



September 2016

# COMBATING WILDLIFE TRAFFICKING

Agencies Are Taking a  
Range of Actions, but  
the Task Force Lacks  
Performance Targets  
for Assessing  
Progress

Accessible Version

# GAO Highlights

Highlights of [GAO-16-717](#), a report to congressional requesters

## Why GAO Did This Study

Illegal trade in wildlife—wildlife trafficking—continues to push some protected and endangered animal species to the brink of extinction, according to the Department of State. Wildlife trafficking undermines conservation efforts, can fuel corruption, and destabilizes local communities that depend on wildlife for biodiversity and ecotourism revenues. This trade is estimated to be worth \$7 billion to \$23 billion annually. In 2013, President Obama issued an executive order that established the interagency Task Force charged with developing a strategy to guide U.S. efforts on this issue.

GAO was asked to review U.S. government efforts to combat wildlife trafficking. This report focuses on wildlife trafficking in Africa, particularly of large animals, and examines, among other things, (1) what is known about the security implications of wildlife trafficking and its consequences, (2) actions Task Force agencies are taking to combat wildlife trafficking, and (3) the extent to which the Task Force assesses its progress. GAO analyzed agency documents and met with U.S. and host country officials in Washington, D.C.; Kenya; South Africa; and Tanzania.

## What GAO Recommends

GAO recommends that the Secretaries of State and the Interior and the Attorney General of the United States, as co-chairs, jointly work with the Task Force to develop performance targets related to the *National Strategy for Combating Wildlife Trafficking Implementation Plan*. Agencies agreed with GAO's recommendation.

View [GAO-16-717](#). For more information, contact Kimberly Gianopoulos at (202) 512-8612 or [gianopoulosk@gao.gov](mailto:gianopoulosk@gao.gov).

September 2016

## COMBATING WILDLIFE TRAFFICKING

### Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance Targets for Assessing Progress

## What GAO Found

While criminal elements of all kinds, including some terrorist entities and rogue security personnel, engage in poaching and transporting ivory and rhino horn across Africa, transnational organized criminals are the driving force behind wildlife trafficking, according to reports GAO reviewed and agency officials GAO spoke with in the United States and Africa. Wildlife trafficking can contribute to instability and violence and harm people as well as animals. According to reports, about 1,000 rangers were killed from 2004 to 2014. Wildlife trafficking in Africa particularly affects large animals, with populations of elephants and rhinos diminishing at a rate that puts them at risk of extinction.

#### This Elephant Died in Northern Kenya Several Days after Sustaining Bullet Wounds



Source: GAO. | GAO-16-717

Agencies of the interagency Task Force leading U.S. efforts to combat wildlife trafficking are taking a range of conservation and capacity-building actions. The Department of the Interior's Fish and Wildlife Service, for example, provides law enforcement assistance and supports global conservation efforts. The Department of State contributes to law enforcement capacity building and diplomatic efforts, while the Department of Justice prosecutes criminals and conducts legal training to improve partner-country capacity. Further, the U.S. Agency for International Development works to build community and national-level enforcement capacity and supports various approaches to combat wildlife trafficking. Several other agencies also contribute expertise or resources to support various activities outlined in the Task Force's *National Strategy for Combating Wildlife Trafficking Implementation Plan*.

The Task Force provides some information about progress, but it lacks performance targets, making effectiveness difficult to determine at the strategic level. A fundamental element in an organization's efforts to manage for results is its ability to set specific targets that reflect strategic goals. Task Force officials identified a range of reasons why they do not have targets, including dependence on global partners, the long time periods needed to document results, and limited data availability. However, Task Force agencies have provided performance targets for other efforts that face similar challenges. Without targets, it is unclear whether the Task Force's performance is meeting expectations, making it difficult to gauge progress and to ensure that resources are being utilized most effectively in their efforts against wildlife trafficking.

---

# Contents

---

Letter	1
Background	4
Transnational Organized Criminals Drive Wildlife Trafficking, Contributing to Violence and Instability	14
U.S. Task Force Agencies Are Taking a Range of Actions to Combat Wildlife Trafficking	19
State and USAID Generally Monitor the CWT Programs We Reviewed in Accordance with Widely Accepted Standards; Both Agencies Have Yet to Conduct CWT-Specific Evaluations	31
CWT Task Force Lacks Performance Targets, Making Effectiveness Difficult to Determine	37
Conclusions	40
Recommendation for Executive Action	41
Agency Comments	41

---

Appendix I: Objectives, Scope, and Methodology	43
Appendix II: Comments from the Department of the Interior	47
Appendix III: Comments from the Department of State	48
Appendix IV: Comments from the U.S. Agency for International Development	50
Appendix V: GAO Contact and Staff Acknowledgments	52
Appendix VI: Accessible Data	53
Agency Comment Letter	53
Accessible Text/Data Tables	58

---

Tables	
Table 1: State and USAID Programs to Combat Wildlife Trafficking in Kenya, South Africa, and Tanzania That GAO Reviewed	32
Table 2: Results of GAO's Analysis of State and USAID Documentation Related to Monitoring for Select Programs to Combat Wildlife Trafficking in Kenya, South Africa, and Tanzania	33
Table 3: USAID Combating Wildlife Trafficking-Related Programs and Evaluation Reports That GAO Reviewed	36
Accessible Text for Figure 4: Selected U.S. Government Actions to Combat Wildlife Trafficking, 2013 to 2016	58

---

Data Table for Figure 5: Minimum Amounts Directed in Appropriations Act for Combating the Transnational Threat of Wildlife Poaching and Trafficking, Fiscal Years 2014 to 2016	58
--	----

---

Figures

Figure 1: Recorded Number of Rhinoceroses Poached in South Africa	6
Figure 2: This Elephant Died in Northern Kenya Several Days after Sustaining Bullet Wounds	7
Figure 3: Main Illicit Trade Flows of Raw Ivory Shipments and Ivory Seizures, in Kilograms, 2007 to 2014	9
Figure 4: Selected U.S. Government Actions to Combat Wildlife Trafficking, 2013 to 2016	12
Figure 5: Minimum Amounts Directed in Appropriations Act for Combating the Transnational Threat of Wildlife Poaching and Trafficking, Fiscal Years 2014 to 2016	13
Figure 6: Members of an Antipoaching Patrol Unit in Northern Kenya	18
Figure 7: Elephant in Ruaha National Park, Tanzania	21
Figure 8: Endangered Rhino in Kruger National Park, South Africa	23
Figure 9: Two Members of the “Black Mambas,” an All-Female Antipoaching Patrol in South Africa	25
Figure 10: Canine Antipoaching Patrol, near Tarangire and Lake Manyara National Parks, Tanzania	29

---

---

## Abbreviations

APA	2015 Annual Progress Assessment
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CWT	combating wildlife trafficking
DHS	Department of Homeland Security
DOI	Department of the Interior
DOJ	Department of Justice
EENT	Endangered Ecosystem of Northern Tanzania
FTO	Foreign Terrorist Organization
FWS	U.S. Fish and Wildlife Service
Implementation Plan	<i>National Strategy for Combating Wildlife Trafficking Implementation Plan</i>
INL	Bureau of International Narcotics and Law Enforcement Affairs
INTERPOL	International Criminal Police Organization
ITAP	International Technical Assistance Program
NGO	nongovernmental organization
NRT	Northern Rangelands Trust
ODNI	Office of the Director of National Intelligence
SMART	Spatial Monitoring and Reporting Tool
State	Department of State
Strategy	<i>National Strategy for Combating Wildlife Trafficking</i>
Task Force	Presidential Task Force on Wildlife Trafficking
Treasury	Department of the Treasury
UNODC	United Nations Office on Drugs and Crime
USAID	U.S. Agency for International Development

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



September 22, 2016

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

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

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

In 2013, President Obama issued an executive order that established an interagency Task Force and charged it with developing a strategy to guide U.S. efforts to combat wildlife trafficking.<sup>1</sup> The Presidential Task Force on Wildlife Trafficking (Task Force) is co-chaired by the Departments of the Interior (DOI), Justice (DOJ), and State, and the White House released the Task Force's *National Strategy for Combating*

---

<sup>1</sup>Exec. Order No. 13648 (July 1, 2013).

---

*Wildlife Trafficking* (the Strategy) in February 2014. The Strategy establishes guiding principles and priorities for U.S. efforts to stem illegal trade in wildlife. In February 2015, the Task Force released the *National Strategy for Combating Wildlife Trafficking Implementation Plan* (Implementation Plan), which identifies specific objectives and steps supported by programs overseen by Task Force agencies.

You asked us to review U.S. efforts aimed at combating wildlife trafficking (CWT). This report focuses on wildlife trafficking in Africa, particularly of large animals, and supply side activities, which include poaching, transport, and export of wildlife and wildlife parts.<sup>2</sup> We examined (1) what is known about the security implications of wildlife trafficking and its consequences; (2) actions Task Force agencies are taking to combat wildlife trafficking; (3) State and U.S. Agency for International Development (USAID) monitoring and evaluation of CWT efforts in select countries; and (4) the extent to which the Task Force assesses its progress.

To obtain information for background and context, we reviewed information related to rhinoceros and elephant products and poaching. We also examined data on the flow of illegal ivory and seizures. We did not assess the reliability of these data.

To address our objectives, we analyzed agency documentation, met with Task Force agency officials and nongovernmental wildlife trafficking experts in Washington, D.C., and conducted fieldwork in Kenya, South Africa, and Tanzania. We selected these countries using a combination of criteria: (1) Since fiscal year 2013, each country has received at least \$1 million annually in U.S. government funding for efforts related to CWT; (2) CWT activities are underway in each country and are expected to make significant impact; and (3) each country has the presence of at least two U.S. government agencies conducting CWT work. This sample is not generalizable to all the countries in which the United States has CWT-related programs. While in each country in Africa, we interviewed officials who served on each embassy's CWT working group, which generally included officials from State, USAID, and the Departments of Defense, Homeland Security, the Interior, and Justice. We also interviewed host

---

<sup>2</sup>There are many additional dimensions to wildlife trafficking, including factors driving demand. We plan to conduct work in this area in the future.



---

government officials, implementing partner representatives, park authorities, and community members.

To examine monitoring efforts in these countries, we worked with State and USAID to identify one program in each country based on the criterion that the program must have CWT-related activities. Agency officials identified a total of four programs that met that criterion, and we assessed the monitoring documentation for those four programs. We identified nine widely accepted monitoring elements and reviewed the documentation the agencies provided for each program to determine whether it addressed each principle—generally, partially, or not at all. We cannot generalize from this sample of programs in these selected countries to the universe of all CWT programs in all countries.

To examine evaluation efforts, we identified CWT-related programs in the three selected countries that had available evaluation reports. In total, we reviewed the evaluation reports for six USAID-supported programs. State was not able to identify any CWT-related programs with an available evaluation report in any of the three countries. To assess the degree to which these evaluations were conducted in adherence to select evaluation standards, we used criteria identified in prior GAO work.<sup>3</sup> We then identified the goals and objectives of each evaluation report to determine the extent to which the evaluations addressed CWT goals.

To address the extent to which the Task Force assesses its progress, we analyzed relevant documentation and information, including the *National Strategy for Combating Wildlife Trafficking Implementation Plan* and the *2015 Annual Progress Assessment*. In addition, we reviewed documentation on results management and spoke with Task Force officials. Using prior GAO work, we established that a fundamental element in an organization's efforts to manage for results is its ability to set performance goals with specific targets and time frames that reflect strategic goals and to measure progress toward its performance goals as

---

<sup>3</sup>GAO, *President's Emergency Plan for AIDS Relief: Agencies Can Enhance Evaluation Quality, Planning, and Dissemination*, [GAO-12-673](#) (Washington, D.C.: May 31, 2012), p. 13. For example, we examined these common evaluation standards, among others: evaluation identifies program and evaluation objectives, evaluation specifies why evaluation is needed, and evaluation design appears to be appropriate. Our 2012 evaluation assessment tool was based on evaluation guidance from USAID, the Centers for Disease Control, the Organisation for Economic Co-operation and Development, and GAO.



---

part of its strategic planning efforts.<sup>4</sup> In addition, according to *Standards for Internal Control in the Federal Government*, managers need to compare actual performance against planned or expected results and to analyze significant differences.<sup>5</sup> Using these criteria, we analyzed the extent to which the Task Force assessed its progress. Appendix II provides a detailed discussion of our objectives, scope, and methodology.

