



SO THAT ELEPHANTS MAY LIVE™

TUSK TASK FORCE™ | TTF™ has one simple mission: To take anti-poaching to the next level by providing strategic and tactical support—from public policy to morale resources—directly to all deployed forces on the ground worldwide. **#SO THAT ELEPHANTS MAY LIVE™.**

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State of Vermont General Assembly
House Committee on Fish, Wildlife, and Water Resources
115 State Street, Room 47
Montpelier, VT 05633

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FOR: THE HOUSE COMMITTEE ON FISH, WILDLIFE, AND WATER RESOURCES

RE: **STRONG SUPPORT OF HOUSE BILL 297:**
An Act Relating to the Sale of Ivory or Rhinoceros Horn

TO: **Chair**, Representative David L. Deen
Vice-Chair, Representative James McCullough
Ranking Member, Representative Steve Beyor
Committee Clerk, Representative Paul Lefebvre
Committee Members, Representatives Robert Krebs, Amy Sheldon, Thomas Terenzini, Kathryn Webb, and Janssen Wilhoit

CC: **Sponsor**, Representative Kurt Wright
Sponsor, Representative Joan G. Lenes
Supporter, Ms. Ashley Prout McAvey MEM, Vermont Ambassador for Elephants DC

April 8, 2015

Mr. Chairman, Mr. Vice-Chair, Committee Clerk, and Honorable Committee Members:

My name is Allen R. Sandico, a graduate of Norwich University *cum laude*, and I am the CEO (Chief Elephant Officer) of TUSK TASK FORCE—a wildlife conservation non-profit with its global HQ in Seattle. We are a part of a growing consortium of wildlife conservation and global security organizations that is very concerned on the issue of wildlife trade. As the chief executive of the world's first wildlife conservation NGO focusing on the link between wildlife poaching and terrorism,¹ **I strongly urge the Committee to pass H.297, to prohibit the trafficking of ivory and rhino horn in the Great State of Vermont.**

¹ There is no single, universally accepted definition of *terrorism*. According to the FBI, *terrorism* is defined as “the unlawful use of force and violence against persons or property to intimidate or coerce a government, a civilian population, or any segment thereof, in furtherance of political or social objectives.” (28 C.F.R., Section 0.85)

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As you may probably know, **the USD \$23-billion black market on wildlife parts² has been known, among the global Intelligence Community (IC) which includes UNEP, UNODC, WCO, and INTERPOL, to fund³ terrorists around the world at the rate of USD \$600,000 a month⁴ and a single tusk can be traded for 18,000 bullets.⁵** These terrorists include (but not limited to) the following:

Al-Shabaab (Harakat al-Shabaab al-Mujahadin) in Somalia, the Sudan, and Kenya

- Designated as a Foreign Terrorist Organization (FTO) by the State Department and proven to be linked to al-Qae'da in Yemen⁶
- Killed 147 people and injured 80 at Garissa University in Nairobi, Kenya on 04/03/2015
- Killed 67 people and injured 175 in the Westgate shopping mall in Nairobi, Kenya on 09/21/2013

Boko Haram (Jama'atu Ahl as-Sunnah li-Da'awati wal-Jihad) in the Niger, Nigeria, Cameroon, and Chad

- Their name means "Western education is forbidden" in the Hausa language, native to the Niger
- Designated by the State Department as a Foreign Terrorist Organization (FTO) in 11/2013⁷
- Kidnapped 276 schoolgirls in Borno State, Nigeria on 04/15/2014
- Reports indicate that these abducted girls have been used for operations that includes suicide bombings, espionage, and unwilling executioners to their enemies⁸
- Pledged allegiance to the Islamic State (IS) providing them with more resources and influence⁹

Joseph Kony's The Lord's Resistance Army (LRA) in Uganda, South Sudan, CAR, and the DRC¹⁰

- Designated by the State Department as a Foreign Terrorist Organization (FTO) in 05/2010¹¹

² Statement of John C. Cruden, Assistant Attorney General, Environment and Natural Resources Division, Department of Justice; 02/11/14.

