

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



Sixteenth meeting of the Conference of the Parties
Bangkok (Thailand), 3-14 March 2013

LETTER TO THE PARTIES AT COP16 REGARDING
AMENDMENT PROPOSALS COP16 PROP. 32 AND COP16 PROP. 38 ON TURTLES

The attached document has been submitted by the United States of America at the request of the International Coalition of Concerned Turtle Scientists and Conservationists (ICCTSC), in relation to amendment proposals CoP16 Prop. 32 and CoP16 Prop. 38 on turtles.¹

¹ *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat or the United Nations Environment Programme concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with their authors.*

ICCTSC

INTERNATIONAL COALITION OF CONCERNED TURTLE SCIENTISTS AND CONSERVATIONISTS

11 February 2013

To the Parties at CITES CoP16, regarding Turtle Proposals 32 and 38:

Turtles are among the world's most endangered vertebrates, with **nearly half** of the 228 species currently assessed on the [IUCN Red List of Threatened Species](#) listed as Critically Endangered, Endangered, or Vulnerable. Additionally, new draft assessments by the [IUCN Tortoise and Freshwater Turtle Specialist Group](#) of 103 previously unevaluated species and updated re-evaluations of previously listed species indicates that, actually, **more than half** (ca. 53%) of all **331 species of turtles and tortoises** are threatened with extinction.

Turtles and tortoises are at high risk of extinction because of their combination of biological life history traits of long lives, delayed reproductive maturity, and high egg and hatchling mortality, which renders their populations unable to respond adequately to high levels of consumptive utilization. Unsustainable harvest for meat consumption, medicinal products, and pets, as well as extensive habitat loss and degradation, are their greatest threats. This is particularly true for turtles and tortoises in Asia, where there is both high species richness and high threats from a long history of high-volume human utilization.

Despite the fact that several turtle species, notably freshwater turtles from Asia, have been listed in the CITES Appendices over the last several years, **we remain concerned** to note, as concluded at recent science-based turtle conservation and trade workshops held in Singapore in 2011 and St. Louis, Missouri, USA, in 2010, **that many turtle populations continue to decline** because:

- Turtles continue to be unsustainably harvested and traded internationally for food, medicine, and pets in high volumes, while also facing increasing threats from high levels of habitat loss and degradation.
- Based on our studies and knowledge of their biology and ecology, we know that turtles are vulnerable to over-exploitation because of their life-history traits of prolonged adult longevity, late sexual maturity, limited annual reproductive output, and high juvenile and egg mortality. This life-history strategy depends on adult turtles producing a sufficient number of offspring over their long lifespan so that a small percentage of hatchlings will survive to maturity and replace them. However, turtles' life-history strategy fails them in the face of significant human utilization. Exploitation that removes even a relatively small proportion of adults from the wild leads to too few eggs being laid, thus reducing the probability that sufficient numbers of animals will survive to maturity. Likewise, the removal of too many eggs from the wild also leads to too few hatchlings surviving to maturity. Population collapse and inability to recover is the ultimate result.
- While some turtle species are perceived as more valuable than others (e.g., the Golden Coin Turtle, *Cuora trifasciata*), as a whole their appearance, use, and value are similar (which is not surprising given their biology and evolution). Turtle species are particularly interchangeable with each other when traded as food. Given their interchangeability, trade in Asian turtle species has followed a **boom-and-bust cyclical pattern** in which exploitation and trade tends to shift from one species to another when: 1) a species becomes so depleted or rare that it is no longer feasible

to commercially exploit it (“commercial extinction”); or 2) a species becomes subject to stricter national and/or international regulations and, as such, is less easily exploitable.

- In addition to these trade-related conservation concerns, there is often patchy biological and population information on many of the species, where few robust data exist.

Given our knowledge of biology, history, trade, and conservation threats for turtles and tortoises, especially the **pattern of boom-and-bust exploitation cycles that we have observed and documented** in Asia and other parts of the world, including the USA, we agree with the conservation approach put forth by China and the United States in their CoP16 turtle proposals. We believe that a piecemeal approach to listing turtles on the Appendices, one species at a time, is not the most effective strategy to regulate turtle trade and potentially enable a lower rate of sustainable utilization. We cannot wait for complete data to be available for all species, because this would mean the certain depletion or complete loss of many of these species. We need to be practical and address the exploitation of turtles more broadly and in a more timely manner.