We conducted this performance audit from August 2015 to September 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

---

## Background

---

### Wildlife Trafficking Is a Multibillion-Dollar Illegal Trade and Threatens Iconic Species

According to a 2014 United Nations Environment Programme report, the illegal trade in wildlife has been estimated by different sources to be worth between \$7 billion and \$23 billion annually.<sup>6</sup> The report also indicates that poached African elephant ivory, just one of many wildlife products, may represent an end-user street value in Asia of an estimated \$165 million to \$188 million per year. According to a 2012 joint report by the World Wildlife Fund, a conservation organization, and Dalberg, a strategic consulting firm, the price of rhino horn had reached approximately \$27,000 per pound—which, at that time, was twice the value of gold and

---

<sup>4</sup>GAO, *DHS Training: Improved Documentation, Resource Tracking, and Performance Measurement Could Strengthen Efforts*, [GAO-14-688](#) (Washington, D.C.: Sept. 10, 2014); *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1996); GAO, *Managing for Results: Critical Actions for Measuring Performance*, GAO/T-GGD/AIMD-95-187 (Washington, D.C.: June 20, 1995); and GAO, *Government Reform: Goal-Setting and Performance*, [GAO/AIMD/GGD-95-130R](#) (Washington, D.C.: Mar. 27, 1995).

<sup>5</sup>GAO, *Internal Control: Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999) and *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

<sup>6</sup>C. Nellemann et al., eds., *The Environmental Crime Crisis—Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources* (Nairobi: United Nations Environment Programme, 2014).

---

platinum and more valuable on the black market than diamonds and cocaine.<sup>7</sup>

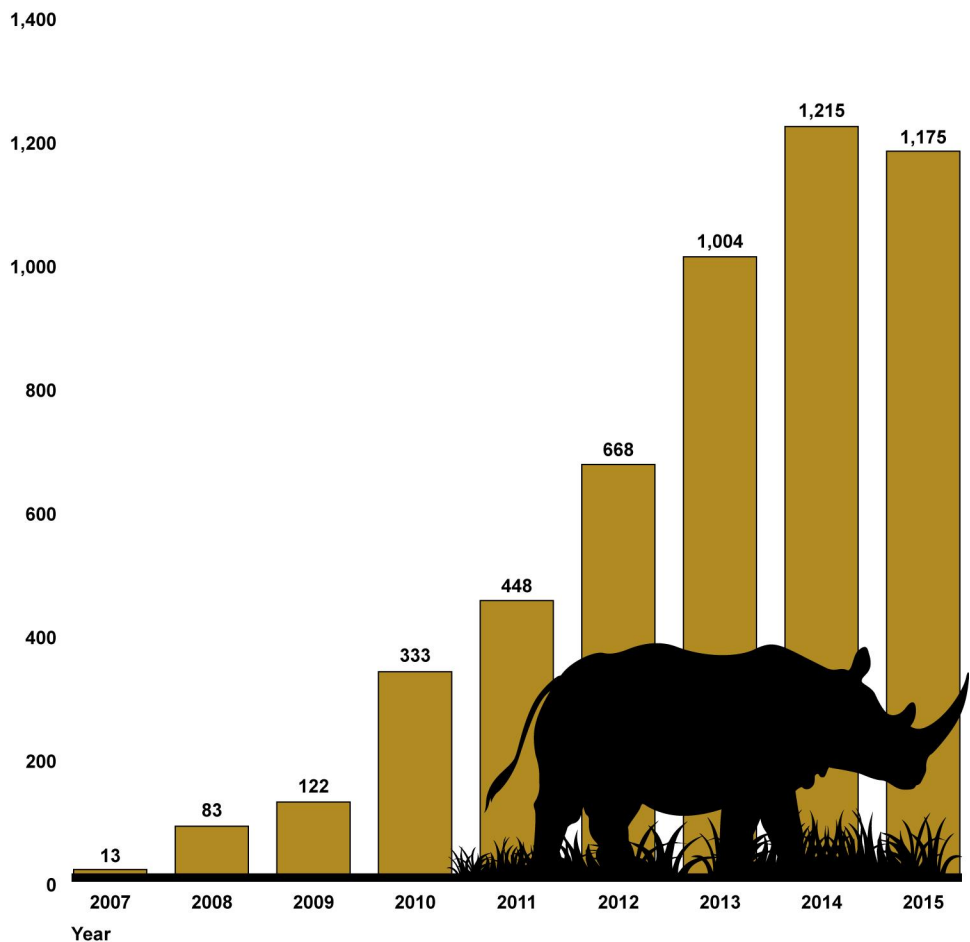
Wildlife trafficking threatens iconic species, including elephants and rhinos in Africa. According to the U.S. Fish and Wildlife Service (FWS), before 1900, black rhinos lived throughout most of sub-Saharan Africa, but from 1970 to 1992, rhino populations declined 96 percent. More recently, from 2007 to 2015 in South Africa, poachers killed 5,061 rhinos, according to the government of South Africa (see fig. 1). Currently, an estimated 25,000 rhinos remain on the continent, according to FWS.<sup>8</sup>

---

<sup>7</sup>Dalberg and World Wildlife Fund, *Fighting Illicit Wildlife Trafficking: A Consultation with Governments* (Gland, Switzerland: 2012).

<sup>8</sup>As we are presenting these data for background and context only, we did not assess their reliability.

**Figure 1: Recorded Number of Rhinoceroses Poached in South Africa**



Source: Government of South Africa. | GAO-16-717

According to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES),<sup>9</sup> the number of elephants killed each year has reached levels deemed unsustainable. The illicit ivory trade has grown by more than three times since 1998, and elephants are being killed faster than they can reproduce. From 2002 to 2011, the total population of forest elephants decreased by an estimated 62 percent

<sup>9</sup>CITES is an international agreement between governments that aims to ensure that international trade in specimens of wild animals and plants does not threaten their survival.

---

across central Africa. According to FWS, from 2010 to 2012, an estimated 100,000 elephants were killed for their ivory, an average of approximately 1 every 15 minutes. The agency also reported that poaching continues at an alarming rate and is at its highest level in decades. Specifically, it reported that the current rate of decline is unsustainable and puts the African elephant at risk of extinction. Elephants are under threat even in areas that were once thought to be safe havens. During our fieldwork in Africa, we observed an elephant that had been shot and died in a protected area of northern Kenya, illustrating the nature of the challenge.

**Figure 2: This Elephant Died in Northern Kenya Several Days after Sustaining Bullet Wounds**



Source: GAO. | GAO-16-717

---

## Africa and Supply-Side Wildlife Trafficking Activities

According to the Strategy, while the United States is among the world's major end markets for wildlife trafficking in general, Africa has become one of the largest sources of animal and plant species to supply criminal networks trading to Asia. As one nongovernmental organization (NGO)



---

reported, wildlife products illegally leave the African continent by air or by sea through increasingly sophisticated routes and concealment methods. In Asia, increased demand for ivory and rhino horn stems from a rapidly expanding wealthy class that views these commodities as luxury goods that enhance social status, as reported in the Strategy.

The flow of ivory illustrates the Africa-Asia nexus. According to a report by an NGO that works with U.S. government agencies on CWT, the primary axis for the illicit ivory trade is from Africa to East Asia, through the international container shipping system.<sup>10</sup> The majority of shipments exit Kenya and Tanzania bound for China, Thailand, and Vietnam. Significant ivory seizures occur in Malaysia and Singapore due to their role as transshipment hubs. A 2016 United Nations Office of Drugs and Crime (UNODC) report indicates that over 70 percent of the ivory seized from 2009 to 2013 was found in large shipments of raw ivory.<sup>11</sup> Figure 3 shows sources and destinations of ivory seizures, based on seizure data from the UNODC, with arrows representing repeated indications of a source-destination pairing.<sup>12</sup>

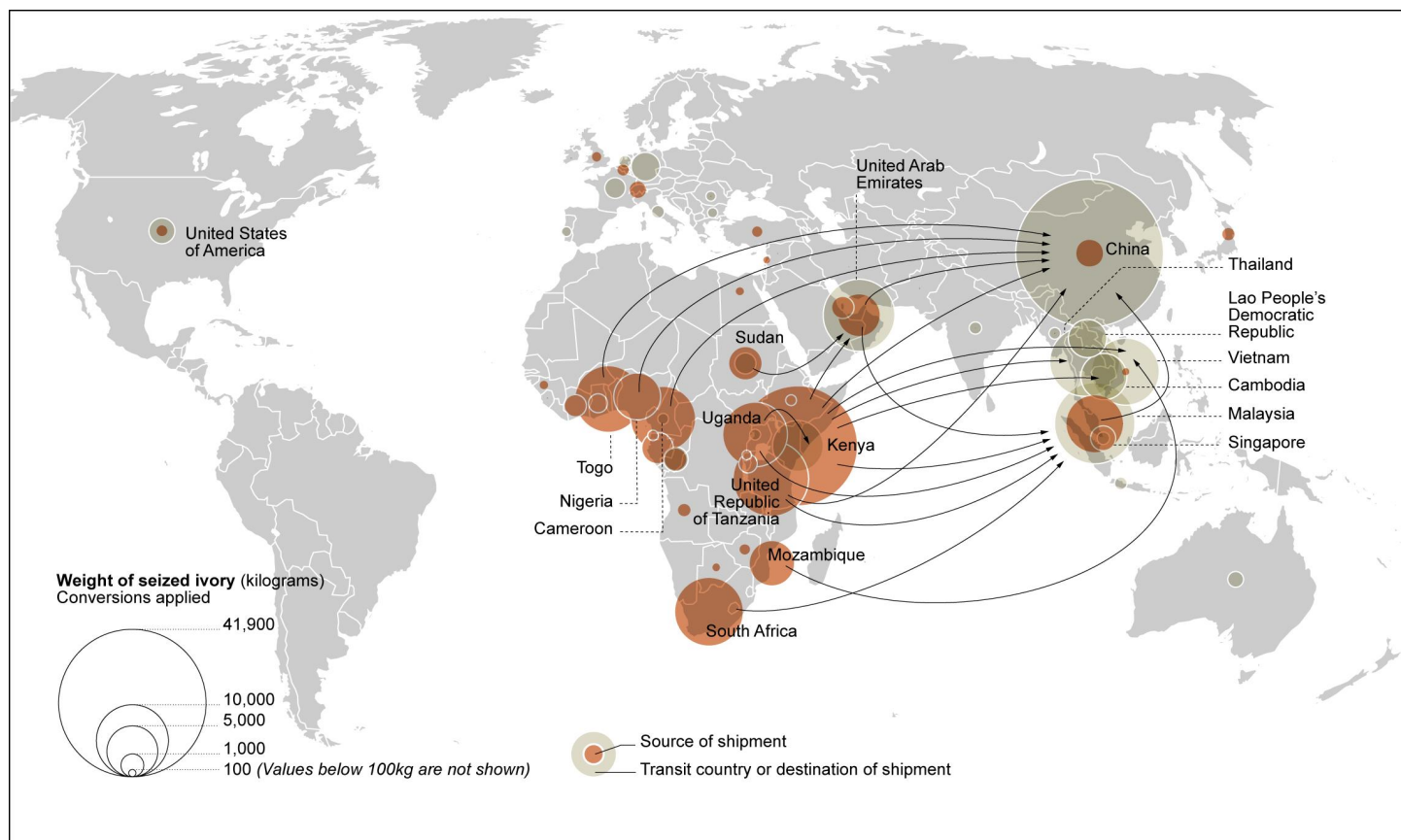
---

<sup>10</sup>Varun Vira, Thomas Ewing, and Jackson Miller, *Out of Africa: Mapping the Global Trade in Illicit Elephant Ivory* (Washington, D.C.: C4ADS and Born Free USA, 2014).

<sup>11</sup>United Nations Office on Drugs and Crime (UNODC), *World Wildlife Crime Report: Trafficking in Protected Species 2016* (Vienna, Austria: May 2016).

<sup>12</sup>As we are presenting these data for background and context only, we did not assess their reliability.

**Figure 3: Main Illicit Trade Flows of Raw Ivory Shipments and Ivory Seizures, in Kilograms, 2007 to 2014**



Source: United Nations Office on Drugs and Crime and World Wildlife Seizure database. | GAO-16-717

Note: The boundaries shown on this map do not imply official endorsement or acceptance by the United Nations.

