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**BEFORE THE U.S. HOUSE OF REPRESENTATIVES, COMMITTEE ON FOREIGN  
AFFAIRS, SUBCOMMITTEE ON TERRORISM, NONPROLIFERATION, AND TRADE  
ON POACHING AND TERRORISM: A NATIONAL SECURITY CHALLENGE**

**April 22, 2015**

Thank you for the opportunity to share my views with you on this most important topic. For the past academic year, I have been leading a graduate course on the topic of global wildlife conservation and the poaching crisis on behalf of a client, the Congressional Research Service (CRS).

Sixteen graduate students under my supervision have been researching these issues, covering key topics in six different reports for CRS, including: (1) national security (2) consumer demand (3) multilateral governance (4) public-private partnerships (5) sport hunting and (6) ecotourism.

As part of the research, teams conducted fieldwork in China and Tanzania. In addition to desk research and numerous telephone interviews, our security team conducted a number of interviews in Washington with various government agencies and non-governmental organizations.<sup>1</sup>

In addition to the papers for CRS, we also have a course blog that is public. I have included sample posts that are relevant to the topic of security and poaching along with my testimony. I encourage you to review some of our work here <http://sites.utexas.edu/wildlife/>

In my testimony, I would like to focus on (1) the key findings from our research, (2) conceptualizing security and poaching, (3) specific findings on Al-Shabaab, and (4) the implications for policy.

### **KEY FINDINGS ON SECURITY AND POACHING**

There is increased awareness of the gravity of the poaching crisis that is affecting iconic wildlife species such as elephants and rhinos, particularly in range states in Africa. It is also well established that the major sources of demand are from countries in Asia where a surge in purchasing power has dramatically increased incomes available for conspicuous consumption.

The connections between wildlife crime and security outcomes have been discussed in numerous official documents from the Obama Administration, notably the President's 2013 Executive

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<sup>1</sup> Interviews were conducted with the following organizations: U.S. Fish and Wildlife Service (FWS); The U.S. State Department; United States of Agency for International Development (AID); The National Security Council (NSC); The Office of the Director of National Intelligence (ODNI); INTERPOL; The Africa Center for Strategic Studies (ACSS); The Center for Advanced Defense Studies (C4ADS); and African Wildlife Foundation (AWF); World Wildlife Fund (WWF).

Order Combatting Wildlife Trafficking,<sup>2</sup> the 2014 National Strategy,<sup>3</sup> and the 2015 Implementation Plan.<sup>4</sup> There is a general recognition that the current poaching crisis been elevated from low-tech, low-scale poaching incidents of the past.

Today, the trafficking of wildlife has turned in to an increasingly industrial scale operation led by transnational criminal groups with sophisticated weaponry who are able to leverage existing transit routes for other products to send wildlife parts in high volumes from range states, particularly in Africa, to demand states, particularly in Asia. Weak states in Africa find their security and park rangers out-gunned and outmatched in the face of such firepower. The trade has corrosive effects on governance in both range and demand states. For security forces, park rangers, port authorities and other government officials, there is much temptation to look the other way in exchange for a portion of the proceeds from wildlife trafficking.

All of this is well understood at the ten thousand foot level. What is less understood are the specific pathways from source populations of animals to intermediaries on to end user consumer markets. The non-governmental organizations TRAFFIC,<sup>5</sup> with support from USAID, as well as C4ADS<sup>6</sup> have detailed studies to identify these market pathways but more information on the specific places and players involved is important to identify key nodes that can be disrupted.

In one of our papers, we sought to assess the links between national security and wildlife trafficking, including the links between groups that use terrorism as a tactic. As Chairman Poe noted in his opening statement, a number of different armed militant groups including Al Shabaab, the Lord's Resistance Army, and the Janjaweed have been implicated in the poaching of animals to fund their operations. Estimating the volume of the resource flows that groups derive from wildlife trafficking is difficult since the business is illicit. What we can say is that because the punishment for wildlife crimes is so low and limited, groups seeking to finance their operations are opportunistic and will often follow the path of least resistance, looking for low-cost, low-risk possibilities to raise money, including wildlife trafficking.

