



DEFENDERS OF WILDLIFE
PRESIDENTIAL TRANSITION WHITE PAPER

RESTORING AMERICA'S GLOBAL LEADERSHIP IN CONSERVATION

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CHALLENGE

Under the outgoing administration the United States has abandoned its historical leadership role as a global environmental leader by refusing to join in key international conservation agreements on global warming and conservation of biological diversity among others. The failure of the U.S. to participate in these treaties makes the treaties less effective while also undermining the ability of the U.S. to influence their implementation.

Global warming is the overriding international environmental issue of our times. The failure of the outgoing administration to seriously address the emissions of greenhouse gas pollution that cause global warming will make solving the problem of global warming, and saving wildlife and habitat from its impacts, even more difficult.

Similarly, the failure of the outgoing administration to secure Senate ratification of the Convention on the Law of the Sea and the Convention on Biological Diversity, two global agreements that are critically important to protecting wildlife and its habitat, has limited both the effectiveness of those treaties and the influence of the U.S. in their implementation.

The Office of Law Enforcement, Migratory Bird, and International programs within the U.S. Fish and Wildlife Service (FWS) support U.S. efforts to meet international treaty obligations, enforce wildlife laws, and protect and restore wildlife populations worldwide. Significant funding cuts under the prior administration have resulted in an 8 percent reduction in the FWS workforce from 2004-2007 and loss of overall capability to meet program missions. Funding must be restored and increased.

Finally, a myriad of other bi- and multi-lateral conservation challenges face the new administration – from restoring conservation concerns to decisions on how best to protect our borders to restoring funding to international conservation programs and reinvigorating U.S. leadership in international treaty organizations such as the Convention on International Trade in Endangered Species (CITES).

ACTION

First 100 Days

Seek increased funding for U.S. Fish and Wildlife Service International Affairs

The Fish and Wildlife Service International Affairs program works to protect and restore sustainable wildlife populations around the globe, implementing international treaties and agreements as well as U.S. wildlife laws as they affect species of international concern, and providing critically needed resources to governments and partners in other nations to assist conservation efforts. Critical treaty obligations include the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the Convention on Nature Protection and Wildlife Preservation in the Western Hemisphere, and the Convention on Wetlands of International Importance (RAMSAR). International Affairs is divided into two subprograms: 1) International Conservation, which provides collaborative support, funding, education and technical assistance delineated in three areas – Wildlife Without Borders Global Programs, focusing on broad treaties and agreements; Wildlife Without Borders Regional Programs, that work with resident peoples to develop locally adapted and long-term wildlife management and conservation programs supported through broad partnerships; and Wildlife Without Borders Species Programs, administering Multinational Species Conservation Fund grants; and 2) International Wildlife Trade, which carries out the scientific and management requirements of applicable legal authorities.

Despite the importance of its work around the globe and the increasing significance of international conservation efforts in the face of climate change and expanding human population along with pressures from related development, pollution and consumption, the International Affairs program is tiny, and inadequate budgets under the Bush administration have only exacerbated the need.

International Conservation has virtually no funding to implement its global program and is unable to meet its obligations under existing treaties; to address cross-cutting problems emerging at the global level such as human-wildlife conflict, wildlife disease, global warming and invasive species; or to provide assistance and help channel the significant conservation resources of large international entities such as the Global Environmental Facility, the World Bank, and the Agency for International Development. The regional programs currently provide grants in four broad geographic areas – Latin America and the Caribbean, Mexico, Russia and East Asia, and Africa – yet total funding in FY 2008 was just over \$2 million, and there is no funding for a fifth important area, the Near East and South Asia. The five species programs – African Elephant, Asian Elephant, Rhinoceros and Tiger, Great Ape, and Marine Turtle – under the Multinational Species Conservation Fund, are currently funded at just 27 percent of the total authorized level. Both the regional and species programs have funding requests anywhere from two to five times the actual funding available.