Therefore, **we urge the CITES Parties to consider a more comprehensive approach** that will regulate species more effectively by listing many of them at multi-species levels (rather than individually), as has now been proposed for Asian members of both the Geoemydidae (pond turtles) (CoP16 Prop. 32) and the Trionychidae (softshell turtles) (CoP16 Prop. 38). This approach recalls the previous comprehensive action successfully taken by CITES in listing all members of the Cheloniidae (sea turtles) and Testudinidae (tortoises). It is a laudable approach that aims to regulate presently over-exploited species as well as species that are likely to become exploited in the near future as trade shifts in boom-and-bust cycles from depleted or regulated species to those that are still relatively abundant and unregulated. History and biology inform us that if any animal group needs such precautionary protection, it would be turtles.

We, the undersigned turtle biologists and conservationists, representing a broad international coalition of concerned turtle-focused academic and conservation individuals and organizations (**120 leading turtle scientists and conservationists from 45 nations**), commend China and the United States, as well as Japan and Vietnam, for the leading roles they have played in the formulation of the current proposals. We further commend them and all other involved CITES Parties for their ongoing roles in initiating and implementing CITES Decisions and Resolutions to improve trade regulations for turtles and tortoises, and for also developing complementary domestic initiatives to assess and improve awareness and regulation of turtle exploitation.

We therefore respectfully request and urge the Parties to support the CoP16 turtle Proposals, specifically 32 and 38, thereby continuing and strengthening the commendable progress already accomplished to secure the survival of some of the world’s most endangered vertebrates – TURTLES.

We thank you for your consideration.

Affiliations below are included in order to identify individuals and do not necessarily imply official institutional endorsement by their respective organizations; individuals have signed in their personal capacity as concerned turtle scientists and conservation experts.




Anders G.J. Rhodin, M.D.
Director, Chelonian Research Foundation,
Co-Chair, Turtle Conservation Fund,
Lunenburg, MA, USA & Buterud, Sweden



Russell A. Mittermeier, Ph.D.
President,
Conservation International,
Arlington, VA, USA



Shi Hai-Tao, Ph.D.
Vice-President and Dean,
College of Life Science,
Hainan Normal University, China



Peter C.H. Pritchard, Ph.D.
President,
Chelonian Research Institute
Oviedo, FL, USA



Justin D. Congdon, Ph.D.
Professor Emeritus of Biology,
University of Georgia,
Savannah River Ecology Laboratory,
Aiken, SC, USA



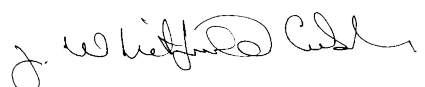
Eric V. Goode
President,
The Turtle Conservancy,
New York, NY, USA



Rick Hudson
President,
Turtle Survival Alliance,
Fort Worth, TX, USA



Susan Lieberman, Ph.D.
Director, International Policy,
Pew Environment Group,
Washington, DC, USA




J. Whitfield Gibbons, Ph.D.
Professor Emeritus of Biology,
University of Georgia,
Savannah River Ecology Laboratory,
Aiken, SC, USA



Matthew G. Frankel, M.D.
President,
Surprise Spring Foundation,
Prescott, AZ, USA



Shailendra Singh, Ph.D.
Director,
Turtle Survival Alliance-India Program,
Lucknow, India



Michael Lau, Ph.D.
Acting Director, Conservation,
WWF-Hong Kong,
Hong Kong SAR, China



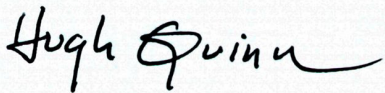
Colin Poole
Director,
WCS Regional Conservation Hub
Wildlife Conservation Society -Singapore
Singapore



John B. Iverson, Ph.D.
Professor Emeritus of Biology,
Earlham University,
Richmond, IN, USA



