



HOUSE COMMITTEE ON
NATURAL RESOURCES
CHAIRMAN BRUCE WESTERMAN

To: Subcommittee on Oversight and Investigations Republican Members
From: Subcommittee on Oversight and Investigations Staff:
Michelle Lane (Michelle.Lane@mail.house.gov) and Jace McNaught
(Jace.McNaught@mail.house.gov); x5-0500
Date: Monday, January 19, 2026
Subject: Oversight Hearing titled “*America First: U.S. Leadership & National Security in International Conservation*”

The Subcommittee on Oversight and Investigations will hold an oversight hearing titled “*America First: U.S. Leadership & National Security in International Conservation*” on **Wednesday, January 21, 2026, at 2:00 p.m. in room 1324 Longworth House Office Building.**

Member offices are requested to notify Sinclair Kouns (Sinclair.Kouns@mail.house.gov) by 4:30 p.m. on Tuesday, January 20, 2026, if their Member intends to participate in the hearing.

I. KEY MESSAGES

- Wildlife trafficking and associated environmental crimes comprise the world’s fourth-largest crime sector, behind narcotics, counterfeiting, and human trafficking. Compared to other crime sectors, environmental crimes are considered “low-risk/high-reward,” making them a lucrative activity for bad actors across the globe.
- Criminal networks increasingly use wildlife trafficking as a money-laundering scheme to merge environmental crimes with the drug trade on a global scale. In such “convergence” crimes, Transnational Criminal Organizations (TCOs) and terrorist groups exploit natural resources to generate significant income and perpetuate violence.
- Environmental crimes distort global markets, undercut law-abiding U.S. producers, and present a significant threat to resource, economic, and national security.
- Penalties for wildlife trafficking and related crimes are supported by a strong U.S. legislative framework and enforced by numerous federal, state, and international law enforcement agencies and bodies, including the U.S. Fish and Wildlife Service (USFWS).

II. WITNESSES

Panel I (Administration Witness)

- **Mr. Justin Shirley**, Principal Deputy Director, USFWS, Department of the Interior, Washington, D.C.

Panel II (Outside Expert Witnesses)

- **Mr. Arturo Tomas Benavides**, Title, Dallas Safari Club, Laredo, TX
- **Dr. R. Evan Ellis**, Senior Non-Resident Associate, Center for Strategic and International Studies, U.S. Army War College, Carlisle Barracks, PA
- **Dr. Eric Kingma**, Executive Director, Hawaii Longline Association, Honolulu, HI
- **Mr. Ed Newcomer**, USFWS Special Agent (Retired), Gardena, CA (*Minority witness*)

III. BACKGROUND

The Illicit Trade of Wildlife is Profitable and Growing

Wildlife trafficking—the illegal trade and poaching of wild animals and plants—is an international crisis that threatens global security and affects the national interests of the U.S. and its global partners.¹ This illicit trade supports a growing underground economy that harms the biodiversity and overall health of exploited ecosystems.² Wildlife trafficking operations also pose significant risks to economic vitality, public health, and national security.³

According to the Basel Institute on Governance, the “illegal wildlife trade is said to be the fourth largest illicit trade globally after weapons, drugs and human trafficking.”⁴ Today, illegal trade in wildlife and wildlife products “is estimated to be worth \$7 billion to \$23 billion annually.”⁵ This figure does not include “illegal logging and illegal fishing, which can account, respectively, for roughly an additional \$50.7 billion [to] \$152 billion annually and \$11 billion [to] \$23.5 billion annually.”⁶ These estimates likely place the value of illegal wildlife trafficking squarely “among the top five most lucrative criminal activities worldwide, behind only narcotics, counterfeiting, and human trafficking.”⁷

Given strong demand and high profits, TCOs and other nefarious actors are heavily involved with wildlife trafficking, leveraging their existing networks for money laundering, drug trafficking, weapons trafficking, and human smuggling.⁸ Notably, wildlife trafficking is widely

¹ See *Combating Wildlife Trafficking*, U.S. FISH AND WILDLIFE SERVICE, <https://www.fws.gov/initiative/combating-wildlife-trafficking>.

² *Id.*

³ See U.S. DEP’T OF STATE, REPORT TO CONGRESS ON THE ELIMINATE, NEUTRALIZE, AND DISRUPT WILDLIFE TRAFFICKING ACT P.L. 114-231; 16 U.S.C. §§ 7601-7644 (Aug. 6, 2025), <https://www.state.gov/2024-end-wildlife-trafficking-report/>.

⁴ WILDLIFE CRIME – UNDERSTANDING RISKS, AVENUES FOR ACTION: PART 1: ILLEGAL WILDLIFE TRADE AND FINANCIAL CRIME, BASEL INSTITUTE ON GOVERNANCE (Apr. 2021), <https://baselgovernance.org/sites/default/files/2021-04/Part%201%20Wildlife%20crime.pdf>.

