GAO Evaluation of Wildlife Trafficking Task Force Indicates Need for Stronger Performance Targets for Assessing Progress

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Wildlife trafficking is a multi-billion dollar, transnational criminal activity that ranks high on the list of illicit types of trade. As a threat to both conservation and security, the United States has directed efforts at combatting wildlife trafficking. In September 2016, the United States Government Accountability Office released a report assessing these efforts. The report, which focuses on the trafficking of large animals in Africa, addresses the security implications and consequences of this crime, the actions taken by Task Force agencies to address the problem, and how progress is currently being assessed. To accomplish this task, the GAO analyzed agency documentation, met with Task Force agency officials and NGO experts in Washington, D.C., and conducted fieldwork in Kenya, South Africa, and Tanzania. The GAO recommended that the Task Force develop performance targets to better evaluate its resolution of the National Strategy for Combating Wildlife Trafficking Implementation Plan.

A 2014 United Nations Environmental Programme report estimates that the illegal wildlife trade is worth $7 billion to $23 billion annually. Trafficking threatens iconic species, such as elephants and rhinos in Africa, but has also pushed other endangered species to the brink of extinction (GAO, 2016: 1). This crime further impedes conservation efforts, fuels corruption, and destabilizes communities that are dependent on wildlife for biodiversity and economy. This violence hurts not only animals, but also people: reports indicate that nearly 1,000 rangers were killed in Africa from 2004 to 2014. The practice is sustained by an unchecked demand for exotic pets, culinary delicacies, and traditional medicines. The United States is one of the largest end markets for wildlife trafficking. Africa is one of the largest suppliers of animal and plant species serving the criminal networks trading to Asia, with the majority of shipments leaving Kenya and Tanzania for China, Thailand, and Vietnam (2016: 8).

In 2013, through Executive Order 13648, President Obama established an interagency Task Force charged with developing a strategy to direct U.S. efforts in combatting wildlife trafficking. The Task Force released a National Strategy for Combating Wildlife Trafficking in 2014, then released an Implementation Plan the following year identifying objectives and agency roles. The Task Force identified three strategic priorities: (1) strengthen enforcement; (2) reduce demand; and (3) build international cooperation, commitment, and public-private partnerships (2016: 10). The Task Force is co-chaired by the DOI, DOJ, and State. The Implementation Plan further names 16 agencies, departments, and offices that play a role in combatting wildlife trafficking.¹ The FWS has been

¹ Other federal efforts have been made as well to combat this international crime. The FWS created a near-total ban on the domestic commercial trade of elephant ivory in June 2016, prohibiting its import and export with limited exceptions. The House and Senate have also passed legislation, the Eliminate, Neutralize, and Disrupt Wildlife Trafficking Act of 2016, aiming to support global anti-poaching efforts, increase partner countries’ capacities to counter trafficking, and designate trafficking countries.
charged with conservation and management of biological resources and is the implementing organization for the Task Force’s efforts (2016: 19). State is tasked with managing U.S. foreign affairs, acting in diplomacy and law enforcement capacity-building (2016: 22). The DOJ prosecutes criminals and conducts judicial and prosecutorial training with partner nations (2016: 26). Further, USAID has been working with communities, many in Africa, to assist with wildlife conservation efforts. This has involved working at the national level, with rangers and law enforcement, and individuals in the supply chain to strengthen capacity (2016: 27). More than a dozen other agencies are also involved in combatting wildlife trafficking efforts (2016: 30).

The GAO’s findings indicate that various criminal elements, including terrorist entities and rogue security personnel, are involved in poaching ivory and rhino horn in Africa. Agency officials related varying perspectives on the degree of terrorist group involvement for a variety of reasons, from a lack of a common definition of “terrorist group” to a lack of reliable information. Transnational organized criminals and networks, however, are the driving force behind wildlife trafficking (2016:14). The vicious cycle of illicit trade is enabled by systemic corruption that allows for the ivory and rhino horn trade, which in turn exacerbates corruption by making high-value illegal products available to individuals (i.e. rangers, customs officers, police, and military) in the supply chain, exacerbating issues of border security (2016: 16). Additionally, adverse national and local-level economic impacts, such as weakened macroeconomic and fiscal stability, deters investment, contributes to income inequality, and hinders growth at all levels of the economy (2016: 18). In particular, the GAO recognized the threats to tourism revenues, local-level impacts on economic opportunities, and the risks of violent conflicts with authorities or poachers.

State and USAID regularly monitor program efforts in Kenya, South Africa, and Tanzania. The GAO assessed these monitoring methods based on the Standards for International Control in the Federal Government. Performance monitoring is critical to making management decisions and facilitates program improvement by providing data-based evidence for adjusting courses of action (2016: 35). Task Force agencies are taking steps to measure progress. Up to this point, State and USAID officials have deemed it too early in the process to conduct such assessments as anti-trafficking specific activities only started in 2014, though there are plans to complete evaluations of their efforts (2016: 36). The GAO has recommended that the Task Force, in order to complete meaningful assessments, needs to develop more specific and measurable performance targets in implementing the National Strategy for Combatting Wildlife Trafficking Implementation Plan. The Plan does not currently provide such targets, which are needed to compare actual performance against planned results. This, in turn, will help managers better implement the plan and lead to more effective stewardship of public resources and allow for continuing evaluation of progress. The agencies concurred with the GAO recommendations.