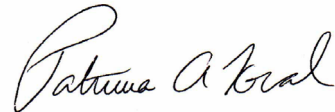
Uwe Fritz, Ph.D.
Professor of Biology, Senckenberg
Gesellschaft für Naturforschung,
Dresden, Germany



Hugh R. Quinn, Ph.D.
Co-Chair, Turtle Conservation Fund,
Rapid City, SD, USA



Lee Durrell, Ph.D., M.B.E.
Honorary Director,
Durrell Wildlife Conservation Trust,
Trinity, Jersey, Channel Islands



Patricia A. Koval, J.D.
Member, Board of Directors,
The Turtle Survival Alliance,
Fort Worth, TX, USA &
Toronto, Ontario, Canada



Ian R. Swingland, O.B.E., Ph.D., D.Sc.
Emeritus Professor of Conservation
Biology, The Durrell Institute of Conserva-
tion and Ecology, University of Kent,
Kent, United Kingdom



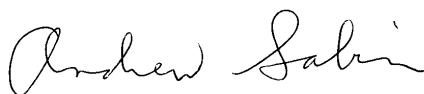
Henk Zwartepoorte
Chair, Turtle Survival Alliance Europe;
President, European Studbook Foundation;
Curator of Reptiles,
Rotterdam Zoo, Netherlands



Herilala Randriamahazo, Ph.D.
Coordinator,
Madagascar Tortoise Conservation,
Turtle Survival Alliance,
Antananarivo, Madagascar



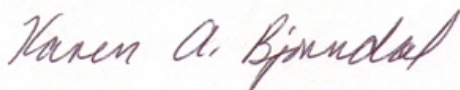
James J. Breheny
Executive Vice-President,
General Director, Zoos and Aquarium,
Wildlife Conservation Society,
Bronx, NY, USA



Andrew Sabin
President,
Sabin Conservation Fund,
East Hampton, NY, USA



Willem M. Roosenburg, Ph.D.
Professor of Biology,
Ohio University,
Athens, OH, USA



Karen A. Bjorndal, Ph.D.
Distinguished Professor of Biology,
Director, Archie Carr Center for Sea Turtle
Research, University of Florida,
Gainesville, FL, USA



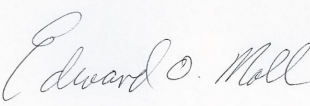
Anne Meylan, Ph.D.
Research Administrator, Florida Fish and
Wildlife Conservation Commission, USA &
Research Associate, Smithsonian Tropical
Research Institute, Panama



Peter V. Lindeman, Ph.D.
Professor of Biology,
Edinboro University of Pennsylvania,
Edinboro, PA, USA



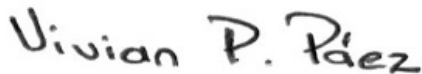
Chris B. Banks
Manager, International Conservation Partner-
ships, Zoos Victoria,
Parkville, Victoria, Australia



Edward O. Moll, Ph.D.
Emeritus Professor of Biology,
Eastern Illinois University,
Charleston, IL, USA



Richard C. Vogt, Ph.D.
Director, WCH6,
Instituto Nacional de Pesquisas da
Amazônia, Manaus, Amazonas, Brazil



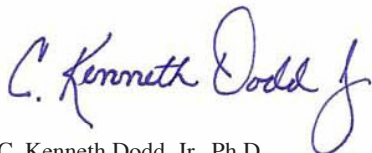
Vivian P. Páez, Ph.D.
Co-Directora,
Grupo Herpetológico de Antioquia,
Profesora Titular, Instituto de Biología,
Universidad de Antioquia, Medellín, Colombia



Arthur Georges, Ph.D.
Professor in Applied Ecology and
Dean of Applied Science,
Institute for Applied Ecology,
University of Canberra, Australia



James F. Parham, Ph.D.
Assistant Professor of Paleontology,
Department of Geological Sciences,
California State University- Fullerton,
Fullerton, CA, USA



C. Kenneth Dodd, Jr., Ph.D.
Courtesy Associate Professor,
University of Florida,
Gainesville, FL, USA



Andrew Walde, M.Sc.
Senior Ecologist,
Walde Research & Environmental Consulting;
Board Member, Turtle Survival Alliance,
Atascadero, CA, USA