Similarly, even in the face of U.S. domination of expanding global wildlife trade, valued at billions of dollars annually, the International Wildlife Trade program operates on a shoestring. Funding is grossly inadequate to address a backlog of needed listings of foreign species under the Endangered Species Act and to regulate movement of species of

international concern. Currently, 20 foreign species are found to warrant listing but precluded due to lack of resources, and 4 additional listing petitions encompassing an additional 28 species were filed in 2008. At the same time, the program receives more than more than 6,000 annual requests for permits under CITES, the Endangered Species Act, the Marine Mammal Protection Act, the Wild Bird Conservation Act, and other legal authorities that require extensive analysis. No funding is available for recovery efforts for foreign listed species, and the Exotic Bird Conservation Fund, established under the Wild Bird Conservation Act to provide financial and technical assistance for projects to conserve exotic birds in their native countries, has never been funded.

In its first budget request, the administration should move International Affairs out of General Operations and establish it as a new budget activity in keeping with its importance on the global stage.

The administration also should request a total of \$21 million for International Affairs for FY 2010, \$9.4 million over the FY 2008 enacted level. This amount would include increases of \$2.25 million for Regional Wildlife Without Borders programs, \$2 million for Global Wildlife Without Borders programs, \$1 million to begin to address the listing backlog, \$1 million to fund the Exotic Bird Conservation Fund for the first time ever, approximately \$2.6 million for needed staff in both the Trade and Conservation programs, and \$0.5 million for fixed costs. In addition, the administration should request a total of \$15 million for the Multinational Species Conservation Fund, an increase of \$7.1 million over FY 2008 distributed as follows: \$2.25 million for African Elephant, Asian Elephant, Great Ape, and Marine Turtle, \$3.5 million for Rhinoceros and Tiger, and \$1.25 million each for two new funds should they be enacted into law, Great Cats and Rare Canids and Crane Conservation.

Seek increased funding for migratory bird conservation programs

Migratory birds are integral to healthy natural systems in many ways, including as predators, prey, seed dispersers and pollinators, and are actively appreciated and enjoyed by millions of people across the country. In 2006 alone, 71 million U.S. residents spent more than \$45 billion to watch wildlife and the majority of these, 47.7 million people or 67 percent, observed birds. Yet many of these creatures that are so important to the U.S. spend only part of their lives here, traveling between breeding, stopovers, and wintering grounds in many nations throughout the Americas, and, in some cases, even beyond. Despite their vital importance at home and abroad, FWS has estimated that about 25 percent of our nation's migratory bird species are in serious need of conservation to assure their long-term survival, and a 2008 report by BirdLife International, *State of the World's Birds*, finds that, globally, bird populations are suffering precipitous declines with one in eight of all bird species threatened with extinction. As the global warming crisis worsens, increasing numbers of bird species, along with their habitats, will become even more vulnerable.

The FWS is the lead federal agency responsible for protecting, conserving and managing the more than 900 species of our nation's migratory birds and their habitat. Its Migratory Bird Management program is multi-faceted and encompasses survey and monitoring, management of permits and hunting regulations, efforts on international treaties, restoration of habitat, coordination of work to reduce direct bird mortalities, and implementation of the North American Waterfowl Management Plan, as well as other efforts to conserve bird

habitat through the Joint Ventures program. The program also administers the North American Wetlands Conservation Act and Neotropical Migratory Bird Conservation Act grants and the federal Duck Stamp program. Migratory Bird Management relies heavily on its work with partners to achieve its mission.

Conservation and Monitoring

Several years ago, in order to make more demonstrable progress in on-the-ground conservation to restore bird species to healthy levels, the FWS developed a list of 139 focal species slated to receive greater attention in the coming years through development and implementation of specific action plans for each species. Focal species were selected from the List of Birds of Management Concern, 412 species, subspecies, or populations of birds protected under the Migratory Bird Treaty Act that present special management challenges, based on the following criteria: 1) high conservation need; 2) representative of a broader species group; 3) high level of current effort; 4) partnership potential; and 5) high likelihood that threats can be addressed. The Service has nearly completed or completed and begun implementation of plans for just twelve of the 139 focal species and has projected it can complete plans for a total of 36 species by the end of FY 2010. However, increased funding is critical to develop the rest of the plans over the coming years and effectively implement them once they are complete.

