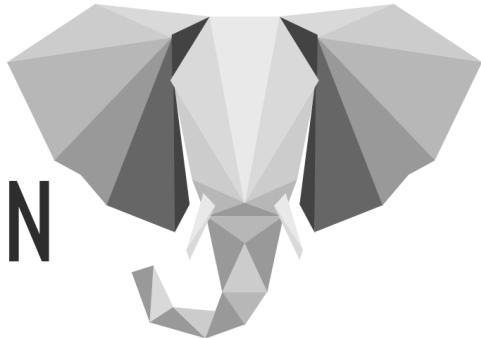


An Analysis of the Wildlife Conservation and Anti-Trafficking Act of 2019

H.R. 864



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CONSERVATION**



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Cover: An African elephant. Image: Nam Ahn/Unsplash

Executive Summary

Wildlife trafficking is the illegal gathering, transportation, and distribution of animals and plants. According to recent estimates, wildlife trafficking is valued at U\$23 billion and incurs costs of up to US\$60 billion dollars annually due to ecosystem service losses, as well as damage to human livelihood and climate change (United Nations Office on Drugs and Crime [UNODC], 2020; Lehner, 2016; Organisation for Economic Co-operation and Development, 2020). The main objective of the Wildlife Conservation and Anti-Trafficking Act of 2019 (H.R. 864) is to support wildlife conservation by improving anti-trafficking enforcement. It is important to note that the program will not impact legal trophy hunting, which is a crucial source of revenue in some developing countries. The objectives are planned to be achieved at no cost to taxpayers, as the bill aims to redirect fines from violations to be used for conservation, rewards for whistleblowers, and add amendments to existing conservation acts.

The bill will reclassify wildlife trafficking violations as significantly more serious crimes, grant awards to whistleblowers for providing information on wildlife trafficking violations, and enable the US Fish and Wildlife Service (USFWS) to develop a comprehensive international wildlife conservation program. Also, the bill will fund enforcement of Illegal, Unreported, and Unregulated fishing (IUU), and increase American leadership in stopping wildlife trafficking. The bill is centered around strengthening the existing international wildlife legislation and conservation programs, including amendments to conservation laws such as the Marine Turtle Conservation Act, the Great Ape Conservation Act, and the Marine Mammal Protection Act. The implementation of the bill will be coordinated with the following sectors: the USFWS, Attorney General, and Secretaries of State, Treasury, Interior, and Commerce. The program is designed around enforcing anti-trafficking practices as it comprehensively addresses illegal trafficking practices directly, thus mitigating the biodiversity loss and zoonotic disease spread associated with the illegal wildlife trade.

This report covers the implementation of the first year of the program. In this program analysis budgeting, staffing, timelines, and performance management systems are highlighted throughout.



Hawksbill sea turtles are endangered due to poaching for their shells. Image: Olga Tsai/Unsplash

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1 Introduction

Communities around the world have used wildlife dietarily or culturally for centuries (Hoffman & Cawthorn, 2012). Over the years, demand for wildlife has followed globalization and population growth, transforming the wildlife trade into a thriving, complex international network. Increasing global demand for wildlife has led to mass illegal exportation of plants and animals, transforming sustainable wildlife trade into illegal wildlife trafficking. Higher wildlife demand has increased the risks accompanying international transportation and distribution of wildlife by imposing additional stress on already fragile ecosystems and threatened animal populations. The drivers of wildlife trafficking vary geographically but are multitudinous and involve supply-side economic and subsistence interests and demand-side cultural traditions. With regards to the supply interests: poverty, lack of access to food, and political influence contribute greatly to local involvement in wildlife trafficking (Harrison, Roe, Baker, et al., 2015). With regards to the demand interests: a key driver of illegal wildlife trade is medicine (i.e. traditional Eastern medicine), such as with rhino and tiger bones and horns (Zhang, Hua, & Sun, 2008). Private collectors and trophy hunters also drive wildlife trafficking.

Wildlife trafficking poses significant threats to biodiversity. The United Nation's latest report on biodiversity alerted world leaders to the dangers of one million species at risk of extinction. The report also stressed conservation and biodiversity protection as two necessary measures to take outside of

reversing climate change (Brondizio, Settle, Díaz, et al., 2019). Given the threats wildlife trafficking poses to human and anthropogenic systems, government action is needed to prevent further consequences. Wildlife trafficking is widely recognized as a highly profitable market which attracts a wide range of actors including poachers, smugglers, traders, and buyers. Poverty is a central driver to participation in wildlife trafficking and has led actors to establish extensive global networks to transport goods (Duffy, St John, Büscher, et al., 2016). The problems associated with illegal wildlife trafficking are addressed by H.R. 864 Wildlife Conservation and Anti-Trafficking Act of 2019 using several scientifically supported policy solutions. Implementing the bill and its solutions is likely to make a significant impact on illegal wildlife trafficking rates globally.



Temminck's ground pangolin. Pangolins are one of the most highly trafficked species. Image: Maria Diekmann/Rare and Endangered Species Trust/USFWS

1.1 H.R. 864

The primary objective of the Wildlife Conservation and Anti-Trafficking Act of 2019 (H.R. 864) is to support wildlife conservation by improving anti-trafficking enforcement. These objectives are set to be achieved in a number of ways that create funding for conservation programs without using taxpayer money. Specifically, the bill intends to reclassify wildlife trafficking violations as more serious crimes, provide awards to whistleblowers providing information on trafficking violations, and enable the USFWS to develop a comprehensive international wildlife conservation program.

H.R. 864 builds on several other wildlife conservation acts that aim to curb trafficking in the US and abroad, such as the Eliminate, Neutralize, and Disrupt (END) Wildlife Trafficking Act of 2015 and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (Animal Welfare Institute, 2019; CITES, n.d.)., H.R. 864 refers to anti-trafficking laws established in these and other pieces of legislature as well as the fines from violations associated with them, which it specifies will be used to fund the primary goals of the bill.

