18 September 2022

To the Parties at CITES CoP19 regarding Turtle Proposals 22 through 33:

We, the undersigned turtle biologists and conservationists, representing a broad international coalition of concerned turtle-focused leading academic and conservation individuals and organizations (157 individuals from 46 countries), applaud Brazil, Colombia, Costa Rica, El Salvador, the European Union, India, Mexico, Panama, Peru, the United States of America, and Viet Nam for the formulation and submission of the current Turtle Proposals to CoP19, and we commend the CITES Parties and Secretariat for their impressive track record of actions to date.

Turtles, including tortoises, freshwater turtles, and sea turtles, are among the two most severely threatened large groups of vertebrates (along with primates), with 63% of the 270 species currently assessed on the IUCN Red List of Threatened Species (2022.1) listed as Critically Endangered, Endangered, or Vulnerable. Additionally, provisional assessments by the IUCN Tortoise and Freshwater Turtle Specialist Group of previously unevaluated species and updated re-evaluations of previously listed species indicates that more than half (ca. 55%) of all 357 global species of turtles and tortoises are threatened with extinction (Rhodin et al. 2018, in *Chelonian Conservation and Biology*; Turtle Taxonomy Working Group 2021, in *Chelonian Research Monographs*).

Predictably, all the typical negative impacts on biodiversity affect turtles, including habitat degradation and loss, pollution, disease, invasive alien species and subsidized native predators, as well as climate change. Above all, however, turtle populations have precipitously declined, and continue to decline, as a result of targeted exploitation via unsustainable domestic and international trade for commercial hobbyists, commercial food use, and shell bones for traditional medicine. These impacts are additive, and often leverage each other, but targeted over-exploitation of wild populations is the single most powerful factor driving turtle populations and species towards extinction.

The potential harm of international trade to turtle populations has been recognized by the CITES Parties from the beginning. Over the years a succession of turtle species have been added to CITES Appendix II and a small number of the most critically endangered species to Appendix I. These actions by the CITES Parties have benefited wild turtle populations and played a significant role in managing the international trade in wild turtles to minimize detrimental effects. CITES Actions have included reviewing legal and illegal trade in CITES-listed turtle species, preparing Non-Detriment Finding guidance, compiling identification resources and establishing a secure turtle identification network, and more. Further, turtles have featured prominently in the Review of Significant Trade, and the Review of trade in animal specimens reported as produced in captivity. Additionally, Parties have developed complementary domestic initiatives to assess and improve awareness and regulation of turtle exploitation. Many of us have contributed to these efforts, and we applaud the many and diverse actions taken by the CITES Parties and the Secretariat.

Nevertheless, many non-CITES and CITES-listed freshwater turtle species continue to be affected negatively by unregulated, poorly regulated, and/or illegal international trade. Traders and collectors seeking new sources to supply the demand for turtle meat and shell bones, and the changing fashion for commercial hob-
byist turtle species, have continued a pattern of sequential exploitation, shifting to turtle populations in ‘new’ countries as populations elsewhere are depleted, and to ‘new’ species as more species come under regulatory control. Clearly the trade prefers species that are not CITES-listed, because their trade implies reduced delays, costs and regulatory oversight of trade shipments. We continue to believe that a piecemeal approach to listing turtles in the Appendices, one species at a time, is not the most effective strategy, and may indeed drive unsustainable trade towards additional non-listed species. Waiting for complete data for all populations would mean the certain depletion or complete loss of many species.

As the largest and most experienced group of turtle researchers globally, we must also highlight the reality of the extreme difficulty in making species identifications for several species proposed for inclusion at CoP19. Turtles pose significant identification challenges even for experts – so they surely do the same for Customs and wildlife inspectors. For example, without reliable information on their precise origin, individual specimens of *Kinosternon* and *Rhinoclemmys* are nearly impossible to identify with certainty without resorting to literature, expert consultation, or molecular genetic analysis. Failing to list look-alike species will be the only roadmap needed by traffickers to evade CITES control measures. These considerations make it imperative that, where possible, turtles be listed in the Appendices at the genus or family level, as many turtles and tortoises already are.

