



IFAW
International Fund
for Animal Welfare

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April 24, 2015

Representative David L. Deen
Chair, House Committee on Fish, Wildlife and Water Resources
115 State Street
Montpelier, VT 05633

Dear Chairman Deen and the Members of the House Committee
on Fish, Wildlife and Water Resources,

On behalf of our nearly 2000 members and supporters in the state
of Vermont, the International Fund for Animal Welfare (IFAW)
submits this letter supporting passage of H 297 by the House
Committee on Fish, Wildlife and Water Resources.

Elephants and rhinos are facing a crisis driven by consumer
demand for their ivory and horn. IFAW has long been at the
leading edge of this issue, including our groundbreaking
investigations into Chinese ivory markets (2008), internet sales of
illegal wildlife (2008 and 2012), the links between national security
and poaching (2008 and 2013), and most recently an analysis of
the United States' ivory markets and related regulatory systems
(2014). In all of these we have found overwhelming evidence that
the legal trade in ivory helps to obscure and propagate a parallel
market in illicit products.

We are currently working to support and strengthen the United
States Fish & Wildlife Service's efforts to restrict domestic
commerce in ivory (colloquially referred to as the "ivory ban")
and welcome Vermont's efforts to enact state-level restrictions
through H 297. However, we are concerned that certain
exemptions for several classes of items proposed by interest
groups could enable illegal activity to continue. We understand
that many such items were legally acquired, but it is easy to
envision a scenario where guns, knives, and musical instruments
are used as vehicles to move illegally sourced ivory under the guise
of "documented" antiques. It is nearly impossible to determine
whether ivory is antique or not and it is very easy to stain or
otherwise weather new, illegally sourced ivory to look old.

Despite these reservations, the bill as currently proposed
represents a major step forward in halting the illegal ivory and
rhino horn trade. Vermont is not alone in its determination to
enact state conservation measures; New York and New Jersey
have already passed similar bills and bans are being considered in
California, Oregon, Massachusetts, and others. Passing H 297
would set a tremendous example to other states, as well as giving
Vermont the distinction of helping to change the global
conversation on this critical issue.



IFAW believes that ivory should belong to elephants. By banning the sale of ivory in your state, you can send the message to poachers, traffickers, and consumers that we value our world's wildlife more than needless trinkets and ornaments. Stopping this bloody trade will reap benefits for wildlife, international security, aid anti-corruption efforts, enable more effective use of our law enforcement funding here and abroad, and give our children the chance to share this planet with one of the planet's truly majestic creatures.

Thank you for your attention to this matter.

A handwritten signature in black ink that reads "Jeff Flocken". The signature is written in a cursive style with a long horizontal line extending to the right.

Jeffrey Flocken
Regional Director—North America