Wildlife conservation and anti-trafficking laws such as H.R. 864 are important not only to protect endangered and threatened species and their environments, but also combat organized crime, which is sometimes funded by the illegal wildlife trade and poaching (Perrigo, 2018). Additionally, conserving endangered and threatened species will help the local communities where these species are found

benefit from tourism (USFWS, n.d. a). Looking into the political climate and context of H.R. 864, during the 2020 coronavirus pandemic, Congress is focusing on providing aid and dealing with adaptations associated with the pandemic and international affairs have had to modify their processes. Wildlife conservation initiatives have faced new challenges with funding and implementation of their initiatives (Cragg, 2020). Some of the challenges have been the shift in focus of Congress predominantly dealing with adaptations and relief from the pandemic.

The bill was introduced by Democratic Representative John Garamendi of California and originally cosponsored by Republican Representative Don Young of Alaska. Including Representative Young, the bill currently has 84 cosponsors, of which 72 are Democrats and 12 are Republicans (Congress.gov, 2019a). The bill was introduced to the House on January 30, 2019, where it was then referred to the House Natural Resources Committee and the House Judiciary Committee.

Title I: Wildlife Trafficking Whistleblowers. In order to encourage and incentivize whistleblowers to come forward with useful information that may lead to the conviction of wildlife traffickers, the bill authorizes the Attorney General, the Secretary of the Interior, the Secretary of Commerce, the Secretary of State, and the Secretary of the Treasury to create a plan of action to raise public awareness of the financial benefits of whistleblowing in the context of wildlife trafficking. Whistleblowers may receive a portion of the fines and penalties received by the US in

wildlife trafficking cases as a reward for providing useful information to anti-trafficking authorities. This can be achieved through coordinated efforts between whistleblower organizations and USFWS agents to incentivize whistleblowers and increase turnout by a larger presence in highly trafficked countries.

Title II: Wildlife Conservation. The bill outlines that the Secretary of the Interior must carry out the International Wildlife Conservation Program in the context of the USFWS. Supporting the International Wildlife Conservation Program helps to build grassroots conservation and anti-trafficking capacity in the US, its territories, and in foreign countries. This section of the bill also specifies the source of funding for some conservation efforts. Fines and penalties from violations of the Marine Mammal Protection Act of 1972 will go to support marine mammal conservation, pay whistleblowers, and enforce the Marine Mammal Protection Act of 1972. Similarly, fines and penalties from shark finning or fishery violations under the Magnuson-Stevens Fishery Conservation and Management Act will go to support shark conservation efforts, pay whistleblowers, and enforce the Magnuson-Stevens Fishery Conservation and Management Act. Additionally, the fines and penalties collected from violations of specific wildlife conservation acts listed in the bill will go to supporting conservation efforts for the animals impacted by the violations.

Title III: Anti-Trafficking and Poaching. The bill states that at least one US Fish and Wildlife special agent attaché must be stationed in any country with a national who has been

confirmed to be engaging in activities that impede the effectiveness of conservation programs for endangered and threatened species. These agents are to assist local agencies with conservation and protection efforts and advise on how US assets may be used to further combat wildlife trafficking in the area. The bill reclassifies wildlife trafficking as a predicate offense under the Travel Act and the Racketeer Influenced and Corrupt Organization Act (RICO), both of which were created to combat organized crime (Feld, Wilkinson, Courington, et al., 2017; Nolo, 2012). In doing so, it amends sections of the Travel Act and RICO to include specific references to the Endangered Species Act of 1973, the African Elephant Conservation Act, and the Rhinoceros and Tiger Conservation Act of 1994, and endangered and threatened species. Through the stationing of USFWS officers, the anti-trafficking efforts of these officers will allow for increased awareness and monitoring of conservation and poaching to combat trafficking over time.

Title IV: Illegal, Unreported, and Unregulated Fishing. The bill states that violations for IUU fishing under the Magnuson-Stevens Fishery Conservation and Management Act will be considered as predicate offenses. Fines, penalties, and forfeitures of property from violations under the Magnuson-Stevens Fishery Conservation and Management Act will go to support fisheries enforcement, in addition to the other destinations for penalty money received from the Act outlined above. IUU fishing will become a predicate offense by amending RICO to include specific references to the Magnuson-Stevens Act.

2 The Problem of Wildlife Trafficking Globally

2.1 Scale, Actors, and Environmental Threats

The illegal trade of wild flora and fauna continues to be a burgeoning global industry. It is defined by the unlawful buying and selling of animal wildlife, illegal logging of protected forests, and the illegal fishing of marine life. The perceived value of many trafficked products is for use in traditional medicines across parts of Asia and Africa. For example, the rhino horn trade—which is banned under the Convention on International Trade in Endangered Species (CITES)—continues to grow in Asia, as local communities maintain strong beliefs as to its medicinal qualities (USFWS, n.d. a). Although largely unsupported by scientific evidence, these beliefs have driven demand for rhino horns to the point of the species being hunted to the point of near-extinction, losing as much as 96% of its total population by the end of the 1990s.

Although the illicit nature of the trade prevents direct and accurate measurement of its scale, a 2016 report by the United Nations Office of Drugs and Crime (UNODC) estimated the value of the industry at US\$23 billion (UNODC, 2020). This makes the illegal wildlife trafficking trade a larger industry than the illegal drug trade, which is valued at US\$13 billion annually (UNODC, n.d.). Between 2016 and 2018, the trafficking of ivory and rhino horns alone generated over US\$400 million in income to actors along the value chain, including trappers, poachers, traffickers, retailers, and collectors. The unregulated and

illegal wildlife trade also faces challenges to its sustainability, as plant and animal populations are exploited faster than they are able to recover. This has caused the depletion of many species populations and has led to their classification as endangered and critically endangered. The subsequent rarity of endangered species places them at higher risk of poaching because their rarity often raises their economic value on the market. Trafficked products are valued for different reasons across cultures and the prevalence of a particular trafficked product in a country is determined by the types of cultural practices that drive demand.

