BRUCE WESTERMAN OF ARKANSAS
CHAIRMAN

VIVIAN MOEGLEIN
STAFF DIRECTOR

JARED HUFFMAN OF CALIFORNIA
RANKING DEMOCRAT

ANA UNRUH COHEN
DEMOCRATIC STAFF DIRECTOR

U.S. House of Representatives
Committee on Natural Resources
Washington, DC 20515

October 28, 2026

The Honorable Marco Rubio
Secretary
U.S. Department of State
2201 C Street N.W.
Washington, D.C. 20520

The Honorable Doug Burgum
Secretary
U.S. Department of the Interior
1849 C Street N.W.
Washington, D.C. 20240

Dear Secretary Rubio and Secretary Burgum,

We write to request information about recent changes in the leadership and coordination of U.S. engagement with the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and to urge that the longstanding, science-based role of the U.S. Fish and Wildlife Service (FWS) be preserved in accordance with federal law.

The implementation of CITES not only supports individuals and businesses engaged in the lawful trade of CITES-listed species but also serves as a defense against illegal wildlife trafficking and other illicit activities, including drugs and arms trafficking, that often operate alongside it. The FWS 2026 Budget Justification states that "the Service's conservation permitting program managed through the International Affairs program issues more than 20,000 permits and certificates to the American public per year under CITES and other permitting authorities. These permits support U.S. international wildlife trade, valued at more than $1 billion annually. These permits are a critical tool for law enforcement globally to distinguish the legal from illegal trade which is estimated annually to be $7-$23 billion for wildlife and plants and another $30-$100 billion for illegal logging and associated trade."[1]

Congress has repeatedly expressed its interest in confronting wildlife trafficking, most recently through the 2022 reauthorization of the END Wildlife Trafficking Act.[2] We are firmly committed to ensuring the proper implementation of CITES. Proper implementation safeguards American businesses and helps ensure that traffickers cannot corrupt legitimate trade or exploit global supply chains to undermine species' survival.

We have received information indicating that the Department of State (DOS) has recently asserted itself as the lead agency on CITES matters and directed the CITES Secretariat to include DOS on all communications with U.S. federal agencies. We have reason to believe that the new U.S. delegation may be seeking to reverse positions taken by the U.S. delegation at the 20th Meeting of the Conference of the Parties (COP20) in Samarkand, Uzbekistan, in November and December 2025. DOS asserting itself as the lead and changing U.S. positions on international wildlife trade

[1] U.S. Fish & Wildlife Serv., Fiscal Year 2026 Greenbook 88 (2026), https://www.fws.gov/sites/default/files/documents/2026-05/fws-2026-greenbook508.pdf
[2] Press Release, Sens. Chris Coons & Rob Portman, Senators Coons, Portman Celebrate Inclusion of END Wildlife Trafficking Act in NDAA (Dec. 13, 2021), https://www.coons.senate.gov/news/press-releases/senators-coons-portman-celebrate-inclusion-of-end-wildlife-trafficking-act-in-ndaa/

would be unprecedented. It would represent a wholesale departure from federal statute and practice by sidelining the agency that has led U.S. implementation of CITES since the Convention was adopted in 1973.

The Statutory and Historical Role of the Department of the Interior (DOI)

Under Article IX of CITES, each participating nation must designate a Management Authority and a Scientific Authority responsible for evaluating species status, making recommendations, and supporting enforcement. Section 8 of the Endangered Species Act (16 U.S.C. § 1537(a)) designates the Secretary of the Interior as the Management and Scientific Authority for CITES implementation in the U.S. and specifies that "respective functions of each such Authority shall be carried out through the United States Fish and Wildlife Service."[3] As such, the FWS serves both management and scientific functions, with the International Affairs Program responsible for carrying out CITES via the authority of the Endangered Species Act.[4] Under this statutory authority, FWS issues permits for the import and export of CITES-listed species, monitors trade, enforces permit requirements, investigates illegal trade, and coordinates and prepares U.S. proposals for each COP in consultation with other agencies.

