



IUCN/SSC
TORTOISE AND FRESHWATER TURTLE SPECIALIST GROUP
INTERNATIONAL UNION FOR CONSERVATION OF NATURE / SPECIES SURVIVAL COMMISSION



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25 March 2008

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Peter Paul van Dijk
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To: Florida Fish and Wildlife Conservation Commission

EXECUTIVE COMMITTEE

Anders G.J. Rhodin
Russell A. Mittermeier
Peter C.H. Pritchard
Peter Paul van Dijk

Dear Commissioners,

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(RED LIST AUTHORITY)

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Kristin H. Berry
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Indraneil Das
Arthur Georges
J. Whitfield Gibbons
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Shi Haitao
Peter Paul van Dijk
Richard C. Vogt

In 2006, 40 of the most knowledgeable experts on Florida turtles published this comprehensive volume on the state's diverse turtle fauna. We, the authors, are pleased to present you with a copy. We have more than 1000 collective years of experience working with wildlife in the Southeast, and have become seasoned observers of the ecology and status of Florida turtles. Florida currently supports one of the two largest centers of diversity of turtles in the world, with all of the more than two dozen species playing integral roles in a multitude of ecosystems. As experts on this critical component of Florida's wildlife diversity, we would like to use this occasion to call your attention to a very serious problem involving Florida turtles.

Our concern is shared by the leadership of the IUCN/SSC Tortoise and Freshwater Turtle Specialist Group, supporter and associated sponsor of this monograph on Florida turtles, as well as the publisher, Chelonian Research Foundation.

TURTLE SURVIVAL ALLIANCE
(TFTSG TASK FORCE)

CO-CHAIRS

Rick Hudson
Dwight P. Lawson

In recent weeks, we have received several alarming reports of unsustainable harvest of freshwater turtles. Many of us had expressed concern about this issue in our chapters. For the same reasons that it is illegal to kill female sea turtles on a nesting beach, it is a very bad idea to take adult turtles in large numbers from any ecosystem. Turtles are extremely slow to reproduce. They take a long time to mature and have very low success rates for nests and hatchlings. Populations are seriously impacted by removal of adults and require extraordinarily long periods of time to recover, and in some cases they do not recover. Every boatload of turtles removed from a water body will take years, or even decades, to replace. Turtles cannot replace themselves like gray squirrels, whitetail deer, or even alligators. Thus, reports of "pick-up truck loads" of turtles from Newnan's Lake (Alachua Co.: Gainesville Sun, 22 Feb. 08), and "large numbers of turtles" from Lake Seminole (Pinellas Co.: St. Petersburg Times, 13 Feb. 08) being removed and apparently killed for consumption have us very concerned. Additionally, the prolonged drought conditions that we are experiencing, especially in the peninsula, are making it easier for turtle catchers to take large numbers of turtles from Lake Okeechobee and elsewhere.

TURTLE CONSERVATION FUND

CO-CHAIRS

Hugh Quinn
Anders G.J. Rhodin

The thoroughly documented unsustainable demand for turtle meat in many Asian countries and Asian communities in the U.S. has led to new patterns of freshwater turtle consumption and trade. This has not only resulted in mass harvest of animals but also threatens many species of turtles worldwide with extinction. In Asia, this has led to a massive crisis of increased extinction risk for most turtle species, and there are now few healthy populations remaining in the wild. We are aware that FWC staff are also concerned about large-scale, unsustainable use of turtles here in Florida, and we look forward to working with our colleagues in FFWCC to take immediate action to reduce the impact of this severe threat.



The primary goals of the FFWCC Wildlife Legacy Program, to keep common species common and to keep additional species from moving onto the list of endangered and threatened species, should be pursued vigorously. We are concerned that the harvest of freshwater turtles on a commercial scale is rapidly increasing in Florida and that it will make common species uncommon and could, in fact, produce additional threatened species. Florida is not alone in facing this increasing threat to freshwater turtles. Both Texas and North Carolina have recently revised their rules to limit the take of freshwater turtles. We believe that Florida must do the same immediately, because our state, with its rich turtle

fauna, is likely to become an increasingly targeted source of turtles for commercial food markets, especially as closures elsewhere become effective.

We understand that the FFWCC is now considering additional protection for freshwater turtles within the context of a broader approach that would provide some level of protection for all non-managed fish and wildlife species.

Although we applaud this approach and look forward to providing input, we unanimously share a very serious sense of urgency that leads us to propose an Emergency Ruling that would place a moratorium on the commercial level harvest of freshwater turtles until carefully considered new guidelines for their use can be put into place. We suggest that the moratorium specify that no one shall take from the wild more than one turtle per day, and two per group of persons, and that these must be of species not currently protected by other rules, unless authorized by a special use permit (e.g., scientific research or to facilitate conservation and management). We recommend that this Emergency Rule be instituted at the earliest possible date.

Thank you for your consideration. We are committed to the proposed action and are readily available to consult with FFWCC staff.



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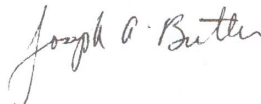
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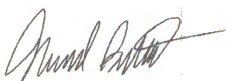
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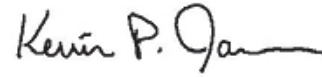
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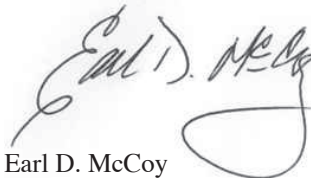
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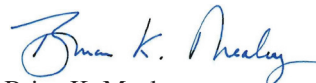
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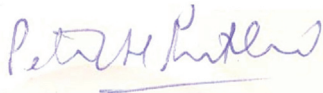
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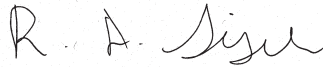
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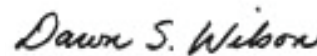
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