Urban areas are becoming increasingly important to bird conservation, and the Service has developed an innovative partnership program to involve citizens in on the ground activities to protect birds. These “Urban Conservation Treaties for Migratory Birds” provide seed money to participating cities for efforts such as reducing migration hazards, restoring and enhancing urban bird habitat, and education and outreach. Currently, no funding is provided specifically for this purpose and funds from other part of the program have been used to support the participation of seven cities. Small sums of money provided specifically for this purpose would support the needed expansion of this very effective program to additional cities.

The Migratory Bird Management program works with federal and non-federal partners to carry out the ongoing surveys and monitoring necessary to effectively plan and implement conservation of our nation’s birds. A crucial component of this effort is the FWS aerial survey capability that has been dependent on a fleet of aging planes. The Service is currently replacing its fleet and will be purchasing nine new airplanes by 2016 – while the cost of buying the planes has been funded, increases will be necessary for operations of the new aircraft and for continued expansion of monitoring and assessment capabilities to address unmet needs such as innovative monitoring programs for currently underserved shy and secretive species and extension of current survey capabilities into areas not already covered by ongoing monitoring efforts.

Permitting

Through the Migratory Bird Management program, the FWS regulates activities that impact migratory birds under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act, processing about 13,000 permits annually and managing up to 40,000 active permits at any given time. Given the recent delisting of the bald eagle, additional resources

will be needed to process an increased number of permits under the Bald and Golden Eagle Protection Act.

North American Waterfowl Management Plan/ Joint Ventures

The highly successful North American Waterfowl Management Plan was created in 1986 to utilize partnerships in an effort to maintain waterfowl populations through the conservation of wetlands and other habitats. The partnerships that were formed to implement the plan are called Joint Ventures, regional, self-directed organizations that include governments at all levels and an extensive array of non-governmental entities. The Joint Ventures have now broadened their mission to meet goals for the conservation of all migratory birds through scientifically-based landscape conservation plans and projects that protect habitat. Currently, all 50 states and the Commonwealth of Puerto Rico participate in one or more of the 21 existing Joint Ventures. Four of these do not receive any funding allocation from the FWS. The Association of Joint Venture Boards supports a plan to incrementally boost appropriations to \$30 million over a five year period.

Federal Duck Stamp Program

The Federal Duck Stamp program supports conservation of vital habitat for migratory birds through the design and sale of the Migratory Bird Hunting and Conservation Stamp (Duck Stamp). Since 1934, the sale of the stamp has provided more than \$725 million for the Migratory Bird Conservation Fund supporting the conservation of more than 5.2 million acres of habitat in the National Wildlife Refuge System. The Junior Duck Stamp program allows school children to use the arts to learn about conservation and nature, helping to meet a critical need at this time to keep children connected to the outdoors – unfortunately specific funding has never been provided for this important educational tool.

North American Wetlands Conservation Fund

More than half of the original wetlands in the U.S. have been lost. This has contributed to the steady decline of migratory birds as well as other fish and wildlife species dependent on wetlands. With fewer wetlands, millions have been spent on erosion control, water treatment, and flood protection that natural wetlands used to provide for free. Restoring and protecting wetlands is vital to conserving fish and wildlife species dependent upon such habitat and maintaining healthy watersheds. These areas protect our safety and welfare without having to invest in costly projects, and provide innumerable opportunities for outdoor recreation for people across the nation. Through September 2008, this grant program, along with more than 4,000 partners, has funded more than 1,800 wetland conservation projects in all 50 U.S. states, Puerto Rico, the U.S. Virgin Islands, 13 Canadian provinces and 31 Mexican states and leveraged some \$2.8 billion in matching and non-matching funds to conserve approximately 24.4 million acres of wetlands and associated uplands. The program continues to play a major role in conserving North American wetlands, migratory birds, and other species of fish and wildlife that depend upon such ecosystems.

