



Animal Welfare Institute

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Testimony in Support
Senate Bill 25-168—Concerning the Prevention of Illegal Wildlife Trafficking
Before the Colorado House Agriculture, Water & Natural Resources Committee

April 18, 2025

Dear Chair McCormick, Vice Chair Mauro, and the honorable members of the House Agriculture, Water & Natural Resources Committee:

The Animal Welfare Institute, on behalf of our members in Colorado, strongly supports SB 25-168, concerning the prevention of illegal wildlife trafficking. Colorado Parks and Wildlife (“CPW”) has recognized the need to increase fines and penalties for wildlife trafficking and enhance its ability to undertake investigations and collect essential data about trafficking occurring in the state. We applaud CPW for promoting a legislative solution to address the wildlife trafficking problem. Enacting SB 25-168 would establish Colorado as a leader among states in the fight to reduce wildlife trafficking across the country and around the world. We respectfully request that you vote in favor of this legislation and pass the bill out of committee.

The Animal Welfare Institute is dedicated to alleviating animal suffering caused by people. We seek to improve the welfare of animals everywhere: in agriculture, in commerce, in our homes and communities, in research, and in the wild. Since 1951, AWI has advanced its mission through strategically crafted policy and legal advocacy, educational programs, research and analysis, litigation, and engagement with policymakers, scientists, industry, educators, other NGOs, the media, and the public. We seek scientifically grounded protections for animals in all settings and robust enforcement of those protections.

If enacted, SB 25-168 would accomplish the following:

- Make the “trafficking of wildlife” illegal for certain species, prohibiting the knowing possession, sale, purchase, transport, import, or export of wildlife for monetary gain or other compensation if the person knew that the wildlife was taken, possessed, sold, transported, imported, or exported in violation of state, federal, Tribal, or international law. Covered species would include:

- species that are listed as threatened or endangered under the federal Endangered Species Act (ESA) of 1973, 16 USC § 1531 *et seq.*,
- species that are listed as threatened or endangered under Colorado law, Section 33-2-105, and
- species that appear in Appendix I to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES Appendix I).
- Establish criminal penalties for wildlife trafficking.
- Provide the Colorado Parks and Wildlife Commission with the authority to suspend the wildlife licenses of people convicted of violating wildlife trafficking laws.
- Require CPW to conduct investigations and collect data about commonly trafficked wildlife to assess trafficking impacts and determine law enforcement mechanisms and conservation measures.

Colorado should enact SB 25-168 to: (1) make our state a leader in the fight to end wildlife trafficking with a statute that could serve as a model for other states; and (2) provide needed new legal tools and increased CPW capacity to combat trafficking of wildlife into and out of Colorado for the benefit of wildlife and people.

1. Enacting SB 25-168 would make Colorado a leader in the fight to end wildlife trafficking.

The trafficking of live and dead wildlife and animal parts is a \$20 billion dollar enterprise.¹ While wildlife traffickers are often involved in other types of international crimes, independently wildlife trafficking only trails drug, human, and counterfeit goods trafficking among the largest and most lucrative illegal international trade operations. Wildlife trafficking is leading to the endangerment of wild animals around the world. Illegally bringing exotic animals into Colorado risks introducing diseases and invasive species with potentially devastating impacts to Colorado’s native wildlife.

SB 25-168 would establish Colorado as a leader in the fight against wildlife trafficking. At least 13 states have enacted laws to restrict or ban the trafficking of certain wildlife products within their borders, including California, Illinois, Hawaii, Maryland, Minnesota, Nevada, New Hampshire, New Jersey, New Mexico, New York, Oregon, Vermont, and Washington, plus the District of Columbia. However, most of these laws cover select commonly trafficked foreign species and their parts. For example, New York’s trafficking law covers only Elephant or Mammoth tusk and Rhinoceros horn.²

In contrast, the scope of SB 25-168 is comprehensive and includes species native to Colorado. The bill covers not merely a limited list of highly trafficked species, but all federal

¹ Interpol. 2023. [Poaching and the illegal wildlife trade has become a major area of activity for organized crime groups.](#)

² New York Consolidated Laws, Environmental Conservation ENV § 11-0535-a.

threatened and endangered species listed under the federal ESA, all species listed under Colorado law as threatened or endangered, and all species listed under Appendix I of the CITES.