Some organizations and media outlets have tried to estimate the magnitude of these flows, but in some cases may overstate the reality. Given publicly available data, we were not in a position to corroborate these estimates independently. The National Intelligence Council assessment on wildlife trafficking prepared a short public report of what we understand to be a longer classified product. That white paper concluded:

Criminal elements of all kinds, including some terrorist entities and rogue security personnel, often in collusion with government officials in source countries are involved in poaching and movement of ivory and rhino horn across east, central, and southern

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<sup>2</sup> The White House. "Executive Order -- Combating Wildlife Trafficking." July 2013, <https://www.whitehouse.gov/the-press-office/2013/07/01/executive-order-combating-wildlife-trafficking>

<sup>3</sup> The White House. "National Strategy for Combating Wildlife Trafficking." February 2014, <https://www.whitehouse.gov/sites/default/files/docs/nationalstrategywildlifetrafficking.pdf>

<sup>4</sup> U.S. State Department. "National Strategy for Combating Wildlife Trafficking: Implementation Plan." February 2015, <http://www.state.gov/documents/organization/237592.pdf>

<sup>5</sup> Tom Milliken. "Illegal Trade In Ivory And Rhino Horn: An Assessment To Improve Law Enforcement Under The Wildlife Traps Project." TRAFFIC. 2012, <http://www.traffic.org/storage/W-TRAPS-Elephant-Rhino-report.pdf>

<sup>6</sup> Varun Vira, Thomas Ewing, and Jackson Miller. "Out of Africa: Mapping the Global Trade in Illicit Elephant Ivory." C4ADS. August 2014. [http://media.wix.com/ugd/e16b55\\_9d27f7e90250420c87c3b7d2703c3114.pdf](http://media.wix.com/ugd/e16b55_9d27f7e90250420c87c3b7d2703c3114.pdf)

Africa. We assess with high confidence that traffickers use sophisticated networks and the complicity of public officials in order to move ivory and rhino horn from relatively remote areas to markets and ports of export, perpetuating corruption and border insecurity in key eastern, central and southern African states. We judge some of these networks probably are the same or overlap with those of other illicit goods such as drugs and weapons. Poaching presents significant security challenges for militaries and police forces in African nations (e.g. Kenya, Tanzania, Congo-Kinshasa, South Africa, and others), which are often outgunned by poachers and their criminal and extremist allies.<sup>7</sup>

## CONCEPTUALIZING POACHING AND NATIONAL SECURITY

We developed an analytical lens to think about the ways that wildlife trafficking could pose a direct threat to the United States and a threat to U.S. interests overseas.

Direct threats potentially include:

- Sale of wildlife items used to fund attacks against the American homeland and/or American bases, embassies, or people abroad.
- Wildlife items smuggled into or out of the United States, possibly among other illicit items (e.g., weapons, drugs) or by the same groups that engage in smuggling of other illicit goods.
- Wildlife items smuggled in that contain infectious pathogens.

Threats to overseas interests include:

- Wildlife items used to fund extremist organizations that do not threaten the United States directly but could threaten U.S. allies/key regional actors.
- Poaching violence and/or wildlife items used to fund rebel groups that pose a threat to peace and security.
- Wildlife crime undercutting governance in range, transit and demand states that are strategically important to the United States.
- Wildlife crime used to finance transnational criminal networks.
- Wildlife crime undermining economic development and growth through increased violence.

We then took this analytical framework to assess 7 high profile cases of groups/networks involved in wildlife trafficking to see which of these pathways was potentially relevant and how conclusive the evidence was supporting the claims connecting these actors to security outcomes. We then sought to assess whether these cases were indicative of wider phenomenon, how the policy community has sought to address these concerns, and what options are available moving forward. Most of the cases we identified reflect threats to U.S. interests rather than direct threats to the United States homeland.

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<sup>7</sup> Office of the Director of National Intelligence. “Wildlife Poaching Threatens Economic, Security Priorities in Africa.” September 2013, [http://www.dni.gov/files/documents/Wildlife\\_Poaching\\_White\\_Paper\\_2013.pdf](http://www.dni.gov/files/documents/Wildlife_Poaching_White_Paper_2013.pdf)

The seven cases include reports of:

- *Al Shabaab's* involvement in the ivory trade to finance its operations, which include potential **attacks** on the United States or U.S. citizens as well as their wider **extremist** network;
- *Trafficking of wildlife products on U.S. soil* which includes illegal products being **smuggled** into the U.S. and the involvement of **transnational crime**;
- The *Lord's Resistance Army (LRA)* involvement in the ivory trade to fund their **rebel group**;
- *Violence in Virunga* which includes **rebel groups** funding their operations, links to **transnational crime** and undermining of **economic development** in the surrounding region;
- The *Uganda military's* possible involvement in elephant poaching and the ivory trade, undermining **governance** and involving the army in **transnational crime**;
- *Ivory smuggled from Africa to Asia*, undermining **governance** in range, transit and demand states and exemplifying **transnational crime**;
- The *Xaysavang network in Laos* that is involved in the wildlife trade through Southeast Asia but appears to be operating with impunity, undermining **governance** and contributing to **transnational crime**; and,
- *A 2012 mass elephant killing in Cameroon*, including the involvement of **rebel groups** and undermining **economic development** in the region.

While space forbids a more exhaustive treatment of all the cases here, let me say a word about Al-Shabaab, the Somali militant group implicated in terror attacks including the recent university attack in northern Kenya and the attack on the Westgate shopping mall in Nairobi in 2013.

## **AL-SHABAAB**

Al-Shabaab has been reputed to receive significant funds from the sale of ivory. The Elephant Action League launched an 18-month investigation from 2011 to 2012 into Al-Shabaab's involvement in the ivory trade. They reported that Al-Shabaab receives a significant portion of their funding through acting as a middleman in the transport of illegal wildlife goods in Africa. Al-Shabaab is known in the criminal world for being well organized and punctual with their operations. The Elephant Action League reports that Al-Shabaab arranges the transfer of ivory shipments to big brokers in Asia from big brokers in Africa.<sup>8</sup>

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<sup>8</sup> Andrea Crosta and Nir Kalron, "Africa's White Gold of Jihad: al-Shabaab and Conflict Ivory," *Elephant Action League*, 2011-2012, <http://elephantleague.org/project/africas-white-gold-of-jihad-al-shabaab-and-conflict-ivory/>.

A 2013 *National Geographic* companion piece to the Elephant Action League investigation claims that Al-Shabaab funded their attack on Westgate mall with money from illegal ivory. Assuming an average salary of \$300 per month, Al-Shabaab's monthly expenditures on salaries for its fighters average around \$1,500,000 per month. They are suspected of assisting in the transport of one to three tons of ivory per month, fetching a price of roughly \$200 per kilogram. With this estimate, Al-Shabaab could receive up to \$600,000 per month from ivory alone.<sup>9</sup> However, a United Nations Environment Programme report *The Environmental Crime Crisis* disputes these claims, and says that media reports that Al-Shabaab ships up to 30kg of ivory each year are unreliable. The established smuggling route that Al-Shabaab would be using to transport ivory has not been linked to ivory smuggling. This report, along with interviews conducted by the team, conclude that Al-Shabaab's main source of income is from illegal charcoal, and taxing of items.<sup>10</sup> That said, it is our understanding that the U.S. government operates on the assumption that a portion of Al Shabaab's funding comes from some form of involvement in the trade of illegal ivory.

## IMPLICATIONS FOR POLICY

Our work has a number of implications for policy, notably in terms of information collection, the contradiction between arming/equipping rangers and disarmament, the challenge of balancing punishment and capacity building, the adequacy of current finance and staffing levels, and understanding the nature of demand.

### *The Need for Better Information and Data.*

More knowledge about the specific nature of the challenges could help inform policy, notably better intelligence and data on the links between poaching incidents and end-market consumers. This would include financial transactions and movement of goods all along the pathway from source to consumer. There is increasing collaboration between intelligence and security oriented-agencies and conservation officials with wildlife officials learning from the toolkit of counter-terrorism, counter-intelligence, and criminal prosecutions. However, both the priority dedicated to this issue and the number of staff for this function might have to be elevated, including at the Department of Treasury.

Our work highlights the role of the Laotian actor Vixay Keosavang, a central figure in the Xaysavang Network with extensive involvement in the wildlife trade. In 2013, the U.S. State Department put forth a reward of up to \$1 million for information that could help undermine the Xaysavang Network.<sup>11</sup> This rewards program is part of the larger Transnational Organized Crime

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<sup>9</sup> Laurel Neme, "Al Shabaab and the Human Toll of the Illegal Ivory Trade," *National Geographic: A Voice for Elephants*, October 3, 2013, <http://voices.nationalgeographic.com/2013/10/03/al-shabaab-and-the-human-toll-of-the-illegal-ivory-trade/>.