Congress affirmatively designated the DOI Secretary as the lead on CITES. This is a statutory delegation of CITES authority, not an agency-delegated practice that can be transferred at will. FWS has a demonstrated track record of asserting this authority. Regulations identify FWS as the relevant agency handling administrative, management, and scientific issues related to CITES[5] and FWS has reiterated its lead role in previous CITES delegation meetings and implementation.[6] FWS has been the U.S. lead to previous CITES meetings but regularly consults with other federal agencies ahead of a COP. Other federal agencies are tasked with CITES-related responsibilities, including scientific and technical support and U.S implementation. These federal partners include the Departments of State, Commerce, Agriculture, Homeland Security, and Justice.

If a partner agency, such as DOS, asserts itself as the lead agency for CITES matters or the DOI Secretary delegates responsibilities away from FWS it would raise serious concerns regarding compliance with statutory authorities delegated by Congress. Congress directed the DOI Secretary to be the designated Management Authority and Scientific Authority and directed FWS to carry out those respective functions for the Convention. Delegation of certain management or scientific authorities to DOS by the DOI Secretary may constitute a violation of the Endangered Species Act and could undermine the role of the FWS's scientific expertise in shaping U.S. negotiating positions under CITES. Changes to the designation of certain authorities must be communicated to the Secretariat and transmitted to all other parties under Article IX of the treaty.[7]

---

[3] 16 U.S.C § 1537

[4] U.S. Fish and Wildlife Service. The Convention on International Trade in Endangered Species of Wild Fauna and Flora. https://www.fws.gov/our-work/cites

[5] 50 C.F.R. § 23.7

[6] Testimony of Tom Strickland, Assistant Secretary for Fish and Wildlife and Parks, U.S. Department of the Interior before the House Committee on Natural Resources, Subcommittee on Insular Affairs, Oceans and Wildlife. Regarding U.S. Preparations for the 15th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species. February 11, 2010. https://www.fws.gov/testimony/fifteenth-meeting-conference-parties-convention-international-trade-endangered-species

[7] Convention on International Trade in Endangered Species of Wild Fauna and Flora. https://cites.org/eng/disc/text.php#IX

Longstanding U.S. Positions

CITES was adopted to facilitate legal and sustainable wildlife trade while protecting species against over-exploitation.[8] Nations that are party to the Convention recognized at ratification that a science-based approach was needed to counter the harmful effects of trade on vulnerable species and biodiversity. DOS asserting a leadership role in the CITES negotiations pulls U.S. positions away from the science-based approach codified in statute and established as the basis for international agreements on wildlife trade. Supplanting scientific experts with political appointees as delegation members suggests U.S. position changes are rooted in something other than scientific evidence.

Interests seeking to loosen restrictions on wildlife trade have repeatedly proposed mechanisms for weighing socio-economic factors when the CITES Appendices of listed species are amended. During CITES ratification, the parties recognized that socio-economic pressures often outweigh conservation concerns and mechanisms that re-prioritize socio-economic pressures would undermine the Convention's central purpose. Such analyses could leave fewer animals and plants protected, particularly species with commercial value regardless of conservation status, and would slow an already onerous listing process by adding an additional layer of review. Until 2026, the United States consistently opposed socio-economic analyses, including during the first Trump Administration.

Additionally, there are growing concerns about zoonotic disease risks posed by the importation of certain species such as non-human primates. Despite recognition in the public health, economic, and biodefense communities of zoonotic disease risks, it appears that the U.S. delegation has recently sought to minimize the role of the live animal trade in the transmission of zoonotic disease, contrary to the best available science. During the CITES Animals Committee meeting in July 2026, Dr. Jenifer Chatfield, the DOI Deputy Assistant Secretary of Fish and Wildlife and Parks, claimed that CITES should not handle disease-risk management, that legal and well-regulated wildlife trade is not a significant disease pathway, and that work on zoonotic diseases should not lead to trade suspensions.[9] These changes and others could undermine longstanding, science-based U.S. positions at CITES and jeopardize our nation’s leadership in international wildlife conservation.