CITES is a global convention to regulate international wildlife trade. It was originally approved in 1973 in Washington, DC and entered into force in 1975. At present, 184 countries and the European Union (collectively known as parties) have ratified CITES.³ Over 40,900 species of animals (6,610) and plants (34,310) are listed in three CITES appendices with 704, 5,466, and 372 animal species listed in Appendix I, II, and III, respectively.⁴ Appendix I includes “species threatened with extinction” and trade in Appendix I species (or specimens) “is permitted only in exceptional circumstances.”⁵ Appendix I listed fauna includes 334 species of mammals, 156 birds, 105 reptiles, 24 amphibians, 16 fish, and 69 invertebrates along with a number of subspecies of mammals, birds, reptiles and invertebrates.⁶ Examples of Appendix I listed species include most African elephants, Asian elephants, tigers, leopards, pangolins, most rhinoceroses, sun bears, scarlet macaws, humpback whales, gorillas, chimpanzees, and orangutans. Appendix II includes “species not necessarily threatened with extinction, but in which trade must be controlled in order to avoid utilization incompatible with their survival.”⁷ Appendix III includes “species that are protected in at least one country, which has asked other CITES Parties for assistance in controlling the trade.”⁸

In the United States, CITES is implemented through the ESA⁹ and enforcement of the convention is primarily the responsibility of the United States Fish and Wildlife Service (“USFWS”) and the National Marine Fisheries Service (“NMFS”), depending on the species in trade. SB 25-168, if passed, will aid these agencies, along with CPW and other enforcement agencies in Colorado, in enforcing CITES by penalizing those convicted of illegally trafficking CITES Appendix I-listed wildlife.

2. Colorado needs SB 25-168 to combat wildlife trafficking.

CPW lacks legal tools and other resources needed to effectively combat illegal wildlife trafficking in Colorado. The agency has more fully described this problem, stating:

Existing penalties and fines in state statute related to illegal possession and sale of wildlife are inadequate to effectively deter illegal trafficking of wildlife. Additionally, CPW currently lacks staff capacity to effectively and holistically address this issue. Lack of data related to the illegal trafficking of native species limits Colorado’s ability to assess the status of, threats to, and conservation needs

³ See, <https://cites.org/eng/disc/parties/index.php>

⁴ See, <https://cites.org/eng/disc/species.php>

⁵ See, <https://cites.org/eng/disc/how.php>

⁶ See, <https://cites.org/eng/disc/species.php>

⁷ *Id.*

⁸ *Id.*

⁹ See 16 USC § 1531 *et seq.*; 50 CFR 23 *et seq.*

of the state’s native wildlife. Without adequate laws, resources, and data, CPW cannot effectively support federal agency efforts to combat illegal wildlife trafficking.¹⁰

SB 25-168 addresses these needs by setting appropriate criminal penalties to deter trafficking, increasing law enforcement capacity, and enabling CPW to increase data collection about the effects of trafficking. SB 25-168 has the potential to decrease the devastating impact of trafficking species native to Colorado and imperiled species around the world and to reduce the growing danger of wildlife trafficking to humans.

Wildlife trafficking in Colorado and the World

CPW described the problem trafficking poses to the wildlife and ecosystems of Colorado as follows:

CPW investigators and officers have been involved in a number of poaching and trafficking cases in recent years, often for bear gallbladders, several types of amphibians and reptiles, fish, eagles, crayfish, and more. This illicit wildlife trade poses real threats to Colorado’s local ecosystems and puts native species under additional pressure at a time when they are already facing threats from residential/commercial development, habitat loss, and climate change. Non-native species can outcompete native species or pose a predatory threat to Colorado’s native wildlife. The unregulated removal of wildlife disrupts the ecology of native food webs and systems across the landscape. Trafficking also increases the risk of zoonotic diseases that can severely impact food, land, and other natural resources critical to both humans and wildlife.¹¹

CPW has also reported a rise in poaching in recent years.¹² In 2022, the agency stated it was writing an average of 2,600–2,700 tickets annually for poaching, though this criminal activity often goes undetected.¹³

In Colorado’s 2015 State Wildlife Action Plan, CPW identifies “collecting,” which is defined as the “killing or trapping wild animals for commercial, recreation, subsistence, research or cultural purposes,” as a threat for several of Colorado’s species of greatest conservation need.¹⁴ This list includes Greenback Cutthroat Trout (*Oncorhynchus clarkii stomias*, which is listed as threatened under the ESA. Additionally, USFWS identified collection as the greatest

¹⁰ Colorado Parks and Wildlife. 2025. Combatting Wildlife Trafficking in Colorado. Factsheet.