⁵ *Id.*

⁶ See PERVAZE A. SHEIKH AND ERIC P. NARDI, CONG. RSCH. SERV., RL32751, THE CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA (CITES) (Jan. 7, 2026), <https://www.crs.gov/Reports/RL32751?source=search>.

⁷ *Id.*

⁸ See e.g., *Dirty Money: Chinese Organized Crime in Latin America*, Hearing before the U.S. Senate Caucus On International Narcotics Control, 119th Cong. (2025) (statement of Dr. Vanda Felbab-Brown, Director, Initiative on Nonstate Armed Actors, and Senior Fellow, The Brookings Institution), <https://www.drugcaucus.senate.gov/wp-content/uploads/2025/12/DSC-Dirty-Money->

considered to be a “low-risk/high-reward” crime.⁹ With this profile enticing TCOs and other criminal elements to expand their reach into wildlife trafficking, unregulated fishing, and illegal logging, the profits from such crimes are anticipated to grow at a rate of up to seven percent annually.¹⁰

Wildlife Trafficking

Demand for traditional medicines, decorations, exotic pets, wild food, and related products drives the multibillion dollar international wildlife trafficking industry.¹¹ For example, the market for traditional Chinese medicines is predicted to reach \$1 trillion by 2030 and has decimated several animal species, including pangolins, sought for their scales, rhinoceros, sought for their horns, tigers, sought for their bones and teeth, and sun bears sought for their bile and paws.¹² In July 2023, the Malaysian Anti-Corruption Commission infiltrated an international pangolin scale smuggling syndicate, seizing 1.8 tons of scales, with support from enforcement agencies in the U.S., the United Kingdom, and Hong Kong.¹³

Animals commonly trafficked for fashion primarily fall into three categories: reptiles (for handbags, belts, and shoes), furbearers (for coats and accessories), and birds (for clothing and jewelry).¹⁴ USFWS seized 5,607 luxury fashion items made from illegal wildlife products at U.S. ports from 2003 through 2013.¹⁵ Researchers found that nearly 70 percent of the items were exotic leather products made from the skins of monitor lizards, pythons, masked water snakes, crocodiles, caimans, and alligators.¹⁶

[in-Latin-America-12-05-2025-Felbab-Brown.pdf](#); Rachel Nuwer, *Illegal Wildlife Trade Tied to Drugs, Arms and Human Trafficking*, SCIENTIFIC AMERICAN (Nov. 21, 2025), <https://www.scientificamerican.com/article/illegal-wildlife-trade-tied-to-drugs-arms-and-human-trafficking/>.

⁹ WILDLIFE CRIME – UNDERSTANDING RISKS, AVENUES FOR ACTION: PART 1: ILLEGAL WILDLIFE TRADE AND FINANCIAL CRIME, BASEL INSTITUTE ON GOVERNANCE (Apr. 2021), <https://baselgovernance.org/sites/default/files/2021-04/Part%201%20Wildlife%20crime.pdf>.

¹⁰ *Id.*

¹¹ See PERVAZE A. SHEIKH, CONG. RSCH. SERV., IF11494, WILDLIFE TRADE, COVID-19, AND OTHER ZOONOTIC DISEASES (Feb. 19, 2021), <https://crs.gov/reports/pdf/IF11494/IF11494.pdf>.

¹² See *Unveiling the criminal networks behind traditional Chinese medicine in The Netherlands*, IUCN National Committee of The Netherlands (2024), https://www.iucn.nl/app/uploads/2024/02/Unveiling-Criminal-networks-behind-traditional-medicine-in-the-netherlands_22-02-2024.pdf; *Ten Threatened and Endangered Species Used in Traditional Medicine*, SMITHSONIAN MAGAZINE (Oct. 18, 2011), <https://www.smithsonianmag.com/science-nature/ten-threatened-and-endangered-species-used-in-traditional-medicine-112814487/>.

¹³ See T.n. Alagesh, *Smuggling of pangolin scales: 12 nabbed, probe to be completed in 2 weeks, assures MACC*, NEW STRAITS TIMES (July 20, 2023), <https://www.nst.com.my/news/crime-courts/2023/07/932982/smuggling-pangolin-scales-12-nabbed-probe-be-completed-2-weeks>.

