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United States Senate

COMMITTEE ON ENVIRONMENT AND PUBLIC WORKS

WASHINGTON, DC 20510-6175

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March 28, 2018

The Honorable Ryan Zinke
Secretary
United States Department of the Interior
1849 C Street NW
Washington, DC 20240

Dear Secretary Zinke,

We write to convey our deep concerns and to request information about recent Department of Interior decisions regarding the importation of sport-hunted elephant, lion and bontebok parts from several African nations. In November 2017, President Trump said he would “be very hard pressed to change [his] mind that this horror show in any way helps conservation of elephants or any other animal.” Despite the President’s statement, the Department seems to be forging ahead with ill-advised policies to allow importation from countries that may not be properly conserving wildlife populations. This could harm the long-term survival of iconic species and encourage poaching activities.

As the Department proceeds with its plans to loosen restrictions on international wildlife hunting and trophy importation, it has simultaneously populated the International Wildlife Conservation Council with trophy hunters and gun industry executives. As you know, this Council is a new federal advisory committee within the Department of Interior that is charged with advising you on the promotion of international wildlife hunting. Because of the unbalanced interests represented on the Council, it could diminish the progress the United States has made fighting against international wildlife hunting and importing. Moreover, we are concerned that the Council may not comply with the Federal Advisory Committee Act.

The Federal Advisory Committees Act requires that committee memberships be “fairly balanced in terms of the points of view represented and the functions to be performed by the advisory committee.” Further, the Act also requires that members of the committees “not be inappropriately influenced by the appointing authority or by any special interest.” The Council does not appear to be in compliance with either provision of the Act. Specifically, all but one of the 16 Council members appear to be directly affiliated with Safari Club International or the National Rifle Association, involved in the hunting tourism industry, or have been involved in the commercial trade of animals. This list of members includes: Paul Babaz, President of Safari Club International; Erica Rhoad, Director of Hunting Policy at the National Rifle Association; Walter Palmer, who killed Cecil the lion in Zimbabwe in 2015; Peter Horn, a vice president of firearms manufacturer Beretta; reality TV stars and hunters Ivan Carter and Keith Mark; Olivia Nalos Opre, who co-produces a hunting competition, has killed about 90 different species on six continents, and brought home approximately 150 animal carcasses; and Jenifer Chatfield, a zoo veterinarian known for running an experiment on lemurs where they were anesthetized and given as many as 50 shock treatments to force them to “electroejaculate” for artificial insemination collections.

The Council's makeup is not surprising, given that in the charter's section on membership, four of the five constituencies to be represented are: hunters actively engaged in "hunting conservation"; "the firearms or ammunition manufacturing industry"; the "hunting sports industry"; and tourism industries related to international hunting. Given the Department of Interior's desire to have all four constituencies represented, and the resulting makeup of the Council, it is difficult to imagine that the Council will remain balanced and uninfluenced by special interests in carrying out its duties.

The United States has made significant strides in the fight against international wildlife trafficking, including by protecting foreign wildlife through the Endangered Species Act and the Convention on International Trade in Endangered Species of Wild Flora and Fauna. The plain language of the International Wildlife Conservation Council charter makes it clear that the Council has been designed to recommend reversal of that progress. For example, some of the Council's duties include:

- "Developing a plan for public engagement and education on the benefits of international hunting."
- "Recommending removal of barriers to the importation into the United States of legally hunted wildlife."
- "Recommending methods for streamlining/expediting processing of import permits."

These duties are based on the assumption that international wildlife hunting is beneficial to conservation, and rather than ask the Council to evaluate whether that is true, the Council has been asked to start from that assumption.

To help us better understand the Department's decision-making process on these matters and how the new Council will operate and carry out its duties under its charter, we respectfully request that you respond to the following requests and questions by April 10, 2018:

1. Staff members for the Senate Committee on Environment and Public Works requested a bipartisan briefing to better understand the Department's thinking on these importation issues more than three months ago. A bipartisan briefing was finally scheduled for Thursday, March 15, 2018 but then cancelled by the Department with little notice, no explanation, and no proposal of alternate dates. Please work to reschedule this meeting immediately; however, such briefing will not serve as an adequate alternative to providing written responses to this letter.
2. Importation of sport-hunted trophies from Zambia and Zimbabwe were banned in 2014 because those countries had not demonstrated effective species conservation practices. What conservation practices have these countries implemented since 2014 that support the Department's decision to lift the ban? How specifically will allowing trophy importation enhance the survival of species, and how will the Department ensure that its policy does not encourage illegal poaching activities?
3. Please provide a complete list of individuals who were nominated for membership to the Council since it was formed in December 2017. For each nominee, please provide the name of the nominator, the date on which the Department of Interior received the nomination, the nominee's resume and qualifications for the position (including their experience with

conservation policy), and whether the nominee was selected for membership on the Council. If the nominee was not selected for membership on the Council, please explain why. Please provide all supporting documents (including emails, comments, memos, white papers, meeting minutes and correspondence) relevant to this request.

4. It appears that at least 10 of the 16 members of the Council have a clear affiliation with Safari Club International, an organization that advocates for wealthy big game hunters and regularly lobbies the federal government to relax or eliminate restrictions on their activity. What role, if any, did Safari Club International play in drafting, reviewing, commenting on, editing, or approving the Council and its charter? Please provide copies of any communications between the Department of Interior and the organization about the Council.
5. Please provide all documents (including emails, comments, memos, white papers, meeting minutes and correspondence) related to the determination that the Committee's charter and the Council's actual membership are in compliance with the Federal Advisory Committee Act's requirements that such Committees be balanced and free from special interest influence.
6. Please provide all internal documents (including emails, comments, memos, white papers, meeting minutes and correspondence) related to your determination that international wildlife hunting benefits conservation.
7. One of the industries targeted for representation on the Council is "the firearms or ammunition manufacturing industry." Please explain why this industry's work is relevant to the issue of international wildlife conservation.
8. According to the Council's charter, although members of the Committee will not be paid for their participation on the Council, the estimated operating cost of the Council will be \$250,000 per year. Please provide copies of all documents supporting costs incurred by members of the Committee or the Department of Interior associated with operation of the Council. After your initial response, please provide new documents covering new information to the Committee on a monthly basis.

Thank you very much for your attention to this important matter. If you have any questions or concerns, please ask the appropriate members of your staff to contact Michal Freedhoff, a member of the Environment and Public Works Committee staff, at 202-224-8832.

Sincerely,



Thomas R. Carper
Ranking Member



Tammy Duckworth
Ranking Member
Subcommittee on Fisheries, Water
and Wildlife