Jeanette Wyneken, Ph.D.
Associate Professor of Biology,
Florida Atlantic University,
Boca Raton, FL, USA



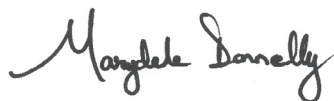
Dale R. Jackson, Ph.D.
Senior Research Zoologist,
Florida Natural Areas Inventory;
Florida State University,
Tallahassee, FL, USA



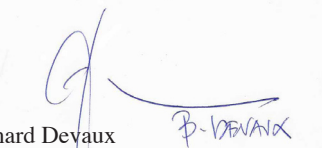
Gary Ades, Ph.D.
Department Head, Fauna Conservation,
Kadoorie Farm & Botanic Garden,
Hong Kong SAR, China



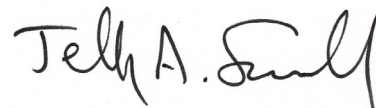
Roger Bour, Ph.D.
Assistant Professor,
Muséum national d'Histoire naturelle,
Paris, France



Marydele Donnelly
Director of International Policy,
Sea Turtle Conservancy,
Ellicott City, MD, USA




Bernard Devaux
Directeur,
SOPTOM, Villages des Tortues,
Gonfaron, France



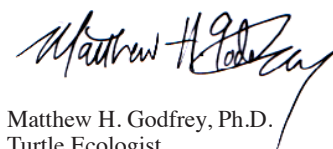
Jeffrey A. Seminoff, Ph.D.
Executive Editor,
Chelonian Conservation and Biology,
La Jolla, CA, USA



Indraneil Das, Ph.D.
Professor of Biology,
Institute of Biodiversity and Environmental
Conservation, Universiti Malaysia Sarawak,
Kota Samarahan, Sarawak, Malaysia



Frank Slavens
Member, Board of Directors,
The Turtle Survival Alliance,
Fort Worth, TX, USA



Matthew H. Godfrey, Ph.D.
Turtle Ecologist,
Duke University Marine Lab,
Beaufort, NC, USA

William F. Holmstrom, Jr.
Herpetology Collection Manager Emeritus,
Wildlife Conservation Society,
Bronx, NY, USA

Ernst H.W. Baard, Ph.D.
Acting Director, Biodiversity Support,
Western Cape Nature Conservation Board,
Cape Town, South Africa

Gerald Kuchling, Ph.D.
Chelonia Enterprises,
The Vines, WA, Australia

Dwight Lawson, Ph.D.
Deputy Director,
Zoo Atlanta,
Atlanta, GA, USA

Douglas B. Hendrie
Chief Technical Advisor,
Education for Nature – Vietnam,
Hanoi, Vietnam

James R. Spotila, Ph.D.
Betz Chair Professor of Environmental
Science, Drexel University,
Chair, The Leatherback Trust,
Philadelphia, PA, USA

Fredric J. Janzen, Ph.D.
Professor of Biology,
Iowa State University,
Ames, IA, USA

Alberto Abreu-Grobois, Ph.D.
Investigador Asociado,
Unidad Académica Mazatlán, Instituto de
Ciencias del Mar y Limnología - UNAM,
Mazatlán, Sinaloa, Mexico

Roderic M. Mast
Executive Vice President,
Oceanic Society,
Herndon, VA, USA

David Emmett
Senior Vice President,
Asia-Pacific Field Division,
Conservation International, Cambodia

John L. Carr, Ph.D.
Professor of Biology,
University of Louisiana at Monroe,
Monroe, LA, USA

Nicolas J. Pilcher, Ph.D.
Executive Director,
Marine Research Foundation,
Kota Kinabalu, Sabah, Malaysia

Kurt A. Buhlmann, Ph.D.
Associate Research Scientist and Conserva-
tion Ecologist, University of Georgia,
Savannah River Ecology Laboratory,
Aiken, SC, USA

Peter A. Meylan, Ph.D.
R.R. Hallin Professor of Natural Sciences,
Collegium of Natural Sciences,
Eckerd College,
St. Petersburg, FL, USA