³ "It's changing from a conservation issue to a global security issue. It's about illegal groups generating funds for terrorist activities," according to Ms. Coleen Schaefer, Director of the USFWS National Wildlife Property Repository. *Australian Broadcasting Corporation* interview on 04/01/2015

⁴ "Ivory's Curse: The Militarization & Professionalization of Poaching in Africa," Born Free USA/c4ads joint report; 04, 2014.

⁵ Statement by Mr. Sasha Lezhnev, associate director of policy at the Enough Project, an organization which works to end genocide and crimes against humanity, from an interview of an LRA defector. Confirmed through e-mail on 04/05/15 and corroborated by Jenny Stanton, reporter from London's *Daily Mail* who reported on the story on 03/23/2015

⁶ Under Section 219 of the Immigration and Nationality Act (as amended) and a Specially Designated Global Terrorist (SDGT) entity under Section 1(b) of *Executive Order 13224* (as amended). National Counterterrorism Center (NCTC), Washington, DC; 04/05/2015

⁷ National Counterterrorism Center (NCTC), Washington, DC; 04/05/2015

⁸ Statement by Ms. Elizabeth Donnelly, assistant director of the Africa program at *Chatham House*, the Royal Institute of International Affairs; London, 01/16/2015

⁹ "Islamic State accepts Boko Haram's allegiance pledge." BBC report, 03/13/2015

¹⁰ Central African Republic and the Democratic Republic of the Congo

¹¹ Congress passed the "Lord's Resistance Army (LRA) Disarmament and Northern Uganda Recovery Act" (05/2010) which follows the inclusion of the LRA on the Terrorist Exclusion List (2001) and its leader, Joseph Kony, being designated as a Specially Designated Global Terrorist (SDGT) under *Executive Order 13324* (2008). National Counterterrorism Center (NCTC), Washington, DC; 04/05/2015

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- **Since 2005, they are believed to have committed hundreds of attacks resulting in over 5,000 deaths and injuries while using abducted children as soldiers and sex slaves¹²**
- **Implicated on the slaughter of more than 130 elephants in Garamba National Park in the DRC (since 04/2014) with 30 killed in just 15 days¹³ by using helicopters and heavy weaponry¹⁴**

Indeed, **wildlife trafficking is such an urgent global security issue threatening our national security** that the White House has implemented initiatives in addressing this issue, which includes:

- Increased collaboration with 5 African countries on anti-poaching operations including deployment of United States Africa Command (AFRICOM) assets since 03/2015¹⁵
- Incorporating the threat of wildlife trafficking into the Office of the Director of National Intelligence's *Worldwide Threat Assessment* (p. 9) to Congress on 02/26/15¹⁶
- Inclusion of wildlife trafficking as an urgent agenda item supplement to the President's *National Security Strategy* with regards to the other non-conventional threats facing our nation's and the world's security¹⁷
- Congressional briefings by an invited panel of national security experts on worldwide threats by wildlife trafficking on 09/10/2014
- Recommendations Submitted to the President by members of the *President's Advisory Council on Wildlife Trafficking* on 06/09/2014¹⁸
- Sending additional forces and military resources by the Department of Defense to increase support against the LRA (03/2014)¹⁹

Compelling evidence brought forth by many organizations, as pointed above, has given this issue a sense of urgency since profits from poaching has become a primary currency for and by terrorist organizations. We must mitigate this by curtailing its supply and demand; and banning their trade in every state is the next necessary step. In order to stop the flow of money from this illicit enterprise of wildlife parts, Vermont has the tremendous leadership opportunity to “act locally, think globally” and disrupt the funding of terrorism by banning all commerce related to ivory and rhino horn.