In addition to the threat the illegal wildlife trade poses to animal species, there are a number of other challenges that are somewhat exacerbated by the growth of the industry. In many trafficking contexts, armed poachers are responsible for the capture or killing of trafficked animals. Evidence shows that the increased prevalence of poaching activities contributes to increased rates of violence, which often spills over into surrounding communities. The financial incentive created by the high prices of trafficked goods increases the likelihood of violence (Lunstrum, 2017). Prior poaching activity leads to the existence of fewer animals being available to poach and sell. The reduced supply increases the amount that traffickers are able to earn from selling the trafficked products, which then makes endangered species particularly vulnerable to further exploitation.

2.2 Focus on Anti-Trafficking Enforcement

H.R. 864 adopts a comprehensive, all-of-the-

above approach of how best to combat wildlife trafficking. While the bill proposes several policies to increase biodiversity, conservation efforts, and the enforcement of anti-trafficking laws, the program proposed in this report is more limited in its scope. The program design focuses specifically on the law enforcement component of the bill, as this is where there exists the most opportunity for large-scale

change. Furthermore, the bill makes provisions to amend existing conservation legislation to cover more species. While important, these provisions do not require significant changes to existing conservation activities per se, but rather establish new legal standards for enforcement. This component has no implications for programming and so has not been included in our program design.



A USFWS officer guards a pile of confiscated elephant ivory. Image: Reuters/Voice of America

3 Proposed Program Design

We will address the requirements of the bill by expanding upon three existing legislative programs: i) deploying USFWS special agents abroad; ii) improving whistleblower rewards; iii) amending current programs. This design option comprehensively addresses illegal trafficking practices directly, consequently mitigating the biodiversity loss and zoonotic disease spread associated with the illegal wildlife trade.

USFWS Abroad. The USFWS already has an existing program and framework for stationing officers abroad, referred to as special agent attachés. There is evidence to suggest these

activities are successful and the special attachés make a difference in curtailing wildlife trafficking rates. Officers are stationed in US embassies and work with local government agencies and non-governmental organizations (NGOs) to build grassroots conservation capacity. Our program design will build on this successful model and expand to countries with high trafficking rates who have requested US intervention and with whom the US has positive relations. These deployments will be funded with money acquired from trafficking fines. We are confident this can be successful given previous experiences.

For example, law enforcement in Namibia requested assistance in stemming the illegal rhino and elephant trade in the north. USFWS officers

with 20 years of anti-trafficking experience were dispatched as a part of the U.S. Embassy in Windhoek, Namibia and stationed at regional headquarters in Kamanjab, Rundu, and Katima Mulilo (US Embassy in Namibia, 2017). The officers primarily shared experiences dealing with similar problems in other countries and trained Namibian police to help improve conservation efforts and provide investigative and enforcement assistance with criminal investigations. The trainings equipped Namibian police officers with proper tools to execute independent wildlife trafficking investigations. As this case study demonstrates, there are frameworks in place that we can build off of for our program.

This component of the design will be implemented in five countries during the first year as a pilot program to troubleshoot and evaluate whether the program operations continue to result in the desired outcomes. During the first year, a USFWS agent will be sent to Mozambique, South Africa, India, Laos, and Vietnam each. These countries are known trafficking hotspots and currently face challenges protecting rhinos, tigers, and elephants from illegal poaching (UNODC, 2020). The design of the USFWS abroad program can be amended based on the challenges and successes faced in these original countries. As funding increases from trafficking revenue, more officers will be sent to countries facing similar challenges in following years.

Whistleblower Program. H.R. 864 requires the USFWS to raise public awareness for the whistleblower reward opportunities and to improve recruitment of whistleblowers. The

bill requires this to be done with formal partnerships with wildlife-focused non-governmental organizations such as the National Whistleblower Center (NWC), which requires no additional staffing. The International Wildlife Conservation Program operates through USFWS and requires additional staffing (Congress.gov, 2019b). The Secretary of the Interior (and USFWS director) must place at least one USFWS attaché in “Focus Countries” outlined in the Eliminate, Neutralize, and Disrupt Wildlife Trafficking Act of 2016 (Congress.gov, 2019b). The whistleblower program will provide unique and valuable information that is otherwise clandestine and inaccessible. This program component addresses all levels of the trafficking chain, from poaching to transportation to trading. Under the bill and program design, whistleblowers are guaranteed a monetary reward if their information is constructive. Given the role financial incentives play in motivating participation in wildlife trafficking, there is reason to believe similar tactics will prove equally effective in encouraging whistleblowers to come forward with information. The whistleblower program is the first title of the bill and will be essential for acquiring fines.

There are existing regulatory frameworks that set precedent for expanding existing whistleblower legislation. These include the False Claims Act, which holds anybody who defrauds the government liable, and the Foreign Corrupt Practices Act, which prohibits US entities from bribing foreign officials (Hajost, 2018). To illustrate the scope of success of existing whistleblower programs, in 2017, US\$3.4 billion were recovered from

whistleblower disclosures under the False Claims Act pertaining to health and military fraud (US Department of Justice, 2017). As the bill focuses on enforcing crimes that are already illegal, our program design will build upon these existing provisions for whistleblowers.

Previous successes with wildlife trafficking whistleblower programs provide evidence that this program component will help bring in the necessary funds for conservation efforts. For example, in 2014, a mail courier informed the USFWS about a reptile trafficking ring between the US and Hong Kong (US Government Accountability Office [GAO], 2018). The information provided led to the indictment of six people and the forfeiture of US\$24,000 in shipments of live Asian leaf turtles (GAO, 2018). The mail courier was awarded US\$5,000 for their cooperation in targeting this illegal trafficking ring (GAO, 2018). As this example demonstrates, the information whistleblowers provide can accelerate investigations and lead to convictions.

