-day workshop on advanced wildlife trafficking investigations for officials across the government.

³⁰As of July 2017, NOAA's Office of Law Enforcement reported that it had 135 sworn law enforcement personnel to cover 3.36 million square miles of open ocean, more than 95,000 miles of U.S. coastline, 13 National Marine Sanctuaries, and five Marine National Monuments. NOAA has jurisdiction over 151 endangered and threatened marine species, 57 of which are foreign species.

Disagreement on Roles and Responsibilities Hindered Some CWT Activities in Southeast Asia

Although agencies have worked together to combat wildlife trafficking, disagreement on roles and responsibilities has hindered some CWT activities in Southeast Asia, according to some officials. In prior work, we defined collaboration broadly as any joint activity that is intended to produce more public value than could be produced when the organizations act alone.³¹ We also identified practices that can enhance and sustain collaborative efforts, including

- establishing mutually reinforcing or joint strategies,
- defining and articulating a common outcome, and
- agreeing on roles and responsibilities.

We found that agencies applied some collaboration mechanisms but also have an opportunity to improve on agreeing on roles and responsibilities. For example, the White House established a joint strategy, the *National Strategy for Combating Wildlife Trafficking*, in 2014. The strategy lays out guiding principles and strategic priorities for U.S. efforts to stem illegal trade in wildlife. In Southeast Asia, the U.S. embassy in Malaysia's *Integrated Country Strategy* articulates mission goals and objectives for a coordinated effort among all U.S. agencies and includes prevention of illegal wildlife trafficking as a key activity, according to officials. In addition, U.S. missions in Bangladesh, Cambodia, India, Laos, Nepal, Thailand, and Vietnam are developing CWT-specific country strategies, according to officials.³²

Agencies also defined and articulated a common outcome, outlined in the *National Strategy for Combating Wildlife Trafficking Implementation Plan* (Implementation Plan). The Implementation Plan states that success relies on agencies working in concert to carry out the objectives, which include strengthening enforcement, reducing demand for illegally traded wildlife, and building international cooperation. Under three strategic priorities, the Implementation Plan identifies 24 objectives and ways to measure progress for each. In Southeast Asia, State and USAID officials told us that they work toward those shared outcomes. In particular, they stated that to achieve the shared outcome of reducing demand for wildlife products, they cooperated on raising public awareness. For example, State collaborated with USAID in Vietnam to implement Operation Game

³¹[GAO-06-15](#).

³²India and Nepal are not in Southeast Asia but they also play a CWT role in the greater region, according to officials.

Change, a 2015 awareness-raising effort designed to inform the Vietnamese public about wildlife trafficking issues. In addition, to achieve the common outcome of strengthening law enforcement capacity, USAID is partnering with State, FWS, and DHS and other nongovernmental actors to implement the Reducing Opportunities for Unlawful Transport of Endangered Species program, which aims to increase enforcement capacity at ports of entry in Vietnam and other countries.

The Implementation Plan designates various U.S. agencies to lead or participate in achieving CWT strategic priorities, so it provides high-level direction on agency roles. However, the Implementation Plan does not define specific roles and responsibilities at the working level for mission staff implementing programs and activities. Officials at some missions reported that agreement on roles, responsibilities, and priorities facilitated collaboration on CWT activities in some instances. For example, an FWS attaché in the region told us that there has been effective collaboration between FWS, State, and ICE HSI due to agreement on roles and a shared understanding of key law enforcement terms and responsibilities. In Thailand, FWS and ICE HSI officials told us that they share information on cases, and FWS and State officials indicated that they have jointly conducted a variety of capacity-building activities across the region. State officials at ILEA in Bangkok attributed their successful regional collaboration with FWS to a mutual understanding that CWT capacity building is a responsibility that should be prioritized. State officials in Cambodia indicated that their Embassy CWT Interagency Working Group has been a forum for discussion among agencies in Cambodia to collaborate on CWT roles and activities. The working group has a designated lead agency and provides a forum to prevent or resolve potential differences in points of view among the agencies.

However, some officials also reported instances of disagreement on roles and responsibilities that they said led to bad outcomes. For example, at the mission in Bangkok, Thailand, which coordinates CWT activities across the Southeast Asia region, agencies' disagreements on roles and responsibilities have resulted in the delivery of inappropriate training activities and interference with U.S. efforts to cooperate with a foreign government, according to some officials. Specifically, FWS, State, and ICE HSI have disagreed with USAID on the roles and responsibilities that USAID implementing partners play with regard to law enforcement activities. USAID officials stated that they entrust their implementing partners to conduct law enforcement training and believe they sufficiently involve their U.S. agency counterparts. However, FWS, State, and ICE HSI officials believe that due to their law enforcement responsibilities

specifically related to strengthening host countries' antiwildlife trafficking enforcement efforts, they should be consulted and involved to a greater degree on activities directly related to such efforts.

In Thailand, a USAID implementing partner's lack of collaboration with U.S. law enforcement entities resulted in inappropriate training activities, according to some officials. Officials from FWS, ICE HSI, and an NGO told us that a CWT course conducted by a USAID implementing partner in Thailand was inappropriate due to a focus on ambush and military tactics, which are not suitable for the park rangers that received the training. In addition, another training course conducted in Thailand was not tailored for that country's landscape, according to a U.S. official, who explained that the Thai officers receiving the training would be unable to apply its lessons locally due to differences in terrain. FWS and ICE HSI officials stated that they were not sufficiently consulted prior to the training and, although they have provided feedback to USAID about these issues, they expressed concern that USAID had not fully considered the feedback. USAID officials indicated that training on ambush or military tactics would not have been allowed, and they have no evidence it occurred. USAID officials also stated that they were unaware of training that was not properly tailored and that host countries generally praised training that was provided by its implementing partner.

FWS and State officials in Thailand also told us that agencies' and implementing partners' efforts to share information on wildlife crime with foreign governments have been fragmented due to disagreements about roles. For example, USAID's implementing partners and FWS separately approached foreign government entities to provide information or support during a recent law enforcement seizure of wildlife products. According to State and FWS officials in Thailand, while USAID's implementing partner has a role in providing information that can support CWT activities, U.S. agencies in-country are responsible for official engagement on law enforcement matters and, therefore, should take the lead in communicating with host governments, particularly in criminal investigations.

According to USAID officials, USAID and its implementing partners share this responsibility and have a role to play. USAID officials told us that they were aware of the difference in views and acknowledged that there may have been instances in which an implementing partner overstepped. USAID officials further explained that they have made an effort to address this particular issue by changing its implementing partner as well as changing their CWT program structure from a cooperative agreement to a

contract so that USAID has more oversight and control. The new implementing partner also brought in a law enforcement expert to help ensure that training and related activities will be appropriate, according to USAID officials. In addition, the new USAID program specifies that coordination with other agencies is required, and USAID conducted a regional workshop in March 2017 to serve as a mechanism for coordination.

