



August 7, 2025

The Honorable Marco Rubio
Secretary of State
2201 C Street NW
Washington, DC 20520

The Honorable Doug Burgum
Secretary of the Interior
1849 C Street NW
Washington, DC 20420

Dear Secretary Rubio and Secretary Burgum,

Safari Club International (SCI) understands that the Administration may be considering withdrawing from the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in compliance with President Trump's Executive Order 14199. SCI respectfully encourages the United States to not withdraw from CITES. Although, like many international treaties, CITES is not perfect, withdrawing would be harmful to American interests.

Safari Club International

SCI, a nonprofit IRC § 501(c)(4) corporation, represents more than 100,000 members and advocates worldwide. Many SCI members hunt internationally and engage in international trade in wildlife by exporting their hunting trophies from range countries and importing them into the United States or exporting trophies hunted within the United States. Hunting significantly contributes to the conservation and management of wildlife in the United States and abroad.

SCI has been a regular participant in CITES meetings since the late 1970s, including nearly all Conferences of the Parties. SCI is committed to working with the U.S. to effect change from within CITES that would be beneficial for sustainable use conservation.

The United States should not withdraw from CITES

The United States has been a strong supporter of CITES across Administrations since it was the first country to join the Convention in 1974 under President Nixon. SCI urges the United States to continue to participate in CITES for several reasons.

First, CITES requires that international trade in CITES-listed species be sustainable, i.e., “not detrimental” to the survival of the species in the wild. This standard provides baseline protections for international trade in many species, here and abroad. However, U.S. law often exceeds this minimum standard required by CITES. The Endangered Species Act and the Marine Mammal Protection Act, among other statutes, impose stricter controls than CITES.¹ Rather than withdrawing from CITES, SCI encourages the U.S. to align its statutes and

¹ Trade of some species, like polar bear, is prohibited by the ESA and MMPA but would otherwise be allowed by CITES. For others, like bontebok, argali, and brown hyena, the ESA requires import permits even though CITES does not. And for others, like markhor, the ESA duplicates and exacerbates permitting requirements already covered by CITES.

regulations more closely with the standards set by CITES. Doing so would provide a more consistent framework for international trade in wildlife and alleviate some of the unnecessarily onerous requirements that hunters and other stakeholders face when complying with stricter U.S. import and export regulations.

Second, even if the United States withdraws from CITES, it will still be bound to follow CITES requirements if hunters and other stakeholders intend to import or export CITES-listed wildlife. CITES has 185 Parties, including 184 countries. All Parties must enforce CITES requirements for the import and export of CITES-listed species, including for trade involving non-Party countries. Under Article X of the Convention, Parties may engage in trade with non-Parties only if the non-Party issues documentation that essentially conforms to CITES standards. In practice, this means that U.S. exporters and importers—including hunters, agricultural businesses, fur traders, zoos and aquariums, pet stores, musicians, U.S. States, and many other businesses and individuals—would still need to comply with CITES requirements if they wish to trade with CITES Parties, which effectively include all relevant countries in the world.

Third, it is likely that some Parties to CITES impose stricter trade requirements on non-Party exports and imports, including possibly prohibiting trade in all CITES-listed species from non-Parties. If the U.S. withdraws, CITES Parties would likely increase scrutiny of international wildlife and plant trade to and from the United States. Thus, importers and exporters would likely have to meet additional requirements and navigate more onerous regulatory mechanisms compared to the criteria now imposed by CITES. In effect, withdrawing from CITES would be detrimental to many stakeholders who benefit from international trade in wildlife and plants. Not only would this impact individuals and businesses that want to import wildlife or plants into the United States, but it would also impact industries and individuals who export items from the U.S., including foreign hunters who come to the U.S. to hunt and otherwise spend tourism dollars.

Fourth, if the Administration's concern is the cost of continued membership in CITES, the United States can lower its financial commitments to CITES without withdrawing as a Party. Some of the contributions that the United States makes to CITES programs are voluntary and can be reduced or eliminated. SCI encourages the United States to push CITES to stick to its core mission—ensuring that international trade of wild animals and plants does not threaten the survival of the species. Too often, the Parties agree to fund projects and programs that are outside the scope of the mandate of CITES. SCI and many other sustainable use organizations routinely encourage CITES Parties to focus on the Convention's mandate. SCI would welcome an opportunity to work with the United States to ensure CITES Parties remain mission focused.

Conclusion

SCI encourages the Administration to work within the CITES decisionmaking processes to promote President Trump's priorities of reducing unnecessary bureaucracy and promoting positive economic and conservation outcomes through regulatory relief. The U.S. would be better positioned to accomplish these objectives by maintaining its position of influence at CITES, rather than withdrawing from the Convention, and SCI would eagerly assist the U.S. in effecting positive change.

Thank you for considering SCI's input on this matter. If SCI can provide any further information, please contact Jeremy Clare, SCI International Affairs Liaison, at jclare@safariclub.org.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Laird Hamberlin". The signature is fluid and cursive, with a long horizontal stroke at the end.

W. Laird Hamberlin
Chief Executive Officer
Safari Club International

cc: Brian Nesvik, Director, U.S. Fish and Wildlife Service
U.S. Fish and Wildlife Service International Affairs Program
John Thompson, Deputy Assistant Secretary for Environment, State Department