Turtles have a specialized life history, characterized by late reproductive maturity and great longevity. Individuals may breed only once a year, but their reproductive lifetime can last for several decades. Females of many species produce relatively small numbers of eggs per year, and on average suffer high losses of eggs, hatchlings, and juveniles. Though this life strategy has served turtles well through their evolutionary history, it now renders them greatly vulnerable to over-exploitation. Removing even a relatively small proportion of breeding-age adults from the wild reduces the probability that sufficient numbers of the next generation will be produced, and renders populations unable to respond adequately to high levels of extractive utilization. It is essential that the international trade in turtles is subject to the minimum standards of an Appendix II listing focused on ensuring that trade is legal and sustainable: verified legal acquisition, detailed records of traded animals and parts, and non-detriment findings.

We acknowledge that including additional freshwater turtle species in the CITES Appendices may impose additional administrative burdens on trading Parties and on legitimate captive breeding specialists and facilities. Additional listings will mean that we scientists and conservationists ourselves will also have to contend with further regulatory requirements for the international exchange of turtles between zoos and assurance colonies, transfer of tissue samples and museum specimens, and more. Nevertheless, we are convinced that the safeguards afforded by inclusion under the CITES trade governance structure are well worth the potential burdens involved, and more crucially, are in the best long-term interests of these species and their wild populations.

We therefore now urge the CITES Parties at CoP19 to support and adopt the following Proposals to amend the Appendices concerning Freshwater Turtles:

**Prop. 22. Brazil, Colombia, Costa Rica, Peru:** *Chelus fimbriata* and *C. orinocensis* – Include in Appendix II.

**Prop. 23. United States of America:** *Macrochelys temminckii* and *Chelydra serpentina* – Transfer from Appendix III to Appendix II.

**Prop. 24. United States of America:** *Graptemys barbouri, G. ernsti, G. gibbonsi, G. pearlensis,* and *G. pulchra* – Transfer from Appendix III to Appendix II.

**Prop. 25. India:** *Batagur kachuga* – Transfer from Appendix II to Appendix I.

**Prop. 26. European Union, Viet Nam:** *Cuora galbinifrons* – Transfer from Appendix II to Appendix I.
Prop. 27. Brazil, Colombia, Costa Rica, and Panama: *Rhinoclemmys* spp. – Include in Appendix II.

Prop. 28. Mexico: *Claudius angustatus* – Include in Appendix II.

Prop. 29. Brazil, Colombia, Costa Rica, El Salvador, Mexico, Panama, and United States of America: *Kinosternon* spp. – Include *Kinosternon cora* and *K. vogti* in Appendix I and include all other *Kinosternon* spp. in Appendix II.

Prop. 30. El Salvador, Mexico: *Staurotypus salvinii* and *S. triporcatus* – Include in Appendix II.

Prop. 31. United States of America: *Sternotherus* spp. – Include in Appendix II.

Prop. 32. United States of America: *Apalone* spp. (except the subspecies in Appendix I) – Transfer from Appendix III to Appendix II.

Prop. 33. India: *Nilssonia leithii* – Transfer from Appendix II to Appendix I.

We respectfully request and urge the CITES Parties to adopt all these CoP19 Turtle Proposals, thereby continuing and strengthening the commendable progress already accomplished to secure the survival of some of the world’s most endangered and well-liked charismatic vertebrates – turtles and tortoises.

We thank you for your consideration. Individuals from the following 46 countries are represented among the 157 turtle scientists and conservationists signing this document: Argentina, Australia, Belize, Benin, Brazil, Bulgaria, Cambodia, Canada, China, Colombia, Dominican Republic, France, Germany, Honduras, Hungary, India, Indonesia, Iran, Italy, Kenya, Madagascar, Malaysia, Mexico, Nepal, Panama, Papua New Guinea, Paraguay, Peru, Philippines, Senegal, Singapore, South Africa, South Sudan, Spain, Sri Lanka, Sweden, Switzerland, Tanzania, Togo, Trinidad and Tobago, United Arab Emirates, United Kingdom, United States of America, Uruguay, Venezuela, and Vietnam.