---

## Brief History of U.S. Task Force, Strategy, and Other CWT Efforts

In 2013, President Obama issued an executive order that established the Task Force and charged it with developing a strategy to guide U.S. efforts on CWT.<sup>13</sup> Figure 4 outlines selected U.S. government CWT actions from 2013 to 2016. In February 2014, the White House released the Strategy, which lays out guiding principles and strategic priorities for U.S. efforts to stem illegal trade in wildlife. In February 2015, the Task Force released the Implementation Plan for the Strategy, which identifies a range of objectives and agency roles. For each objective, the Implementation Plan designates one or more lead and participating agencies, departments, or offices. One objective, for example, is to achieve a near-total U.S. ban on trade in elephant ivory and rhino horn. The lead agency designated for this objective is DOI, working through FWS; the participating agencies are DOJ, the Department of Commerce through its National Oceanic and Atmospheric Administration, the Department of Homeland Security (DHS), and the Office of the U.S. Trade Representative. The Implementation Plan identifies a total of 24 objectives categorized under three strategic priorities:

- Strengthen Enforcement;
- Reduce Demand for Illegally Traded Wildlife; and
- Build International Cooperation, Commitment, and Public-Private Partnerships.

In June 2015, FWS, in coordination with wildlife and conservation partners from government, NGOs, and the private sector, hosted its second major ivory crush event to educate consumers and to send a message to ivory traffickers that the United States will not tolerate this illegal trade. One ton of ivory seized during an FWS undercover operation, plus other ivory from the New York State Department of Environmental Conservation and the Association of Zoos and Aquariums, was crushed in Times Square, New York City. In June 2016, FWS finalized a rule that, according to FWS, established a near-total ban on

---

<sup>13</sup>Multiple federal agencies, departments, and executive offices were brought together as a Task Force to create and implement the Strategy: the Council on Environmental Quality; the Departments of Agriculture, Commerce, Defense, Homeland Security, the Interior, Justice, State, Transportation, and the Treasury; the Domestic Policy Council; the National Security Staff; the Offices of the Director of National Intelligence, Management and Budget, Science and Technology Policy, and the United States Trade Representative; and the U.S. Agency for International Development. The executive order designates the Departments of the Interior, Justice, and State as co-chairs.



---

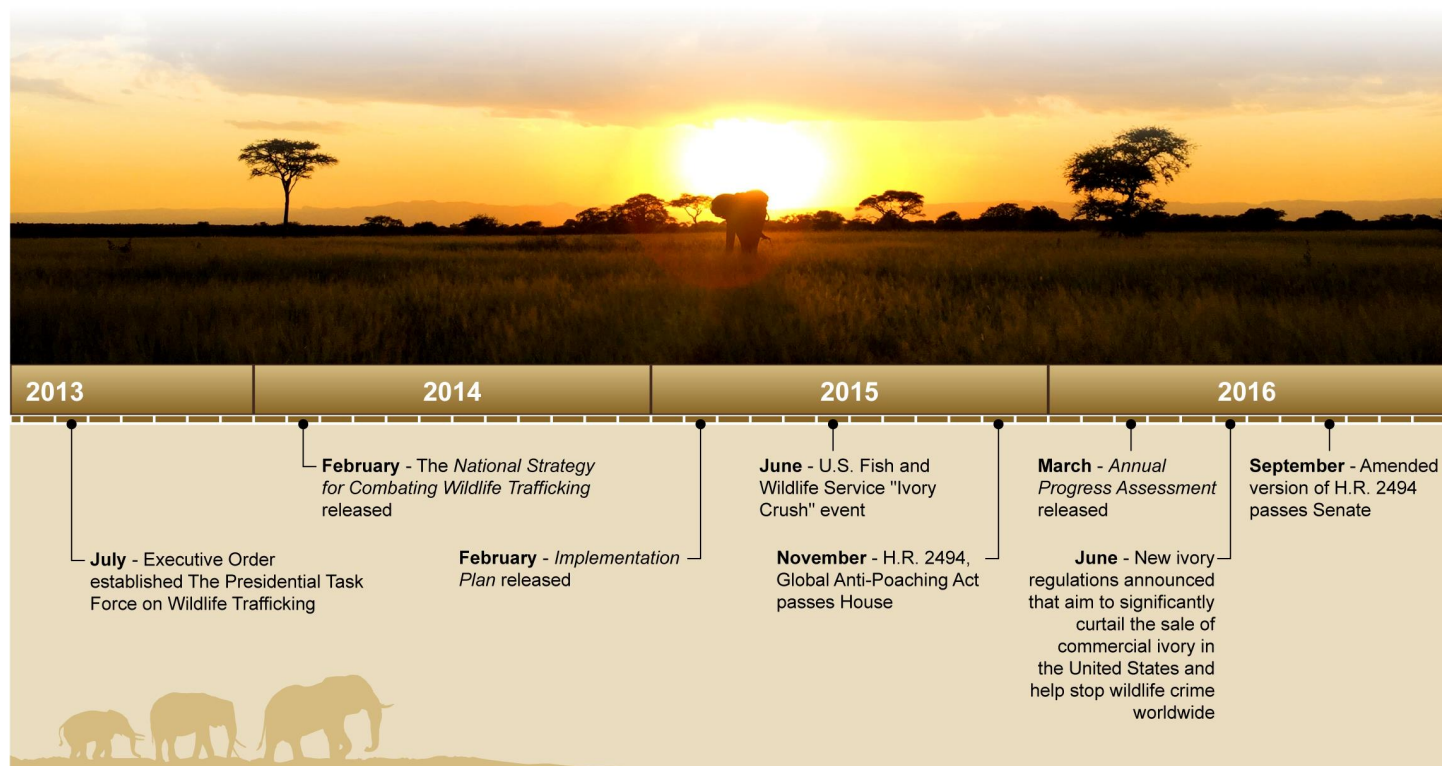
the domestic commercial trade of African elephant ivory.<sup>14</sup> The rule prohibits the import and export of African elephant ivory, with limited exceptions. In March 2016, the Task Force issued an Annual Progress Assessment (APA), which describes accomplishments related to the Implementation Plan. In addition, Congress is considering multiple CWT legislative proposals. For example, in November 2015 and September 2016, the House and Senate, respectively, passed legislation which aims, among other things, to support global antipoaching efforts, strengthen the capacity of partner countries to counter wildlife trafficking, and designate major wildlife-trafficking countries.<sup>15</sup>

---

<sup>14</sup>See Fed. Reg. 36387 (June 6, 2016) amending 50 C.F.R. § 17.40.

<sup>15</sup>In November 2015, the House passed H.R. 2494, the Global Anti-Poaching Act. In September 2016, the Senate passed a substitute version of H.R. 2494, the Eliminate, Neutralize, and Disrupt (END) Wildlife Trafficking Act of 2016. Both versions include certain wildlife trafficking violations, as defined under the act, as predicate offenses under money-laundering statutes if the endangered or threatened species, products, items, or substances involved in the violation have a total value of more than \$10,000. The Strategy states that the administration will work with Congress to seek legislation that recognizes wildlife-trafficking crimes as predicate offenses for money laundering, thus placing wildlife trafficking on an equal footing with other serious crimes.

**Figure 4: Selected U.S. Government Actions to Combat Wildlife Trafficking, 2013 to 2016**

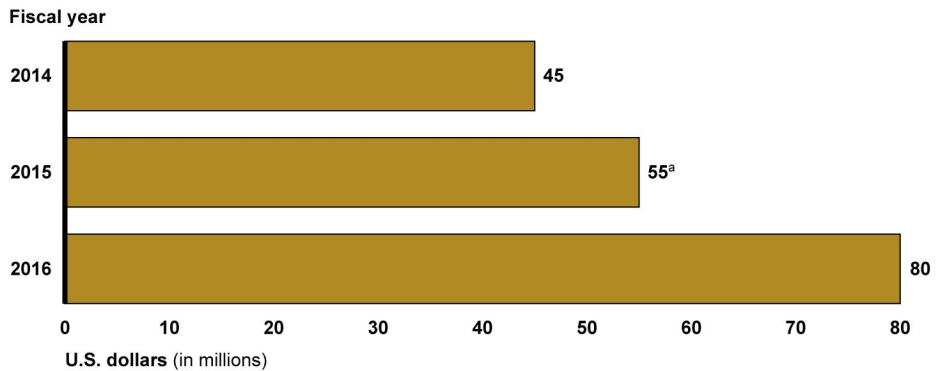


Source: GAO analysis. | GAO-16-717

## Agency Spending on Combating Wildlife Trafficking Is Difficult to Determine

From fiscal year 2014 to 2016, Congress directed that not less than \$180 million be made available to combat wildlife trafficking (see fig. 5).

**Figure 5: Minimum Amounts Directed in Appropriations Act for Combating the Transnational Threat of Wildlife Poaching and Trafficking, Fiscal Years 2014 to 2016**



Source: GAO analysis of annual appropriations acts for fiscal years 2014 to 2016. | GAO-16-717

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

While annual appropriations acts directed that a minimum amount be made available to combat the transnational threat of wildlife poaching and trafficking in each fiscal year from 2014 to 2016, determining how much agencies have obligated to CWT efforts is challenging. According to agency officials, this is due in part to the inherently interdisciplinary nature of CWT, which involves development conservation, domestic conservation, local law enforcement, combating transnational crime, and demand reduction. According to USAID, extrapolating the CWT component of obligations is not possible in accounting terms, but programs that include CWT goals and funding are managed to achieve intended CWT objectives. However, some agencies have attempted to make informed estimates of CWT funding, based on a specific USAID-State definition, and have identified CWT as a key issue in their budget justifications. Agency officials also told us that they use different methodologies to identify CWT funding because CWT activities often are part of programs that have multiple goals, and funding stems from different authorizations.

---

## Transnational Organized Criminals Drive Wildlife Trafficking, Contributing to Violence and Instability

---

### Transnational Organized Criminals and Networks Drive Wildlife Trafficking

While criminal elements of all kinds, including some terrorist entities and rogue security personnel, are involved in poaching and transporting ivory and rhino horn across Africa, transnational organized criminals and networks are the driving force behind wildlife trafficking, according to reports we reviewed and agency officials we spoke with in the United States and Africa. A 2016 UNODC report states that wildlife trafficking is increasingly recognized as a specialized area for transnational organized criminals and a significant threat to many animal species.<sup>16</sup> A report by an NGO that works with U.S. government agencies on CWT analyzed the flow of ivory and found that a relatively narrow logistics and distribution chain suggests collusion of transnational criminal organizations.<sup>17</sup> In addition, a representative of the U.S. Intelligence Community and other agency officials in Washington, D.C., indicated that organized criminal groups that have the scale and sophistication to conduct illicit trade internationally are the main actors responsible for moving large volumes of wildlife products across the world. Agency officials we spoke with in Africa also told us that because such criminal organizations have global links and the desire to earn money by any means, they play the major role in wildlife trafficking. As of July 2016, State's Transnational Organized Crime Rewards Program, which authorizes rewards for certain information regarding members of significant transnational criminal organizations, identified the Xaysavang Network as an international wildlife-trafficking syndicate that facilitates the killing of elephants, rhinos, and other protected species for products such as ivory and rhino horn.

---

<sup>16</sup>UNODC, *World Wildlife Crime Report*.

<sup>17</sup>Jackson Miller, Varun Vira, and Mary Utermohlen, *Species of Crime: Typologies & Risk Metrics for Wildlife Trafficking* (Washington, D.C.: C4ADS, May 2015).

---

## Officials and Reports Provide Mixed Views on Terrorist Group Involvement in Wildlife Trafficking

Agency officials we spoke with expressed varying perspectives on the degree of terrorist group involvement in wildlife trafficking. Reporting from NGOs is also mixed. Agency officials told us that the differences in views may be due to a range of reasons, including a lack of a common definition for and usage of the term “terrorist group,” lack of reliable evidence, and the tendency for different types of criminal activities to blend together.

State applies a specific definition to designate Foreign Terrorist Organizations (FTO), criteria for which include that the organization must be a foreign organization, must engage in terrorist activity or retain the capability and intent to engage in terrorist activity or terrorism, and must threaten the security of U.S. nationals or the national security of the United States. State has designated the following, among others, as FTOs: al Qaeda, al Qaeda in the Islamic Maghreb, al-Shabaab, and Boko Haram. A senior State official publicly testified that al-Shabaab is directly or indirectly (through taxation of goods moving through areas they control) involved in wildlife trafficking. NGOs also reported that al-Shabaab has been actively buying and selling ivory as a means of funding their militant operations.<sup>18</sup> However, another report from an NGO found flaws with the al-Shabaab–ivory nexus.<sup>19</sup> In addition, some State and other agency officials we spoke with suggested that evidence linking FTOs to wildlife trafficking is generally inconclusive, due in part to lack of specific, reliable evidence.