Neotropical Migratory Bird Conservation Fund (NMBCA)

Since 2000, the NMBCA has functioned as a matching grant program for projects that conserve neotropical migratory birds – those that breed in or migrate through the United States and Canada and spend the non-breeding season in Latin America and the Caribbean. Monies support partnership programs to conserve birds in the U.S., Latin America and the Caribbean, where approximately 5 billion birds representing over 500 species spend their winters, including some of the most endangered birds in North America. These funds provide an upland complement to the wetland bird conservation work accomplished under the North American Wetlands Conservation Act. Projects may include bird habitat conservation, research and monitoring, law enforcement, and outreach and education. All grant requests must be matched by non-federal funds at least 3 to 1. By law, 75 percent of the funds must be spent internationally. Between 2002 and 2008, partners in 48 U.S. states and territories and 36 other countries have been involved in 260 NMBCA-supported projects. More than \$25.5 million in grants has leveraged some \$122.6 million in total partner contributions to support activities that bring long-term benefits to neotropical migratory birds including conservation of 1.9 million acres of bird habitat. While more than 100 worthy proposals are received each year, with the current funding provided, only 40 can be funded.

In its first budget, the administration should request a total of \$61.2 million for Migratory Bird Management, \$20.8 million over the FY 2008 enacted level. This amount would include increases of \$4 million for focal species planning and implementation, \$4.2 million for inventory and monitoring, \$1 million for Urban Treaties, \$1.3 million for permitting to process additional requests under the Bald and Golden Eagle Protection Act, \$0.5 million for the Junior Duck Stamp program, \$8.2 million for the Joint Ventures, and \$1.6 million for fixed costs. In addition, the administration should request \$50 million, an increase of \$8 million for the North American Wetlands Conservation Fund, and \$6.5 million, an increase of \$2 million and the full authorized level for the Neotropical Migratory Bird Conservation Fund.

First year:

The new administration should secure Senate ratification of the Convention on Biological Diversity and the Law of the Sea treaty.

The failure of the outgoing administration to secure Senate ratification of the Convention on Biological Diversity (CBD) and the UN Convention on the Law of the Sea (UNCLOS), two global agreements that are vital for protecting wildlife, has undermined the ability of the United States to influence implementation of these treaties and undercut the effectiveness of the treaties themselves. Both treaties have nearly universal participation by the rest of the world; the U.S. stands in isolation as a non-party.

The CBD is a 16-year old conservation treaty with 191 parties. It provides the recognized forum for vital negotiations on conservation, commercial and social issues related to biodiversity. Developing nations, in particular, view the CBD as essential in negotiations related to wildlife and genetic resources. Only four nations worldwide are non-parties: Andorra, Iraq, Somalia and the United States. President Clinton signed the CBD on behalf

of the U.S. in 1993. The Senate Foreign Relations Committee voted overwhelmingly (16 to 3) for ratification in 1994, but the Senate failed to bring CBD ratification to a floor vote.

The outgoing administration did not seek Senate ratification of the CBD. A U.S. interagency group headed by the State Department reviewed the CBD in 2006 and no government agency had any objections to U.S. ratification. Moreover, ratification is supported by a number of business and environmental organizations

The Law of the Sea treaty provides an international framework for coordinating marine wildlife conservation worldwide, reducing maritime pollution, mitigating the impacts of oil, gas, and mineral exploration, and coordinating the laying of ocean-floor infrastructure, such as cables and pipelines. UNCLOS has been in effect for 13 years, yet the United States is the only major seafaring nation that has not ratified it. Consequently, the U.S. does not have a vote on critical UNCLOS decisions, such as pending marine boundary disputes in the Arctic Ocean, where the fast-melting icepack is raising tensions over rights to oil and gas and other disputed undersea resources.

The outgoing administration supported UNCLOS ratification, a position endorsed by virtually every stakeholder in U.S. marine issues, including environmentalists, the oil and gas industry, marine industries, the U.S. Navy and all other federal agencies. Nevertheless, the Senate did not bring UNCLOS up for ratification.

The new administration should make it an urgent priority to obtain Senate ratification of these two landmark treaties as a key step in restoring the United States' global environmental leadership.

The new administration should request, and Congress should provide, sufficient funding for key U.S. Fish and Wildlife Service programs that help to maintain and enhance America's global leadership in wildlife conservation.