Craig Stanford, Ph.D.
Professor of Biology and Anthropology,
University of Southern California,
Los Angeles, CA, USA

Dionysius Sharma, Ph.D.
Executive Director and CEO,
WWF-Malaysia,
Kuala Lumpur, Malaysia

Franco L. Souza, Ph.D.
Professor of Biology,
Universidade Federal de Mato Grosso do Sul,
Centro de Ciências Biológicas e da Saúde,
Campo Grande, Mato Grosso do Sul, Brazil

Eng Heng Chan, Ph.D.
Vice-President and Co-Founder,
Turtle Conservation Society of Malaysia,
Kuala Terengganu, Malaysia

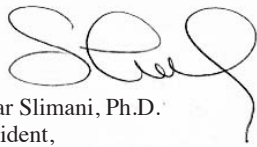
German Forero-Medina, Ph.D.
Director Científico, Programa Colombia,
Wildlife Conservation Society; Coordinador
de Programa, Turtle Survival Alliance,
Cali, Colombia

Djoko T. Iskandar, Ph.D.
Professor of Biology, Head of Academic
Senate, School of Life Sciences and
Technology, Institut Teknologi Bandung,
Bandung, Indonesia

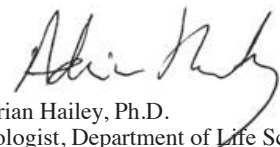
Sabine Schoppe, Ph.D.
Board Member, Katala Foundation Inc.,
Director, Philippine Freshwater Turtle
Conservation Program,
Puerto Princesa City, Palawan, Philippines



William R. Branch, Ph.D.
Curator Emeritus of Herpetology,
Bayworld,
Humewood, South Africa



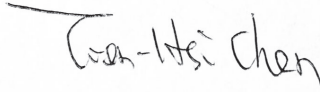
Tahar Slimani, Ph.D.
President,
Moroccan Society of Herpetology,
Marrakesch, Morocco



Adrian Hailey, Ph.D.
Zoologist, Department of Life Sciences,
University of the West Indies,
St. Augustine, Trinidad and Tobago



S.M.A. Rashid, Ph.D.
Chief Executive,
Centre for Advanced Research in Natural
Resources & Management (CARINAM),
Dhaka, Bangladesh



Tien-Hsi Chen, Ph.D.
Assistant Professor of Biology, Institute of
Wildlife Conservation, National Pingtung
University of Science and Technology,
Neipu, Pingtung, Taiwan



Ronald Orenstein, Ph.D.
Affiliate Professor of Environmental
Science and Policy,
George Mason University,
Mississauga, Ontario, Canada



Hinrich Kaiser, Ph.D.
Professor of Biology,
Victor Valley College,
Victorville, CA, USA



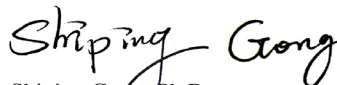
V. Deepak, Ph.D.
Postdoctoral Research Associate,
Centre for Ecological Sciences,
Indian Institute of Science,
Bangalore, Karnataka, India



Reginald T. Mwaya, Ph.D.Cand.
Senior Lecturer,
College of African Wildlife Management,
Mweka, Moshi, Tanzania



Sabine Vinke
Chief Editor, Schildkröten im Fokus,
Vice Director, Proyecto Paraguay Salvaje,
Filadelfia, Fernheim, Paraguay



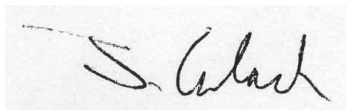
Shiping Gong, Ph.D.
Professor of Biology,
South China Institute of Endangered Animals,
Guangzhou, China



Thomas Vinke
Director, Proyecto Paraguay Salvaje,
Editor, Schildkröten im Fokus,
Filadelfia, Fernheim, Paraguay



Hidetoshi Ota, Ph.D.
Professor of Biology, University of Hyogo,
Curator of Herpetology,
Museum of Nature and Human Activities,
Sanda, Hyogo, Japan



Justin Gerlach, Ph.D.
Scientific Coordinator,
Nature Protection Trust of Seychelles,
Cambridge, United Kingdom &
Mahé, Seychelles