According to State, Janjaweed and the Lord’s Resistance Army are not FTOs, but agency officials told us these organizations are commonly referred to as terrorist groups. The Lord’s Resistance Army, an armed group that operates in several countries of central Africa, uses proceeds from elephant poaching to support its illicit activities, according to agency officials. Various reports from U.S. agencies and NGOs also implicate

---

<sup>18</sup>For example, see International Fund for Animal Welfare, *Criminal Nature: The Global Security Implications of the Illegal Wildlife Trade* (Yarmouth Port, MA: 2013), and Nir Kalron and Andrea Crosta, “Africa’s White Gold of Jihad: Al-Shabaab and Conflict Ivory” (Elephant Action League), accessed July 13, 2016, at <http://www.elephantleague.org/project/africas-white-gold-of-jihad-al-shabaab-and-conflict-ivory/>.

<sup>19</sup>Tom Maguire and Cathy Haenlein, *An Illusion of Complicity: Terrorism and the Illegal Ivory Trade in East Africa*, An Occasional Paper (London: Royal United Services Institute for Defence and Security Studies, September 2015).

---

Janjaweed, a group of Sudanese Arab militias, as active in wildlife trafficking.<sup>20</sup>

The 2016 UNODC report suggests that, in general, it is difficult to see how African terrorist groups are making large sums of money by poaching elephants for ivory in areas they control.<sup>21</sup> Agency officials told us that terrorist groups would engage in wildlife trafficking if it presented a practical opportunity to generate revenue, and they said that some are so engaged, but exactly where and to what extent is difficult to determine. Moreover, activities of criminal elements blend together, a condition referred to as “convergence” in law enforcement. Criminal organizations can exploit the same weaknesses—corrupt institutions, porous borders, unstable regions—to overlap and blur linkages to their illicit undertakings, including wildlife trafficking. This, combined with the fact that illegal activity by nature is clandestine, makes it difficult to determine the extent to which terrorist groups are involved in wildlife trafficking, according to agency officials.

---

## Wildlife Trafficking Contributes to Instability and Violence

Wildlife trafficking contributes to instability and violence, with corruption playing a major role, according to reports we reviewed and agency officials we spoke with in the United States and Africa. A 2013 report from the Office of the Director of National Intelligence (ODNI) found that systemic corruption enables the illicit ivory and rhino horn trade and that the trade exacerbates corruption by making high-value illegal products available to influential individuals along the supply chain, from rangers to customs officers, police, and the military.<sup>22</sup> By inducing widespread movement of armed poachers and traffickers, ivory and rhino horn trade also exacerbates border insecurity, particularly across porous borders, according to the ODNI report. As an example of this kind of condition, U.S. agency and South African officials in Kruger National Park, a key

---

<sup>20</sup>FWS, *A Results-Based Vision for Conservation in Central Africa* (Washington, D.C.: September 2015). International Fund for Animal Welfare, *Criminal Nature - The Global Security Implications of the Illegal Wildlife Trade*, 2013. C4ADS and Born Free, *Ivory's Curse: The Militarization & Professionalization of Poaching in Africa*, April 2014. Congressional Research Service, *Wildlife Poaching in Africa: An Overview* (Washington, D.C.: Dec. 23, 2015).

<sup>21</sup>UNODC, *World Wildlife Crime Report*.

<sup>22</sup>Office of the Director of National Intelligence, *Wildlife Poaching Threatens Economic, Security Priorities in Africa* (Washington, D.C.: September 6, 2013).

---

rhino-poaching ground, told us that poachers from Mozambique cross the South African border to hunt for wildlife and that deadly gun battles occur on an ongoing basis. In addition, according to international organization and NGO reports, an estimated 1,000 rangers were killed worldwide over the decade from 2004 to 2014, which on average means that 1 ranger died every 4 days during that period.<sup>23</sup> On our visit to northern Kenya, we met with an antipoaching ranger patrol unit (see fig. 6). The commander told us that a team member was recently killed in the line of duty, demonstrating the risk that rangers face on the job every day. In addition, a high-level official in South Africa told us that a shoot-out involving poachers recently occurred in downtown Pretoria, the capital, indicating that wildlife trafficking-related violence can affect urban areas as well as remote parks.

---

<sup>23</sup>United Nations Environment Programme, *The Environmental Crime Crisis*. See also "Our Story," *The Thin Green Line Foundation*, accessed July 13, 2016, at <https://www.thingreenline.org.au/story/>.



**Figure 6: Members of an Antipoaching Patrol Unit in Northern Kenya**



Source: GAO. | GAO-16-717

Wildlife trafficking also has adverse national and local-level economic impacts. The 2013 ODNI report found that the illicit trade in ivory and rhino horn arguably weakens macroeconomic and fiscal stability, deters investment, contributes to income inequality, and hinders growth at all levels of an economy. Tourism revenues are particularly threatened by unchecked poaching, according to the report. Agency officials in Africa told us that wildlife tourism provides a significant source of income. Local communities in particular suffer when poaching occurs, because, among other things, it reduces already limited economic opportunities. For example, some of the villagers we spoke with in northern Kenya told us they had at one time been poachers but then became antipoaching

---

rangers, because they saw first-hand that poaching produced a range of adverse impacts on their communities, reducing revenue from tourism while upsetting the delicate ecosystem balance and risking violent conflict with authorities or other poachers.

---

## U.S. Task Force Agencies Are Taking a Range of Actions to Combat Wildlife Trafficking

The Task Force is co-chaired by DOI, DOJ, and State, and the Implementation Plan designates approximately 16 agencies, departments, or offices to play a role in taking action to combat wildlife trafficking. For the purposes of this report, we focused on the co-chair agencies and USAID, which is one of the agencies most heavily involved in CWT. Within DOI, FWS is responsible for conservation and management of biological resources, and it acts as the implementing organization for CWT efforts. State, responsible for managing U.S. foreign affairs, contributes to CWT-related diplomacy and law enforcement capacity-building activities. DOJ's role in CWT involves prosecuting criminals and conducting judicial and prosecutorial training with partner nations. Under its development mission, USAID works with local communities and at the national level to conserve wildlife in Africa and around the world.

---

## FWS Provides Law Enforcement Assistance and Supports Species Conservation Efforts

Through grants and other means, FWS provides law enforcement assistance and supports conservation efforts that contribute to addressing wildlife trafficking. The Implementation Plan gives FWS a lead or participating role in each of the 24 objectives, making it the co-chair agency with the most responsibility for conducting CWT work. According to FWS officials, in fiscal year 2015, FWS awarded funding to 141 wildlife trafficking-related projects through its International Affairs Program, obligating approximately \$20 million worldwide. This included \$9.6 million of USAID funds for the Central Africa Regional Program for the Environment program, implemented by FWS and their partners; \$7.2 million from FWS regional and species funds; and \$2.6 million to counter wildlife trafficking in Southeast Asia, implemented by FWS through an interagency agreement with State.

In addition, in the summer of 2015, FWS placed two law enforcement attachés in Africa to help build capacity in 16 partner nations. One attaché is based in Botswana and another in Tanzania, but their responsibilities are regional. The attaché in Botswana covers southern Africa and is responsible for nine countries: Angola, Botswana, Lesotho, Mozambique, Namibia, South Africa, Swaziland, Zambia, and Zimbabwe. The attaché in Tanzania is responsible for seven countries: the Democratic Republic of

---

the Congo, Kenya, Madagascar, Malawi, Rwanda, Tanzania, and Uganda. The attachés provide countertrafficking expertise to embassy staff and work with host government officials to build law enforcement capacity. Their role may involve training foreign counterparts in conducting wildlife-focused criminal investigations, providing support for digital evidence collection and technical investigative equipment, or contributing directly to casework or criminal investigations of wildlife traffickers. FWS officials we spoke with in the field stated that the placement of personnel in-country has made a positive impact. Previously, for example, FWS would have had to rely on nonagency sources of information or send officials abroad temporarily to conduct work, and it could not be as active or involved in CWT efforts in Africa. Now, FWS is able to conduct or facilitate investigations on its own and can establish personal relationships with counterparts, significantly enhancing cooperation.

FWS also manages species-specific conservation grant programs for elephants and rhinos and Africa regional grants that include CWT efforts. For example, a fiscal year 2015 grant aims to generate local support for the protection of elephants in and around Ruaha National Park, Tanzania, by conducting education and outreach programs in villages and operating a program for local residents to meet with park officials (see fig. 7).



---

**Figure 7: Elephant in Ruaha National Park, Tanzania**



Source: GAO. | GAO-16-717

FWS also plays a role in the agency's CWT efforts through DOI's International Technical Assistance Program (ITAP). In East Africa, USAID supports ITAP's work in priority areas, including wildlife law enforcement, CITES implementation, and information sharing. ITAP also collaborates with other organizations such as the U.S. Geological Survey, National Park Service, and Bureau of Land Management, in conducting field work on an as-needed and temporary basis to supplement efforts of the FWS attachés. For example, in 2016, after conducting assessments with funding from USAID, ITAP produced a Five Year Strategic Plan and Year One Work Plans for Tanzania and Uganda that will guide ITAP's work in the region.

---

## State Contributes to CWT-Related Diplomacy and Law Enforcement Capacity Building

State contributes to CWT-related diplomacy through public outreach and support of international organizations and also contributes to law enforcement capacity building by, for example, providing training and equipment to park rangers. According to State officials, State supports organizations that address wildlife trafficking, such as the International Consortium to Combat Wildlife Crime, which includes the CITES Secretariat, the International Criminal Police Organization (INTERPOL), UNODC, the World Bank, and the World Customs Organization. The consortium aims to strengthen wildlife law enforcement effectiveness through intelligence-led interdiction and advanced investigative methods.

State also has conducted public outreach efforts in countries such as Kenya and Tanzania to raise awareness. For example, in Kenya, the U.S. ambassador participated in a gathering with Kenyan officials on World Wildlife Day in March 2016 and announced more than \$4.1 million in new U.S. government assistance to support wildlife conservation and community development. As another example, in January 2015 in Tanzania, the U.S. ambassador met with game scouts—local villagers who help rangers and communities mitigate poaching by conducting patrols and alerting authorities—during a USAID-supported media tour in the Selous Game Reserve.

With regard to law enforcement capacity building, since 2013 State's Bureau of International Narcotics and Law Enforcement Affairs (INL) has awarded more than \$6 million in bilateral CWT grants for work in Kenya and South Africa in addition to funding for regional programs. For example, in Kenya, INL awarded a grant to the Northern Rangelands Trust (NRT), a U.S. government-supported community conservation organization, to build a more effective ranger force that includes advanced classroom and field-based training and equipment. Through specialized and refresher training of mobile community policing teams, the grant aims to increase coverage of elephant range areas and strengthen ranger capacity in arresting poachers and dealers, recovering firearms and trophies, and ensuring the rangers' own safety.

In South Africa, INL provided approximately \$1.3 million in grants during 2014 and 2015 to support the Endangered Wildlife Trust, which operates around Kruger National Park, a threatened rhino habitat (see fig. 8).



**Figure 8: Endangered Rhino in Kruger National Park, South Africa**



Source: GAO. | GAO-16-717

Among other things, the trust's INL-funded activities support local law enforcement capacity building, including an all-female antipoaching unit called the "Black Mambas" (see fig. 9). According to a trust representative, this group conducts antipoaching patrols, aided by smartphone technology that enables them to identify animals or potential issues in real time. While they carry no weapons, the Black Mambas patrol range areas, alerting authorities if they find poachers' camps or anything suspicious. Black Mamba members told us that they patrol the perimeter, looking for the tracks of poachers and disturbances in fencing such as cut wires or other indications of possible intrusion. In addition, they said they trek through the interior to look for signs of poacher camps,

---

poached animals, or snares used to catch bushmeat.<sup>24</sup> According to a representative of the Endangered Wildlife Trust, these patrols have been effective because bushmeat poaching is down 78 percent since 2013.