However, even after this conference, officials indicated that some agencies still had not agreed on the appropriate balance for how implementing partners should collaborate with U.S. law enforcement on criminal investigations. According to State and FWS officials, differences in agency views of their roles have hindered U.S. efforts to cooperate with a foreign government and confuse foreign government officials who may not realize that an implementing partner is not a U.S. government agency and thus does not have the same authority. USAID officials indicated that they were unaware of instances where its implementing partner interfered with U.S. efforts to cooperate with a foreign government.

Our work has shown that although collaborative mechanisms differ in complexity and scope, they all benefit from certain key features, including clarity of roles and responsibilities. For example, our work also notes that agreement on roles and responsibilities helped agencies determine who will lead a collaborative effort, clarify who will perform specific tasks, organize joint and individual efforts, and facilitate decision making. In addition, we have previously reported that key issues agencies should consider whether participating agencies have clarified the roles and responsibilities of participants in collaborative efforts and whether participating agencies have agreed to a process for making and enforcing decisions. Some U.S. missions in Southeast Asia are developing CWT-specific country strategies, which could provide a platform for the Task Force to give additional guidance on roles and responsibilities of mission staff engaged in CWT efforts in the region. Doing so would help clarify which agency will do what and facilitate maximum use of resources.

FWS, State, and USAID Have Taken Steps to Assess CWT Activities

FWS, State, and USAID Monitor CWT Activities

FWS

FWS uses a range of measures to track the progress of its partners and grantees. For example, FWS has established standard indicators for CWT, which include the following:

- the number of arrests of large-scale wildlife traffickers resulting from a project's investigations, operations support, or both; and
- the number of wildlife traffickers who have been arrested who are successfully prosecuted.

Specifically for public relations efforts, the guidance calls for applicants to identify the desired behavior that the campaign is intended to encourage. In addition, FWS required 2017 CWT project proposals to identify all expected outputs or products of key project activities. This may include management plans, brochures, posters, training manuals, number of people trained, workshops held, hours of training provided, and equipment purchased.

One FWS-funded program designed to counter pangolin trafficking to China by laying the foundations for reducing consumer demand provides an illustrative example of how it applied FWS monitoring guidance. Among other activities, the program proposed developing and piloting strategies to change behavior, with the goal of eliminating the market for illegally traded wildlife in key areas. The proposal identifies outputs, such as reports on consumer demand, and states that key components of developing a demand reduction strategy include identification of target audiences and the specific behaviors that the campaign aims to change. Quarterly reports as of April 2017 have described progress toward goals, outlining methodological details on how motivation and potential barriers for desired behavior will be measured. The program is scheduled to conclude in September 2017.

The FWS Office of Law Enforcement Strategic Plan 2016 – 2020 identifies a set of CWT-related metrics for CWT, such as interdictions, penalties, fines, and value of illegal activities. FWS reports this information publicly. For example, Operation Crash, an ongoing nationwide criminal investigation led by FWS that focuses on the illegal trade in rhinoceros horn and elephant ivory, has resulted in 32 individuals sentenced and approximately 34 years of total prison sentences, \$2 million in fines, and \$6 million in forfeitures as of February 2017.

Regarding U.S.-based partnerships, FWS monitored the U.S. Illegal Wildlife Demand Reduction Campaign by tracking the estimated number of people who see the ads (reach) and the number of times content is displayed (impressions). From launch through the middle of the second quarter of fiscal year 2017, FWS reported the following:

- Billboards: Monthly, about 5 million travelers are estimated to pass by the airport billboards at the international airports of Atlanta, Georgia; Chicago, Illinois; Los Angeles, California; and Miami, Florida. To date, an estimated total of about 45 million travelers have passed through these airports and may have seen the messages.
- Social media: On September 7, 2016, FWS and its implementing partner, WildAid, launched the campaign with joint press conferences held at the Atlanta International Airport and at the Los Angeles International Airport. This resulted in more than 1 million impressions on Twitter, engagement of more than 236,000 friends on Facebook, and 5,000 new followers on Instagram.

In addition, at the beginning of the campaign, WildAid completed a public survey to assess what percentage of the U.S. general public was aware of wildlife trafficking. At the conclusion of the 3-year campaign, WildAid intends to facilitate another public survey to evaluate the effectiveness of the campaign, with results expected in late 2018.

State

INL's *Guide to Developing a Performance Measurement Plan* states that program teams are to monitor project activities and results in order to identify project successes and challenges, guide resource allocations, and facilitate improved performance. According to a State official, INL requires every CWT program implementer to provide quarterly progress and financial reports and final programmatic and financial reports. Quarterly reports must provide a quantitative and qualitative analysis of work performed and include, among other things, results achieved, challenges encountered, and action taken. At the end of a program, INL

extracts best practices and lessons learned for future planning, according to a State official.

We examined monitoring documentation related to three INL CWT programs as illustrative examples, described below.

- From February to March 2016, State's ILEA in Thailand provided a Wildlife Trafficking Investigators course designed to cover a range of topics, including case management, corruption, and wildlife identification. The report covering the first quarter of calendar year 2016 for this program describes progress made toward objectives and identifies challenges and corrective action. For example, the report states that students participated in crime scene processing, surveillance, undercover operations, interviewing, raid planning, and case presentation exercises – all reflective of a specific performance measurement objective. The report also identifies challenges such as securing role players for exercises and proposes using FWS instructors and ILEA staff as a solution.
- State provided an approximately \$2 million grant, running from September 2015 to September 2017, to the Wildlife Conservation Society (WCS) aimed at strengthening the capacity of government and law enforcement officials on wildlife trafficking across key countries in Latin America and Asia. The report covering the first quarter of calendar year 2017 for this program describes progress and activities related to objectives. For example, one activity is intended to strengthen legislative frameworks to combat wildlife trafficking, and the report states that in Vietnam, WCS has been providing inputs to articles of the penal code relevant to wildlife protection.
- State provided approximately \$400,000 to UNODC and the University of Washington for a program running from September 2015 to September 2017 to facilitate forensic DNA analysis of ivory seizures in Africa and Asia. The most recent quarterly report for the program provides information on results associated with objectives. For example, one objective is to conduct DNA analysis on 175 African elephant reference samples, and the report indicates that over 100 samples had been analyzed from countries in Africa.

USAID

USAID's *Evaluation Policy* states that performance monitoring reveals whether implementation is on track and that project managers will ensure that implementing partners collect relevant monitoring data. To monitor ARREST, USAID's implementing partner collected and self-reported data on activities and progress against main goals. For example, the implementing partner reported in 2016 that to strengthen law

enforcement, ARREST trained approximately 2,300 people. To reduce consumption of endangered species, ARREST's iThink campaign at its peak reached more than 40 million people per day, according to the partner's report. In addition, a contractor analyzed ARREST's iThink demand reduction campaign results. According to its report, 62 percent of the audience in China had received the message after 6 months. In Thailand, 63 percent of the audience had received the message, while in Vietnam, 75 percent of the audience had received the message. The report also provided suggestions for future work based on lessons learned, such as segmenting the market, incorporating social norms, and increasing the emphasis on social media.