Amendments to Existing Acts. The program design calls for general legislative amendments to expand current, established programs. It increases penalties for wildlife trafficking, amends existing conservation laws, and establishes trafficking violations as predicate offenses. For example, the Marine Turtle conservation act is expanded to include tortoises, and fines for trafficking turtles will increase from US\$80,000 to US\$150,000. These changes primarily require strengthening of current programs and thus do not involve significant administrative burden.

4 Year One Implementation

4.1 Organizational Structure

The Office of Law Enforcement has a Special Operations Division to direct international wildlife enforcement activities (USFWS, 2016). The International Affairs Department coordinates with the Office of Law Enforcement and manages NGO partnerships to engage whistleblowers through the Division of Management Authority, meanwhile the Division of International Conservation manages international and regional conservation programs (Figure 1). This program design calls for a new class of five USFWS agents who will be stationed abroad. The organization infrastructure to hire, train, and manage these individuals is already in place, so the primary staffing change within the Division of Special Operations is the hiring of five additional USFWS agents.



A live Asian leaf turtle with its legs taped down recovered by USFWS from an illegal reptile trafficking ring. Image: USFWS

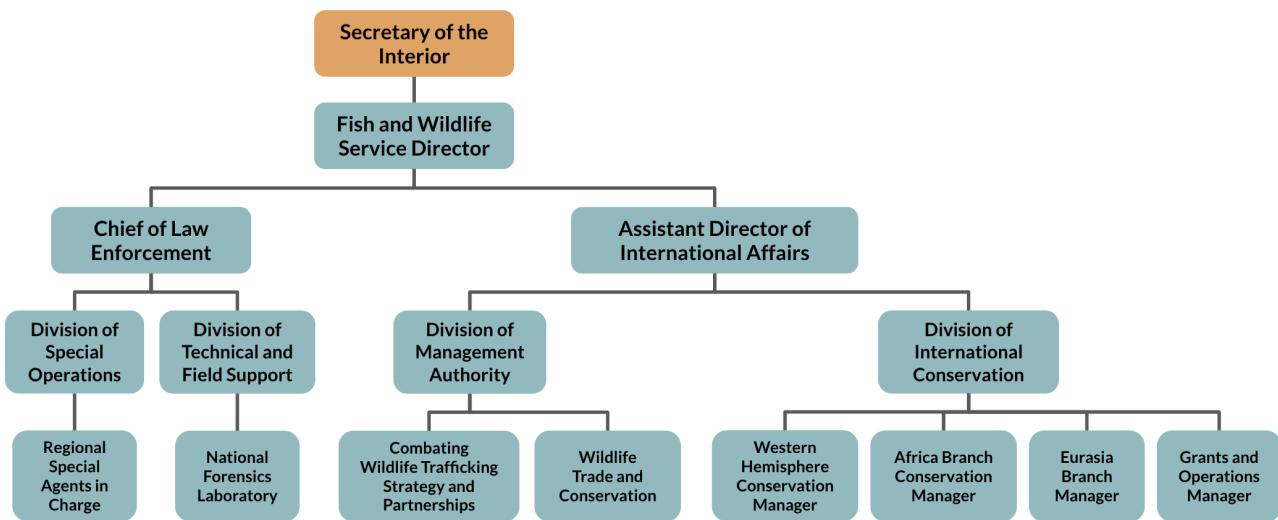


Figure 1. Organization chart of the Law Enforcement and International Affairs Departments of the US Fish and Wildlife Service, under the Department of the Interior.

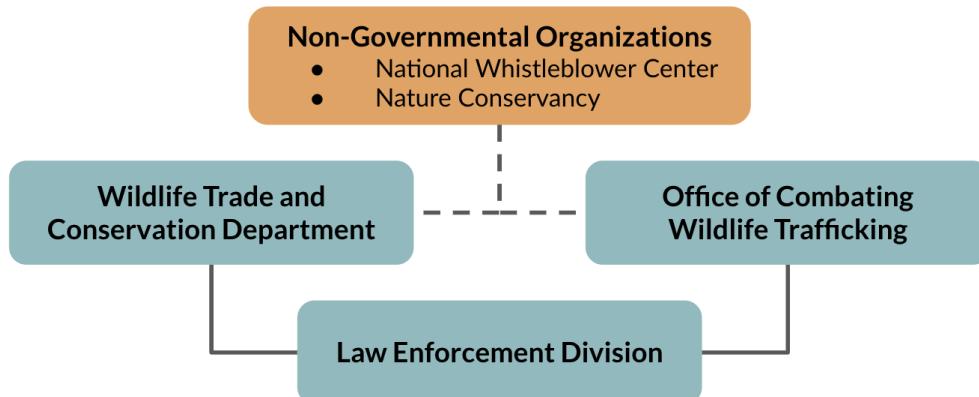


Figure 2. This diagram shows the flow of information from NGOs through the Wildlife Trade and Conservation Department and the Office of Combating Wildlife Trafficking to the Law Enforcement Office

Workflow and Management Adjustments.

Existing: The existing whistleblower process (Figure 2) is effective, but does not completely meet the needs of the new program design. Currently, the Office of Combating Wildlife Trafficking and the Wildlife Trade and

Conservation Department liaise with NGOs like the National Whistleblower Center, and The Nature Conservancy. These offices receive tips from NGOs and refer information to the law enforcement office which dispatches enforcement and investigators accordingly.