---

<sup>24</sup>According to FWS, in Africa, forests and savannas are commonly referred to as “bush.” Many rural communities depend on hunting wildlife for subsistence, and their ability to sustainably harvest wildlife is a vital part of their lives and essential to their well-being. The “bushmeat” trade refers to the illegal and unsustainable overhunting of wildlife for meat and income.



---

**Figure 9: Two Members of the “Black Mambas,” an All-Female Antipoaching Patrol in South Africa**



Source: GAO. | GAO-16-717

---

## DOJ Prosecutes Criminals and Conducts Training

DOJ's role in CWT, which is coordinated and led by the Environment and Natural Resources Division, involves prosecuting criminals and conducting prosecutor and foreign judicial training. For example, Operation Crash—a rhino horn and ivory-smuggling investigation led by FWS and prosecuted by DOJ—resulted in charges being brought in U.S. courts against nearly 40 individuals or businesses. As of September 2016, Operation Crash had led to at least 30 convictions, prison terms as long as 70 months, and forfeitures and restitutions as high as \$4.5 million. According to DOJ officials, DOJ also regularly prosecutes individuals and businesses involved in the illegal importation of ivory into the United States, including, in recent years, prosecutions involving the smuggling of raw ivory, worked ivory carvings, and ivory inlaid items such as pool cues.

In addition, with funding from State and assistance from USAID, DOJ is implementing a series of regional capacity-building workshops on wildlife trafficking for judges and prosecutors in Africa. The first workshop of the series took place in Livingstone, Zambia, in October 2015 for 32 judges and prosecutors from six southern African nations (Angola, Botswana, Malawi, Mozambique, Namibia, and Zambia). The second took place in Accra, Ghana, in June 2016 for 36 judges and prosecutors from five western African nations (Gabon, Ghana, Nigeria, Republic of the Congo, and Togo). The workshops provided training by subject matter experts from UNODC, antitrafficking NGOs, and other U.S. government agencies. Topics covered by the training included evidentiary and prosecutorial issues unique to wildlife-trafficking cases, as well as sessions on money laundering, asset tracing, and corruption issues.

---

## USAID Works to Build Community and National-Level Enforcement Capacity to Conserve Wildlife

USAID combats wildlife trafficking by working with communities to help them conserve wildlife, particularly in Africa. USAID also works at the national level and with rangers and law enforcement personnel throughout the supply chain to strengthen capacity. In June 2015, USAID committed to starting more than 35 new CWT projects in 15 countries. Initiatives that address the supply side of wildlife trafficking include, among others, support for the Spatial Monitoring and Reporting Tool (SMART), a free software tool that enables village scouts and rangers to instantly capture GPS and observational data in the field, enhancing conservation efforts. According to USAID, for many years, rangers have collected monitoring data on paper that had to be sifted through to find relevant information, limiting its usefulness for planning and analysis. With SMART, rangers can digitally record and analyze information on poaching encounters, areas patrolled, and wildlife sightings to make protected area

---

management more effective and efficient. For example, USAID has equipped and trained more than 400 rangers in the Democratic Republic of the Congo and Republic of the Congo on the use of GPS units, hand-held computers for data collection, and SMART. As a result, according to the Task Force's 2015 APA, SMART patrols are now providing credible, actionable data on wildlife presence and threats, which park managers use to deploy ranger teams to high-intensity poaching areas. According to this assessment, as of March 2016, more strategic patrols and other measures across eight landscapes in the two countries resulted in the destruction of nearly 1,800 snares and traps, the confiscation of 2,800 firearms, the arrest of 416 poachers, and numerous seizures of elephant tusks and other wildlife products.

In the countries we visited, USAID officials told us that USAID takes a holistic approach to CWT at the national and community level, with efforts aimed at improving livelihoods, governance, and security.<sup>25</sup> Project sites we visited faced common issues, including poverty and conflict, which provide fertile conditions for poaching. USAID aims to address these root causes in parallel with CWT efforts by focusing on improving equity, transparency, and livelihoods in local communities. For example, to incentivize villagers who live in and around range areas to protect wildlife, USAID works to establish programs that increase revenue generated from wildlife tourism and safaris. The community is then to share the income and use it to meet public demand for health care, education, and other critical needs. The following are illustrative examples from our fieldwork.

- In Kenya, USAID has provided assistance to the NRT for years, according to a USAID official, and in September 2015 signed an agreement worth approximately \$20 million over 5 years that aims to reduce wildlife trafficking as one of five key goals. According to USAID officials and NRT representatives, the trust has contributed to bringing peace, stability, and reduced poaching in regions of northern Kenya. For example, according to NRT representatives, the rate of illegal killing of elephants declined from 81 percent in 2012 to 46 percent in

---

<sup>25</sup>According to a U.S. official we spoke with in Africa, one example that demonstrates a whole-of-government approach to CWT is the Wildlife Anti-Trafficking Coordinator position at the U.S. embassy in Tanzania funded by USAID. The role involves organizing and aligning interagency CWT efforts and is fulfilled under the Department of Agriculture while using State offices and facilities.

---

2014. USAID and NRT representatives told us that while the area protected by the trust is vast and poaching remains an ongoing concern, the overall success of its CWT effort has been driven by a combination of supportive donors, strong security capabilities, and governance mechanisms that communities perceive to be fair, equitable, and transparent. As a result, they said that communities realize the benefits of tourism and receive revenue from wildlife and therefore are motivated to protect it.

- In South Africa, USAID supports the Resilience in the Limpopo Basin Program, a \$14.5 million effort started in 2012 aimed at improving the transboundary management of an area that spreads over parts of South Africa, Botswana, Mozambique, and Zimbabwe. Almost half of the area is within South Africa, which relies heavily on the basin to support agriculture, industry, and tourism. Protected areas across the basin, including Kruger National Park, exhibit a unique biodiversity and are home to several vulnerable species for which poaching is a key threat. One of the program's three primary objectives is to conserve biodiversity and sustainably manage high-priority ecosystems. According to USAID and implementing partner officials, one activity with that aim involves improving the livelihoods of villagers who live around Kruger National Park by increasing income opportunities from wildlife, thus strengthening the incentive for them to protect wildlife. For example, they said that USAID helped villagers work with park authorities to clarify agreements on how to share revenue generated from wildlife in the area, ultimately resulting in more transparency and increased income for the villagers.
- In Tanzania, USAID supports Promoting Tanzania's Environment, Conservation, and Tourism, a \$14.5 million 5-year project that aims to enhance the country's capacity to combat wildlife poaching and trafficking as one of its focal areas. Started in April 2015, the project aims to improve the abilities of park, customs, and judiciary authorities by, for example, training customs officials on the detection of wildlife products. In addition, in September 2015, USAID launched the Endangered Ecosystem of Northern Tanzania (EENT) Project, which, according to USAID, plans to provide \$12.4 million over 5 years to support and secure the long-term conservation and resilience of more than 6 million acres of wildlife habitat. One of EENT's four strategic goals is to improve wildlife protection and land and habitat management. EENT implementing partners emphasized the importance of an integrated and holistic approach and told us that they are working with communities to improve livelihoods, develop conservation incentives, and build capacity. According to



representatives of these implementing partners, one activity that has made a positive impact is strengthening security, particularly through the use of canine patrols, which significantly enhance detection and tracking capabilities (see fig. 10). We observed an exercise demonstrating that properly trained dogs can follow a scent in the field and quickly and accurately lead rangers to the source. According to the implementing partner representatives, the addition of canine units has enabled rangers to find, identify, and arrest poachers who otherwise would have escaped detection.

**Figure 10: Canine Antipoaching Patrol, near Tarangire and Lake Manyara National Parks, Tanzania**



Source: GAO. | GAO-16-717

---

## Other Agencies Also Contribute to CWT

In addition to the co-chair agencies and USAID, more than a dozen other federal agencies, departments, or offices contribute to CWT efforts. Department of Defense (DOD) officials, for example, told us that DOD plays a role in CWT through its capacity-building efforts. For example, DOD has provided training to partner nations' enforcement agencies in various skills and tactics, including those involved in countering public corruption, running basic criminal investigations, and conducting border patrols to counter illicit trafficking. Specifically, in March 2015, DOD personnel, with State Africa Bureau funding, delivered antipoaching training in weapons-handling procedures, combat marksmanship, patrolling, offensive tactics, land navigation, and mounted operations for more than 40 Tanzanian rangers in the Selous Game Reserve. In addition, in Gabon, DOD trained Gabonese park rangers in infantry tactics to enhance their capacity to thwart trafficking in ivory and other wildlife products.<sup>26</sup> DOD officials told us that they are continuing to explore ways in which DOD can help address wildlife trafficking, particularly in Africa.

DHS officials told us that, like DOD, DHS contributes to CWT through capacity building, providing training to partner nations, and working alongside foreign counterparts to support CWT investigations and enforcement initiatives. For example, in March 2016, DHS's Customs and Border Protection provided, with funding from USAID and DOD, elephant ivory- and narcotics-sniffing canine units and trained handlers for the air and sea ports in Dar es Salaam, Tanzania. We met with Tanzanian port officials who indicated that having dogs on site would improve their ability to detect smuggled wildlife products in shipping containers. Also, in 2015, according to U.S. Immigration and Customs Enforcement's Homeland Security Investigations officials, the attaché in Pretoria supported the South African Police Service on covert operations involving a proposed sale of a drug that is often used to immobilize elephants, rhinos, and other large mammals. They said that the operations led to the arrest of five wildlife poaching conspirators, some with links to transnational organized criminals, and the seizure of items used in the proposed killing of a rhino.

---

<sup>26</sup>According to DOD, although CWT is not the primary purpose of DOD training, partner nations improve their capacity for countering wildlife trafficking as an additional benefit.

---

For its part in CWT, Department of the Treasury (Treasury) officials told us that the department analyzes available information and, if applicable, exercises U.S. sanctions authorities against individuals and entities that engage in wildlife trafficking. For example, in March 2016, Treasury designated the Lord's Resistance Army as subject to Executive Order 13667, which blocks any and all transactions involving the U.S. property of persons contributing to the conflict in the Central African Republic. In making this designation, Treasury noted that the Lord's Resistance Army had engaged in illicit diamonds trade, elephant poaching, and ivory trafficking for revenue. In addition, Treasury represents the United States as an observer to the Eastern and Southern Africa Anti-Money Laundering Group and, as a member of the Asia/Pacific Group on Money Laundering, two of nine Financial Action Task Force-style regional bodies that uphold international standards on anti-money laundering and countering terrorism financing. Treasury officials told us that due to mission priorities, limited staff resources are dedicated to CWT issues, although the Implementation Plan designates Treasury as the lead or a participating agency in 8 of the 24 objectives. However, if a significant amount of relevant information emerges on wildlife trafficking, Treasury officials said they could take immediate action.

---

State and USAID  
Generally Monitor the  
CWT Programs We  
Reviewed in  
Accordance with  
Widely Accepted  
Standards; Both  
Agencies Have Yet to  
Conduct CWT-  
Specific Evaluations



State and USAID  
Generally Follow  
Monitoring Standards for  
the Four CWT-Related  
Programs We Reviewed

We found that State and USAID generally follow selected elements of widely accepted monitoring standards for CWT-related programs in the countries we visited—Kenya, South Africa, and Tanzania. As shown in table 1, we reviewed documentation for one State program and one USAID program in Kenya, a State program in South Africa, and a USAID program in Tanzania.<sup>27</sup>

**Table 1: State and USAID Programs to Combat Wildlife Trafficking in Kenya, South Africa, and Tanzania That GAO Reviewed**

Country	Agency	Program
Kenya	State	Combating Poaching and Wildlife Trafficking in Community Conservancies in Northern Kenya
	USAID	Partnership for Enhanced Engagement in Research (PEER); Subgrant to the National Museums of Kenya in support of the project “DNA Barcoding to Combat Wildlife Crime”
South Africa	State	Cutting Wildlife Trafficking Off at the Source: Strengthening Capacity to Investigate and Combat Transnational Wildlife Crime in and from South Africa
	USAID	No programs available
Tanzania	State	No programs available
	USAID	Promoting Tanzania’s Environment, Conservation, and Tourism

Source: GAO analysis of documents from the Department of State (State) and the U.S. Agency for International Development (USAID).  
| GAO-16-717

For the State programs in Kenya and South Africa and the USAID programs in Kenya and Tanzania, we assessed the agencies’ documentation related to monitoring against selected key elements of widely accepted monitoring standards that we determined can be applied to foreign assistance programs. We identified the widely accepted monitoring standards through a review of *Standards for Internal Control in the Federal Government*,<sup>28</sup> the Government Performance and Results Act (GPRA) Modernization Act of 2010,<sup>29</sup> and Uniform Administrative

<sup>27</sup>Agency officials informed us that there were no USAID programs in South Africa and no State programs in Tanzania with CWT-related funds.