Request for Information

The House Committee on Natural Resources has jurisdiction over fisheries and wildlife, including conservation under Rule X(m). To help us fulfill our oversight obligations and inform potential legislation, please provide the following information by November 13, 2026:

1. All directives, guidance, and communications from DOS to the CITES Secretariat or Secretary-General from June 1, 2026 to October 28, 2026 referring or relating to CITES matters, including any changes in designations or authorizations under the provisions of CITES Article IX.

[8] Convention on International Trade in Endangered Species of Wild Fauna and Flora, What Is CITES?, CITES, https://cites.org/eng/disc/what.php (last visited Oct. 2, 2026)

[9] Contention on International Trade in Endangered Species of Wild Fauna and Flora. Thirty-fourth meeting of the Animals Committee. Geneva, Switzerland. July 13-17, 2026. https://cites.org/sites/default/files/eng/com/ac/34/E-AC34-SR.pdf

2. All directives, guidance, and communications from DOI to the CITES Secretariat or Secretary-General from June 1, 2026 to October 28, 2026 referring or relating to CITES matters, including any changes in designations or authorizations under the provisions of CITES Article IX.

3. Documents from June 1, 2026 to October 28, 2026 referring or relating to all actions DOS has taken, or plans to take, to reverse, revise, or withdraw positions taken by the U.S. delegation at COP20. For positions under review, please provide documents to indicate who directed the review and who is involved in conducting the review.

4. Documents created between June 1, 2026 and October 28, 2026 referring or relating to all actions DOI has taken, or plans to take, to reverse, revise, or withdraw positions taken by the U.S. delegation at COP20. For positions under review, please provide documents indicating who directed the review and who has been involved in conducting the review.

5. Documents created between June 1, 2026 and October 28, 2026 referring or relating to any changes in U.S. positions on CITES issues under this administration including socio-economic analysis, trade in captive-bred species, animal welfare concerns associated with the live animal trade, transmission of zoonotic diseases via live animal trade, and best available science in regulating wildlife trade.

6. Documents created between June 1, 2026 and October 28, 2026 referring or relating to any longstanding U.S. position changes, including documents sufficient to explain how the position change meets CITES' science-based mandate and conforms with U.S. policy in past administrations including the first Trump administration.

7. Documents created between June 1, 2026 and October 28, 2026 referring or relating to the U.S. position on zoonotic disease risk in the live animal trade, including documents sufficient to explain how the U.S. will ensure zoonotic disease risks arising from wildlife trade will be managed.

8. Documents created between June 1, 2026 and October 28, 2026 referring or relating to the interagency process used to review and develop U.S. positions for the recent Animals and Plants Committee meetings, and the upcoming 81st CITES Standing Committee meeting beginning on November 2, 2026 in Geneva, Switzerland. Include documents sufficient to explain how U.S. negotiating positions have been vetted through that process, including by FWS, the National Marine Fisheries Service, and the U.S. Department of Agriculture.

9. Documents created between April 1, 2026 and October 28, 2026 listing all prospective and actual members of the U.S. delegation to the CITES Animals Committee and Plants Committee meetings in July 2026. Please include the final version, all related drafts, and documents indicating delegation member qualifications, criteria used to select them, and whether they are scheduled to serve on future CITES delegations.

10. Documents created between June 1, 2026 and October 28, 2026 listing all members of the U.S. delegation to the 81st CITES Standing Committee meeting beginning on November

2, 2026 in Geneva, Switzerland. Please include the final version, all related drafts, and documents indicating delegation member qualifications, criteria used to select them, and whether they are scheduled to serve on future CITES delegations.

11. Documents created between June 1, 2026 and October 28, 2026 referring or relating to DOS' transmittal of the annual U.S. contribution to CITES, as appropriated by Congress. If the annual U.S. contribution has not yet been transmitted, explain why not and provide information on when it will be paid.

12. Documents from June 1, 2026 to October 28, 2026 indicating DOI's stance on DOS assuming the lead role on CITES communications and positions.

We look forward to your prompt response.