¹⁴ See e.g., *Clothing and Ornaments*, Animal Welfare Institute, [https://awionline.org/content/clothing-ornaments#:~:text=Approximately%2015%25%20of%20highly%20threatened,worked%20products%20such%20as%20jewelry](https://awionline.org/content/clothing-ornaments#:~:text=Approximately%2015%25%20of%20highly%20threatened,worked%20products%20such%20as%20jewelry;); Emma Hakansson, *Cruelty is Out Of Fashion: An Overview of the fashion industry's policies on wild animal products*, Collective Fashion Justice and World Animal Protection (2022), <https://www.worldanimalprotection.org.au/siteassets/documents/reports/cruelty-is-out-of-fashion-report-2022.pdf>; Rachel Nuwer, *Luxury fashion brands had thousands of exotic leather goods seized by U.S. law enforcement*, NATIONAL GEOGRAPHIC (May 22, 2020), <https://www.nationalgeographic.com/animals/article/luxury-fashion-wildlife-imports-seized>.

¹⁵ See Rachel Nuwer, *Luxury fashion brands had thousands of exotic leather goods seized by U.S. law enforcement*, NATIONAL GEOGRAPHIC (May 22, 2020), <https://www.nationalgeographic.com/animals/article/luxury-fashion-wildlife-imports-seized>.

¹⁶ See Monique C. Sosnowski & Gohar A. Petrossian, *Luxury Fashion Wildlife Contraband in the USA*, 17 ECOHEALTH 94 (2020), <https://pubmed.ncbi.nlm.nih.gov/31989364/>.

Wildlife trafficking jeopardizes biodiversity and can even lead to ecosystem collapse.¹⁷ This illicit practice can also increase the spread of invasive species and the potential emergence of zoonotic diseases that could harm humans, animals, and plants.¹⁸ Notably, illegal trafficking of wildlife, including both flora and fauna, poses risks to legitimate, legal trade operations throughout global supply chains.¹⁹

Illegal, Unreported, and Unregulated Fishing

Fishery resources are a valuable aspect of the U.S. economy. According to a report by the U.S. Department of State, the U.S. was the “largest single-country market for fish and fish products and the fifth largest wild seafood producer.”²⁰ Fisheries and aquaculture products generate billions of dollars in revenue and constitute some of the most internationally traded food commodities.²¹

Illegal, unreported, and unregulated (IUU) fishing includes many forms, from independent small-scale fishing vessels misreporting their catch to coordinated offshore fleets illegally fishing in waters in violation of international treaties and bans.²² IUU fishing threatens the global fishing industry by putting legitimate producers at a disadvantage by avoiding the operational costs associated with sustainable and regulated fishing while also undermining port and maritime security.²³ This is estimated to cause annual global losses of tens of billions of dollars.²⁴

One of the most flagrant offenders of IUU fishing is China, which operates the world's largest distant-water fleet, with nearly 17,000 vessels.²⁵ Since most of its domestic fish stocks are depleted, China has its distant-water fleet primarily operate in the territorial waters of low-income countries, extracting at unsustainable levels and often competing with and pushing out local fishermen.²⁶ Many of these fishing vessels operate under foreign “flags of convenience” from nations with lax regulations, making enforcement measures even more difficult.²⁷

¹⁷ See *Dirty Money: Chinese Organized Crime in Latin America*, Hearing before the U.S. Senate Caucus On International Narcotics Control, 119th Cong. (2025) (statement of Dr. Vanda Felbab-Brown, Director, Initiative on Nonstate Armed Actors, and Senior Fellow, The Brookings Institution), <https://www.drugcaucus.senate.gov/wp-content/uploads/2025/12/DSC-Dirty-Money-in-Latin-America-12-05-2025-Felbab-Brown.pdf>.

¹⁸ See Annika Mozer & Stefan Prost, *An introduction to illegal wildlife trade and its effects on biodiversity and society*, 3 FORENSIC SCIENCE INTERNATIONAL: ANIMALS AND ENVIRONMENTS 100064 (2023), [An introduction to illegal wildlife trade and its effects on biodiversity and society](#).

¹⁹ WILDLIFE CRIME – UNDERSTANDING RISKS, AVENUES FOR ACTION: PART 1: ILLEGAL WILDLIFE TRADE AND FINANCIAL CRIME, BASEL INSTITUTE ON GOVERNANCE (Apr. 2021), <https://baselgovernance.org/sites/default/files/2021-04/Part%201%20Wildlife%20crime.pdf>.

²⁰ See U.S. DEP’T OF STATE, ILLEGAL, UNREPORTED, AND UNREGULATED FISHING, <https://www.state.gov/illegal-unreported-and-unregulated-fishing>.

²¹ *Id.*

²² See CAITLIN KEATING-BITONTI AND ANTHONY R. MARSHAK, CONG. RSCH. SERV., R48215, ILLEGAL, UNREPORTED, AND UNREGULATED (IUU) FISHING: FREQUENTLY ASKED QUESTIONS (Dec. 23, 2025), https://crs.gov/Reports/R48215?source=search#_Toc217389492.