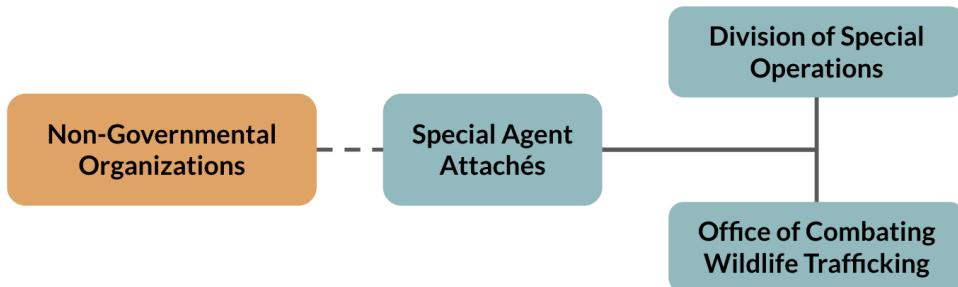


Figure 3. This diagram shows the proposed flow of information from NGOs through the stationed special agent attachés to the Division of Special Operations and the Office of Combating Wildlife Trafficking, whichever is most appropriate.

Implementation: The program design would streamline the process. The placement of special agents abroad allows them to work directly with NGOs and whistleblowers when addressing wildlife trafficking. Because they are employed and managed by the Law Enforcement Division, they have a direct line of contact to the law enforcement managers and anti-wildlife trafficking coordinators. This allows for expedited action and improved on-the-ground relationships. If matters need to be escalated higher than the assistant chief of special operations, they can be, but instead of moving tips through a network of offices, matters would be handled at lower levels.

Management: The program would alter management structures slightly. The changes will clarify the special agent relationship with the Office of Law Enforcement and the Department of International Affairs. Special agents will collaborate with the Office of Combating Wildlife Trafficking, but the special agents would be part of the Regional Special Agents program immediately under the Division of Special Operations within the Office of Law Enforcement. Their immediate

authority would be the Assistant Chief of Special Operations. The Chief of Law Enforcement is one step above and may need to approve some activities due to the special assignment nature of the program. This staffing management pattern is ideal because it allows for quick action by officers by providing a direct line to authority, but also vests significant authority within the agents themselves. This requires significant coordination with the State Department and the Office of Combating Wildlife Trafficking, which the Special Operations Division is already highly familiar with.

Environmental Justice Considerations

There are three primary ways to include environmental justice into the expansion of the anti-wildlife trafficking work and international conservation that the USFWS undertakes. This includes training, hiring, and grant programs. First and foremost, grant recipients are generally in developing nations, so encouraging environmental justice means prioritizing grants that do not just conserve or preserve wildlife, but grants with benefits for the people as well. Consumers of illegal wildlife are often in North

America, Europe, and China, which represents an environmental injustice on nature-rich nations. Effective and equitable conservation emphasizes the importance of rebuilding ecosystem services for those who have lost them and providing resources to develop an economy that does not require exploitation or extractivism. One of the most effective conservation methods is to encourage community-based conservation, which empowers communities that have been harmed by biodiversity loss and the illegal activities related to wildlife trafficking (Torkelson, 2020). By focusing on conservation and empowerment of these communities to provide economic activity and environmental health independent of the wildlife's mercantile value, environmental justice is automatically prioritized.

Community-based conservation includes local people from inception to a project's completion to ensure participation, community buy-in, and effectiveness.

Additionally, training these federal agents should include cultural sensitivity and country specific training, given that they will be working abroad. It should be made clear that while combating wildlife trafficking is the directive, many of the people on the ground poaching and participating are often victims of wildlife trafficking and the violence surrounding it. The Office of Diversity and Inclusive Workforce Management will help ensure that the class is demographically and culturally diverse, through consultation in the design and training curriculum (USFWS, 2020a).

Programmatic Budget	
Category	Cost (US\$)
International Anti-Trafficking Enforcement	3,000,000
Incentivizing Whistleblowers	1,000,000
Total	4,000,000

4.2 Program Budget and Revenue Plan

Programmatic Budget

The total budget for FY2022 for the program is US\$4 million. The desired outcomes from the program are to enhance international anti-trafficking enforcement and incentives for whistleblowers. US\$3 million will be spent on international anti-trafficking enforcement efforts by sending five USFWS agents to

first year and US\$1 million will be spent on monetary rewards that will incentivize whistleblowers to come forward with useful information about illegal trafficking crimes.

Revenue Plan

Restrictions to Funding. H.R. 864 states that the activities in the bill must be carried out at no expense to taxpayers. Additionally, the activities of the program cannot rely on

funding from appropriations because of the 2012 statutory PAYGO, or pay-as-you-go, policy, that all new legislation generates revenue to fund associated activities (Tax Policy Center, 2020).

Revenue Stream Within H.R. 864. The bill includes several sections that specify that money collected as fines and civil penalties greater than US\$10,000 from violations of the Endangered Species Act, African Elephant Conservation Act, and the Rhinoceros and Tiger Conservation Act of 1994 will be used by USFWS for conservation efforts. During implementation, the USFWS will use these funds to support the special agents in their work, which can be considered conservation efforts since reducing pressure from illegal traffickers will allow conservation programs that work directly with threatened animals will be more successful. Using estimations for the proportion of total fines collected that would be fines produced by violations of the three relevant wildlife conservation acts, we estimated that will be US\$4 million available for the program in FY2022 (USFWS Office of

Law Enforcement, 2020). H.R. 864 states that whistleblowers will receive 15-50% of fines collected from violations as rewards depending on the usefulness of the information they provide on illegal wildlife trafficking. We applied an average of 32.5% for the amount paid out as rewards, which we approximated to be US\$1 million. The remaining US\$3 million will be used to fund the international anti-trafficking enforcement component of the program.

Benchmarks and Scaling Up. Since the budget for each fiscal year of this program will be determined by the amount of revenue generated during the previous year, we expect that the amount of revenue generated each year following FY2022 will increase and allow the program to scale up quickly. The ultimate goal of the program is to send a total of 24 agents to trafficking hotspots in foreign countries, which we estimate has the potential to happen over the course of the next five years, depending on revenue generated through fines.