<sup>28</sup>GAO, *Internal Control: Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

<sup>29</sup>GPRA Modernization Act of 2010, Pub. L. No. 111-352, amends the Government Performance and Results Act (GPRA) of 1993, Pub. L. No. 103-62, 107 Stat. 285 (1993).

Requirements, Cost Principles, and Audit Requirements for Federal Awards.<sup>30</sup>

Table 2 summarizes our overall assessment of the select CWT programs' monitoring activities. Appendix I provides greater detail on our selection and analysis of these programs.

**Table 2: Results of GAO's Analysis of State and USAID Documentation Related to Monitoring for Select Programs to Combat Wildlife Trafficking in Kenya, South Africa, and Tanzania**

Are the agencies implementing the following elements of widely accepted monitoring standards?	Kenya		South Africa		Tanzania	
	State	USAID	State	USAID	State	USAID
Creating monitoring plan(s)?	Partially	Partially	Generally	NA	NA	Generally
Identifying source(s) of resources for monitoring?	Partially	Generally	Partially	NA	NA	Generally
Periodically collecting and analyzing data on performance indicators?	Generally	Generally	Generally	NA	NA	Generally
Procedures for assuring data quality on performance indicators?	No	Generally	No	NA	NA	Generally
Ensuring appropriate qualifications for staff conducting monitoring?	Generally	Partially	Generally	NA	NA	Generally
Defining roles and responsibilities of personnel responsible for monitoring?	Generally	Generally	Generally	NA	NA	Generally
Submitting periodic and final performance reports?	Generally	Generally	Generally	NA	NA	Generally
Validation of implementing partner's performance through site visit or other means of verification?	Partially	Partially	No	NA	NA	Generally
Considering monitoring information in making management decisions?	No	Partially	Partially	NA	NA	Generally

Legend: NA=Not applicable because no CWT-related programs were available to review.

Source: GAO analysis of documents from the Department of State (State) and the U.S. Agency for International Development (USAID). | GAO-16-717

For the four programs we reviewed, we found that State and USAID generally follow the nine key elements of widely accepted monitoring standards listed in table 2, with some exceptions. Both agencies' programs fully implement procedures to periodically collect and analyze data on performance indicators, define roles and responsibilities of personnel responsible for monitoring, and submit periodic and annual reports. Fully adhering to these three elements of widely accepted monitoring standards helps enable the agencies to promote data-driven

<sup>30</sup>2 C.F.R. ch. II.

---

analysis and regular reporting of results, which could help identify any needed course corrections in a timely manner.

We found that the USAID program in Kenya partially implements the element of ensuring appropriate qualifications for staff conducting monitoring, while the State programs in Kenya and South Africa and the USAID program in Tanzania fully implement this element. Implementing this element helps to ensure that staff have the expertise to exercise sound judgment in overseeing the programs.

We also found that all four programs at least partially implement the element of creating a monitoring plan and at least partially implement the element of identifying funding sources for monitoring; USAID's program in Tanzania was the only one of the four that fully implemented both these elements of the monitoring standards. Three of the four programs partially created a monitoring plan or partially identified funding sources for monitoring, based on documentation we received. For example, documentation for the two programs that partially created monitoring plans provided some detail on how performance would be monitored through activities such as establishing time lines and tracking performance indicators; however, the documentation contained little or no information on how responsible parties within the agencies, such as a grants officer or grants officer representative, would ensure a systematic review of monitoring efforts. In addition, we found that both of State's programs only partially identify funding sources, because program documentation lacked funding information specific to monitoring activities.

As table 2 (above) shows, the results of our analysis for the remaining three elements of monitoring standards were mixed. Only USAID's program in Tanzania fully implemented all three by (1) implementing data quality assurance procedures on performance indicators, (2) validating the implementing partner's performance through site visits and other activities, and (3) considering monitoring information in making management decisions. Conducting data quality procedures helps provide assurance that the likelihood of significant errors or incompleteness is minimal and that the data can be used for their intended purposes. Site visits, along with other methods of verification, can help address or avoid problems that programs sometimes experience, such as delays in program start-up, untimely submission of progress or financial reports, or allegations of misuse of funds. In Kenya, each agency's program only partially implemented this element. For example, State's program in that country provided reports of telephone audits but no additional documentation such as photographs or other

evidence to support validation of program implementation. Considering performance information in making management decisions facilitates program improvement by providing data-based evidence for making adjustments.

#### **USAID's Toolkit for Periodically Collecting and Analyzing Data on Performance Indicators**

USAID created an impact measurement toolkit in 2015 to be a primary resource to improve action and accountability in USAID's efforts to combat wildlife crime at the programmatic level. According to a USAID official, the Promoting Tanzania's Environment, Conservation, and Tourism (PROTECT) program was the first to apply the toolkit in designing its monitoring and evaluation plan, which includes baseline values and targets for each indicator and a time line for specific monitoring and evaluation activities. A representative of PROTECT told us that the monitoring and evaluation plan will be revised each year to preserve flexibility. For example, one revision already made was to reduce the number of performance indicators originally proposed in the program's monitoring and evaluation plan to improve program results.



Source: U.S. Agency for International Development (USAID).  
| GAO-16-717

Agencies are taking steps to measure progress. One example is the CWT toolkit, which USAID created in 2015 (see sidebar).<sup>31</sup> USAID officials stated that they hope the toolkit serves as a resource for other Task Force agencies as well. According to State officials, through efforts such as the toolkit, Task Force agencies will continue to strengthen the monitoring and evaluation sections of their programs as the agencies continue to improve efforts of combating wildlife trafficking and lessons learned from ongoing programs.

<sup>31</sup>U.S. Agency for International Development, *Measuring Impact—Measuring Efforts to Combat Wildlife Crime: A Toolkit for Improving Action and Accountability* (Washington, D.C.: October 2015).

State and USAID Have Not Yet Evaluated CWT-Specific Programs

While State and USAID monitor CWT programs to some degree in the countries we selected for this review, the agencies have not yet conducted CWT-specific evaluations in those countries. Both State and USAID officials told us that it is too early to conduct such evaluations, given that appropriations for CWT-specific activities only began in fiscal year 2014 and no CWT-specific programs in the three countries we focused on had been completed yet. Officials also indicated that they plan to conduct evaluations of major CWT-specific activities when these are completed. At our request, however, USAID identified a total of six programs it had recently supported in Kenya, South Africa, and Tanzania that had some element of CWT-related activity as well as a final evaluation report available to assess (see table 3). State was not able to identify any CWT-related programs with an available evaluation report.

Table 3: USAID Combating Wildlife Trafficking-Related Programs and Evaluation Reports That GAO Reviewed

Country	Program
Kenya	Africa Biodiversity Collaborative Group
	Laikipia Natural Resource Management and Biodiversity Conservation Program
	Wildlife Conservation Project
South Africa	Southern Africa Regional Environment Program
Tanzania	Scaling- Up Conservation and Livelihoods Efforts in Northern Tanzania Project
	Tanzania Wildlife Management Areas

Sources: U.S. Agency for International Development (USAID). | GAO-16-717

We found that of the six evaluation reports we reviewed, none included CWT-related efforts as a primary goal or objective of the evaluation. Generally, we found that the six evaluated broader conservation goals of each program without focusing on specific CWT-related activities. However, some of the evaluation reports provide limited CWT information. For example, the evaluation report for the Scaling-Up Conservation and Livelihoods Efforts in Northern Tanzania Project indicated that the project had accomplished its goal to continue building capacity for an antipoaching unit in two of its wildlife management areas. This specific output was tied to the program’s broader goal to deliver transformational conservation and economic impact. Another example is the Africa Biodiversity Collaborative Group, a coalition of U.S.-based international conservation organizations that operate field programs in Africa. The evaluation report stated that the group had been highly effective in creating new conservation partnerships, some of which led to

---

faith leaders uniting against illegal wildlife trade. The Spatial Monitoring and Reporting Tool for law enforcement was cited as an example showing how one of the program's innovative conservation practices had been more widely adopted in Africa as a result of the group's collaborative work, which helped to ensure that wildlife patrols were carried out.

---

## CWT Task Force Lacks Performance Targets, Making Effectiveness Difficult to Determine

While the interagency Task Force, co-chaired by State, DOI, and DOJ, provides some information about progress, it lacks performance targets, making effectiveness difficult to determine at the strategic level. The Implementation Plan and the 2015 Annual Progress Assessment (APA) describe objectives, metrics, and accomplishments. Under three strategic priorities, the Implementation Plan identifies 24 objectives and ways to measure progress for each. For example, one objective is to develop and broadly disseminate cost-effective analytical tools and technological solutions to support wildlife trafficking investigations and prosecutions. The plan outlines two ways to measure progress for this objective:

- new inspection and interdiction technologies developed and applied, and
- forensic tools, capacity, and networks developed.

In reporting on progress related to this objective, the APA states that USAID launched the Wildlife Crime Tech Challenge to generate new science and technology solutions for detecting transit routes, strengthening forensic evidence, reducing consumer demand, and tackling corruption along the supply chain. According to the announcement of winners, one awardee in South Africa developed a product that enables the tracing of rhino horn through individualized DNA profiling, thus providing a means of linking a sample of trafficked product back to a specific crime. Such information describes accomplishments that relate to objectives, but the Task Force does not provide targets, in the APA or elsewhere, that would enable comparison of actual performance against planned results.

As we have previously reported, a fundamental element in an organization's efforts to manage for results is its ability to set performance goals with specific targets and time frames that reflect strategic goals and to measure progress toward its performance goals as part of its strategic

---

planning efforts.<sup>32</sup> Such performance measurement allows organizations to track progress in achieving their goals and gives managers crucial information to identify gaps in program performance and to plan any needed improvements. In addition, according to *Standards for Internal Control in the Federal Government*, managers need to compare actual performance against planned or expected results and to analyze significant differences.<sup>33</sup> Furthermore, internal control helps managers achieve desired results through effective stewardship of public resources. Having targets would allow the Task Force to more fully demonstrate the commitment articulated in its Implementation Plan: to continually evaluate progress, both by assessing the extent to which the Task Force is able to achieve the specific objectives identified in the plan and by looking more broadly at the effectiveness of those objectives toward achieving strategic priorities and the ultimate goal of ending wildlife trafficking.

The Task Force identified a range of reasons why it does not have targets, including that

- results cannot be attributed solely to U.S. government actions and are dependent on continued combined global effort;
- results often require years to document accurately;
- many potential indicators are metrics with limited or uneven availability of data from the key developing countries; and
- reporting against metrics could downplay the contributions of other stakeholders, divert resources, and either risk oversimplification or confuse audiences with complicated explanations of the limitations of quantitative targets.

We have highlighted strategies in our past work that agencies can use when faced with the challenge of having limited control over external factors that can affect a program's outcomes.<sup>34</sup> These strategies include selecting a mix of outcome goals over which the agency has varying levels of control; using data on external factors to statistically adjust for their effect on the desired outcome; and disaggregating goals for distinct

---

<sup>32</sup>GAO-14-688; GAO/GGD-96-118; GAO/AIMD/GGD-95-130R; and GAO/T-GGD/AIMD-95-187.

<sup>33</sup>GAO/AIMD-00-21.3.1 and GAO-14-704G.

<sup>34</sup>GAO, *Managing for Results: Measuring Program Results That Are Under Limited Federal Control*, GAO/GGD-99-16 (Washington, D.C.: Dec. 11, 1998).