²³ *Id.*

²⁴ *Id.*

²⁵ See Miren Gutiérrez et al., *China’s distant-water fishing fleet: Scale, impact and governance*, ODI GLOBAL (June 2020), https://media.odi.org/documents/chinesedistantwaterfishing_web.pdf.

²⁶ *Id.*

²⁷ *Id.*

TCOs are also complicit in IUU fishing. In the mid-2000s, for example, approximately 100 Russian trawlers, operated by “mafia-style gangs,” participated in large-scale illegal fishing.²⁸ TCOs in Latin America, such as the Sinaloa and New Jalisco cartels, illegally harvest marine products—including sea cucumbers, abalone, and the bladder of the totoaba fish in Mexico—to traffic to Chinese markets.²⁹ These organizations and other criminal syndicates also deliver stolen and siphoned-off fuel to China’s distant-water fleet, allowing its vessels to evade oversight and law enforcement by not docking in ports.³⁰

IUU fishing puts law-abiding fishermen and American seafood producers at a competitive disadvantage.³¹ Beyond that, the destructive practices of IUU fishing imperil the natural resources that are critical to food security across the globe.³² These dire consequences are heightened when TCOs violate national and international laws and regulations and engage in IUU fishing.³³

Illegal Logging

Illegal logging—the harvest, transport, purchase, or sale of timber in violation of national laws—is a growing and pervasive global challenge.³⁴ The International Criminal Police Organization (INTERPOL) estimates that the illegal timber trade accounts for 15 to 30 percent of all global forestry activity and may reach as high as 90 percent in tropical countries in the Amazon, Central Africa, and Southeast Asia.³⁵ As one of the world’s largest importers and consumers of wood, the U.S. represents a lucrative market for illegal suppliers.³⁶ In 2015, for instance, 96 percent of the timber in a single shipment from Peru was determined to be illegal.³⁷ In response, U.S. Customs and Border Protection (CBP) banned imports from the two Peruvian companies responsible for the shipment when they failed to provide evidence of timber legality.³⁸

Despite such enforcement efforts, legitimate American businesses continue to be hurt by illegal logging. The American Forest and Paper Association estimates that illegal logging has caused a 7 to 16 percent price reduction in legal world timber prices, which “significantly affects the ability of U.S. producers to export.”³⁹ Furthermore, the knock-on effects of deforestation can pose

²⁸ See CAITLIN KEATING-BITONTI AND ANTHONY R. MARSHAK, CONG. RSCH. SERV., R48215, ILLEGAL, UNREPORTED, AND UNREGULATED (IUU) FISHING: FREQUENTLY ASKED QUESTIONS (Dec. 23, 2025), https://crs.gov/Reports/R48215?source=search#_Toc217389492.

²⁹ See *Dirty Money: Chinese Organized Crime in Latin America*, Hearing before the U.S. Senate Caucus On International Narcotics Control, 119th Cong. (2025) (statement of Dr. Vanda Felbab-Brown, Director, Initiative on Nonstate Armed Actors, and Senior Fellow, The Brookings Institution), <https://www.drugcaucus.senate.gov/wp-content/uploads/2025/12/DSC-Dirty-Money-in-Latin-America-12-05-2025-Felbab-Brown.pdf>.

³⁰ *Id.*

³¹ “IUU Fishing & Sustainable Fisheries: Combating IUU Fishing and Advancing Global Sustainable Fisheries Management,” National Oceanic and Atmospheric Administration, <https://www.fisheries.noaa.gov/s3/2024-08/Combating-IUU-Fishing-Factsheet-Flyer.pdf>, last accessed Jan. 15, 2026.

³² *Id.*

³³ *Id.*

³⁴ See PERVAZE A. SHEIKH AND KEZEE PROCITA, CONG. RSCH. SERV., IF11114, INTERNATIONAL ILLEGAL LOGGING: BACKGROUND AND ISSUES (Feb. 26, 2019), <https://www.crs.gov/Reports/IF11114?source=search>.

³⁵ *Id.*

³⁶ See KYLA H. KITAMURA AND ANNE A. RIDDLE, CONG. RSCH. SERV., R48781, U.S.-CANADA SOFTWOOD LUMBER TRADE: CURRENT ISSUES FOR CONGRESS (Dec. 30, 2025), <https://www.crs.gov/Reports/R48781?source=search>.

³⁷ See Hannah Waldhorn, *The True Cost of Timber*, U.S. CUSTOMS AND BORDER PROTECTION FRONTLINE (Dec. 30, 2024), <https://www.cbp.gov/frontline/cbp-stops-illegal-logging>.