USAID designed monitoring elements into and developed plans for its recently initiated programs in Southeast Asia. For example, USAID's request for proposal (RFP) for Saving Species Vietnam, issued in January 2016 prior to the contract award, identifies key results and illustrative indicators for the main tasks. Specifically, the RFP suggests metrics for reducing consumer demand, such as percentage of target audience that receives the intended message and percentage change in purchases of targeted illegal wildlife products. In addition, the RFP calls for quarterly reports that must include, among other things, performance indicator results against targets. USAID's RFP for Wildlife Asia also designed monitoring into the program from the start by including similar elements.

In May 2017, USAID produced an Activity Monitoring, Evaluation and Learning Plan for Saving Species (MEL Plan), which includes a Results Framework that identifies the purpose of the program and details associated tasks and key results. According to the MEL Plan, the Results Framework was developed based on a range of inputs, including USAID's *Measuring Efforts to Combating Wildlife Crime – A Toolkit for Improving Action and Accountability*. The MEL Plan also provides a mix of output and outcome performance indicators with baselines and targets, to be used for communication and decision making. In addition, the MEL Plan calls for Pause and Reflect Sessions, Annual Strategic Reviews, work planning sessions, and other key learning events to reflect on progress and use that knowledge to adapt accordingly. In May 2017, USAID also produced a draft MEL Plan for Wildlife Asia, which provides performance indicators with baselines and targets. In addition, the April 2017 draft MEL Plan for the Philippines Protect Wildlife program contains similar information and, according to USAID officials, the MEL Plan used the action and accountability toolkit to inform the development of CWT metrics.

One Evaluation of CWT Activities Has Been Conducted by USAID

One USAID CWT program in Asia conducted a midterm evaluation, but State and FWS have not conducted any evaluations. State has not conducted any evaluations of INL CWT activities because none meet State's criteria for completing an evaluation, including funding and duration thresholds, according to a State official. FWS has not conducted any evaluations of its CWT activities in Asia but has established a new CWT-focused branch, which is developing a strategic plan, a framework, and indicators to measure progress and success for CWT efforts.³³ In March 2016, the Task Force released an annual progress report that describes U.S. government accomplishments; however, according to an official, the Task Force does not plan to issue a progress report in 2017 due to vacancies in leadership and because agencies are working on a similar report planned for completion sometime in 2017, in response to the Eliminate, Neutralize, and Disrupt Wildlife Trafficking Act of 2016.

USAID's Evaluation Policy states that for each project, consideration will be given during the design phase to the performance evaluation that will be undertaken. The ARREST program conducted a midterm evaluation, and we assessed it against key elements to determine the quality of the evaluation. We have previously reported that addressing or requiring certain elements provides the basis for a high-quality evaluation.³⁴ For this analysis, we considered a range of criteria, including the following:

- Evaluation questions align with program goals.
- Target population and sampling method are appropriate, given the scope and nature of the evaluation questions.
- Data collection is appropriate for answering the evaluation questions.
- Data analysis is appropriate to answer the evaluation questions.

³³State, FWS, USAID, and NGO officials told us that they face a range of challenges in evaluating CWT activities, including these: isolating the impact of interventions (outcomes may be due to many actors' efforts or to factors out of agency control); identifying a counterfactual; and obtaining reliable data.

³⁴See, for example, GAO, *Designing Evaluations: 2012 Revision*, [GAO-12-208G](#) (Washington, D.C.: January 2012); GAO, *Foreign Assistance: Selected Agencies' Monitoring and Evaluation Policies Generally Address Leading Practices*, [GAO-16-861R](#) (Washington, D.C.: Sept. 27, 2016); GAO, *Foreign Assistance: Agencies Can Improve the Quality and Dissemination of Program Evaluations*, [GAO-17-316](#) (Washington, D.C.: Mar. 3, 2017).

We found that overall, the midterm evaluation was acceptable in quality, although it fell short of fully addressing all the key elements. For example, the evaluation generally met the first two elements above. However, the evaluation only partially met the element for data collection and data analysis.³⁵ For example, the evaluation did not clearly specify how survey recipients had been selected and did not provide precise details about how qualitative data from in-person interviews had been analyzed. USAID did not conduct a final evaluation of ARREST because, according to officials, the timing of a late midterm evaluation was such that its findings were used in the development of the new Wildlife Asia program, and it would not have been cost-effective to conduct a final evaluation, among other reasons.

The draft Wildlife Asia MEL Plan identifies plans to prepare for a midterm and final performance evaluation at the middle and end of the program time line, and USAID officials confirmed that they intend to conduct evaluations of the program. The Saving Species MEL Plan indicates that program officials will work in collaboration with USAID to conduct a midterm evaluation and that one objective will be to provide recommendations in order to improve effectiveness and evaluate factors that help or hinder the achievement of expected outcomes and objectives. The MEL Plan also calls for a third-party firm, identified by USAID through a competitive process, to conduct the evaluation in the third year of the program. The draft Philippines Protect Wildlife MEL Plan indicates that the program will conduct a midterm and final evaluation.

FWS, State, and USAID Have Identified and Applied Some Lessons Learned

FWS, State, and USAID guidance states that agencies should learn from monitoring and evaluation efforts so they can identify what works, what does not work, and why. For example, from monitoring the first year of implementation, FWS learned from its domestic campaign that most Americans consider themselves wildlife lovers, but most know little about wildlife trafficking, indicating the need for outreach and education efforts.

³⁵To conduct this assessment, we applied a methodology and procedures we developed to assess a representative sample of 173 U.S. government foreign assistance evaluations completed in fiscal year 2015. See [GAO-17-316](#), in which we found that 26 percent of foreign assistance evaluations were of high quality, 47 percent were of acceptable quality, and 27 percent were of lower quality. Based on these findings, we identified opportunities for improvement and recommended that the agencies, including USAID, develop plans to better the quality of their evaluations. USAID and the other agencies concurred with our recommendation.

State officials told us that they took stock of regional CWT activities in Asia to improve program planning. As a result, before launching the next set of CWT courses, INL is conducting a needs assessment to clarify skill gaps, impact potential, and alignment with other activities. In addition, INL is examining approaches to strengthen sustainability such as adding train-the-trainer courses.

USAID and implementing partner officials told us that they learned lessons during the implementation of ARREST and applied or plan to apply them to new programs. For example, in response to ARREST's midterm evaluation recommendation to focus demand reduction efforts increasingly on behavior change communication, officials stated that they adjusted the message of their campaign advertisements to target behavior change and worked to recruit a range of key opinion leaders to maximize reach and impact. USAID intends to carry this lesson over to its new regional program, according to 2016 plans that call for the use of behavior change communication methodologies, as opposed to one-off public relations campaigns, in demand reduction activities. Officials told us that in practice this means future campaigns will focus on specific species, such as pangolins, and target Chinese and Vietnamese consumers who believe pangolin scales can help with lactation. USAID's implementing partner for Saving Species also identified possible ways to improve the impact and sustainability of CWT training. For example, instead of providing traditional, onetime classroom training, officials plan to establish mentoring and on-the-job training programs in which officials in similar roles teach one another. This facilitates learning and may help identify CWT champions, enhancing sustainability and effectiveness, according to program officials.