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
Board Chair, Turtle Conservancy
Arlington, VT, USA & Buterud, SWEDEN

Susan Lieberman, Ph.D.
Vice President, International Policy
Wildlife Conservation Society
New York, NY, USA

Ronald Orenstein, Ph.D.
Turtle Researcher
Mississauga, Ontario, CANADA

Bruce J. Weissgold
Wildlife Consultant
Annandale, VA, USA

Vivian P. Páez, Ph.D.
Grupo Herpetológico de Antioquia
Universidad de Antioquia
Medellin, COLOMBIA

Camila R. Ferrara, Ph.D.
Turtle Specialist,
Wildlife Conservation Society
Manaus, Amazonas, BRAZIL

Minh D. Le, Ph.D.
Head, Department of Natural Resources and Conservation
Central Institute for Natural Resources and Environmental Studies (CRES)
Vietnam National University
Hanoi, VIETNAM

B.C. Choudhury, M.Sc.
Professor and Executive Trustee
Senior Scientific Advisor,
Aquatic and Marine Projects
Wildlife Trust of India
Noida, INDIA

Patricia A. Koval, J.D.
Board Chair, Turtle Survival Alliance
Board Chair, Toronto and Region Conservation Foundation
Charleston, SC, USA & Toronto, Ontario, CANADA

International Coalition of Concerned Turtle Scientists and Conservationists
c/o Chelonian Research Foundation • 564 Chittenden Dr., Arlington VT 05250 USA • 978-807-2902 • rhodincrf@aol.com • www.chelonian.org/icctscl
Dr. Gabriel Hoinsoude Segniagbeto
Laboratory of Ecology & Ecotoxicology,
Faculty of Sciences, University of Lomé
Lomé, TOGO

Dr. Uwe Fritz
Professor of Zoology, Senckenberg
Gesellschaft für Naturforschung
Dresden, GERMANY

Arthur Georges, Ph.D.
Distinguished Professor
Applied Ecology and Genetics
Institute for Applied Ecology
University of Canberra, AUSTRALIA

Sixto J. Inchaustegui, Ph.D.
Professor, Autonomous University of
Santo Domingo and Grupo Jaragua
Santo Domingo, DOMINICAN REPUBLIC

Claudia P. Ceballos, Ph.D.
Associate Professor
Veterinary Medicine School
Universidad de Antioquia
Medellín, COLOMBIA

Pham Van Thong
Conservation Research Manager,
Save Vietnam’s Wildlife
Cuc Phuong, Ninh Binh, VIETNAM

Donald McKnight, Ph.D.
Postdoctoral Researcher, La Trobe University
Wodonga, VIC, AUSTRALIA

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

Peter A. Meylan, Ph.D.
Professor of Natural Sciences
Eckerd College
St. Petersburg, FL, USA &
Smithsonian Tropical Research Institute
Balboa, PANAMA

Hugh R. Quinn, Ph.D.
Co-Chair, Turtle Conservation Fund
Milan, MO, USA

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

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

Jacob Muei Ngwava
National Museums of Kenya
Nairobi, KENYA

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

Franco L. Souza, Ph.D.
Professor of Biology
Universidade Federal de Mato Grosso do Sul
Instituto de Biociências
Campo Grande, MS, BRAZIL

Willem M. Roosenburg, Ph.D.
Director, Center for Ecology and
Evolutionary Studies
Ohio University
Athens, OH, USA

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

International Coalition of Concerned Turtle Scientists and Conservationists
[c/o Chelonian Research Foundation • 564 Chittenden Dr., Arlington VT 05250 USA • 978-807-2902 • rhodincrf@aol.com • www.chelonian.org/icctsc/
Russell A. Mittermeier, Ph.D.
Chief Conservation Officer, Re:wild
Austin, TX, USA

Rick Hudson
President, Turtle Survival Alliance
Charleston, SC, USA & Fort Worth, TX, USA

Eric V. Goode
President, Turtle Conservancy
Ojai, CA, USA

Jeffrey E. Lovich, Ph.D.
Turtle Researcher
Flagstaff, AZ, USA

Andrew Walde, M.Sc.
Chief Operating Officer
Turtle Survival Alliance
Charleston, SC & Atascadero, CA, USA

Tomas Diagne
Director, African Chelonian Institute
Ngaparou, SENEGAL

Charlotte Ducotterd, Ph.D.
Scientific Collaborator
Centre Emys & Infofauna
Chavornay, SWITZERLAND & Neuchâtel, SWITZERLAND

Roy D. Nagle, M.Sc.
Instructor
Environmental Science and Studies
Juniata College
Huntingdon, PA, USA

Tim McCormack, M.Sc.
Director, Asian Turtle Program of Indo-Myanmar Conservation
North Yorkshire, UNITED KINGDOM & Hanoi, VIETNAM

Anslem de Silva, M.Sc.
Retired Consultant Herpetologist and Lecturer
Rajarata University
Mihintale, SRI LANKA

Gabriel Jorgewich Cohen, M.Sc.
University of Zurich
Zurich, SWITZERLAND & São Paulo, BRAZIL