---

target populations for which the agency has different expectations. Additionally, to help interpret the results of performance measures, we have also emphasized in our past work the importance of communicating adequate contextual information, such as factors inside or outside the agency's control that might affect performance.<sup>35</sup>

In addition, Task Force agencies have provided performance targets for efforts facing similar challenges to measuring and reporting results. For example, the performance and accountability reports of State, USAID, DOI, and DOJ all provide targets for diplomatic, development, legal, and conservation-related activities that are complex and difficult to measure. Despite challenges associated with measuring progress against climate change, State and USAID provide quantitative targets for measuring results in their *FY 2015 Joint Summary of Performance and Financial Information*.<sup>36</sup> In its *2016/17 Annual Performance Plan & 2015 Report*, DOI identifies a target for status of international species.<sup>37</sup> DOJ's *FY 2015 Annual Performance Report* and *FY 2017 Annual Performance Plan* provides a target for protecting Americans from terrorism and other threats to national security—a complex, global challenge.<sup>38</sup> In addition, a separate presidential task force, responsible for addressing species conservation of pollinators, identified a target that encompasses, among

---

<sup>35</sup>GAO, *Federal Prison System: Justice Could Better Measure Progress Addressing Incarceration Challenges*, [GAO-15-454](#) (Washington, D.C.: July 19, 2015).

<sup>36</sup>See Department of State and U.S. Agency for International Development, *FY 2015 Joint Summary of Performance and Financial Information* (Washington, D.C.: February 2016), p. 4: "By September 30, 2015, U.S. bilateral assistance under Low Emission Development Strategies (LEDS) will reach at least 25 countries and will result in the achievement of at least 45 major individual country milestones, each reflecting a significant, measureable improvement in a country's development or implementation of LEDS. Also by the end of 2015, at least 1,200 additional developing country government officials and practitioners will strengthen their LEDS capacity through participation in the LEDS Global Partnership and that capacity will be meaningfully applied in at least 25 countries."

<sup>37</sup>Department of the Interior, *2016/2017 Annual Performance Plan & 2015 Report* (Washington, D.C.: Feb. 9, 2016), p. 20: "Number of international species of management concern whose status has improved in cooperation with affected countries."

<sup>38</sup>See Department of Justice, *FY 2015 Annual Performance Report and FY 2017 Annual Performance Plan* (Washington, D.C.: January 2016), p. I-14: "Disrupt 175 terrorist threats and groups and disrupt and dismantle 600 cyber threat actors."

---

other things, international partners, long time periods, and factors outside the control of the U.S. government.<sup>39</sup>

Developing targets for CWT may not require significant resources or complicated analysis. For example, regarding the aforementioned objective to disseminate cost-effective analytic tools and technological solutions, targets may include the following:

- Develop and apply x number of new inspection and interdiction technologies by z year.
- Develop w number of forensic tools, x level of capacity, and y networks by z year.

Providing some basis for comparison would enable the Task Force to better understand the extent to which its accomplishments are meeting expectations.

---

## Conclusions

Wildlife trafficking, worth at least \$7 billion annually, continues to push some protected and endangered animal species to the brink of extinction. Furthermore, wildlife trafficking can fuel corruption and criminal activity, leads to loss of both human and animal lives, and destabilizes communities that depend on wildlife for biodiversity and ecotourism revenue. Task Force agencies are helping combat wildlife trafficking through a variety of efforts; however, at the strategic level, the Task Force has not identified performance targets.

Without such targets, it is unclear whether the Task Force's accomplishments are meeting expectations, making it difficult to gauge progress and to ensure effective stewardship of public resources. For example, do those accomplishments represent a satisfactory level of performance, given the level of investment and expected results, or should resources be adjusted? Without targets, agencies risk reporting their progress merely as an annual description of successes and accomplishments. While important, these accomplishments alone do not

---

<sup>39</sup>See Federal Pollinator Health Task Force, *National Strategy to Promote the Health of Honey Bees and Other Pollinators* (Washington, D.C.: May 19, 2015), p. i: "Monarch Butterflies: Increase the Eastern population of the monarch butterfly to 225 million butterflies occupying an area of approximately 15 acres (6 hectares) in the overwintering grounds in Mexico, through domestic/international actions and public-private partnerships, by 2020."

---

provide accountability because they do not link back to targets, and there is no basis for comparison between actual and intended results. In addition, over time, such descriptions may lack continuity. It would be difficult to compare progress from year to year, if the Task Force reports different types of successes and accomplishments each cycle.

To maximize resources available to address this problem, it is critical that the agencies involved continually assess the efficiency and effectiveness of their efforts so as to ensure that the most effective Task Force efforts are supported. By establishing targets, the Task Force would be able to generate and communicate more meaningful performance information that would help them identify performance shortfalls and the best options for making improvements in their efforts against wildlife trafficking.

---

## Recommendation for Executive Action

To provide a basis for comparing actual results with intended results that can generate more meaningful performance information, we recommend that the Secretaries of the Interior and State and the Attorney General of the United States should jointly work with the Task Force to develop performance targets related to the *National Strategy for Combating Wildlife Trafficking Implementation Plan*.

---

## Agency Comments

We provided a draft of this report for review and comment to the Departments of Defense, Homeland Security, the Interior, Justice, State, the Treasury, and USAID. The Departments of the Interior, Justice, and State, and USAID agreed with our recommendation. Written responses from Department of the Interior, Department of State, and USAID are reproduced in appendixes II, III, and IV. All agencies provided us with technical comments, which we incorporated as appropriate.

---

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

---

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

A handwritten signature in black ink, reading "Kimberly M. Gianopoulos". The signature is fluid and cursive, with the first name "Kimberly" and last name "Gianopoulos" clearly legible.

Kimberly M. Gianopoulos  
Director, International Affairs and Trade

---

# Appendix I: Objectives, Scope, and Methodology

---

This report focuses on the efforts of the Presidential Task Force on Wildlife Trafficking (Task Force) to combat wildlife trafficking of large animals in Africa and supply side activities, which include poaching, transport, and export of wildlife and wildlife parts.<sup>1</sup> The report examines (1) what is known about the security implications of wildlife trafficking and its consequences; (2) actions Task Force agencies are taking to combat wildlife trafficking; (3) Department of State (State) and U.S. Agency for International Development (USAID) monitoring and evaluation efforts in select countries; and (4) the extent to which the Task Force assesses its progress.

To obtain information for background and context, we reviewed information related to rhinoceros and elephant products and poaching from both U.S. and foreign government sources as well as from international organizations. We also examined the flow of illegal ivory and seizure data. We did not assess the reliability of these data.

To address our objectives, we met with Task Force agency officials and nongovernmental wildlife trafficking experts recommended by agency officials and other nongovernmental wildlife trafficking experts in Washington, D.C., and conducted fieldwork in Kenya, South Africa, and Tanzania. We selected these countries using a combination of criteria: (1) Since fiscal year 2013, each country has received at least \$1 million annually in U.S. government funding for efforts related to combating wildlife trafficking (CWT); (2) CWT activities are underway in each country and are expected to make a significant impact; and (3) each country has the presence of at least two U.S. government agencies conducting CWT work. This sample is not generalizable to all the countries in which the United States has CWT-related programs. While in each country in Africa, we interviewed officials who served on each embassy's CWT working group, which generally included officials from State, USAID, and the Departments of Defense, Homeland Security, the Interior, and Justice. The Department of the Treasury did not have an attaché in any of the three countries we visited. We also interviewed representatives from host governments responsible for the management of natural resources and parks; nongovernmental organizations involved in implementing U.S. government programs related to conservation, law enforcement, and

---

<sup>1</sup>There are many additional dimensions to wildlife trafficking, including factors driving demand. We plan to conduct work in this area in the future.

other CWT objectives; and community members that live in or around protected areas that are directly impacted by wildlife trafficking.

To examine what is known about wildlife trafficking and its consequences, particularly security implications, we reviewed more than 15 relevant reports and other information from U.S. agencies and international and nongovernmental organizations. We selected these reports and information from organizations that had produced wildlife trafficking analysis, that had worked with the U.S. government on CWT activities, or that had been recommended to us by officials or experts. We also interviewed representatives from these organizations in the United States and in Africa.

To address actions Task Force agencies are taking to combat wildlife trafficking, we reviewed relevant documentation and information, including agency and implementing partner documentation of CWT-related projects, programs, and grants. We also interviewed agency officials in Washington, D.C., and in Africa. During our fieldwork, we visited project sites and met with host government officials, implementing partner representatives, park authorities, security units, and community members.

To address CWT monitoring and evaluation efforts, we selected State and USAID programs in the three countries we visited that were at or near completion or that were started in fiscal year 2013. Our analysis is not generalizable and applies only to the selected programs in selected countries.

To examine monitoring efforts in these countries, we worked with State and USAID to identify one program in each country based on the criterion that the program must have CWT-related activities. State officials reported that State had no CWT-funded programs in Tanzania, and USAID officials reported that USAID had no CWT-funded programs in South Africa. As a result, we assessed monitoring documentation for a total of four programs, which included award agreements and modifications, performance management plans, monitoring and evaluation plans, quarterly monitoring reports, and annual funding data. We identified widely accepted monitoring principles, determined commonalities among the principles, and considered the life-cycle of the project from planning to the utilization of monitoring information. Using these criteria, we identified nine elements and asked agencies for documentation that demonstrated that their monitoring practices reflected these elements. We reviewed the documentation the agencies provided

for each program to determine whether it addressed each element—generally, partially, or not at all. For each program, an analyst was instructed to (1) answer whether an element was addressed by entering “yes,” “partial,” or “no”; and (2) summarize or cite relevant information or a source from the monitoring documents. A methodologist then reviewed the information and determined whether there was sufficient support to answer if an element was met “generally” (which was “yes”), “partially,” or “no.” In those instances where the analyst and methodologist interpreted the information differently, they met to discuss their differences and reach consensus. In instances when the initial documentation provided did not indicate that the agencies generally or partially met an element for a program, we informed the agencies and asked for any additional documentation that might be available. We cannot generalize from this sample of programs in these selected countries to the universe of all CWT programs in all countries.

To examine evaluation efforts, we identified CWT-related programs in the three selected countries that had available evaluation reports. In total, we reviewed six programs, all of which are USAID supported. State was not able to identify any CWT-related programs with an available evaluation report in any of the three countries. We reviewed the evaluation reports available for each identified USAID program. To assess the degree to which these evaluations were conducted in adherence to select evaluation standards, we used criteria identified in prior GAO work.<sup>2</sup> We then identified the goals and objectives of each evaluation report to determine the extent to which the evaluations addressed CWT goals.

To address the extent to which the Task Force assesses its progress, we analyzed relevant documentation and information, including the *National Strategy for Combating Wildlife Trafficking Implementation Plan* and the *2015 Annual Progress Assessment*. In addition, we reviewed documentation on results management and spoke with Task Force officials. Using prior GAO work, we established that a fundamental element in an organization’s efforts to manage for results is its ability to set performance goals with specific targets and time frames that reflect

---

<sup>2</sup>GAO, *President’s Emergency Plan for AIDS Relief: Agencies Can Enhance Evaluation Quality, Planning, and Dissemination*, [GAO-12-673](#) (Washington, D.C.: May 31, 2012), p. 13. For example, we examined common evaluation standards, including, among others, the evaluation identifies program and evaluation objectives, the evaluation specifies why evaluation is needed, and the evaluation design appears to be appropriate.



strategic goals and to measure progress toward its performance goals as part of its strategic planning efforts.<sup>3</sup> In addition, according to *Standards for Internal Control in the Federal Government*, managers need to compare actual performance against planned or expected results and to analyze significant differences.<sup>4</sup> Using these criteria, we analyzed the extent to which the Task Force assessed its progress.

We conducted this performance audit from August 2015 to September 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

---

<sup>3</sup>GAO, *DHS Training: Improved Documentation, Resource Tracking, and Performance Measurement Could Strengthen Efforts*, [GAO-14-688](#) (Washington, D.C.: Sept. 10, 2014); GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1996); *Managing for Results: Critical Actions for Measuring Performance*, GAO/T-GGD/AIMD-95-187 (Washington, D.C.: June 20, 1995); and GAO, *Government Reform: Goal-Setting and Performance*, [GAO/AIMD/GGD-95-130R](#) (Washington, D.C.: Mar. 27, 1995).

<sup>4</sup>GAO, *Internal Control: Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999) and *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

# Appendix II: Comments from the Department of the Interior



## United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, D.C. 20240

SEP 06 2016

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

Dear Ms. Gianopoulos:

Thank you for providing the Department of the Interior (Department) the opportunity to review and comment on the draft Government Accountability Office (GAO) Report entitled, *Combating Wildlife Trafficking: Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance Targets for Assessing Progress (GAO-16-717)*. We appreciate GAO's review of the U.S. government efforts to combat wildlife trafficking.

The Department concurs with the recommendation and look forward to working with the other Presidential Task Force on Wildlife Trafficking (Task Force) Co-chairs and the broader Task Force to develop clear performance targets related to the National Strategy for Combating Wildlife Trafficking Implementation Plan.