Conclusions

Wildlife trafficking, worth at least an estimated \$7 billion annually, continues to push some protected and endangered animal species to the brink of extinction. Although agencies have worked together to combat wildlife trafficking, as outlined in the National Strategy for Combating Wildlife Trafficking Implementation Plan, disagreement on roles and responsibilities has hindered some CWT activities in Southeast Asia. We have previously reported that key issues agencies should consider include whether participating agencies have clarified the roles and responsibilities of participants in collaborative efforts and whether participating agencies have agreed to a process for making and enforcing decisions. Agencies have collaborated on a range of CWT activities, including building law enforcement capacity, raising awareness, and helping spur partner-nation action on CWT. While agencies have applied

some practices that can enhance and sustain collaborative efforts, such as establishing joint strategies and defining a common outcome, some officials in Southeast Asia reported a level of disagreement on roles and responsibilities, resulting in the delivery of inappropriate training activities and in the hindering of U.S. efforts to cooperate with a foreign government. DOI, State, and USAID are members of the Presidential Task Force on Wildlife Trafficking that is charged with coordinating among agencies combating wildlife trafficking efforts. By ensuring that all relevant member agencies have agreed on and clearly defined roles and responsibilities, agencies will have more reasonable assurance that they can effectively marshal the contributions of all agencies to take full advantage of their expertise and resources in addressing CWT issues. Taking steps to clarify specific roles and responsibilities, for example by including them in a CWT country strategy or other document, could help improve coordination, help ensure activities are mutually reinforcing, reduce the risk of fragmented efforts, and maximize the impact of CWT activities in Southeast Asia.

Recommendations for Executive Action

GAO is making the following three recommendations:

- The Secretary of the Interior should work with the Task Force to clarify roles and responsibilities of mission staff engaged in collaborative efforts on combating wildlife trafficking in Southeast Asia. (Recommendation 1)
- The Secretary of State should work with the Task Force to clarify roles and responsibilities of mission staff engaged in collaborative efforts on combating wildlife trafficking in Southeast Asia. (Recommendation 2)
- The Administrator of the U.S. Agency for International Development should work with the Task Force to clarify roles and responsibilities of mission staff engaged in collaborative efforts on combating wildlife trafficking in Southeast Asia. (Recommendation 3)

Agency Comments and Our Evaluation

We provided a draft of this report for review and comment to the Departments of Commerce, Homeland Security, the Interior, Justice, State, and the Treasury, and USAID. The Departments of the Interior and State and USAID agreed with our recommendations, and their comments are reproduced in appendixes III, IV, and V, respectively. The Departments of Commerce, the Interior, Justice, and State and USAID provided us with technical comments, which we incorporated as appropriate.

In its comments, USAID indicated that it objects to the phrase “bad outcomes”, the word “inappropriate,” and the description related to an implementing partner that may have “overstepped” as used in our discussion of agency collaboration. We attribute that language specifically to certain agency officials, acknowledge differences in agency views, and include perspectives from USAID officials for balance.

In its comments, DOI notes that that the content in the report that most directly substantiates the recommendations occasionally reads as disagreements involving a few specific activities among a small number of U. S. government personnel. Our findings focus on a limited set of people and activities but reflect a clear opportunity to clarify roles and responsibilities. Moreover, as we mention, the mission in Bangkok coordinates CWT activities across the Southeast Asia region, so efforts to improve collaboration potentially would have a broad effect and benefit.

We are sending copies of this report to the appropriate congressional committees and to the Secretaries of Commerce, Homeland Security, the Interior, State, and the Treasury; the Attorney General of the United States; the Administrator of USAID. In addition, the report is available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-8612, or gianopoulosk@gao.gov. Contact points for our Offices of Congressional Relations and of Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix VI.



Kimberly M. Gianopoulos
Director, International Affairs and Trade

Appendix I: Objectives, Scope, and Methodology

This report examines (1) what is known about the demand for illegal wildlife and wildlife products in the United States and in Asia, (2) actions agencies are taking to reduce demand for illegal wildlife products in the United States and Asia, and (3) the extent to which the U.S. Fish and Wildlife Service (FWS) within the Department of the Interior (DOI), the U.S. Department of State (State), and the U.S. Agency for International Development (USAID) are assessing the effectiveness of their combating wildlife trafficking (CWT) activities.

We limited the scope of this review to the United States and Asia—identified as major markets for the illegal wildlife demand—to complement our 2016 report and to provide geographical diversity in our work. We selected these geographic areas based on our review of reports on demand for illegally traded wildlife and discussions with U.S. government agencies.

To address our objectives, we analyzed agency documentation and met with officials from DOI, State, USAID, the Department of Justice, and the Department of Commerce's National Oceanic and Atmospheric Administration, which have designated roles in the *National Strategy for Combating Wildlife Trafficking Implementation Plan* to lead or participate in efforts to reduce illegal wildlife demand; the Department of Homeland Security, which has a role in enforcement and capacity-building efforts; and nongovernmental organizations (NGO) that focus on combating wildlife trafficking. We conducted fieldwork in Miami, Florida; China; Hong Kong; Thailand; and Vietnam. We selected these locations using a combination of criteria: (1) Since fiscal year 2014, the location has received at least \$1 million in U.S. government funding for efforts related to CWT; (2) CWT activities are under way in the location; and (3) the location has the presence of at least two U.S. government agencies conducting CWT work. This sample is not generalizable to all the locations in which the United States has CWT-related programs.

While in each location in Asia, we interviewed officials who played a role in CWT activities, which included officials from State, USAID, and the Departments of Homeland Security and the Interior. We also interviewed officials from host governments responsible for the management of natural resources and parks and representatives from NGOs, some of which were involved in implementing U.S. government programs related to awareness raising, law enforcement, and other CWT objectives.

To describe what is known about the demand for illegal wildlife and wildlife products in the United States and in Asia, we reviewed reports on

wildlife trafficking produced by United Nations organizations, the Organisation for Economic Co-operation and Development, and NGOs about the demand for these products in our locations of interest. We also reviewed surveys conducted for programs partially or fully funded by U.S. agencies that asked questions about purchasing behaviors for these products in the United States, China, Vietnam, and Thailand. These reports were either recommended to us by officials we interviewed or had been identified during our prior work on the supply of wildlife products. We reviewed the methodologies described in the reports and surveys and determined they were sufficiently reasonable for providing examples of wildlife and wildlife products traded and consumed and drivers for consumption in China and countries in Southeast Asia. However, it was beyond the scope of this review to determine the reliability of the underlying data. Many of these reports depend heavily on seizure data, which have limitations. The amount and location of seizures depend on law enforcement efforts, efficacy of law enforcement efforts, presence of illicit trade, and other factors, which are difficult to isolate.