¹¹ Colorado Parks and Wildlife. 2025. Combatting Wildlife Trafficking in Colorado. Factsheet.

¹² Simpson, K. 2023. [Troubling surge of poaching cases in Colorado has wildlife officers trying to keep up](#). The Colorado Sun. January 29.

¹³ *Id.*

¹⁴ Colorado Parks and Wildlife. 2015. State Wildlife Action Plan. p. 63.

controllable threat to the Colorado endemic Uncompahgre Fritillary Butterfly (*Boloria acronema*), listed as endangered under the ESA.¹⁵

Denver International Airport (“DIA”) is a major nexus of illegal wildlife trafficking. USFWS reported seizing 1,150 parts or products of illegally trafficked wildlife at DIA in 2024.¹⁶ The parts or products of over 56 species were seized at DIA within a year and a half period, shown in the list below.

Animals and Animals Whose Parts and Products were Seized at Denver International Airport between October 10, 2023 and March 7, 2025

<i>Aerodramus fuciphagus</i>	Edible-Nest Swiftlet
<i>Amazona</i> sp.	Amazonian parrot
<i>Anas acuta</i> [^]	Northern Pintail
<i>Aphelocoma</i> sp.	jay
<i>Aquila chrysaetos</i> [^]	Golden Eagle
<i>Ara ararauna</i>	Blue-And-Yellow Macaw
<i>Ara macao</i> ^{*°}	Scarlet Macaw
<i>Axis porcinus</i> [*]	Indian hog deer
<i>Branta canadensis</i> [^]	Canada Goose
<i>Bubo virginianus</i> [^]	Great Horned Owl
<i>Buteo jamaicensis</i> [^]	Red-Tailed Hawk
<i>Buteo lagopus</i> [^]	Rough-Legged Hawk
<i>Buteo magnirostris</i>	Roadside Hawk
<i>Buteo plagiatus</i>	Gray Hawk
<i>Calyptorhynchus banksii</i>	Red-Tailed Black Cockatoo
<i>Canis latrans</i> [^]	Coyote
<i>Caracara cheriway</i>	Crested Caracara
<i>Caracara plancus</i>	Southern Caracara
<i>Cervus elaphus</i> [^]	Elk
<i>Chicoreus ramosus</i>	Branched Murex
<i>Colaptes auratus</i> [^]	Northern Flicker
<i>Columba livia</i>	Rock Dove
<i>Connochaetes gnou</i>	Black Wildebeest
<i>Conus litteratus</i>	Lettered Cone Shell
<i>Conus marmoreus</i>	Marbled Cone Shell
<i>Conus virgo</i>	Cone Shell
<i>Cracidae</i>	bird in the <i>Cracidae</i> family (chachalacas, guans, and curassows)
<i>Crocodylus porosus</i> ^{*°}	Saltwater Crocodile

¹⁵ Uncompahgre Butterfly Recovery Team. 1994. [Uncompahgre Fritillary Butterfly Recovery Plan](#). United States Fish and Wildlife Service. March 17.