¹² “LRA Regional Update: CAR, DRC and South Sudan.” UN Office of Coordination of Humanitarian Affairs (OCHA). January-March 2012

¹³ Statement by Jean-Marc Froment, Director of Conservation of African Parks, whose group co-manages the park. AP report, 03/26/2015

¹⁴ “Poachers Without Borders: New Satellite Imaging and Predictive Mapping to Empower Park Rangers and Combat Ivory Traffickers in Garamba National Park” report for *Satellite Sentinel Project* by the Enough Project, African Parks, and Digital Globe; released on 04/2015

¹⁵ *Senate Committee on Foreign Relations*. 115th Cong. 1st sess. “United States Africa Command 2015 Posture Statement,” by GEN David M. Rodriguez, USA, Commander, United States Africa Command; 03/06/2015

¹⁶ Director of National Intelligence, GEN James R. Clapper, presented this report to the *Senate Armed Services Committee* on 02/26/15.

¹⁷ *National Security Strategy of the United States*. Executive Office of the President; 02/11/2015

¹⁸ Appointed pursuant to Section 5 of *Executive Order 13648* to implement the *National Strategy for Combating Wildlife Trafficking*. Executive Office of the President; 02/11/2014

¹⁹ National Counterterrorism Center (NCTC), Washington, DC; 04/05/2015

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Last year, the States of New York and New Jersey passed stringent laws to ban ivory and rhino horn within their borders. Arkansas, California, Connecticut, Florida, Hawai'i, Illinois, Massachusetts, Oregon, and Rhode Island also have current bills pending in their legislatures to ban ivory and rhino horn. **Now, it's your turn to push H.297 through this committee and, eventually, on to the House floor for a vote.**

I am also an aspiring PhD candidate working on a thesis in counterterrorism so I have attached a one-page "briefing points" sheet for your quick review and I will gladly provide you with more research on the link between wildlife trade and terrorism with citations and references, if you so desire at your convenience.

Regardless of the growing evidence of the nexus between terrorism and wildlife trade, we need not wait for a "smoking gun" to act on this issue as required by those opposing this bill. With that being said, I would like to close my testimony with this quote from the Assistant Secretary of State for the *Bureau of International Narcotics and Law Enforcement Affairs*, Ambassador William Brownfield: **"I don't think we have to [link it to terrorism]. I think that illegal wildlife trafficking is in and of itself so repulsive, so repugnant that we don't need to tie it to something else as a matter of making a point."**²⁰

As your fellow Vermonter with deep ties to our great state, I thank you so much your time in considering my testimony on this urgent public policy and national security issue.

Respectfully,



Allen R. Sandico, MPA
Chief Elephant Officer,
Tusk Defender 1

Encl/ars

²⁰ Statement given to Lisa Miller, Washington correspondent for *ABC Radio Australia* for her report entitled, "US warehouse of 1.5 million stuffed animals stands as reminder of horrific illegal wildlife trade," aired on 04/01/2015.

TUSK TASK FORCE'S OUTREACH MISSION IS TO SPREAD THE MESSAGE THAT POACHING WILDLIFE PARTS IS NOT JUST ABOUT THE ANIMALS ANYMORE; IT'S NOW A GLOBAL SECURITY ISSUE SINCE POACHING FUNDS TERRORISM.