Additionally, we analyzed national seizure data from the FWS's Law Enforcement Management Information System to report on wildlife confiscated in the United States. To assess the reliability of these data, we interviewed agency officials, reviewed documentation about the data, and conducted basic logical tests. We reviewed the 42,100 seizure records that FWS provided for logical consistency and removed a few hundred records for which we found duplicative, unknown, or blank values. Overall, we determined the data are sufficiently reliable for the purposes of identifying wildlife products seized between fiscal years 2007 and 2016. Data on seizures may not be indicative of underlying trends in trade and consumption, as they are dependent upon factors such as enforcement and techniques used by those importing the goods. To gather perspectives on demand for illegally traded wildlife in China and Southeast Asia, during our field visits to China, Hong Kong, Thailand, and Vietnam, we interviewed officials from DOI, State, USAID, the Department of Homeland Security, and officials at foreign ministries, NGOs that are implementing partners for U.S. agencies or have cooperated with U.S. agencies on CWT activities, and one company. We interviewed the company for illustrative purposes.

To examine actions agencies are taking to reduce demand for illegal wildlife products in the United States and Asia, we interviewed relevant officials and reviewed information, including agency and implementing partner documentation of CWT-related projects, programs, and grants. We also analyzed how agencies combating wildlife trafficking in

Southeast Asia are applying selected practices that can enhance and sustain collaborative efforts. As we have previously reported, such practices include establishing mutually reinforcing or joint strategies, defining and articulating a common outcome, and agreeing on roles and responsibilities.¹ In addition, we conducted fieldwork at the Port of Miami and interviewed U.S. government officials at this location to obtain insights on U.S. government activities. We selected the Port of Miami because it has been the site of large-scale CWT operations, and agency officials identified Miami as a hub for wildlife trade and an illustrative example of U.S. government CWT operations. We also conducted fieldwork in China and Vietnam, where we visited rescue centers and interviewed host government officials and NGO representatives.

To examine the extent to which FWS, State, and USAID are assessing the effectiveness of their CWT activities, we selected programs to analyze, spoke with agency officials, and reviewed documentation from the programs selected. We included programs that had started, finished, or been ongoing from the beginning of fiscal year 2015 to the end of fiscal year 2016 and that are or were solely dedicated to CWT. Specifically for State, programs must have been identified by its Bureau of International Narcotics and Law Enforcement Affairs as a discrete activity that contributed to CWT and must have been at least 3 months into implementation. Specifically for USAID, programs must have (or have had) funding greater than \$1 million. To assess agency monitoring practices, we analyzed agency guidance on monitoring and examined selected programs as illustrative examples of how agencies applied their own guidance. To assess evaluation practices, we assessed a USAID midterm evaluation against key elements to determine quality.² Two social science analysts independently assessed this evaluation using the same criteria, methods, and procedures that we developed for [GAO-17-316](#). The analysts met and reconciled any initial differences in their assessments.

¹See GAO, *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005). We selected these practices because they were the most relevant to agency CWT efforts in Southeast Asia.

²We have previously reported that addressing or requiring certain elements provides the basis for a high-quality evaluation. See, for example, GAO, *Foreign Assistance: Agencies Can Improve the Quality and Dissemination of Program Evaluations*, [GAO-17-316](#) (Washington, D.C.: Mar. 3, 2017), and *Foreign Assistance: Selected Agencies' Monitoring and Evaluation Policies Generally Address Leading Practices*, [GAO-16-861R](#) (Washington, D.C.: Sept. 27, 2016).

We conducted this performance audit from October 2016 to October 2017 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Photographs Related to Combating Wildlife Trafficking in the United States and Asia

The following photographs (see fig. 8-26) were taken by GAO staff during field visits to Miami, Florida; Beijing, China; Hong Kong; Bangkok, Thailand; and Hanoi, Vietnam. GAO observed and photographed the following:

- shipment inspections conducted by U.S. Fish and Wildlife Service inspectors at the Port of Miami;
- examples of wildlife that are traded in the United States;
- examples of wildlife and wildlife products that have been seized by the U.S. Fish and Wildlife Service;
- examples of wildlife and wildlife products that have been seized in Hong Kong;
- antiwildlife trafficking awareness campaigns at the Hartsfield–Jackson Atlanta International Airport; Beijing Capital International Airport; Hong Kong International Airport; Suvarnabhumi Airport, Bangkok, Thailand; Chatuchak Market in Bangkok, Thailand; and a highway in Hanoi, Vietnam;
- wildlife at the Beijing Rescue and Rehabilitation Center; the Endangered Primate Rescue Center, Cuc Phuong National Park, Vietnam; and the Carnivore and Pangolin Rescue Center, Cuc Phuong National Park, Vietnam; and
- shops that sell ivory products in Hong Kong.

To view these photographs online, please click on this [hyperlink](#).

Appendix II: Photographs Related to
Combating Wildlife Trafficking in the United
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Figure 8: U.S. Fish and Wildlife Service Inspections at the Port of Miami



Source: GAO. | GAO-18-7

Appendix II: Photographs Related to
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States and Asia