³⁸ *Id.*

³⁹ *Id.*

significant environmental threats. Forests are complex ecosystems that act as natural carbon sinks.⁴⁰ In contrast, countries with strong oversight and timber practices are succeeding in expanding their tree populations.⁴¹ For example, private working forest owners in the U.S. grow 43 percent more wood than they harvest.⁴²

National Security Implications of Wildlife Trafficking

Organized Criminal Networks and Foreign Terrorist Organization Diversification into Environmental Crime

Environmental crime is increasing at a staggering rate, according to a joint report from the United Nation's Environment Programme (UNEP) and INTERPOL.⁴³ The report estimated that environmental crime is the world's fourth-largest crime sector, growing at five to seven percent annually, which is approximately two to three times the pace of the global economy.⁴⁴ As environmental crime has proliferated, TCOs have diversified their revenue streams towards the illicit trafficking of natural resources.⁴⁵ Not only do environmental crimes offer new ways of generating cash flows for nefarious actors, they allow TCOs to utilize wildlife commodities for money laundering and tax evasion.⁴⁶ A form of this manifests as *feiqian*, or "flying money," laundering schemes, where Chinese groups barter with cartels for products ranging from rare hardwoods to wildlife and marine products in exchange for precursor chemicals needed for fentanyl production.⁴⁷

Bad actors from China and Latin America are not the only perpetrators of environmental crime. Al-Shabab, a Somali terrorist organization, is primarily funded through their illegal charcoal trade in East Africa.⁴⁸ UNEP's Global Resource Information Database (GRID) estimates that al-Shabab brings in an estimated \$38 to 56 million dollars trafficking this illicit product.⁴⁹ In Mali, al-Qaeda affiliate Jamaat Nusrat al-Islam has capitalized on the illegal trade of endangered

⁴⁰ See Melissa Kreye, *How Forests Store Carbon*, PENN STATE EXTENSION (Aug. 22, 2023), <https://extension.psu.edu/how-forests-store-carbon>.

⁴¹ See NATIONAL ALLIANCE OF FOREST OWNERS, PRIVATE FOREST OWNERS GROW 43% MORE WOOD THAN THEY HARVEST (July 15, 2019), <https://nafoalliance.org/private-forest-owners-grow-43-more-wood-than-they-harvest/>.

⁴² *Id.*

⁴³ The Rise of Environmental Crime: A Growing Threat to Natural Resources, Peace, Development and Security, UNITED NATIONS ENVIRONMENT PROGRAMME (2016), <https://wedocs.unep.org/items/f1e192f5-8879-4e06-9d13-92d44392ebb6>.

⁴⁴ *Id.*

⁴⁵ See *Transnational Criminal Organizations: The Menacing Threat to the U.S. Homeland*, Hearing before the U.S. House Committee on Homeland Security, Subcommittee on Counterterrorism, Law Enforcement and Intelligence, 118th Cong. (2023), (statement of Douglas Farah, President, IBI Consultants LLC), <https://www.ibiconsultants.net/upload/mediaandpublications/document/df-testimony-house-homeland-security-june-2023.pdf>.

⁴⁶ See *Dirty Money: Chinese Organized Crime in Latin America*, Hearing before the U.S. Senate Caucus On International Narcotics Control, 119th Cong. (2025), (statement of Dr. Vanda Felbab-Brown, Director, Initiative on Nonstate Armed Actors, and Senior Fellow, The Brookings Institution), [DSC-Dirty-Money-in-Latin-America-12-05-2025-Felbab-Brown.pdf](https://www.brookings.edu/articles/dsc-dirty-money-in-latin-america-12-05-2025-felbab-brown.pdf).

⁴⁷ See Andrea Crosta, *Op-Ed Environmental crimes are often hidden by 'flying money' laundering schemes*, IUCN U.S. NATIONAL COMMITTEE (June 11, 2025), <https://iucn-members.us/2025/06/11/op-ed-environmental-crimes-are-often-hidden-by-flying-money-laundering-schemes/>; see also *Dirty Money: Chinese Organized Crime in Latin America*, Hearing before the U.S. Senate Caucus On International Narcotics Control, 119th Cong. (2025), (statement of Dr. Vanda Felbab-Brown, Director, Initiative on Nonstate Armed Actors, and Senior Fellow, The Brookings Institution), [DSC-Dirty-Money-in-Latin-America-12-05-2025-Felbab-Brown.pdf](https://www.brookings.edu/articles/dsc-dirty-money-in-latin-america-12-05-2025-felbab-brown.pdf), <https://www.brookings.edu/articles/how-chinese-criminal-networks-fuel-illicit-markets-across-the-americas/>.

⁴⁸ See *The illegal charcoal trade controlled by Al Shabaab*, GRID ARENDAL, <https://www.grida.no/resources/7489>.