- **Every 15 minutes, an elephant is killed for its tusk. That's 4 an hour, 96 a day, 672 a week, 2,880 a month, and 34,560 a year. African elephant population dropped 80,000 from 2006 to 2013. A total of 35,000 elephants were killed in 2013 alone with current trends rising every year.**¹
- **Wildlife trafficking has an estimated \$23-billion-a-year market.**²
- **Rhino population is down at 97% since 1960 and one is killed every 13 hours, every day. Rhino population figures include Black (<5,000), Southern White (<20,000), Greater One-Horned (<3,000), Sumatran (<100), and Javan (35-45). The Northern White Rhino is now extinct.**³ **In 2014, approximately 1,215 rhinos were killed in South Africa alone.**⁴
- **Individual elephant tusks can sell for \$20,000 to \$175,000 in Asia, roughly between \$1,000 to \$3,000 per pound, which is more than the price of gold.**⁵ **Reports indicate that the substantial portions of these illegal profits are ending up in the hands of transnational organized crime syndicates that also conduct trafficking of humans, drugs, and weapons and extremist groups like al-Shabaab in the Sudan/Somalia/Kenya, Boko Haram in Nigeria/Cameroon/Chad, and Joseph Kony's Lord's Resistance Army (LRA) in Uganda/Sudan/Chad/DRC which uses the proceeds to finance human rights abuses, rapes, murder, and terrorist activities.**⁶ **"Wildlife trafficking is increasingly associated with rebel and terrorist groups such as the Lord's Resistance Army (LRA) and al-Shabaab, an al-Qaeda terrorist cell in East Africa,"** according to the Ambassador and Permanent Representative of the United Republic of Tanzania to the United Nations.⁷
- **Consumer demand, through legal domestic markets in many countries around the world, is elevating the price of ivory and driving elephant poaching. Vietnam and China are the world's biggest consumers of rhino horn due to non-regulation and illicit trade. Supplies of ivory from Africa and elsewhere are usually purchased and distributed by Chinese mafia organizations in Hong Kong, Australia, the United Kingdom, and the United States with those funds being recycled to purchase arms for poachers and terrorists to use.**⁸
- **Within the United States, assessed by some to be the second largest commercial market for ivory in the world, studies indicate that illegal ivory is frequently sold alongside legal ivory in shops across the country. It is impossible to distinguish legal ivory from illegal ivory without an expensive lab test. This renders enforcement of existing U.S. law extremely difficult, and traffickers frequently exploit these regulatory loopholes in order to sell poached ivory in legal markets at the state/local level.**⁹
- **UN Office on Drugs and Crime identified the notorious al-Shabaab, the Somali-based affiliate of al-Qae'da, raises \$600,000 a month from poaching to fund all of its operations.**¹⁰

¹ Wittemyer, G., Northrup, J.M., Douglas-Hamilton, I., et al. "Illegal killing for ivory drives global decline in African elephants." Proceedings of the *National Academy of Sciences*, 2014

² Statement of John C. Cruden, Assistant Attorney General, Environment and Natural Resources Division, Department of Justice; 02/11/14

³ "IUCN Red List/The IUCN Red List of Threatened Species." Version 2014.3; Accessed on 04/05/2014

⁴ "Update on rhino poaching statistics." Ministry of Environmental Affairs and Tourism, Republic of South Africa, 01/17/2015

⁵ Max Fisher, "Obama wants to curb Africa's ivory trade. Here's what he's up against." *The Washington Post*, July 1, 2013

⁶ "The Environmental Crime Crisis: Threats to Sustainable Development from Illegal Exploitation and Trade in Wildlife and Forest Resources."

UNEP/INTERPOL Rapid Response Assessment with GRID-Arendal, Nairobi and Arendal; 06/26/14

⁷ 67th Session of the UN General Council. Statement of Mr. Tuvako N. Manongi, Ambassador Extraordinary and Plenipotentiary, United Republic of Tanzania.

⁸ Dan Levin. "The price of Ivory: From elephants' mouths, an illicit trail to China." *The New York Times*, 03/01/2013

⁹ *Senate Committee on Foreign Relations*. 112th Cong. 2nd sess. "Ivory and Insecurity: The Global Implications of Poaching in Africa," by Tom Cardamone, managing director of Global Financial Integrity; 05/24/2012

¹⁰ "Ivory's Curse: The Militarization & Professionalization of Poaching in Africa," *Born Free USA/c4ads* joint report; 04, 2014

IF CURRENT POACHING RATES CONTINUE OR INCREASE DUE TO DEMAND, ELEPHANTS AND RHINOS WILL BE EXTINCT BY 2024 OR EARLIER.