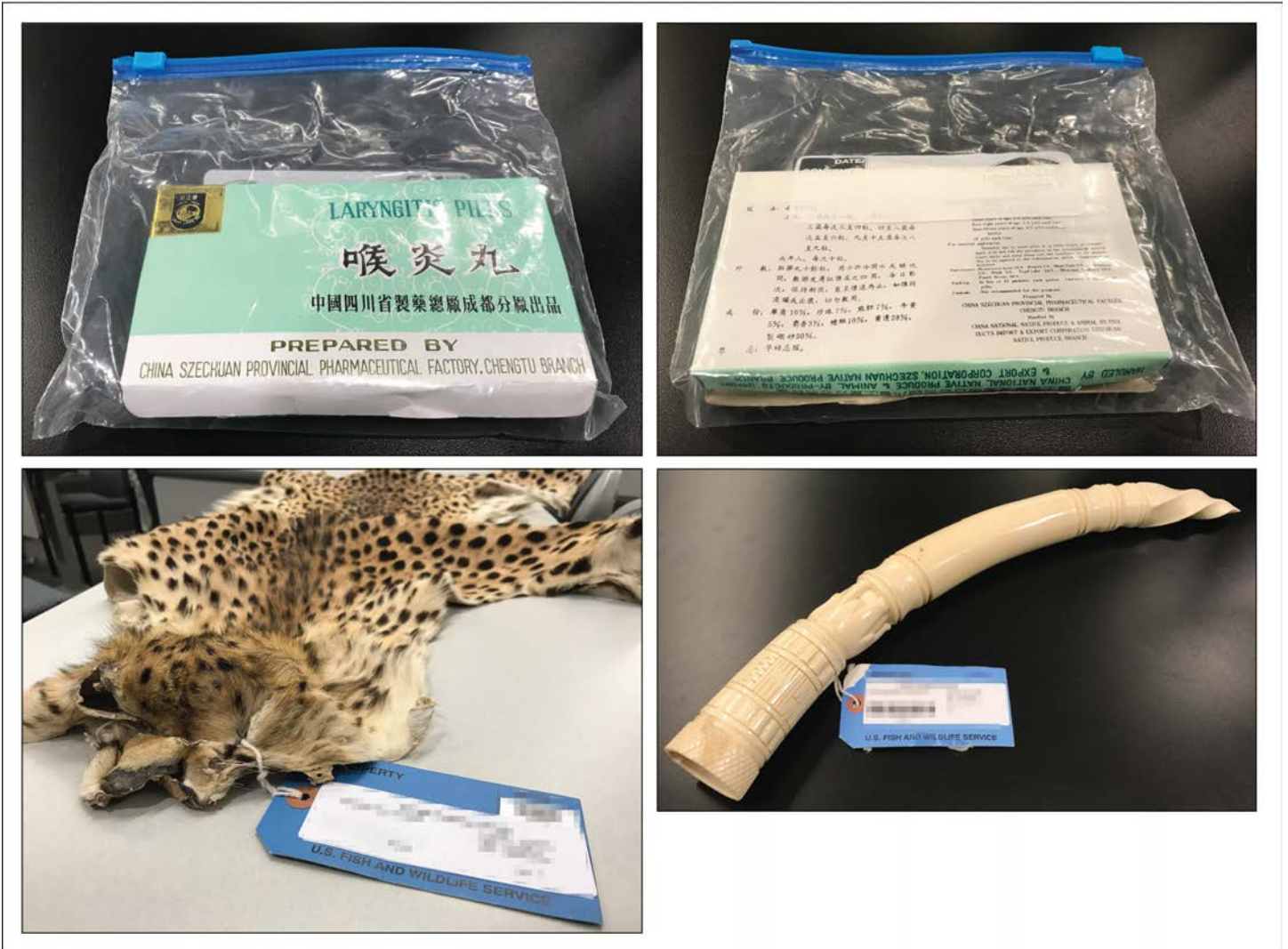
Figure 9: Examples of Seized Wildlife Products at the Port of Miami



Source: GAO. | GAO-18-7

Appendix II: Photographs Related to Combating Wildlife Trafficking in the United States and Asia

Figure 10: Examples of Wildlife Products Seized in the United States

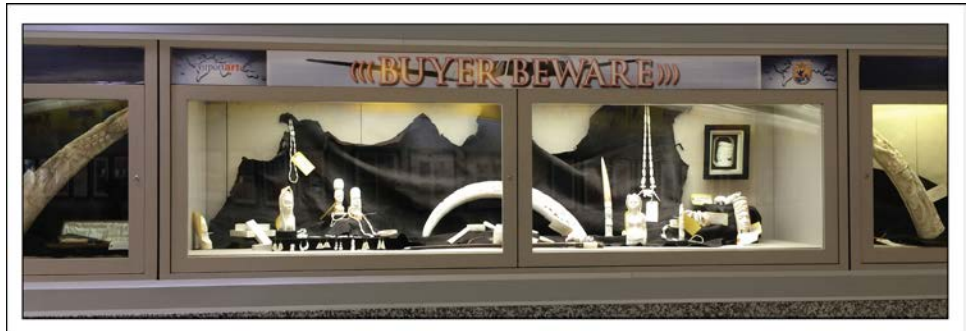


Medicine containing rhino horn (top left and right), cheetah skin (bottom left) and ivory carving (bottom right).

Source: GAO. | GAO-18-7

Appendix II: Photographs Related to
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Figure 11: Display of Ivory Products Confiscated by the U.S. Fish and Wildlife Service in the Hartsfield–Jackson Atlanta International Airport



Source: GAO. | GAO-18-7

Figure 12: World Wildlife Fund Awareness Campaign in a Beijing, China, Subway Station



Source: GAO. | GAO-18-7

Appendix II: Photographs Related to Combating Wildlife Trafficking in the United States and Asia

Figure 13: International Fund for Animal Welfare Wildlife Trafficking Elephant Awareness Campaign, Beijing Capital International Airport



Source: GAO. | GAO-18-7

Figure 14: Illegal Wildlife Trade Awareness Display in Hong Kong International Airport



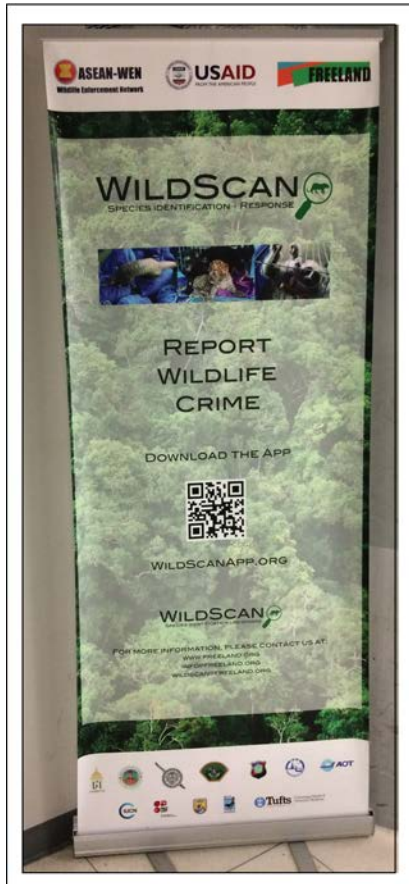
Source: GAO. | GAO-18-7

Figure 15: Wildlife Trafficking Awareness Poster in the Baggage Claim Area of Suvarnabhumi Airport, Bangkok, Thailand



Source: GAO. | GAO-18-7

Figure 16: WildScan Awareness Poster in the Suvarnabhumi Airport, Bangkok, Thailand



Source: GAO. | GAO-18-7

Figure 17: Wildlife Trafficking Awareness Poster about Elephant Ivory, in the
Suvarnabhumi Airport, Bangkok, Thailand



Source: GAO. | GAO-18-7

Figure 18: Illegal Wildlife Trade Awareness Displays at Chatuchak Market, Bangkok, Thailand



Source: GAO. | GAO-18-7

Figure 19: Illegal Wildlife Trade Rhino Horn Awareness Billboard in Hanoi, Vietnam



Source: GAO. | GAO-18-7

Appendix II: Photographs Related to
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Figure 20: Wildlife at the Beijing, China, Rescue and Rehabilitation Center



Source: GAO. | GAO-18-7

Appendix II: Photographs Related to
Combating Wildlife Trafficking in the United
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Figure 21: Primates at the Endangered Primate Rescue Center, Cuc Phuong National Park, Vietnam



Source: GAO. | GAO-18-7

Appendix II: Photographs Related to
Combating Wildlife Trafficking in the United
States and Asia

Figure 22: Examples of Wildlife Products Seized by the Hong Kong Government, on Display in Hong Kong's Agriculture, Fisheries, and Conservation Department Education Center



Clockwise from top left: animal fur skins, reptile skin fashion items, hornbill products, and live ball python.