⁴⁹ *Id.*

rosewood and ivory from the tusks of the threatened Gourma elephant, with both products having a significant export market to China.⁵⁰

According to the Global Initiative Against Transnational Organized Crime, this crime convergence is estimated to generate up to \$281 billion a year globally, with much of it untraceable due to the nature of this illicit trade.⁵¹ These numbers make environmental crime one of the most lucrative criminal economies in the world.⁵²

Governance, Corruption, and Regional Stability

Apart from funding criminal networks, environmental crime allows many states and insurgent groups to perpetrate wars and create regional instability.⁵³ UNEP estimates that at least 40 percent of internal conflicts in the last 60 years have a link to natural resources.⁵⁴

The Armed Conflict Location and Event Data Project lists Myanmar as the second-most violent place in the world following the country's 2021 military coup.⁵⁵ The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) described timber and pearl exports as key sources of funding for the Burmese military junta in the ongoing civil war within the country.⁵⁶ According to Myanmar's own reporting, the country exported \$235.6 million worth of timber between 2021 to 2023, with actual levels likely being much greater than these reports due to cross-border smuggling.⁵⁷

Since 2018, the Wagner Group, a Russia-based mercenary army, has exploited the weak governance and corrupt regulations of the Central African Republic (CAR) to exploit the nation's natural resources.⁵⁸ In 2021, CAR granted a Wagner-affiliated group a 30-year logging concession for a 186,000 hectare tract of land. It is estimated that if Wagner utilized just one-third of that land, its profits could reach up to \$900 million.⁵⁹ The Wagner Group is using logging revenues to fund its illicit activities and Vladimir Putin's war in Ukraine.⁶⁰

⁵⁰ See Justyna Gudzowska and Laura Ferris, *The War on Trees*, FOREIGN AFFAIRS. (June 2, 2025), <https://www.foreignaffairs.com/united-states/war-trees>; See also *Poached Timber: Rosewood Crisis in Mali and Unprecedented Opportunity for a Regional Solution*, ENVIRONMENTAL INVESTIGATION AGENCY. (May 18, 2022), <https://eia.org/press-releases/20220518-poached-timber-pr/>.

⁵¹ Kristina Amerhauser & Robin Cartwright, *Hidden in Plain Sight: Counting the cost of environmental crime*, GLOBAL INITIATIVE AGAINST TRANSNATIONAL ORGANIZED CRIME (Nov 1, 2023), <https://globalinitiative.net/analysis/hidden-in-plain-sight-environmental-crime/>.

⁵² *Id.*

⁵³ See *The Rise of Environmental Crime: A Growing Threat to Natural Resources, Peace, Development and Security*, UNITED NATIONS ENVIRONMENT PROGRAMME (2016), <https://wedocs.unep.org/items/f1e192f5-8879-4e06-9d13-92d44392ebb6>.

⁵⁴ *Id.*

⁵⁵ See *Conflict Index*, ACLED, (2025), <https://acleddata.com/series/acledd-conflict-index>.

⁵⁶ Treas., OFAC, Press Release on Treasury Sanctions Key Timber and Pearl Enterprise in Burma, (Apr. 21, 2021), <https://home.treasury.gov/news/press-releases/jy0138>.

⁵⁷ See Scilla Aleccia, *Myanmar's controversial timber trade persists, despite Western sanctions*, INTERNATIONAL CONSORTIUM OF INVESTIGATIVE JOURNALISTS, (Feb. 29, 2024), <https://www.icij.org/investigations/deforestation-inc/myanmars-controversial-timber-trade-persists-despite-western-sanctions/>.

⁵⁸ See *Illegal Logging in the CAR by Wagner Group and Criminal Syndicates Drives Insecurity*, AFRICA DEFENSE FORUM, (August 22, 2023), <https://adf-magazine.com/2023/08/illegal-logging-in-the-car-by-wagner-group-and-criminal-syndicates-drives-insecurity/>.

⁵⁹ *Id.*

⁶⁰ *Id.*

The above examples are just a few of the many instances in which conflict situations and social fragility contribute to environmental crimes.⁶¹ Natural resource exploitation and conflict persist in tandem, with corrupt institutions and chaotic governance creating opportunities for states and insurgent groups to extract revenue from the environment to fund and fuel conflict.⁶² These conflicts lead to a self-perpetuating cycle of corruption, in which post-conflict states become vulnerable to corruption and weak governance, undermining sustainable natural resource development and conservation efforts.⁶³

Effects on Global Ecosystem Health and Safety

Beyond endangering species through population loss, wildlife trafficking can drastically harm ecosystem health, diversity, and stability.⁶⁴ In southern Florida, for example, invasive species introduced through illegal wildlife trade, like the Burmese python and Argentine black and white tegu, pose serious threats to native mammals and weaken local economies.⁶⁵