<sup>10</sup> Neville Ash, Rune Henriksen, Christian Nellemann, Elizabeth Mrema, and Patricia Raxter, *The Environmental Crime Crisis: Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources*, A UNEP Rapid Response Assessment, United Nations Environment Programme and GRID-Arendal, Nairobi, and Arendal, 2014.

<sup>11</sup> U.S. Department of State, Bureau of International Narcotics and Law Enforcement Affairs, "Transnational Organized Crime Rewards Program: Xaysavang Network," <http://www.state.gov/j/inl/tocrewards/c60273.htm>.

Rewards Program (TOCRP), which is administered by the Bureau of International Narcotics and Law Enforcement Affairs (INL). This followed the passage of legislation earlier in 2013 that expanded the TOCRP to cover transnational organized crime more broadly.<sup>12</sup> We note that the program could be used in the future to assist in gathering information to dismantle significant transnational networks involved in wildlife trafficking. Thus, rewards could be offered for tips that undercover the transaction chain from suppliers to consumers and that ultimately lead to successful prosecutions of wildlife crimes.

Data could also be useful in tracking incidents at the local level to understand emergent hotspots of poaching and where ranger resources and international attention should be directed. Already, non-governmental organizations like the Wildlife Conservation Society have pioneered so-called SMART Conservative Software.<sup>13</sup> SMART is a collaboration with national park staff in range states to employ hand-held GPS devices that allow rangers to track and reference the geocoordinates of poaching incidents. Support for SMART or instruments like it could help establish a firmer evidentiary base for the nature of emergent poaching threats.

However, even with improved information, range states face a number of problems in being able to fend off the increasingly sophisticated weaponry of poachers.

#### *The Contradiction Between Arming Rangers and Disarmament.*

Governments in the range states, outside of South Africa, do not have sufficient state capacity to rein in the networks responsible for large-scale poaching. Even South Africa, a relatively rich and developed state with a well-equipped and organized national park infrastructure and administration, has struggled to stop the spate of rhino killings that have led to more than 1000 rhinos being slaughtered per year in Kruger National Park, up from negligible levels in 2007.

This recognition leads to two contradictory impulses: arm the rangers and disarmament. On the one hand, the current fight against traffickers is unfair, as poachers tend to be better armed and equipped than many park guards who are trying to defend wildlife at great personal risk. On the other hand, militarizing the conflict with poachers might lead to increased escalation contributing to more violent encounters between rangers and poachers. While this could raise the punishment costs of poaching, there is also the risk that additional weaponry in range states already rife with small arms could ultimately be channeled into violence against humans or the wildlife themselves. In this context, peacebuilding and post-conflict disarmament efforts may be important options to try to staunch the flow of weapons into particular areas.

#### *The Challenge of Balancing Punishment and Capacity Building.*

Another tension emerges between capacity-building and punishment for range states. In the face of reports of the decimation of elephant reserves in southern Tanzania in Selous Game Reserve and Ruaha National Park, the USFWS ruled in 2014 that the existing program permitting elephant sport hunting trophies could not determine that Tanzania's sport hunting was not a

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<sup>12</sup> House Committee on Foreign Affairs, "Chairman Royce Applauds Announcement of Reward for Wildlife Trafficker Vixay Keosavang's Zaysavang Network," press release, November 13, 2013, <http://foreignaffairs.house.gov/press-release/chairman-royce-applauds-announcement-reward-wildlife-trafficker-vixay-keosavang-s>.

<sup>13</sup> SMART. "Smart Conservation Software," <http://www.smartconservationsoftware.org/>

detriment to the species' survival.<sup>14</sup> This move effectively banned elephant sport hunting trophy exports from Tanzania to the United States, depriving Tanzania of revenue from the sales that could support conservation. Similarly, Mozambique's complicity in the poaching of rhino of transshipment of rhino horn out of South Africa to buyers in Asia has also been identified as a reason to use punitive measures such as the Pelly Amendment to encourage the state to crack down on traffickers.<sup>15</sup>

While these particular punishments may be necessary, both cases raise the question whether the problem is the state's motivation or capacity to rein in traffickers. Would punishing a weak state for failure to address the poaching crisis lead to improved behavior? USAID and USFWS are engaged in capacity building exercises to support states, but the sequence and combination of policy instruments in different country contexts ought to be kept in mind. Punishment may be important for changing state motivations, but support for capacity building may be required to translate that political will into progress.