Robert W. Murphy, Ph.D.
Royal Ontario Museum & University of Toronto
Toronto, CANADA

Gary W.J. Ades, Ph.D.
Head of Fauna Conservation Department
Kadoorie Farm & Botanic Garden,
Hong Kong SAR, CHINA

Jonathan J. Fong, Ph.D.
Associate Professor
Lingnan University
Hong Kong SAR, CHINA

Pearson McGovern, M.Sc.
Turtle Researcher,
African Chelonian Institute
Ngaparou, SENEGAL

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

Mónica T. Nieto-Vera
Grupo en Conservación y Manejo
de Vida Silvestre
Universidad Nacional de Colombia
Bogotá, COLOMBIA

Omar Hernández, Lic.
Director General, Fundación para el
Desarrollo de las Ciencias Físicas,
Matemáticas y Naturales (FUDECI)
Caracas, VENEZUELA
Gilson A. Rivas  
Museo de Biologia  
Universidad del Zulia  
Maracaibo, VENEZUELA

Brian D. Horne, Ph.D.  
Freshwater Turtle and Tortoise Conservation Coordinator  
Wildlife Conservation Society  
New York, NY, USA

Neil D’Cruze, Ph.D.  
International Head of Wildlife Research, World Animal Protection  
Associate Researcher, WildCRU, University of Oxford  
London & Oxford, UNITED KINGDOM

Adrian Hailey, Ph.D.  
Formerly Professor in Zoology, Department of Life Sciences University of the West Indies St. Augustine, TRINIDAD AND TOBAGO

Gerald R. Johnston, Ph.D.  
Professor of Biology Santa Fe College Gainesville, FL, USA

Gift Simon Demaya, M.Sc.  
Department of Wildlife University of Juba Juba, SOUTH SUDAN

Carla C. Eisenberg, Ph.D.  
Research Institute for the Environment and Livelihoods Charles Darwin University Darwin, NT, AUSTRALIA

Sitha Som, M.Sc.  
Landscape Project Manager Wildlife Conservation Society — Cambodia Program  
Phnom Penh, CAMBODIA

Djoko T. Iskandar, Ph.D.  
Professor Emeritus of Biology School of Life Sciences and Technology Institut Teknologi Bandung Bandung, INDONESIA

Oscar Flores-Villela, Ph.D.  
Museo de Zoología Facultad de Ciencias Universidad Nacional Autónoma de México Mexico City, MEXICO

Federico Luis Pantin Contreras, M.V.  
Director Zoológico Leslie Pantin Payá, Turmero, Aragua, VENEZUELA

Susan Carstairs, D.V.M.  
Executive and Medical Director Ontario Turtle Conservation Centre Peterborough, Ontario, CANADA

Arunima Singh, Ph.D. Cand.  
Ex-situ Conservation and Training Turtle Survival Alliance India Program Lucknow, INDIA

Yik Hei Sung, Ph.D.  
Assistant Professor, Science Unit Lingnan University Hong Kong SAR, CHINA

Deborah S. Bower, Ph.D.  
Senior Lecturer University of New England Armidale, NSW, AUSTRALIA

Adeline Seah, Ph.D.  
Conservation Science Manager  
Ojai, CA, USA & Co-Founder & Director, Coral CoLab SINGAPORE

Ashmita Shrestha, M.Sc.  
Research Fellow Greenhood Nepal Sindhupalchok, NEPAL

Alejandro Fullabrino  
Executive Director, Karumbé, Centro de Tortugas Marinas Montevideo, URUGUAY
The following individuals have also signed this letter, but due to field work and/or travel, were not able to scan and submit their digital signatures.

Juliette Velosoaba
 Juliette Velosoa, M.Sc.  
Responsible of Rere Conservation  
Durrell Wildlife Conservation Trust  
Antananarivo, MADAGASCAR

R. Bruce Burya
 R. Bruce Bury, Ph.D.  
Editor-in-Chief  
Herpetological Conservation and Biology  
Corvallis, Oregon, USA

Important Note:  
This letter may still be signed by additional individuals before being officially submitted to CITES

---

a Tom Herman, Ph.D.  
Co-Chair, Amphibians and Reptiles SSC, COSEWIC  
Professor Emeritus of Biology  
Acadia University  
Wolfville, NS, CANADA

b Pelf Nyok Chen, Ph.D.  
Executive Director, Turtle Conservation Society of Malaysia  
Terengganu, MALAYSIA