According to the World Health Organization, some 60 percent of the world's emerging infectious diseases are of zoonotic origin, meaning they are transmitted from animals to humans.⁶⁶ Wildlife trafficking markets often disregard health and sanitary protocols, creating optimal conditions for the rapid spread of zoonotic diseases.⁶⁷ For example, the African swine fever was introduced to the European Union through illegally traded meat in 2014,⁶⁸ and the Severe Acute Respiratory Syndrome Coronavirus (SARS-CoV) was transmitted to humans from civets sold in wildlife markets in China in 2002.⁶⁹

Wildlife trafficking can also disrupt critical supply chains for U.S. industries, like pharmaceuticals and biotechnology, that rely on non-human primates for research.⁷⁰ During a September 2024 hearing, the House Committee on Natural Resources (Committee) examined how worldwide shortages of long-tailed macaques threatened domestic medical research, as well how the false labeling (as captive-bred) of wild-caught, long-tailed macaques from Cambodia could damage the reputations of U.S. domestic businesses.⁷¹ For additional information on these subjects, see the Committee's [hearing memo](#).

⁶¹ See Jade Saunders & Marigold Norman, *Conflict, Fragility, and Global Trade in High-Risk Timber*, FOREST TRENDS, (Aug. 2020), https://www.forest-trends.org/wp-content/uploads/2020/08/doc_5758.pdf.

⁶² *Id.*

⁶³ *Id.*

⁶⁴ See UNITED NATIONS OFFICE ON DRUGS AND CRIME, *E4J University Module Series: Wildlife Crime Module 1: Illicit Markets for Wildlife, Forest, and Fisheries Products* (Sep. 2019), [https://www.unodc.org/e4j/en/wildlife-crime/module-1/key-issues/implications-of-wildlife-trafficking.html#:~:text=Wildlife%20trafficking%20is%20related%20to,19\)](https://www.unodc.org/e4j/en/wildlife-crime/module-1/key-issues/implications-of-wildlife-trafficking.html#:~:text=Wildlife%20trafficking%20is%20related%20to,19)).

⁶⁵ See *Everglades National Park Florida: Invasive Species: Everglades National Park*, NATIONAL PARK SERVICE, <https://www.nps.gov/ever/learn/nature/invasivespecies.htm>.

⁶⁶ See *One Health*, WORLD HEALTH ORGANIZATION (Oct. 23, 2023), <https://www.who.int/news-room/fact-sheets/detail/one-health>.

⁶⁷ See Annika Mozer and Stefan Prost, *An introduction to illegal wildlife trade and its effects on biodiversity and society*, 3 FORENSIC SCIENCE INTERNATIONAL: ANIMALS AND ENVIRONMENTS 100064 (2023), <https://www.sciencedirect.com/science/article/pii/S2666937423000021>.

⁶⁸ *Id.*

⁶⁹ See PERVAZE A. SHEIKH, CONG. RSCH. SERV., IF11494, WILDLIFE TRADE, COVID-19, AND OTHER ZOOONOTIC DISEASES (Feb. 19, 2021), <https://www.crs.gov/Reports/IF11494?source=search>.

⁷⁰ See *The Fish and Wildlife Service Gone Wild: Examining Operation Long Tail Liberation*, Hearing before the Subcomm. on Oversight and Investigations of the H. Comm. on Natural Resources, 118th Cong. (2024) (hearing memo), https://naturalresources.house.gov/uploadedfiles/hearing_memo_-_sub_on_oi_ov_hrg_on_operation_longtail_09.10.24.pdf.

⁷¹ *Id.*

Legislative & Law Enforcement Frameworks to Address Illegal Wildlife Trade

The U.S. has a robust legislative and regulatory framework to combat wildlife trafficking, both within its borders and abroad. The U.S. has passed a number of federal statutes, including the Endangered Species Act,⁷² Marine Mammal Protection Act,⁷³ and Fishermen's Protective Act,⁷⁴ which contain provisions targeting wildlife trafficking.⁷⁵ The primary tools for both domestic and international law enforcement on these matters lie within the Lacey Act and America's participation in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

The Lacey Act

Enacted in 1900, the Lacey Act was the first law of its kind in the U.S.⁷⁶ Originally aimed at regulating the trade in fauna, this statute was later amended to include flora and remains, and it remains in effect as the foundation for prosecutorial action against wildlife traffickers.⁷⁷ Specifically, the Lacey Act prohibits the trade of organisms, or products derived from them, that were obtained in violation of U.S. law (including the trade of species that the Secretary of the Interior (Secretary) designates as injurious to the U.S.) or the laws of the foreign nations from which they were sourced.⁷⁸ The Act also instructs the Secretary to establish and maintain requirements for the "humane and healthful" transport of live animals.⁷⁹