Source: GAO. | GAO-18-7

Appendix II: Photographs Related to
Combating Wildlife Trafficking in the United
States and Asia

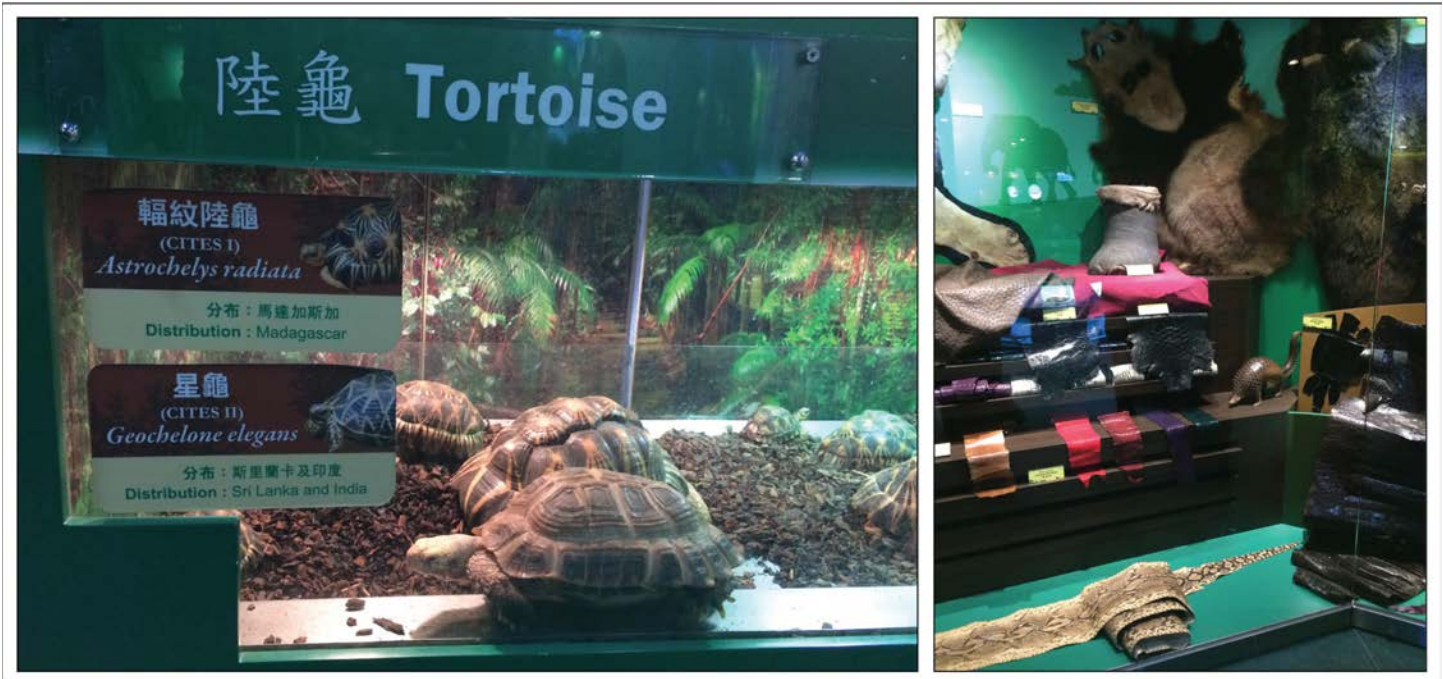
Figure 23: Examples of Wildlife Products Seized by the Hong Kong Government, on Display in Hong Kong's Agriculture, Fisheries, and Conservation Department Education Center



Clockwise from top left: Humphead wrasse, saiga antelope horn products, a taxidermy tiger, and seahorses.

Source: GAO. | GAO-18-7

Figure 24: Examples of Wildlife Products Seized by the Hong Kong Government, on Display in Hong Kong's Agriculture, Fisheries, and Conservation Department Education Center



Live tortoises (left) and various seized wildlife products such as rat snake skin and panda fur (right).

Source: GAO. | GAO-18-7

Appendix II: Photographs Related to
Combating Wildlife Trafficking in the United
States and Asia

Figure 25: Rhino Horn Products Seized by the Hong Kong Government, on Display in Hong Kong's Agriculture, Fisheries, and Conservation Department Education Center



Source: GAO. | GAO-18-7

Figure 26: Ivory Shops in Hong Kong



Source: GAO. | GAO-18-7

Appendix III: Comments from the Department of the Interior



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

SEP 29 2017

Ms. Kimberly Gianopoulos
Director, International Affairs and Trade
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Gianopoulos:

Thank you for providing the Department of the Interior (Department) the opportunity to review and comment on the draft Government Accountability Office (GAO) report entitled, *Combating Wildlife Trafficking: Agencies are Taking Action to Reduce Demand, but Opportunities Exist to Improve Collaboration in Southeast Asia* (GAO-18-7). We appreciate GAO's review of U.S. agencies' efforts to combat wildlife trafficking.

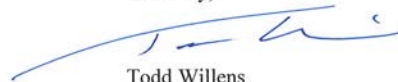
Illegal trade in wildlife, also known as wildlife trafficking, continues to push some protected and endangered animal species to the brink of extinction. Therefore, in 2013, a Presidential Task Force on Wildlife Trafficking (Task Force) was established to develop a strategy to guide U.S. efforts to combat wildlife trafficking.

The Department concurs with GAO's recommendation requiring the Secretary of the Interior to work with the Task Force to clarify roles and responsibilities of mission staff engaged in collaborative efforts on combating wildlife trafficking in Southeast Asia. We believe that increased collaboration and clarification of roles and responsibilities will improve the U.S. Government's overall effectiveness in combating wildlife trafficking not only in Southeast Asia but also on a global basis. We note, however, that the content in the report that most directly substantiates the recommendations, occasionally reads as disagreements involving a few specific activities among a small number of U. S. Government personnel. We believe that the specific examples, particularly on pages 29-34, undermine the broader recommendations and fail to reflect the progress made in this area. We believe that providing a broader summation of these issues would be more persuasive.

The enclosure contains some technical comments for your consideration when finalizing the report.

If you have any questions or require additional information, please contact Daphne Carlson Bremer, the Policy Specialist and Program Officer for Combating Wildlife Trafficking Strategy and Partnerships, at (703) 358-2098.

Sincerely,



Todd Willens
Acting Assistant Secretary
Fish, Wildlife and Parks

Enclosure

Appendix IV: Comments from the Department of State



United States Department of State

Comptroller

Washington, DC 20520

SEP 26 2017

Charles M. Johnson, Jr.
Managing Director
International Affairs and Trade
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

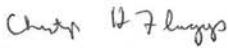
Dear Mr. Johnson:

We appreciate the opportunity to review your draft report, "COMBATING WILDLIFE TRAFFICKING: Agencies are Taking Action to Reduce Demand, but Opportunities Exist to Improve Collaboration in Southeast Asia" GAO Job Code 101167

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

If you have any questions concerning this response, please contact Joseph Detellis, Congressional Affairs Officer, Oceans and International Environmental and Scientific Affairs at (202) 647-6958.