Personnel and Other Than Personnel Budgets

Category	Cost (US\$)
Personnel	1,065,000
Other Than Personnel	2,935,000
Total	4,000,000

Sources: "Average U.S. Fish and Wildlife," n.d.; US Department of State [DOS], n.d. a; DOS, n.d. b; DOS, n.d. c; GAO, 2017; DOS, n.d. d; DOS, 2019; GAO, 2005; US Department of Homeland Security, 2018; Bangkok International Law Enforcement Academy [ILEA], n.d.; Budapest ILEA; n.d.; Roswell ILEA, n.d.

Personnel and Other Than Personnel Budgets

Funding Sources. The program budget is funded entirely from the revenue generated by H.R. 864. However, we would like to acknowledge that some of the preexisting programs with funding in the USFWS budget align perfectly with the objects of this program. While the costs associated with these preexisting programs are not included in this program budget, they nonetheless contribute to the success of the program. Most notably, these preexisting programs include issuing grants that highlight the use of intelligence and community engagement in anti-trafficking enforcement (USFWS Division of Management Authority, 2018).

The Personnel budget includes costs for sending five USFWS agents to wildlife trafficking hotspots in foreign countries, which comes to US\$1,065,000. The cost to send one USFWS agent to a trafficking hotspot is US\$213,000. These costs are benchmarked from approximate costs of establishing financial attaché offices in US embassies and from other occasions when USFWS agents have been posted at US embassies (GAO, 2005; US Department of the Interior [DOI], 2013).

The Other Than Personnel (OTP) budget includes costs for establishing a new attaché position for five USFWS agents in US embassies in wildlife trafficking hotspots in foreign countries, which comes to US\$1,935,000, in addition to the US\$1,000,000 to be used as monetary rewards for whistleblowers. The cost of establishing a new attaché position per agent is US\$387,000.

These costs were benchmarked based on costs for sending any US Department of State employees to work at a US embassy.

Investment in Global Anti-Trafficking Enforcement

One of the key components of this bill is that USFWS agents will train law enforcement officials from other countries in best practices for combating wildlife trafficking through the International Law Enforcement Academy (ILEA). Each workshop hosted by USFWS agents can train on average 40 foreign law enforcement officials (DOS, 2004). Thus, the investment of the program budget into anti-trafficking enforcement can potentially multiply itself 40-fold for each workshop hosted by the USFWS agent. We estimate that USFWS agents host 11 workshops across the five different ILEA campuses each year, which means after one year of this program, the budget's impact has the potential to multiply itself 440-fold (DOS, 2019; Bangkok ILEA, n.d.; Budapest ILEA, n.d.; Roswell ILEA, n.d.).

Funding Summary

The program budget is US\$4 million generated from revenue streams outlined in this bill. Approximately, US\$1 million of this budget will be used as monetary incentives for whistleblowers and the remaining US\$3 million will be used to station five USFWS agents in wildlife trafficking hotspots in this first year of implementing the program. The ultimately plan is to send 24 USFWS agents abroad but this will be done incrementally over the following five years since the USFWS can only use money generated from collecting fines from the previous year. After the program takes

effect, we expect the capacity to catch illegal wildlife traffickers to expand so that USFWS can bring in more revenue and scale up the program.

4.3 Monitoring and Evaluation

The program design focuses on enforcing wildlife trafficking through sending USFWS agents abroad to build local capacity and assist whistleblowers to report illegal wildlife trafficking practices. In the first year goal, five special agents will be sent to the wildlife trafficking hotspots and each will host training workshops through the International Law Enforcement Academy and train on average about 40 foreign law enforcement officers per workshop (DOS, 2004). To measure the impact of the program, we need to measure the number of special agents deployed, the number of wildlife law enforcement trainings conducted by USFWS agents, and the number of local wildlife enforcement officials they train.

Along with collecting information on the program to learn if it is being implemented correctly, information related to the program's impacts have strong implications for program modification and improvement. In order to see if the implementation of the bill is having the desired outcomes, we have come up with a few different metrics that can act as proxies to let us know if these anti-trafficking enforcement efforts are working or not. After the information is collected from the responsible parties, the Office of Law Enforcement will aggregate the data into a performance report and send it to the Chief of Law Enforcement who makes decisions on program design

modifications based on the performance report. The reporting and feedback mechanism ensures that the performance measures can guide the organizational behaviors to achieve the most desirable outcomes.

Collecting Information

Usefulness of Information. One desirable outcome is to build local capacity in criminal investigation and enforcement in trafficking hotspot countries. Building local capacity is hard to qualify and difficult to measure. Thus, the USFWS will rely on indirect measurement such as surveying participants from the International Law Enforcement Academy workshops to see if the information they learned there has been helpful to them.

In 2016, the USFWS piloted its People Analytics platform, which is an automated performance management system that is intended to replace the current system, which is conducted primarily by hand with pen and paper (Nicholas, 2016). The platform generates and publishes reports on employee performance based on the agency's pre-determined metrics. The usefulness of information from ILEA workshops can be added as a predetermined metric to incorporate the results from surveys into this platform and conduct direct analysis of each agent's performance on a year basis to make sure the program is successfully carried out.

Success of Investigations

Collecting information on wildlife trafficking practices helps us know the program's progress on wildlife trafficking intervention and the efforts to further mitigate biodiversity loss and conserve highly trafficked species. Information

related to anti-trafficking practices is already collected by USFWS. Up until 2016, the USFWS has been issuing an annual report detailing total wildlife trafficking interceptions, including shipments inspected, evidence examined, the number of crime investigations, number of years prosecuted, and the amount of money from fines and civil penalties (USFWS, 2017). For example, in 2016, the USFWS Office of Law Enforcement pursued 10,000 wildlife crime investigations resulting in over US\$21 million in fines (USFWS, 2017). The report gives a specific number of cases investigated for each species of interest. Under the current administration, the Office of Law Enforcement has not continued with annual reports, so this are the latest data available. The Office of Law Enforcement also has an International Trade Data System (ITDS) that compiles all information on the import and export of wildlife trade and trafficking from the multiple agencies involved into one system (USFWS, n.d. b). Information is constantly collected by all involved actors and analyzed yearly to produce the annual reports.