Patrick J. Baker, Ph.D.
Research Scientist,
The Wetlands Institute,
Stone Harbor, NJ, USA



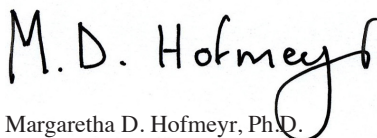
Leandro Alcalde, Ph.D.
Investigador Asistente,
Instituto de Limnología - CONICET,
Florencio Varela, Buenos Aires, Argentina



Natalia Gallego-García, Ph.D.Cand.
Departamento de Biología,
Universidad de los Andes,
Bogotá, Colombia



Karthikeyan Vasudevan, Ph.D.
Scientist, Department of Animal Ecology
and Conservation Biology,
Wildlife Institute of India,
Dehradun, India



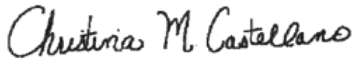
Margaretha D. Hofmeyr, Ph.D.
Professor of Biodiversity
and Conservation Biology,
University of the Western Cape,
Bellville, South Africa



Tim McCormack, M.Sc.
Program Coordinator,
Asian Turtle Program,
Hanoi, Vietnam



Dimitris Margaritoulis, Ph.D.
ARCHELON,
Sea Turtle Protection Society of Greece,
Athens, Greece



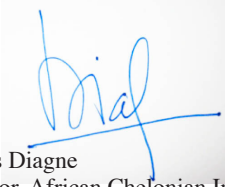
Christina M. Castellano, Ph.D.
General Curator,
Utah's Hogle Zoo,
Salt Lake City, UT, USA



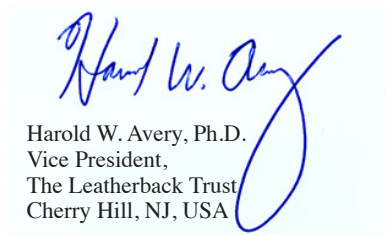
Hanyeh Ghaffari, Ph.D.Cand.
Founder and Director,
Pars Herpetologists Institute
Tehran, Iran



Marine Arakelyan, Ph.D., D.Sc.
Researcher and Lecturer in Zoology,
Yerevan State University,
Yerevan, Armenia



Tomas Diagne
Director, African Chelonian Institute,
Chair, Turtle Survival Alliance Africa,
Ngaparou, Senegal, West Africa



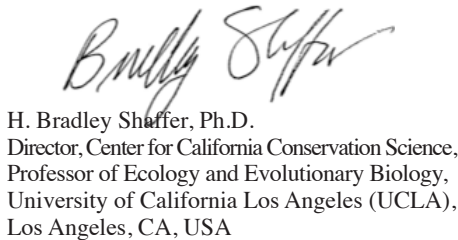
Harold W. Avery, Ph.D.
Vice President,
The Leatherback Trust
Cherry Hill, NJ, USA



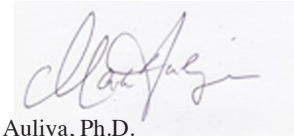
Albert Bertolero, Ph.D.
Zoologist and Ecologist,
Institut de Recerca i Tecnologia Agroali-
mentàries-IRTA-Ecosistemes Aquatics,
Sant Carles de la Ràpita, Spain



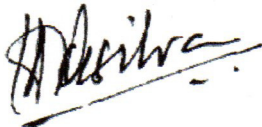
A. Ross Kiester, Ph.D.
Chief Scientist,
The Turtle Conservancy,
Biodiversity Futures Consulting,
Corvallis, OR, USA



H. Bradley Shaffer, Ph.D.
Director, Center for California Conservation Science,
Professor of Ecology and Evolutionary Biology,
University of California Los Angeles (UCLA),
Los Angeles, CA, USA



Mark Auliya, Ph.D.
Department of Conservation Biology,
Helmholtz Centre for Environmental
Research GmbH - UFZ,
Leipzig, Germany



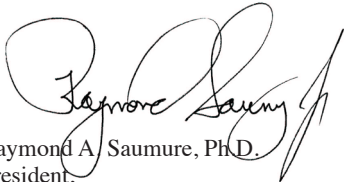
Anslem de Silva, M.Sc.
Consultant Herpetologist and Lecturer,
Rajarata University
Mihintale, Sri Lanka