¹⁶ United States Fish and Wildlife Service. [Public Notices of Forfeiture](#). [Accessed April 16, 2025]

<i>Dasyatis</i> sp.	stingray
<i>Dasypodidae</i>	armadillo species in the <i>Dasypodidae</i> family
<i>Elasmobranchii</i>	shark in the <i>Elasmobranchii</i> subclass
<i>Elephantidae</i> *	a species in the <i>Elephantidae</i> family (elephants)
<i>Falco peregrinus</i> ^°	Peregrine Falcon
<i>Falco sparverius</i> ^	American Kestrel
<i>Geranoaetus albicaudatus</i>	White-Tailed Hawk
<i>Haliaeetus leucocephalus</i> ^	Bald Eagle
<i>Haliotis iris</i>	Abalone Shell
<i>Ictinaetus malayensis</i>	Indian Black Eagle
<i>Littorina</i> sp.	periwinkle snail
<i>Meleagris gallopavo</i> ^	Wild Turkey
<i>Moschus moschiferus</i> *°	Siberian Musk Deer
<i>Naja</i> sp.	cobra
<i>Odocoileus virginianus</i> ^	White-Tailed Deer
<i>Pagophilus groenlandicus</i>	Harp Seal
<i>Panthera onca</i> *°	Jaguar
<i>Papio ursinus</i>	Chacma Baboon
<i>Phasianus</i> sp.	pheasant
<i>Polinices tumidus</i>	Moon Shell
<i>Procyon lotor</i> ^	Raccoon
<i>Psittacidae</i>	parrot in the <i>Psittacidae</i> family
<i>Rangifer tarandus</i>	Reindeer
<i>Saiga tatarica</i> *	Steppe Saiga
<i>Scleractinia</i>	stony coral in the order <i>Scleractinia</i>
<i>Struthio camelus</i>	Southern African Ostrich
<i>Syncerus caffer</i>	African Buffalo
<i>Ursidae</i> ^	bear in the <i>Ursidae</i> family

^ native to Colorado

* listed as endangered or threatened under the ESA

° CITES Appendix I species

As noted in the list above of species seized at DIA, Scarlet Macaw, Indian Hog Deer, Saltwater Crocodile, elephant, Siberian Musk Deer, Jaguar, and Steppe Saiga are listed as threatened or endangered under the ESA. These animals are all in danger of extinction, as described below.

Scarlet Macaw

Scarlet Macaw populations are declining.¹⁷ The greatest threat to the bird is the use of its feathers and other body parts for crafts and jewelry and capture for the pet trade.¹⁸ The species occurs in South America, Central America, and into southern Mexico. The Scarlet Macaw is listed as endangered under the ESA and is a CITES Appendix I species. Nineteen macaw species occur in the Americas, and nine of them are listed as threatened or endangered under the ESA.

Indian Hog Deer

The Indian Hog Deer is native to Southern and Central Asia and is declining.¹⁹ It is endangered under the ESA, and the IUCN considers the species endangered as well. This deer is hunted for bushmeat and trophies, and the species' parts are used for medicine. People may also be capturing the species to live in captivity as livestock.

Saltwater Crocodile

Saltwater Crocodiles around the coasts of Australia, Indonesia, and Southern Asia in the Indian and Pacific oceans. They are hunted for meat and leather for clothing and accessories and are also collected for the pet trade.²⁰

Siberian Musk Deer

The Siberian Musk Deer is declining in large part due to the high value of the musk that the males secrete, which is used as medicine.²¹ They are native to parts of Russia, Mongolia, and Japan. All musk deer species are federally listed as endangered.

Saiga

The Saiga, an antelope species from Central Asia, began being hunted for its horns for medicine as a substitute for rhino horn.²² By the mid-2010s, the species' population had declined by 95%, which happened within 15 years. Saiga are also very susceptible to respiratory disease. The species is listed as endangered under the ESA.

¹⁷ IUCN. 2022. *Scarlet Macaw (Ara macao)*. The IUCN Red List of Threatened Species. Version 2022-2.

¹⁸ Collar, N., Boesman, P. F. D., Sharpe, C. J. 2020. *Scarlet Macaw (Ara macao)*, version 1.0. Ithaca, NY, USA. Cornell Lab of Ornithology.

¹⁹ IUCN. 2015. *Hog Deer (Axis porcinus)*. The IUCN Red List of Threatened Species. Version 2015-4.

²⁰ IUCN. 2021. *Saltwater Crocodile (Crocodylus porosus)*. The IUCN Red List of Threatened Species. Version 2021-2.

²¹ IUCN. 2015. *Siberian Musk Deer (Moschus moschiferus)*. The IUCN Red List of Threatened Species. Version 2015.2.

