

July 24, 2026

United States Sentencing Commission
Office of Public Affairs
One Columbus Circle, NE
Suite 2-500, South Lobby
Washington, DC 20002-8002

Dear Members of the United States Sentencing Commission:

On behalf of The Wildlife Society (TWS), we appreciate the opportunity to provide comments regarding the Commission's proposed priorities for the amendment cycle ending May 1, 2027, as published in the Federal Register on June 12, 2026. TWS respectfully urges the Commission to designate federal sentencing for serious wildlife trafficking offenses as a priority for the upcoming amendment cycle.

Wildlife trafficking is a multi-billion-dollar transnational criminal enterprise that threatens biodiversity, undermines global security, fuels corruption and instability worldwide, and creates significant risks to animal, plant, and public health, as well as native ecosystems, through the introduction of invasive species and wildlife diseases. Wildlife trafficking is widely recognized as one of the most profitable forms of organized crime, often operating alongside other illicit activities such as narcotics trafficking, money laundering, and human exploitation.

Wildlife trafficking can result in significant population-level impacts and may impose substantial economic harm on governments, industries, and communities, extending well beyond the immediate conservation consequences of the crime. Additionally, the suffering experienced by many individual animals taken from the wild, often which are restrained and drugged for transport, is in and of itself an unacceptable atrocity. Advancing animal welfare has been named as an Administration priority across agencies—including the Department of Justice, Health and Human Services, and the US Department of Agriculture—and we urge the Commission to examine illegal trade through this lens as well.

Despite its scale and impact, wildlife trafficking is not consistently treated within the U.S. federal sentencing framework in a manner that reflects the seriousness of the crime. In practice, penalties for significant trafficking offenses often do not align with the scope, sophistication, or harm associated with these activities—particularly for the high-level actors who orchestrate complex, transnational supply chains.

As a result, wildlife trafficking continues, in many cases, to operate as a high-reward, low-risk crime. This imbalance undermines deterrence, weakens enforcement outcomes, and risks positioning the United States as a comparatively attractive environment for international trafficking networks. This dynamic stands in contrast to sentencing outcomes for other forms of organized crime, where penalties more consistently reflect the scale and impact of the offense.



We recognize and commend the important work of U.S. federal investigators and prosecutors, who have successfully brought complex wildlife trafficking cases before the courts. However, the sentences that follow do not always reflect the magnitude of the trafficking activity or the defendant's role within broader criminal enterprises.

Designating this issue as a priority would enable the Commission to evaluate whether current sentencing guidelines adequately account for:

- organized and transnational nature of modern wildlife trafficking networks;
- the scale of financial gain and criminal enterprise involved;
- broader harms associated with wildlife trafficking, including threats to biodiversity, agriculture, animal, plant, and public health, native ecosystems, and the economy; and
- the need for meaningful deterrence, particularly for high-level offenders.

The Wildlife Society is an international organization of wildlife professionals dedicated to addressing issues that affect wildlife populations worldwide. Many of our members work to conserve species that are at risk of extirpation due, in part, to illegal wildlife trafficking. Our members also pioneer methods to combat illegal trafficking, [creating new tools to improve our ability to combat wildlife laundering](#) and [prosecute wildlife traffickers](#).

In conclusion, we believe a comprehensive review of wildlife trafficking sentencing would represent an important step toward ensuring that federal penalties more accurately reflect the seriousness of these offenses while supporting broader efforts to combat transnational organized crime. We appreciate the Commission's continued commitment to ensuring that the federal sentencing guidelines remain effective in addressing evolving criminal threats. Should the Commission determine that this issue warrants further consideration, The Wildlife Society would welcome the opportunity to provide any additional information or expertise that may be helpful.

Respectfully,

Dr. Edward B. Arnett, CWB®

Chief Executive Officer

The Wildlife Society