#### *The Adequacy of Current Resources and Staffing.*

If the United States has identified poaching as a strategic problem, then it should dedicate resources commensurate to address the issue. As Robert Dreher noted in his testimony, President Obama requested \$75.4 million for the USFWS Office of Law Enforcement in FY 2016 to combat expanding illegal wildlife trafficking and support conservation efforts on-the-ground in Africa and across the globe. That represents an increase of \$8 million. News reports suggest that the number of inspectors for USFWS has largely remained frozen around 300 for the past thirty years.<sup>16</sup>

Assistant Attorney General Cruden in his testimony for this hearing noted that one way to generate new resources to fight trafficking would be to pass legislation that would allow funds collected from wildlife trafficking prosecutions to support conservation. Senate Bill 27, the Wildlife Trafficking Enforcement Act of 2015, which was introduced in this Congress by Senators Dianne Feinstein and Lindsey Graham contains such provisions.<sup>17</sup>

#### *Understanding the Nature of Demand.*

While the a subject of a separate paper, all of these measures to improve the awareness of the networks that traffic these products, the geography of poaching incidents, the connections to security outcomes, and the punishments for wildlife crimes will be for naught without successful efforts to change the demand for these products, particularly in Asia. That requires an understanding of both the nature of demand and how public messaging and behavior change work in different country contexts, particularly ones where there is not a conservation tradition and ethic of protecting wildlife.

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<sup>14</sup> Fish and Wildlife Service. "Import of Elephant Trophies from Tanzania & Zimbabwe."

<http://www.fws.gov/international/permits/by-activity/sport-hunted-trophies.html>

<sup>15</sup> Save the Rhino. "'Operation Crash' and the Pelly Amendment." July 2014,

[http://www.savetherhino.org/latest\\_news/news/1035\\_operation\\_crash\\_and\\_the\\_pelly\\_amendment](http://www.savetherhino.org/latest_news/news/1035_operation_crash_and_the_pelly_amendment)

<sup>16</sup> *The New York Times*. "Wildlife Slaughter Goes Unabated." February 14, 2015,

<http://www.nytimes.com/2015/02/15/opinion/sunday/wildlife-slaughter-goes-unabated.html>

<sup>17</sup> "S. 27: Wildlife Trafficking Enforcement Act of 2015." <https://www.govtrack.us/congress/bills/114/s27>

## **SELECTED BLOG RESOURCES ON SECURITY AND POACHING**

- Lea Bogner. "Militarizing the response to poaching is just a band-aid." Global Wildlife Conservation Group, University of Texas, April 6, 2015.  
<https://sites.utexas.edu/wildlife/2015/04/06/militarized-poaching-is-just-a-band-aid/>
- Caitlin Goodrich. "From Africa to Asia: An Ivory Trafficking Incident." Global Wildlife Conservation Group, University of Texas, April 16, 2015.  
<https://sites.utexas.edu/wildlife/2015/04/16/from-africa-to-asia-an-ivory-trafficking-incident/>
- Cameron Lagrone. "Does illegal wildlife trafficking really fund terrorism?" Global Wildlife Conservation Group, University of Texas, April 13, 2015.  
<https://sites.utexas.edu/wildlife/2015/04/13/does-illegal-wildlife-trafficking-really-fund-terrorism/>
- John Owens. "Infrastructure and Guns May Curb Wildlife Trafficking." Global Wildlife Conservation Group, University of Texas, April 27, 2015.  
<https://sites.utexas.edu/wildlife/2015/04/27/infrastructure-and-guns-may-curb-wildlife-trafficking/>
- Wade Tanner. "Militarizing Conservation." Global Wildlife Conservation Group, University of Texas, March 5, 2015.  
<https://sites.utexas.edu/wildlife/2015/03/05/militarizing-conservation/>
- Tawheeda Wahabzada. "The Future of Operation Crash." Global Wildlife Conservation Group, University of Texas. April 17, 2015.  
<http://sites.utexas.edu/wildlife/2015/04/17/the-future-of-operation-crash/>