Duncan J. Limpus
Senior Technical Officer,
Aquatic Threatened Species,
Dept. of Environment & Heritage Protection,
Bundaberg, Queensland, Australia



S. Bhupathy, Ph.D.
Principal Scientist,
Salim Ali Centre for Ornithology & Natu-
ral History,
Anaikatti, Coimbatore, India



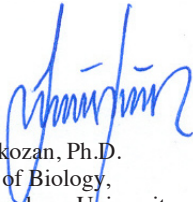
Raymond A. Saumure, Ph.D.
President,
WildFauna Incorporated,
Board Member, Turtle Survival Alliance,
Las Vegas, NV, USA



Uzma Noureen, M.Ph.Cand.
Wetlands Conservation Biologist and
Project Coordinator,
WWF - Pakistan
Islamabad, Pakistan



Heng Sovannara
Deputy Director, Dept. of Fisheries Conserva-
tion, Project Manager, Turtle Conservation,
WCS Cambodia
Phnom Penh, Cambodia



Oguz Turkozan, Ph.D.
Professor of Biology,
Adnan Menderes University,
Aydin, Turkey



Yuichirou Yasukawa, Ph.D.
Research Staff,
Takada Reptiles & Wildlife Research Institute,
Okinawa City, Okinawa, Japan



Mario Vargas-Ramírez, Ph.D.
Researcher,
Museum of Zoology Senckenberg,
Dresden, Germany &
Fundación Biodiversa, Colombia



Omar Attum, Ph.D.
Associate Professor of Biology,
Indiana University Southeast,
New Albany, IN, USA



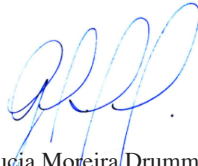
Susan Carstairs, D.V.M.
Executive and Medical Director,
Kawartha Turtle Trauma Centre,
Peterborough, Ontario, Canada



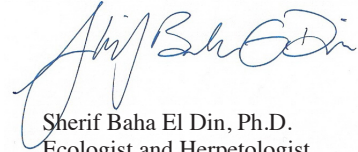
Andrew Terry Ph.D.
Head of Field Programmes,
Durrell Wildlife Conservation Trust,
Trinity, Jersey, Channel Islands



Alejandro Fallabrino
Executive Director, Karumbé,
Centro de Tortugas Marinas
Montevideo, Uruguay



Gláucia Moreira Drummond
General Superintendent,
Biodiversitas Foundation,
Belo Horizonte, Brazil



Sherif Baha El Din, Ph.D.
Ecologist and Herpetologist,
Nature Conservation Egypt,
Mohandiseen, Egypt

The following individuals have also signed this letter,
but due to current field work and/or travel, were not able to scan and submit their digital signatures in time.



Luca Luiselli, Ph.D.
Centre of Environmental Studies Demetra,
Universita di Roma La Sapienza,
Rome, Italy



Steven G. Platt, Ph.D.
Ecologist,
Wildlife Conservation Society,
Yangon, Myanmar



Frank Paladino, Ph.D.
Professor of Biology,
Indiana-Purdue University,
Fort Wayne, IN, USA



Rod Kennett, Ph.D.
Program Manager, North Australian
Indigenous Land and Sea Management
Alliance, Charles Darwin University,
Darwin, Northern Territory, Australia



William Dennler
Executive Director Emeritus,
Toledo Zoological Gardens,
Toledo, OH, USA



Jacqueline D. Litzgus, Ph.D.
Professor of Biology,
Laurentian University,
Sudbury, Ontario, Canada



James O. Juvik, Ph.D.
Professor of Geography and Environmental
Science, University of Hawaii-Hilo,
Senior Conservation Scientist, Turtle
Conservancy, Hilo, HI, USA



Mark L. Feldman, M.D.
Turtle Researcher
and Consultant Physician,
Kerikeri, Northland, New Zealand



Ryan C.J. Walker, Ph.D.
Senior Ecologist,
Nautilus Ecology,
Rutland, United Kingdom