

**Testimony of Jocelyn Ziemian, Senior Legislative Specialist  
Humane Society Legislative Fund  
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The Humane Society Legislative Fund thanks Chairwoman McCollum, Ranking Member Joyce, and all the members of the Appropriations Subcommittee on Interior, Environment, and Related Agencies for this opportunity to offer testimony on Fiscal Year 2020 appropriations. We wish to address the U.S. Fish and Wildlife Service's (FWS's) International Wildlife Conservation Council (IWCC). Specifically, we request the Subcommittee to block all funding for the IWCC.

As stated in its charter, the IWCC was created in 2017 to advise the federal government on increasing public awareness “regarding the conservation, wildlife law enforcement, and economic benefits that result from United States citizens traveling to foreign nations to engage in hunting,” and on “the benefits international hunting has on foreign wildlife and habitat conservation, anti-poaching and illegal wildlife trafficking programs, and other ways in which international hunting benefits human populations in these areas.”

The IWCC was established under the Federal Advisory Committee Act (FACA) (5 U.S.C. App. 2). This statute provides that “new advisory committees should be established only when they are determined to be essential and their number should be kept to the minimum necessary,” 5 U.S.C. App. 2 § 2(b)(2). Further, “[n]o advisory committee shall be established unless such establishment is determined...to be in the public interest in connection with the performance of duties imposed on that agency by law.” Id. § 9(a)(2). The membership of an advisory committee must “be fairly balanced in terms of the points of view represented and the functions to be performed by the advisory committee” (id. § 5(b)(2)), and must “not be inappropriately influenced by... any special interest” (id. § 5(b)(3)).

As we detail below, the IWCC violates FACA's criteria in multiple ways. The council is not essential, is not in the public interest, and is not balanced or protected from undue influence of special interests. As such, the IWCC is not a responsible use of the American taxpayers' money. This is particularly relevant since IWCC funding would detract from the agency's principal efforts to protect imperiled species, already reduced after years of cuts to the FWS budget.

**The IWCC is not essential**

The FWS has failed to demonstrate that the IWCC is essential. In 2013, the agency established a Wildlife Trafficking Advisory Council to combat illicit wildlife trade and to improve enforcement of wildlife trade laws. The United States is among the world's largest markets for legal and illegal wildlife trade. The Wildlife Trafficking Advisory Council played a key role in formulating the U.S. government's wide range of responses to tackle a \$20 billion illicit economy, including strengthening U.S. leadership in multiple international wildlife enforcement operations. The council was essential to the nation's holistic approach to promoting species conservation. However, this council was deemed inessential and discontinued by executive order in September 2017. It was arbitrary and capricious for the FWS to then establish the IWCC to consider activities previously addressed by the Wildlife Trafficking Advisory Council, which just a few months before had been deemed unnecessary. The IWCC's duplicative nature is further demonstrated by the fact that the IWCC includes a representative from the U.S. Department of State; the Presidential

Task Force on Wildlife Trafficking, established by executive order in 2013 already provides a forum for the FWS and the State Department to discuss issues of international wildlife trade, including trade in hunting trophies.

The IWCC has proven inessential in a broader statutory context also. The council's charter includes as its duties "[r]ecommending removal of barriers to the importation into the United States of legally hunted wildlife" and "[r]ecommending methods for streamlining/expediting processing of import permits." Yet the Endangered Species Act already enables interested parties to submit applications for import permits that demonstrate the alleged benefit of trophy hunting, and to submit comments on other permit applications and foreign species listing petitions. Thus, there is no functional need for an advisory council dedicated to these purposes.

There also exists an advisory council entitled the Hunting and Shooting Sports Conservation Council (HSSCC), which has the authority to address the matters included in the IWCC's proposed purview. Like the IWCC, the HSSCC's objectives explicitly include to "(a) benefit wildlife resources; (b) encourage partnership among the public; sporting conservation organizations; Federal, state, tribal, and territorial governments; and (c) benefit recreational hunting and recreational shooting sports." To achieve the goal of promoting recreational hunting, the HSSCC seeks in part to "promote opportunities and expand access to hunting and shooting sports on public and private lands."

### **The IWCC is not in the public interest**

Federal advisory committees are supposed to serve the public interest by helping the federal government gather balanced information through an open and public input process, but the IWCC fails to comply with that requirement as well.

In fact, the IWCC's very purpose is inconsistent with the public interest. The IWCC seeks to promote trophy hunting of wildlife abroad and to relax the legal restrictions for importing trophies of threatened and endangered species, presuming as incontrovertible fact the notion that trophy hunting promotes wildlife conservation. However, this is a highly controversial and hotly debated subject, with ample scientific evidence to the contrary, yet the council's own goals preclude objective investigation and airing of these ideas.

At the IWCC's first meeting, we witnessed the members of this trophy hunting council receiving a lesson from the FWS that could be described as "Wildlife Conservation 101." The fact that the members needed this type of lecture underscores their lack of expertise to advise the agency on solutions to our world's most pressing conservation challenges.

### **The IWCC is not balanced or protected from undue influence of special interests**

The IWCC also violates FACA's precept that advisory committees remain objective and outside the sphere of undue influence from special interests. Almost all of the council's nongovernmental members come from the world of hunting—such as professional and celebrity hunters, the firearms and ammunition lobby, and the hunting tourism industry. They have personal, financial, or other vested interests in loosening restrictions on hunting wildlife internationally, which render them unfit for advising the government on conservation.

Despite the council's supposed commitment to conservation, it comprises not a single conservation biologist to advise on the management of imperiled species. Indeed, even the charter's reference to participation by conservation and management organizations is so vague that it could include biased groups like Safari Club International or the National Rifle Association, groups that have filed lawsuits against the FWS to assert their interests as they are presently doing via the IWCC.

Unsurprisingly, this membership's predilection is reflected in the IWCC charter's "Description of Duties," which lays out goals that mostly represent the viewpoint of trophy hunters. Simply put, the IWCC is a self-serving platform using taxpayer dollars to cater to the wealthy trophy hunters and the trophy hunting industry the council represents.

Once again, we urge the Subcommittee to block any funding for the FWS IWCC.