²² IUCN. 2023. *Saiga (Saiga tatarica)*. The IUCN Red List of Threatened Species. Version 2023-1.

Jaguar

Habitat loss and fragmentation, conflict with humans, and poaching have severely impacted jaguar populations.²³ They have been eradicated from over 50% of their historic range across South America, Central America, and Mexico—just across the United States’ southern border.²⁴ Jaguars are often killed for their spotted coats, and there is also illegal demand for jaguar paws, teeth, and other products. The species is listed as endangered under the ESA.

Elephant

The Asian Elephant (*Elephas maximus*) is listed as endangered under the ESA, and the African Elephant (*Loxodonta africana*) is listed as threatened. The demand for ivory from elephant tusks has decimated Asian and African elephants, particularly African Elephant species. Within the last 100 years, 90% of African Elephants were killed by poachers.²⁵ Taxonomists have recently determined that African Elephants should be divided into two species: African Forest Elephant (*Loxodonta cyclotis*) and African Savannah Elephant (*Loxodonta africana*). Both African species are declining, and poaching remains a leading cause.²⁶

Other commonly trafficked species include rhinoceroses, tigers, lions, leopards, cheetahs, sea turtles, pangolins, sharks, rays, giraffes, and great apes.

Poaching for the illegal wildlife trade is a brutal, bloody practice. Animals are often shot with military-grade weapons, and tusks, horns, and other parts are harvested by mutilating the sometimes still-living animals. Tight-knit herds of social species are torn apart, and babies are orphaned or even killed. In addition to being an animal welfare and conservation issue, there is a direct link between the decimation of vulnerable wildlife populations, particularly elephants and rhinos, and the violent actions of global criminal networks.

The impact of wildlife trafficking on humans

The illegal wildlife trade has implications for more than just the preservation of species. Poaching is not a small or unsophisticated operation; rather, it is often intertwined with violent militias, organized crime networks, and corrupt government officials. The casualties are not limited to animals. In Africa, for example, more park rangers are being killed in the line of duty

²³ Polisar, J., Davies, C., Morcatty, T., Da Silva, M., Zhang, S., Ducheze, K., Madrid, J., Lambert, A.E., Gallegos, A., Delgado, M. and Nguyen, H., 2023. [Multi-lingual multi-platform investigations of online trade in jaguar parts](#). PLoS one, 18(1), p.e0280039.

²⁴ United States Fish and Wildlife Service. 2018. [Jaguar Recovery Plan](#). July.

²⁵ TRAFFIC. 2025. [African Elephants: Elephant conservation and the global trade in ivory](#).

²⁶ IUCN. 2022. [African Savannah Elephant \(*Loxodonta Africana*\)](#). The IUCN Red List of Threatened Species. Version 2022-2; IUCN. 2021. [African Forest Elephant \(*Loxodonta cyclotis*\)](#). The IUCN Red List of Threatened Species. Version 2021-2.

than ever before, most often via ambush. On average, 62 rangers are murdered each year because they stand between the animals and the poachers.²⁷

Militias and organized crime networks use poaching as a substantial source of funding. They employ logistics and supply chains of major container and shipping companies to move their product in a system interwoven with the networks that also enable terrorism, drugs, weapons, and human trafficking.

Several insurgent groups undermining the rule of law are either directly involved in poaching or trafficking, or are likely sharing some of the same facilitators, such as corrupt customs and border officials, money launderers, and supply chains. For instance, the Lord's Resistance Army, an extremist rebel group originally from Uganda, took part in elephant poaching operations in the Central Africa beginning in 2002 to fund weapons purchases.²⁸

This crisis has reached such a scale that these criminal groups are a concern for the stability of some African governments. Well-funded terrorist organizations operating in developing countries can take advantage of governments that lack the capacity to regulate their country's natural assets. A region destabilized by corruption and violent conflict is not only problematic for the nations involved, but also for U.S. security.²⁹