Sincerely,

Jared Huffman
Ranking Member
House Committee on Natural Resources

Val Hoyle
Ranking Member
Subcommittee on Water, Wildlife, and Fisheries

CC:

Director Brian Nesvik
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington, D.C. 20240

Ambassador Jamieson Greer
Office of the United States Trade Representative
600 17th St. N.W.
Washington, D.C. 20508

Responding to Committee Document Requests

In responding to document requests from the Committee on Natural Resources, please apply the instructions and definitions set forth below:

Instructions

1. In complying with the request, you should produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. You should also produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party. Requested records, documents, data, or information should not be destroyed, modified, removed, transferred, or otherwise made inaccessible to the Committee.

2. In the event that any entity, organization, or individual denoted in this request has been, or is currently, known by any other name than that herein denoted, the request should be read also to include them under that alternative identification.

3. Documents must be provided in electronic form (i.e., memory stick, thumb drive, or internet-based). Documents produced should also be organized, identified, and indexed electronically. Documents should be produced in their native file format. For example, emails from Microsoft Outlook should have a ".pst" file extension, Excel files should have an ".xls" or similar extension, and Microsoft Word documents should have a ".doc" extension. Consult with the Committee to determine the appropriate format in which to produce the information.

4. Each document produced should be produced in a form that renders the document capable of being copied.

5. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, or folder transmitted through the internet is produced, each should contain an index describing its contents.

6. Documents produced in response to this request should be produced together with copies of file labels, dividers or identifying markers with which they were associated when this request was issued. To the extent that documents were not stored with file labels, dividers, or identifying markers, they should be organized into separate folders by subject matter prior to production.

7. When you produce documents, you should identify the paragraph in the Committee's schedule to which the documents respond.

8. It shall not be a basis for refusal to produce documents that any other person or entity also possesses a non-identical or identical copy of the same documents.

9. If compliance with the request cannot be made in full, compliance should be made to the extent possible and should include an explanation of why full compliance is not possible.

10. In the event that any document or part of a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document or part of a document: (a) the privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author and addressee; and (e) the relationship of the author and addressee to each other.

11. If any document responsive to this request was, but no longer is, in your possession, custody, or control, you should identify the document (stating its date, author, subject and recipients) and explain the circumstances by which the document ceased to be in your possession, custody, or control.

12. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, you should produce all documents which would be responsive as if the date or other descriptive detail were correct.

13. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date should be produced immediately upon location or discovery subsequent thereto.

14. All documents should be Bates-stamped sequentially and produced sequentially.

15. Documents produced to the Committee in response to this request should be delivered to minority staff in Room 1332 of the Longworth House Office Building or directly through the internet.

Definitions

1. The term **"document"** means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, working papers, records notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intra-office communications, electronic mail (e-mail), contracts, cables, notations of any type of conversation, telephone calls, text messages, MMS or SMS messages, other mobile-to-mobile messages, instant messages or online chat messages, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press

releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, voice mails, microfiche, microfilm, videotape, recordings and motion pictures), and electronic and mechanical records or representations of any kind (including, without limitation, tapes, cassettes, disks, computer server files, computer hard drive files, CDs, DVDs, memory sticks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.

2. The term **"documents in your possession, custody, or control"** means (a) documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, or representatives acting on your behalf; (b) documents that you have a legal right to obtain, that you have a right to copy, or to which you have access; and (c) documents that you have placed in the temporary possession, custody, or control of any third party.

3. The term **"communication"** means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether face-to-face, in a meeting, by telephone, facsimile, mail, e-mail (desktop or mobile device), text message, MMS or SMS message, other mobile-to-mobile message, instant message or online chat, telexes, releases, personal delivery, or otherwise.

4. The terms **"and"** and **"or"** shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information which might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neuter genders.

5. The terms **"person"** or **"persons"** means natural persons, firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, or other legal, business or government entities, and all subsidiaries, affiliates, divisions, departments, branches, and other units thereof.

6. The term **“identify,”** when used in a question about individuals, means to provide the following information: (a) the individual's complete name and title; and (b) the individual's business address and phone number.

7. The terms **"referring or relating,"** with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with or is in any manner whatsoever pertinent to that subject.

8. The term **“employee”** means agent, borrowed employee, casual employee, consultant, contractor, de facto employee, independent contractor, joint adventurer, loaned employee, part-time employee, permanent employee, provisional employee, subcontractor, or any other type of service provider.