We appreciate your consideration to incorporate our comments in the enclosure when finalizing the report. If you have any questions or need additional information, please contact Mr. Craig Hoover, Chief, Division of Management Authority, International Affairs, at (703)358-2162.

Sincerely,

Michael J. Bean  
Principal Deputy Assistant Secretary  
for Fish and Wildlife and Parks

# Appendix III: Comments from the Department of State



**United States Department of State**

*Washington, DC 20520*

September 7, 2016

Dr. Loren Yager  
Managing Director  
International Affairs and Trade  
Government Accountability Office  
441 G Street, N.W.  
Washington, D.C. 20548-0001

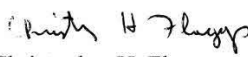
Dear Dr. Yager:

We appreciate the opportunity to review your draft report, "COMBATING WILDLIFE TRAFFICKING: Agencies Are Taking a Range of Actions, but the Task Force lacks Performance Targets for Assessing Progress" GAO Job Code 100249.

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

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

Sincerely,

  
Christopher H. Flaggs

Enclosure:  
As stated.

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

**Department of State Comments on GAO Draft Report**

**COMBATING WILDLIFE TRAFFICKING: Agencies Are Taking a  
Range of Actions, but the Task Force Lacks Performance  
Targets for Assessing Progress  
(GAO-16-717, GAO Code 100249)**

Thank you for the opportunity to comment on the draft report *Combating Wildlife Trafficking: Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance Targets for Assessing Progress*.

The Department of State greatly appreciates GAO's evaluation of the United States' collaborative efforts to combat wildlife trafficking. With respect to the recommendation, which addresses performance targets related to the National Strategy for Combating Wildlife Trafficking Implementation Plan, we agree that the Task Force would benefit from the development of measures and targets to better track performance against the planned results. We concur with the recommendation. As we continue to implement the National Strategy to Combat Wildlife Trafficking, we will work with our fellow Co-Chairs and Task Force agencies to establish targets to measure results achieved against the planned results.

We appreciate GAO's work in this area and its recommendations for the U.S. government's efforts to combat wildlife trafficking. Thank you again for the opportunity to comment on the draft report.

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



**USAID**  
FROM THE AMERICAN PEOPLE

SEP 06 2016

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

Re: COMBATING WILDLIFE TRAFFICKING: Agencies Are Taking a Range of Actions,  
but the Task Force Lacks Performance Targets for Assessing Progress, GAO-16-717

Dear Ms. Gianopoulos:

I am pleased to provide the United States Agency for International Development's (USAID) formal response to the U. S. Government Accountability Office (GAO) draft report entitled, "*COMBATING WILDLIFE TRAFFICKING: Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance Targets for Assessing Progress*" (GAO-16-717).

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

Sincerely,

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

Angelique M. Crumbly  
Assistant Administrator  
Bureau for Management

Enclosure: a/s



**USAID COMMENTS ON GAO DRAFT REPORT**

No. GAO-16-717

USAID's innovative approaches to combating wildlife trafficking are implemented at the community, national, regional and global levels and focus programming along the enforcement and demand reduction chains. For example, in FY15 the breakdown of our CWT funds is estimated at: Law Enforcement – 61%; Community Engagement – 23%; and Demand Reduction – 16%. We appreciate that GAO has agreed it can modify the sentence in paragraph two on the GAO Highlights summary page as follows, to better reflect the breadth of the Agency's work as detailed in the report's text:

- Further, the U.S. Agency for International Development works to build community and national level enforcement capacity and support various approaches to combating wildlife trafficking.

Similarly, in the second section title on page 21, we appreciate that GAO has agreed it can modify the section title to:

- USAID works to build community and national level enforcement capacity to conserve wildlife.

**GAO Report Recommendation:**

There is one recommendation in this report that might involve USAID, on page 36 of the draft report, as follows:

- To provide a basis for comparing actual results with intended results that can generate more meaningful performance information, we recommend that the Secretaries of the Interior and State and the Attorney General should jointly work with the Task Force to develop performance targets related to the *National Strategy for Combating Wildlife Trafficking Implementation Plan*.

USAID agrees with this recommendation and will work with the co-chair agencies to develop performance targets related to the *National Strategy for Combating Wildlife Trafficking Implementation Plan*.

---

# Appendix V: GAO Contact and Staff Acknowledgments

---

## GAO Contact

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

---

## Staff Acknowledgments

In addition to the individual named above, Judith Williams (Assistant Director), Marc Castellano, David Dayton, Martin De Alteriis, Mark Dowling, Shakira O'Neil, and Oziel Trevino made key contributions to this report.

---

# Appendix VI: Accessible Data

---

## Agency Comment Letter

---

Text of Appendix II:  
Comments from the  
Department of the Interior

---

Page 1

United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, D.C. 20240

SEP 06 2016

Ms. Kimberly Gianopoulos

Director, International Affairs and Trade

U.S. Government Accountability Office

441 G Street, NW

Washington, DC 20548

Dear Ms. Gianopoulos:

Thank you for providing the Department of the Interior (Department) the opportunity to review and comment on the draft Government Accountability Office (GAO) Report entitled, Combating Wildlife Trafficking: Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance Targets/or Assessing Progress (GAO-16-717). We appreciate GAO's review of the U.S. government efforts to combat wildlife trafficking.

The Department concurs with the recommendation and look forward to working with the other Presidential Task Force on Wildlife Trafficking (Task Force) Co-chairs and the broader Task Force to develop clear performance targets related to the National Strategy for Combating Wildlife Trafficking Implementation Plan.

---

We appreciate your consideration to incorporate our comments in the enclosure when finalizing the report. If you have any questions or need additional information, please contact Mr. Craig Hoover, Chief, Division of Management Authority, International Affairs, at (703)358-2162.

Sincerely,

Michael J. Bean

Principal Deputy Assistant Secretary for Fish and Wildlife and Parks

---

Text of Appendix III:  
Comments from the  
Department of State

---

Page 1

United States Department of State

Washington, DC 20520

September 7, 2016

Dr. Loren Yager

Managing Director

International Affairs and Trade

Government Accountability Office

441 G Street, N.W.

Washington, D.C. 20548-0001

Dear Dr. Yager:

We appreciate the opportunity to review your draft report, "COMBATING WILDLIFE TRAFFICKING: Agencies Are Taking a Range of Actions, but the Task Force lacks Performance Targets for Assessing Progress" GAO Job Code 100249.

---

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

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

Sincerely,

Christopher H. Flaggs

Enclosure:

As stated.

cc:

GAO - Kimberly Gianopoulos

OES - Judith G. Garber (Acting)

State/OIG - Norman Brown

---

Page 2

Department of State Comments on GAO Draft Report

COMBATING WILDLIFE TRAFFICKING: Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance

Targets for Assessing Progress (GAO-16-717, GAO Code 100249)

Thank you for the opportunity to comment on the draft report Combating Wildlife Trafficking: Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance Targets for Assessing Progress.

The Department of State greatly appreciates GAO's evaluation of the United States' collaborative efforts to combat wildlife trafficking. With respect to the recommendation, which addresses performance targets related to the National Strategy for Combating Wildlife Trafficking Implementation Plan, we agree that the Task Force would benefit from the development of measures and targets to better track performance against the planned results. We concur with the recommendation. As we continue to implement the National Strategy to Combat Wildlife Trafficking, we will work with our fellow Co-Chairs and Task Force



---

agencies to establish targets to measure results achieved against the planned results.

We appreciate GAO's work in this area and its recommendations for the U.S. government's efforts to combat wildlife trafficking. Thank you again for the opportunity to comment on the draft report.

---

Text of Appendix IV:  
Comments from the U.S.  
Agency for International  
Development

---

Page 1

USAID

FROM THE AMERICAN PEOPLE

SEP 06 2016

Ms. Kimberly Gianopoulos

Director, International Affairs and Trade

U.S. Government Accountability Office

441 G Street, NW

Washington, DC 20548

Re: COMBATING WILDLIFE TRAFFICKING: Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance Targets for Assessing Progress, GA0-16-717

Dear Ms. Gianopoulos:

I am pleased to provide the United States Agency for International Development's (USAID) formal response to the U. S. Government Accountability Office (GAO) draft report entitled, "COMBATING WILDLIFE TRAFFICKING: Agencies Are Taking a Range of Actions, but the Task Force Lacks Performance Targets for Assessing Progress " (GA0-16-717).

---

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

Sincerely,

Angelique M. Crumbly

Assistant Administrator

Bureau for Management

Enclosure: a/s

---

Page 2

---

USAID COMMENTS ON GAO DRAFT REPORT

No. GA0-16-717

USAID's innovative approaches to combating wildlife trafficking are implemented at the community, national, regional and global levels and focus programming along the enforcement and demand reduction chains. For example, in FY15 the breakdown of our CWT funds is estimated at: Law Enforcement -61%; Community Engagement -23%; and Demand Reduction -16%. We appreciate that GAO has agreed it can modify the sentence in paragraph two on the GAO Highlights summary page as follows, to better reflect the breadth of the Agency's work as detailed in the report's text:

- Further, the U.S. Agency for International Development works to build community and national level enforcement capacity and support various approaches to combating wildlife trafficking.

Similarly, in the second section title on page 21, we appreciate that GAO has agreed it can modify the section title to:

- USAID works to build community and national level enforcement capacity to conserve wildlife.

GAO Report Recommendation:

There is one recommendation in this report that might involve USAID, on page 36 of the draft report, as follows:

- To provide a basis for comparing actual results with intended results that can generate more meaningful performance information, we recommend that the Secretaries of the Interior and State and the Attorney General should jointly work with the Task Force to develop performance targets related to the National Strategy for Combating Wildlife Trafficking Implementation Plan.

USAID agrees with this recommendation and will work with the co-chair agencies to develop performance targets related to the National Strategy for Combating Wildlife Trafficking Implementation Plan.

Accessible Text/Data  
Tables

Accessible Text for Figure 4: Selected U.S. Government Actions to Combat Wildlife Trafficking, 2013 to 2016

**2013:**  
**July** - Executive Order established The Presidential Task Force on Wildlife Trafficking

**2014:**  
**February** - The National Strategy for Combating Wildlife Trafficking released

**2015:**  
**February** - Implementation Plan released  
**June** - U.S. Fish and Wildlife Service "Ivory Crush" event  
**November** - H.R. 2494, Global Anti-Poaching Act passes House

**2016:**  
**March** - Annual Progress Assessment released  
**June** - New ivory regulations announced that aim to significantly curtail the sale of commercial ivory in the United States and help stop wildlife crime worldwide  
**September** - Amended version of H.R. 2494 passes Senate

Source: GAO analysis. | GAO-16-717

Data Table for Figure 5: Minimum Amounts Directed in Appropriations Act for Combating the Transnational Threat of Wildlife Poaching and Trafficking, Fiscal Years 2014 to 2016

Fiscal year	U.S. dollars (in million)
2014	45
2015	55

Fiscal year	U.S. dollars (in million)
2016	80

---

---

## GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

---

## Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's website (<http://www.gao.gov>). Each weekday afternoon, GAO posts on its website newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to <http://www.gao.gov> and select "E-mail Updates."

---

## Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <http://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

---

## Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).  
Subscribe to our [RSS Feeds](#) or [E-mail Updates](#). Listen to our [Podcasts](#).  
Visit GAO on the web at [www.gao.gov](http://www.gao.gov).

---

## To Report Fraud, Waste, and Abuse in Federal Programs

Contact:

Website: <http://www.gao.gov/fraudnet/fraudnet.htm>

E-mail: [fraudnet@gao.gov](mailto:fraudnet@gao.gov)

Automated answering system: (800) 424-5454 or (202) 512-7470

---

## Congressional Relations

Katherine Siggerud, Managing Director, [siggerudk@gao.gov](mailto:siggerudk@gao.gov), (202) 512-4400,  
U.S. Government Accountability Office, 441 G Street NW, Room 7125,  
Washington, DC 20548

---

## Public Affairs

Chuck Young, Managing Director, [youngc1@gao.gov](mailto:youngc1@gao.gov), (202) 512-4800  
U.S. Government Accountability Office, 441 G Street NW, Room 7149  
Washington, DC 20548

---

## Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707  
U.S. Government Accountability Office, 441 G Street NW, Room 7814,  
Washington, DC 20548