The staff collecting this information work within the Office of Law Enforcement, which prepares annual reports for internal analysis. They collect information from ITDS and input the information into reports based on how many forms of prosecutions, seizures, and fine penalties were submitted. The USFWS should leverage existing collection and metrics because this gives them an opportunity to compare systematic changes to benchmarks to determine any enhanced efficacy.

Increased Whistleblower Engagement

For the implementation of the bill, there is

already an existing whistleblower program framework the program builds off of. As it stands, the National Whistleblower Center collects information from the USFWS and the National Oceanic and Atmospheric Administration (NOAA) on annual whistleblower occurrences and aggregates the data to produce a yearly report. The report details the number of rewards the agencies reported paying, as well as the total reward amounts paid (National Whistleblower Center, 2019). This program design would rely on the same metrics to evaluate the success of the whistleblower program. The scope of this program is international.

However, there are some challenges with the current program. In the past, USFWS and NOAA have not kept sufficiently robust records of whistleblower interactions and thus their data somewhat underestimates the scope of the whistleblower programs. Existing programs are also outdated and operating under capacity. For this reason, the program design focuses on tracking whistleblower interactions to make accurate estimates of the scope of the whistleblower programs. The USFWS will continue to work with the responsible NGOs such as the NWC to increase the awareness of these existing whistleblower opportunities through advocacy. The NWC has supported the legislative amendments the bill proposes and expects they will help increase efficiency of whistleblower reward systems and help obtain more revenue.

Larger Populations

Successes of conservation initiatives are challenging to measure given the complexities of species interactions in ecosystems.



In 2019, USFWS agents ran a workshop at the International Law Enforcement Academy campus in Bangkok where they trained 29 law enforcement officials from six different countries. Image: ILEA Bangkok

Conservation evaluation requires long periods of time, while the current measurements of success are focused on adjusting the program year to year. Thus, the USFWS will rely on evaluating the impact of the program design on conservation over a long term. If the program design is functional, it will provide more funding for specific conservation acts that can be measured independently.

The Department of the Interior measures conservation programs in its annual performance plan and report. This report provides performance and funding details of each contributing bureau. The USFWS is one of these bureaus that is responsible for the goal: ‘sustain fish, wildlife, and plant species’ (DOI, 2019). The report contains key funding sources

with information on the amount of grants given to each specific conservation program, including the Cooperative Endangered Species Conservation Fund, Multinational Species Conservation Fund, and State Wildlife Grants (DOI, 2019). Since the grants are coming from fining illegal trafficking practices, the increase in grants will be an indicator of the program’s success in enforcing anti-trafficking.

Reporting and Feedback

The managers of the international components of the Division of Special Operations will provide direct analysis of each agent’s performance. These managers have access to the People Analytics platform to obtain performance data. They will pass their evaluations to the Office of Law Enforcement.

The Office of Law Enforcement will directly collect other performance statistics, such as anti-trafficking practices, whistleblower programs, and conservation program funding. The service collects most of this information, so there is limited coordination required. However, they will need to hire a special coordinator and work with the NWC to obtain whistleblower performance data. Data is then aggregated into an annual report for the Office of Law Enforcement. The Chief of the Office of Law Enforcement is responsible for making decisions on program design modifications based on data, and the manager of the Division of Special Operations will carry out these decisions.

With each of these performance metrics the Chief of the Office of Law Enforcement might approve programmatic changes that alter the duties of officers. For example, if agents report that their work on grant project oversight is not time well spent, this might become a diminished part of their work. Conversely, if countries and deployed agents see collaborative training as highly effective in combating wildlife trafficking, this may become a larger part of their duties and more time would be dedicated.

4.4 Implementation Schedule

Recruitment

The recruitment process will occur over the first nine weeks as the initial steps of the program. The first step is to assign the recruitment role to someone within the USFWS Human Resources Department. After this role is assigned, that person will set up a team to

begin the recruitment process, which will begin by establishing the recruitment criteria. These will consist of skills related to the wildlife trade, international relations, and physical fitness. Next, the team will establish a timeline for recruitment and hiring and begin drafting job descriptions. Once these descriptions are established, job postings will be created and advertised through USAJobs.

Hiring

After the recruitment process is completed, the hiring process will begin. The hiring role will be assigned to someone within the Human Resources Department of the USFWS, potentially the same person who led the recruitment team. Again, this person will create a team to manage the hiring process. The first task of the team will be to establish the interview questions and logistics, including how many people will be accepted to the remote interview stage and the in-person interview stage. Efforts will be made to combat bias in the hiring process in service of increasing diversity by establishing a set process so merits and qualifications will be evaluated above all else. The hiring team will then screen the applicant resumes, and conduct remote interviews for potential candidates. The top candidates from the remote interviews will then interview in person with the hiring team. The team will then check the references of the top candidates, and offer the position to the selected candidates. Finally, the team will confirm the employment logistics and negotiations of the candidates who accept the offer. This entire process will begin immediately following the recruitment process and will take a total of 13 weeks, bringing the total time spent on recruitment and hiring to

22 weeks, a few weeks more than the average hiring times of government agencies. Extra time may be needed because it is a new program and the roles will be abroad.