The dedicated men and women of the U.S. Fish and Wildlife Service (FWS) Office of Law Enforcement (OLE) form the "Thin Green Line" standing between federally and internationally protected animals and plants and the ruthless poachers and smugglers who traffic in them. Through the OLE, the FWS is the sole agency charged with investigating violations of federal wildlife laws and international treaties – ranging from trafficking in prohibited animal parts to poaching protected plant species. The annual illegal wildlife trade is valued at \$10 billion globally, ranking only behind illegal trafficking in arms and drugs. A huge amount of that illegal trade involves imports to, and exports from, the United States. This trade will continue to rise in conjunction with population growth, increased demand for novel wildlife, more globalized trade routes and faster shipping and travel, unless enforcement resources also expand to meet the challenge. The OLE's challenge is heightened by large increases in the total numbers of federally and internationally regulated animal and plant species that require monitoring, now in the many thousands.

The OLE encompasses a cadre of special agents, a network of wildlife inspectors, and the National Fish and Wildlife Forensics Laboratory in Ashland, Oregon. Special agents investigate, and help prosecute, complex trafficking cases with multiple suspects in multiple locations committing multiple felonies – not just wildlife crimes but also conspiracy, money

laundering and wire fraud. Defendants include, for example, global suppliers of exotic species, upscale art galleries, guides offering illegal hunts, interstate networks of taxidermists, and large caviar importers. Now, much of the illegal trade confronted by the agents is fly-by-night internet trafficking facilitated by anonymous e-commerce. The investigation, forensics, arrest and seizure challenges are enormous.

Wildlife inspectors are deployed at U.S. ports of entry at the nation's major international airports, ocean ports, and border crossings in controlling import and export of wildlife and seizing smuggled wildlife and wildlife products. Inspectors are responsible for processing a growing number of declared shipments, enforcing trade embargoes linked to wildlife disease, and stopping imports of prohibited species. Interdictions at ports are often the first stage in broader criminal investigations of smuggling activity. The state-of-the-art National Fish and Wildlife Forensics Laboratory – where real-life “Wildlife CSI” is done – is the only such laboratory in the world. It provides critical science support for federal, state, and international law enforcement officers in the field, such as precisely identifying species, collecting and analyzing evidence of wildlife crimes, doing crime scene analysis, giving expert witness testimony in court, and developing new analytical techniques in wildlife forensics.

Although the OLE is crucial in the face of growing illegal international wildlife trade and poaching, its already meager base budget has been severely eroded by budget shortfalls imposed by the Bush administration.

The FWS leadership openly admits it has not been able to adequately support its special agents in their nationwide undercover investigations. No other U.S. enforcement agency asks more of its agents while at the same time providing fewer resources, including some cases when the agents' very lives are in jeopardy through infiltrating criminal organizations. These dedicated “wildlife cops” have produced top-notch results: numerous stings, high-profile prosecutions, prison terms for smugglers, and many rare animals and plants saved from death or exploitation, yet needed support is lacking.

Numbers of special agents have plummeted to a 30 year low, down from a high of 238 in 2002 to 184 in 2008, a 23 percent loss and nearly 30 percent below the authorized number of 261. The OLE also is unable to provide needed equipment and resources for the agents it does have to do their jobs safely and effectively. From FY 2006 to FY 2007, the number of crime investigations that agents were able to conduct dropped 16 percent, and although the level of investigations for FY 2008 is slightly above FY 2007, it still falls 11 percent below FY 2006. Given the lack of resources, the OLE often must make a “Sophie's Choice” between dealing with overt individual infractions of the law versus undertaking more difficult, time-intensive, undercover investigations of sophisticated organized crime such as wildlife smuggling. Funding increases and specific direction provided by the 110th Congress will bring the total special agent force up to 210 in early FY 2009, however, given the complex nature of their work, the new agents will not be up to full capacity for another two years, and, even with the additions, agent numbers still will be nearly 12 percent below 2002 and more than 19 percent below authorized numbers.

The vital OLE port inspection function is far overstretched. In FY 2007 wildlife inspectors processed more than 187,000 wildlife shipments with a declared value of \$2.8 billion at 18 designated port locations and 20 additional ports of entry around the country. User fees

charged to animal importers and exporters, that were intended to recover the costs of compliance inspections, have stayed flat since 1996 and now cover only about \$10 million of the current \$20 million needed. These fees must be increased because Federal taxpayers are “paying the freight” that private wildlife businesses should be paying. A proposed rule published early in 2008 to increase user fees was slated to be finalized before the end of the year, however, even with this new fee structure, the current cost of the program will not be covered until FY 2012.