Sincerely,


Christopher H. Flagg

Enclosure:
As stated

cc: GAO – Kimberly Gianopoulos
OES– Judith Garber (Acting)
State/OIG - Norman Brown

Department of State Comments on Draft GAO Report

**COMBATING WILDLIFE TRAFFICKING: Agencies Are Taking
Action to Reduce Demand, but Opportunities Exist to
Improve Collaboration in Southeast Asia**
(GAO-18-7, GAO Code 101167)

Thank you for the opportunity to comment on the draft report "*Combating Wildlife Trafficking: Agencies are Taking Action to Reduce Demand, but Opportunities Exist to Improve Collaboration in Southeast Asia.*"

The Department of State greatly appreciates GAO's evaluation of the United States' efforts to reduce demand for illegally traded wildlife and wildlife products. With respect to the recommendations, which speak to clarifying roles and responsibilities stemming from the National Strategy for Combating Wildlife Trafficking Implementation Plan, we agree that the Task Force, especially at the working level, would benefit from these clarifications. We concur with the recommendations. As we continue to implement the National Strategy for Combating Wildlife Trafficking, we will work with our fellow Co-Chairs and Task Force agencies to improve interagency coordination on roles and responsibilities.

We appreciate GAO's work in this area and its recommendations for the U.S. government's efforts to combat wildlife trafficking.

Appendix V: Comments from the U.S. Agency for International Development



SEP 26 2017

Ms. Kimberly Gianopoulos
Director, International Affairs and Trade
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: COMBATING WILDLIFE TRAFFICKING: Agencies are Taking Action to Reduce Demand, but Opportunities Exist to Improve Collaboration in Southeast Asia (GAO-18-7).

Dear Ms. Gianopoulos:

I am pleased to provide the United States Agency for International Development's (USAID) formal response to the U.S. Government Accountability Office (GAO) draft report entitled, "*COMBATING WILDLIFE TRAFFICKING: Agencies are Taking Action to Reduce Demand, but Opportunities Exist to Improve Collaboration in Southeast Asia*" (GAO-18-7).

This letter and the enclosed USAID comments are provided for incorporation as an appendix to the final report. Thank you for the opportunity to respond to the GAO draft report and for the courtesies extended by your staff while conducting this GAO engagement.

Sincerely,

A handwritten signature in blue ink, appearing to read "Angelique M. Crumbly".

Angelique M. Crumbly
Acting Assistant Administrator
Bureau for Management

Enclosure: a/s

USAID COMMENTS ON GAO DRAFT REPORT

No. GAO-18-7

USAID appreciates GAO's inclusion of some of our Asia regional mission's (USAID/RDMA) points made in response to the initial Statement of Facts. We think, however, that some of the points are not adequately integrated into the body of the report and we request a more balanced summation of the issues. This pertains to the first three points below. The fourth item is a correction to language used to describe USAID's position on one point.

- 1) **GAO highlights page, 2nd sentence from the bottom:** "Disagreements on these roles and responsibilities in Southeast Asia resulted in inappropriate training activities and hindering U.S. cooperation with a host nation, according to some officials." USAID objects to the word "inappropriate" as it does not reflect the variety of opinions and recollections among USG staff on this issue. In fact, the approaches that were utilized in the ARREST supported NGO training were within the scope of the agreement and USAID's legal and regulatory parameters. USAID considers a more accurate description of the issue could be: "Among agencies providing assistance, there continues to be differing views on the role of NGOs in providing capacity building on law enforcement; this ongoing debate highlights the need for improved coordination and discussion among USG agencies at post."
- 2) **Page 31, last paragraph:** "However, officials also reported instances of disagreement on roles and responsibilities that they said led to bad outcomes." USAID objects to the phrase "bad outcomes" as this appears to be without merit. Quoting from USAID/RDMA's response to the Statement of Facts "State/INL and FWS officers, including two FWS attaches on long-term TDYs with ARREST, observed trainings to ensure content and activities were appropriate. According to the two AORs for this activity (one from 2012 to 2015, the other for 2016), these INL and FWS officers did not contemporaneously raise the concerns cited in GAO's findings, nor any other serious concerns." USAID also objects to the word "inappropriate" in the second sentence for the same reasons stated above in point #1. Again, these issues highlight the need for improved coordination and discussion among USG agencies at post and for all staff to document issues and problems in an open and transparent manner so that issues can be addressed in a timely fashion.
- 3) **Page 32, middle paragraph:** "In Thailand, a USAID implementing partner's lack of collaboration with U.S. law enforcement entities resulted in inappropriate training activities." USAID also objects to the word "inappropriate" for the same reasons stated above in points #1 and #2. USAID considers a more accurate discussion for this paragraph would be to highlight the need for coordination and cooperation in delivering training and that, as reflected in point (1) above: "Among agencies providing assistance, there continues to be differing views on the role of NGOs in providing capacity building on law enforcement; this ongoing debate highlights the need for improved coordination and discussion among USG agencies at post." This debate is acknowledged. Many agencies work with NGOs, contractors, and international organizations to provide training, and therefore coordination among USG agencies at post and with Washington is critical. As mentioned in the first full

paragraph on page 33, mechanisms for coordination have been put in place; coordination efforts are improving and will continue to be a focus of the interagency.

- 4) **Page 33, 2nd paragraph:** “USAID officials told us that they were aware of the difference in views and acknowledged that there may have been instances in which an implementing partner overstepped.” USAID objects to the word "overstepped" as it does not reflect our views on our implementing partner’s performance. USAID believes that a more accurate representation would be: “USAID officials told us that they were aware of the difference in views and acknowledged that verbal feedback was received from other USG officials about instances in which they felt that an implementing partner exercised too much independence.”

GAO Report Recommendation:

There is one recommendation in this report directed to USAID, on page 43 of the draft report, as follows:

- The Administrator of the U.S. Agency for International Development should work with the Task Force to clarify roles and responsibilities of mission staff engaged in collaborative efforts on combating wildlife trafficking in Southeast Asia. (Recommendation 3)

USAID agrees with this recommendation and has already taken steps to increase effective coordination among USG agencies in Southeast Asia. USAID will continue to work with DOL/FWS and State Department colleagues to improve and formalize coordination in SE Asia.

Appendix VI: GAO Contact and Staff Acknowledgments

GAO Contact

Kimberly M. Gianopoulos, (202) 512-8612, or gianopoulosk@gao.gov.

Staff Acknowledgments

In addition to the individual named above, Judith Williams (Assistant Director), Marc Castellano (Analyst-in-Charge), David Dayton, Martin De Alteriis, Neil Doherty, Mark Dowling, Michael Hoffman, and Jasmine Senior made key contributions to this report.

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