CITES

CITES is an international treaty with the mission of ensuring that global trade in wildlife is legal and sustainable.⁸⁰ The member nations of CITES, collectively known as the Conference of the Parties (CoP), assist one another in enforcing sustainable trade practices and may request assistance in controlling trade in certain designated species.⁸¹ The treaty imposes strict controls on the trade of animals, plants, and the products made from them that are listed within three appendices established by the treaty and managed by the members.⁸² Indeed, "[a]ll import, export, re-export and introduction from the sea of species covered by [CITES] has to be authorized through a licensing system."⁸³ Additionally, each member country is required to "designate one or more Management Authorities in charge of administering that licensing system and one or more Scientific Authorities to advise them on the effects of trade on the status of the species." Under Article XIV, CITES establishes the minimum trade standards for listed species, while member nations are free to enact stricter trade standards on their own initiative.⁸⁴

⁷² 16 U.S.C. §§ 1531-1544.

⁷³ 16 U.S.C. §§ 1361-1423h.

⁷⁴ 22 U.S.C. §§ 1971-1979.

⁷⁵ 16 U.S.C. 1531-1544; 16 U.S.C. 1361-1407; 22 U.S.C. 1978.

⁷⁶ See CASSANDRA J. BARNUM, CONG. RSCH. SERV., R48669, CRIMINAL LACEY ACT OFFENSES: AN OVERVIEW OF SELECTED ISSUES (Sep. 2, 2025), <https://crs.gov/Reports/R48669?source=search>.

⁷⁷ 18 U.S.C. 42.

⁷⁸ *Id.*

⁷⁹ *Id.*

⁸⁰ "CITES," U.S. Fish and Wildlife Service," <https://www.fws.gov/international-affairs/cites>, last accessed January 15, 2026.

⁸¹ See CITES, *How CITES works*, <https://cites.org/eng/disc/how.php>.

⁸² *Id.*

⁸³ *Id.*

⁸⁴ Convention on International Trade in Endangered Species of Wild Fauna and Flora, Mar. 3, 1973, 27 U.S.T. 1087, 993 U.N.T.S. 243.

Several federal law enforcement agencies collaborate to combat wildlife trafficking at both the domestic and international level, including the USFWS Office of Law Enforcement (OLE),⁸⁵ the National Oceanic and Atmospheric Administration (NOAA)'s Fisheries OLE, and CBP. These agencies work hand in hand with state and local police, as well as global partners, to investigate and prosecute wildlife trafficking cases.

The USFWS OLE has several divisions dedicated to combating wildlife trafficking at the international, national, regional, and local levels.⁸⁶ USFWS OLE wildlife law enforcement personnel are stationed in U.S. Embassies around the world, partnering with other agencies to coordinate investigations and provide training and resources to other nations seeking to combat transnational wildlife crimes.⁸⁷ USFWS OLE also supports on-the-ground law enforcement investigations and inspects shipments at U.S. ports of entry. In this capacity, USFWS OLE works with its partners to “help facilitate legal, sustainable wildlife trade by inspecting declared and permitted shipments of wildlife products at ports of entry nationwide.”⁸⁸

In addition to the USFWS OLE, the NOAA Fisheries OLE focuses on marine wildlife, enforces laws for threatened and endangered marine species, and supports international treaty compliance for global fisheries.⁸⁹ CBP works alongside USFWS OLE and other agencies at U.S. ports of entry to intercept illegal wildlife shipments and participate in ongoing investigations.⁹⁰

IV. CONCLUSION

The illicit trade of wildlife and natural resources has evolved from a conservation challenge into a complex threat-multiplier that endangers U.S. national security, economic prosperity, and public health. With its perpetrators ranging from Mexican cartels to the Wagner Group, environmental crimes serve as critical financial engines for TCOs and adversarial regimes. The U.S. possesses the robust legislative and regulatory track records necessary for bolstering the sustainable legal trade of wildlife while pursuing those who seek to operate illegally. Effectively combating this multi-billion-dollar shadow economy is essential not only for preserving global biodiversity but for upholding the rule of law and protecting the integrity of legitimate domestic and international markets.

⁸⁵ “Law Enforcement,” U.S. Fish and Wildlife Service, <https://www.fws.gov/initiative/combating-wildlife-trafficking/law-enforcement>.

⁸⁶ *Id.*

⁸⁷ *Id.*

⁸⁸ *Id.*

⁸⁹ “About Us: Office of Law Enforcement,” National Oceanic and Atmospheric Administration, Office of Law Enforcement, <https://www.fisheries.noaa.gov/about/office-law-enforcement>, last accessed Jan. 15, 2026.

⁹⁰ “CBP officers intercepted parrots in an alleged wildlife smuggling attempt,” U.S. Customs and Border Protection, Jan. 7, 2026, <https://www.cbp.gov/newsroom/local-media-release/cbp-officers-intercepted-parrots-alleged-wildlife-smuggling-attempt>.