Similarly, the National Fish and Wildlife Forensics Laboratory has suffered budget shortfalls over the last 8 years. An additional 12 forensic scientists are needed to support its globally unique and heavily in-demand forensic analyses.

Continued shortchanging of this irreplaceable workforce needs to stop. Cutting back enforcement of U.S. and international laws undermines protection for treasured species – from elk to game birds, tigers to great apes, eagles to sea turtles, orchids to cacti - the list is endless. Further, reduced enforcement will mean that imports of invasive injurious species prohibited under the Lacey Act will increase, hurting the environment and the economy. And U.S. laws against transporting illegal wildlife and wildlife parts across state lines will go unheeded.

In its budget for FY 2010, the administration should request at least \$72.8 million for the OLE, an increase of at least \$13.2 million over FY 2008. This amount would include increases of \$8.5 million to train and fund a class of 24 additional special agents, \$1 million for 10 additional inspectors, \$1.7 million for 12 additional forensic scientists, and \$2 million for fixed costs.

Should the new fee structure rule for the inspection program not be finalized by the end of 2008, the new administration should take steps to finalize it as quickly as possible. In its FY 2009 budget, the Bush administration had proposed a budget decrease for the OLE assuming the anticipated fee increase as an offset. The new administration should not impose any similar such cuts. The glaring funding deficit for the OLE more than justifies retaining any funds generated by a raised user fee without suffering a corresponding offset to the program’s appropriation, especially considering that the new fee structure will not be generating enough to cover even the current cost of the program until 2012.

First term:

The new administration should commit the U.S. to substantial reductions in greenhouse gas emissions in international climate change negotiations.

Although the outgoing administration acknowledged -- belatedly -- that global warming is a serious problem and is due to human activities, it refused to commit the U.S. to emissions reductions. As a result, the U.S. has lagged behind other countries and even the efforts of states, local governments, and private business in addressing the causes and impacts of global warming. The new administration has the opportunity to rejoin the community of nations in charting a new path and a new international agreement to address global warming, by agreeing to cut greenhouse gas emissions by at least 80 percent below 2000 levels by 2050, with an interim target of cuts of 15 to 20 percent by 2020.

The new administration should propose, and Congress should provide, an incentive for international forest protection by dedicating funding to such activities, primarily through a federal climate cap-and-trade system.

Deforestation produces as much as 25% of the world's annual greenhouse gas emissions. Thus, reducing emissions from the combustion of fossil fuels alone cannot halt global warming. Carbon emission reductions through avoided deforestation, reforestation, and improved forest management, particularly in developing countries, offer cost-effective ways to achieve the necessary reductions as rapidly as possible. Saving tropical forests also will provide vast additional environmental, economic, and social benefits for some of the world's poorest countries.

A fundamental element of any cap-and-trade legislation to address global warming should be inclusion of a strong incentive to preserve tropical forests, such as those in the Amazon, Indonesia, and the Congo, which are vital to sequestering carbon from the atmosphere, while also moderating Earth's climate and conserving a vast number of Earth's wild species. The new administration should propose and support such an incentive in comprehensive climate change legislation.

Any market system for avoided forest carbon emissions must deal in real, permanent, and verifiable reductions, with reliable measuring and monitoring and appropriate accounting for imperfections in the system. Technology, science, and institutions have advanced in recent years to make this achievable — what is needed now is political will and funding.

Whether in the context of the United Nations Framework Convention on Climate Change (UNFCCC) or in capacity-building institutions like the World Bank's Forest Carbon Partnership Facility (FCPF), the outgoing administration has failed to engage constructively with the world community. The U.S. contribution to the FCPF has been a paltry \$5 million of a total of \$187 million pledged by developed countries to date (the U.S. contribution is the same as that of Denmark and Finland, and \$55 million less than Germany's contribution).