Diplomatic Coordination

Diplomatic coordination will occur for the entirety of the first year of the program, primarily focusing on ensuring a smooth transition for the officers to an international position. The first step in diplomatic coordination is to establish USFWS staff to manage coordination and to identify the countries for the deployment of the first five agents. The proposed countries for the first year are Mozambique, South Africa, India, Laos, and Vietnam. The USFWS will work together with the Department of State to consider these countries and others to finalize stations with a likely chance of success. Having these countries established within the first five weeks of the project will assist in the process of hiring the most qualified candidates. Next, there will be coordination with partner government agencies and international governments to ensure the training and deployment of the officers operates flawlessly. Additionally, the team will coordinate with the Department of State to ensure that any embassy or consulate will be prepared for incoming officers. These steps should be finalized early in the second quarter of the year, and coordination will shift to a focus on the visa process. Applying for visas for the chosen candidates, finalizing the logistics with the selected countries, and confirming the visas for each officer will round out the logistic roles throughout the end of the third quarter approaching the deployment of the officers.

Training

Most of the training programs will occur in previously established courses. While the logistics of hiring are established, the class will be registered for the Criminal Investigators Training Program (CITP) and the coordination team will ensure that the funding from the Department of Homeland Security is received and that housing is obtained for the duration of the training (Federal Law Enforcement Training Centers, n.d.). Immediately following the hiring of the first class of agents, they will be sent to the CITP, where they will complete a nine-week training on law enforcement. This process of registering, managing funding from the Department of Homeland Security, and managing housing is repeated for Special Agent Basic School (SABS), which the class of agents will complete after the CITP. The SABS is a six-week training course to add more in-depth skills to the knowledge learned in the CITP (USFWS, 2020b). The coordination team will register the class for the International Law Enforcement Academy training during the final weeks of the SABS, and they will pay for the training from the budget allotted to the program (USFWS, 2013). The class will complete a two-week training focused on wildlife enforcement before beginning the fourth section of training, the National Conservation Law Enforcement Leadership Academy (NCLELA), a three-week training focused on conservation law and leadership training, which the coordination team registered the class for in the weeks of the ILEA training (National Association of Conservation Law Enforcement Chiefs, 2019). The coordination team will then create the final aspect of the training: a new course focusing on whistleblower training and cultural competency. The training will take

place in each of the agents' assigned countries, so after they are deployed, staff will travel with them to finish this two-week training before their work begins. All of the training will take place over 30 weeks from the second half of the second quarter through the first nine weeks of the fourth quarter of the year.

Travel Logistics

The first steps of the deployment process begin at the beginning of the third quarter of the year

and consist of establishing housing. The coordination team will arrange housing and travel for the officers. The final step of the first year of the project is to conduct an initial performance review after the first week of work, to ensure that everything is operating smoothly.



© Operation Cobra II - Ethiopia

A leopard pelt recovered during Operation Cobra II. This operation took place in 2014 and involved coordination and intelligence sharing between 28 countries, including the US. It was extremely successful, with more than 400 arrests of wildlife traffickers and seizures of thousands of illegal wildlife products across Asia and Africa. Image: USFWS

5 Political Context and Feasibility

Political Context

Currently, Skopos Labs has estimated that H.R. 864 has a 2% of being enacted (Govtrack.us, 2019). While this bill faces uncertainty within Congress, for this bill to be enacted, a new Senate and President of the United States would have to be put in place, and potentially a new House Speaker who prioritizes conservation legislation. A crucial aspect of this program will be through negotiations with host countries for the successful implementation of the USFWS agents stationed abroad. This will require communication and united political, economical, and social relationships with foreign officers to successfully combat wildlife trafficking outside of the United States.

Environmental Justice and Anti-Racism

While the bill itself does not directly address environmental justice and anti-racism, there are aspects of the bill that impact these issues. The program design includes measures to address them. This process will proceed throughout the timeline of the program. From coordination within host countries and through the hiring process, the program will allow for environmental justice to occur and anti-racism practices inside and outside of the workforce to be enabled. The bill will ideally cut down on human trafficking and international organized crime, which involves human capital exploitation in most developing countries involved in trafficking (Congress.gov, 2019c). Additionally, conservation program development can promote economic mobility through job creation.



(Upper and lower) Illegal wildlife products from an ivory crush event in New York City in 2015. Image: Kelsey Williams/USFWS

6 Conclusion

Illegal wildlife trafficking and the unsustainable taking of animals from their environment leads to biodiversity loss, which severely impacts the functioning of healthy ecosystems and ecosystem services. Illegal wildlife trafficking also increases the frequency of interactions between humans and wild animals, which increases the chances that a zoonotic disease may spread from animals to humans. Both of these outcomes of wildlife trafficking have serious consequences for human health, ecological health, and the economy. Because ecosystems provide material and cultural benefits for humans, conserving natural resources has far-reaching benefits. Conserving biodiversity also decreases the risk of disastrous zoonotic disease outbreaks, such as the COVID-19 virus that has caused significant social upheaval at the time this document was written.

Given the significant threats wildlife trafficking poses to the health of both our natural habitats and human society, swift action must be taken to address any potential causes of concern regarding biodiversity loss and zoonotic disease dissemination. By increasing conservation funding, biodiversity can be conserved in areas where the rate of biodiversity loss is of particular concern, which will in turn protect ecosystem services. Placing USFWS agents abroad to assist in conservation will help stem trafficking, biodiversity loss, and disease spread by leveraging the United States' scientific and enforcement expertise. Lastly, increasing penalties for illegal wildlife trafficking and bolstering information channels by awarding whistleblowers larger sums of

money will improve information attainment and decrease the proliferation of criminal activity related to wildlife trafficking. By implementing H.R. 864, the United States can enhance its efforts to combat wildlife trafficking, and therefore biodiversity loss, the emergence of novel zoonotic diseases, and other associated problems.

In addition to designing a program according to the objectives laid out in H.R. 864, this report also reflects original contributions from the authors that reflect extensive research and benchmarking over the course of two semesters. This includes a project budget and revenue plan developed using historical data and best estimates based on comparable initiatives, and a detailed organizational staffing plan.



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Appendix: Master Calendar