At the federal level, there has been broad bipartisan recognition of the risk that wildlife trafficking poses to our nation's safety. President Obama issued an executive order³⁰ in 2013 that identified wildlife trafficking as a security threat and subsequently released a National Strategy for Combatting Wildlife Trafficking in 2014. Presidents Trump and Biden both issued executive orders³¹ on transnational crime that recognized the ties between wildlife trafficking and organized criminal networks. Congress has acted as well by passing the bipartisan Eliminate, Neutralize, and Disrupt (END) Wildlife Trafficking Act in 2016 to enhance national security by providing the federal government with additional tools to curb illicit wildlife trade. This law was reauthorized in 2022 with the passage of the bipartisan END Wildlife Trafficking Reauthorization and Improvements Act, which also expanded the responsibilities of the Presidential Task Force on Wildlife Trafficking.³²

²⁷ Galliers, C., Cole, R., Singh, R., Ohlfs, J., Aisha, H., Koutoua, A.B., Roodt, C. and Malvido, M.Á., 2022. [Conservation casualties: an analysis of on-duty ranger fatalities \(2006–2021\)](#). Parks, 28(1), pp.39-50.

²⁸ Security Council, United Nations. 2013. [UN Secretary-General's report on Central Africa links illegal ivory trade to the Lord's Resistance Army](#). May 20.

²⁹ United States Customs and Border Protection. 2025. [Wildlife Trafficking](#). February 10. United States Immigration and Customs Enforcement. 2025. [End Wildlife Trafficking](#). April 10.

³⁰ Executive Order 13648, Combatting Wildlife Trafficking.

³¹ Executive Order 13773, Enforcing Federal Law with Respect to Transnational Criminal Organizations and Preventing International Trafficking; and Executive Order 14060, Establishing the United States Council on Transnational Organized Crime.

³² [Senators Coons, Portman celebrate signing of END Wildlife Trafficking Act into law](#). Press Release. December 23, 2022.

Conclusion

We are confident, if enacted, SB 25-168 would significantly help to tackle the tragic problem of wildlife trafficking in Colorado. Moreover, SB 25-168 would be a model for other state legislation due to its unique inclusion of federally listed species, state-listed threatened and endangered species, and CITES Appendix I species. We therefore respectfully request that you vote in favor of this legislation. If you have any questions or if there is any additional information we can provide, please do not hesitate to contact us.

Sincerely,



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House Agriculture, Water & Natural Resources

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SB25-168 Prevention of Wildlife Trafficking

Typed Text of Testimony Submitted

Name, Position, Representing	Typed Text of Testimony
<p>Roland Halpern For Colorado Voters for Animals</p>	<p>My name is Roland Halpern, and I am the executive director of Colorado Voters for animals, and all-volunteer nonprofit representing over 45,000 Coloradans who support strong animal welfare and protection laws. We support SB25-168 - Prevention of Wildlife Trafficking.</p> <p>When most people think about wildlife trafficking, they think about the usual suspects, elephant ivory, Rhino horns, and shark fins, but there is so much more. This includes endangered tropical fish, birds, reptiles, amphibians, stuffed animals, furs and medications, like the pangolin pills I bought a few years ago just to see if this so-called medicine made from an endangered species could be purchased in Colorado.</p> <p>Important aspects of this bill include Colorado becoming a party to CITES (the Convention on International Trade in Endangered Species), which means Colorado agrees to certain obligations regulating trade in endangered animals. What is not endangered today, may be tomorrow, so adhering to the CITES protocol means any newly declared endangered species would automatically be added, without Colorado having to create new amendments to add the species.</p> <p>Wildlife trafficking is often connected with organized crime, which should come as no surprise. Worldwide about 150 park rangers are murdered each year trying to protect endangered wildlife. Poachers use the monies from the sale of endangered species, or their parts, to finance military operations, or to enrich themselves. But there has to be a market, and there is. If someone wants something, and cannot legally acquire it, they often turn to underground markets. Two years ago, a Morrison resident was convicted, along with 8 others, of illegally smuggling endangered coral from the Philippines. And yes, coral is considered a marine animal.</p> <p>There is also the issue of potential disease that trafficked animal or their parts may bring with them. Often animals taken from the wild are not evaluated for health, and parts of animals may not be adequately sanitized, meaning potential exposure to non-native pathogens that could infect existing animal populations.</p> <p>We would ask for your yes vote on this bill.</p>

	Thanks you.
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