The new administration should assert greater global leadership to further avoided deforestation measures to combat climate change. The new administration should announce a commitment of at least \$60 million to the World Bank's FCPF – matching Germany's contribution - to build global capacity for effective avoided deforestation efforts and to make forest carbon markets work. In international UNFCCC negotiations, the United States should engage with the Coalition for Rainforest Nations, the European Union, private companies, environmental groups, and other stakeholders to support development of private markets for avoided forest carbon emissions.

The new administration should increase the number of special agents for the Office of Law Enforcement and the number of wildlife trade inspectors

Early in its first term, the administration should act to increase the special agent force up to its authorized level of 261 as quickly as possible and ensure its maintenance at that level, given that, on average, 14 agents are lost each year through attrition. Without a plan to replace agents lost to attrition, the OLE will continue to lose ground – even with the

addition of a new class of 24 every two years, the force still would suffer a net loss of 4 agents over that same time period. Enough resources also should be provided to properly equip the agents and provide adequate support. Currently, the full cost of hiring, processing, training and paying a class of 24 totals \$8.5 million – this includes \$3.7 million just for processing and training costs. Therefore, once the total authorized number of agents is on board, even if salary and operating costs for agents lost to attrition are rolled over, additional funding would have to be provided on a regular basis for the processing and training costs of filling vacant agent positions. In addition, the new administration should undertake an assessment of the program to determine if increases to the authorized number of special agents are necessary and make any needed adjustments.

Given that the current inspection program is insufficient to address expanding wildlife trade, the administration should add at least 40 more inspector positions, 10 per year, over the four year period at a total cost of \$4 million. Finally, since the pending new fee structure only will adequately cover the current inspection program, the administration should develop a new fee structure to meet the growing need.

The new administrations should enhance the capacity, and increase funding, of FWS International Affairs

During its first term, the administration should consolidate all non-regulatory functions of the International Affairs program into an International Institute for Wildlife Conservation. To maintain consistency and coordination between regulatory and non-regulatory functions, the new Institute and the International Wildlife Trade program should be under the broad International Affairs program.

The establishment of this new Institute, along with increased funding, would give the Fish and Wildlife Service the resources it needs to comprehensively address the proliferating challenges facing conservation of wildlife and habitat around the globe by allowing it to better manage and coordinate existing programs, meet significant requirements on treaties, international agreements and other important obligations that are currently unaddressed, collaborate with large well-funded entities such as the Global Environmental Facility and Agency for International development to launch new initiatives and facilitate improved delivery of wildlife conservation, and establish an expanded network of relationships in vital areas to advance cooperation with other nations.

To accommodate this expanded capacity, by the end of the first term, annual funding for the International affairs program should be increased by at least \$32 million. This would include increases of at least \$17 million for the new Institute, \$5 million for listing and permitting under the International Wildlife Trade program, \$2 million for the Exotic Bird Conservation Fund, approximately \$6 million for staff, and \$2 million for fixed costs. In addition, the administration should evaluate how much recovery funding is needed for foreign species listed under the Endangered Species Act for which no funding is currently provided and request appropriate increases for the new institute to address that need. The administration also should request full funding of \$40 million, the authorized levels, for programs under the Multinational Species Conservation Fund distributed as follows: \$5 million for African Elephant, \$5 million for Asian Elephant, \$10 million for Rhinoceros and Tiger, \$5 million

for Great Ape, \$5 million for Marine Turtle, and for two new funds should they be enacted into law, \$5 million for Great Cats and Rare Canids and \$5 million for Crane Conservation.

The new administration should increase funding for migratory bird conservation programs

By the end of its first term, annual funding for Migratory Bird Management should be increased by a total of at least \$46 million. This amount would include total increases of \$10 million for focal species planning and implementation, \$6.5 million for inventory and monitoring, \$1 million for Urban Treaties, \$2.5 million for permitting to process additional requests under the Bald and Golden Eagle Protection Act, \$0.5 million for the Junior Duck Stamp program, \$19.2 million for the Joint Ventures, and \$6.4 million for fixed costs. The administration should gradually increase funding for the North American Wetlands Conservation Fund to its full authorized level of \$75 million. Finally, the administration should support legislation to reauthorize the Neotropical Migratory Bird Conservation Fund to incrementally increase to \$20 million by FY 2015 and work to boost funding toward that level.