May 28, 2018

Arkansas Game & Fish Commission
Attn: Fisheries Division
2 Natural Resources Drive
Little Rock, Arkansas 72205

Dear sirs,

The state of Arkansas continues to allow unlimited collection of 14 species and subspecies of native American turtles from the wild by commercial turtle trappers. Most states have eliminated or curtailed such offtake. According to the Center for Biological Diversity, more than 120,000 wild turtles were collected in Arkansas in 2014–16 alone. Numerous studies have shown that wild turtle populations cannot withstand intensive collection without experiencing severe population declines or extirpation.

Turtles and tortoises are among the world’s most endangered vertebrates, with more than half of all 356 species threatened with extinction, as determined by the IUCN Red List and the IUCN SSC Tortoise and Freshwater Turtle Specialist Group. Turtles and tortoises are at high risk of extinction because of their combination of life history traits: long lifespan, delayed reproductive maturity and high adult survival rates (when they are not exploited by people). These life history traits served turtles well during their evolution, but render their populations unable to respond adequately to high levels of offtake. Unsustainable collection is a severe threat to their continued existence. In particular, removing adult turtles from a population severely impedes population recovery. Sustainable offtake is possible only from carefully managed turtle populations, particularly if collection is limited to eggs or small juveniles; however, the monitoring effort that must be made to ensure sustainability is significant and costly. We are all aware of the declines that over-collection and habitat loss have inflicted on marine turtle populations as well as on tortoise and freshwater turtle populations in Asia – none of us wants to see this repeated for freshwater turtles in the United States, whether in Arkansas or anywhere else.

The IUCN SSC Tortoise and Freshwater Turtle Specialist Group (TFTSG) is the main global intergovernmental organization that monitors and assesses the threats facing freshwater turtles and tortoises worldwide. The TFTSG works in close cooperation with the United States Federal and several State Governments, international conventions such as CITES, and a range of US-based and international NGOs focused on tortoise and freshwater turtle conservation, such as the Turtle Survival Alliance, Turtle Conservancy, Chelonian Research Foundation, Turtle Conservation Fund, Wildlife Conservation Society, Global Wildlife Conservation, and others, to respond and work towards minimizing or reversing such threats.

We, the Executive Committee of the TFTSG, including leaders of several turtle-focused NGOs, urgently request that the state of Arkansas Game and Fish Commission move to ban all commercial exploitation of turtles in your state.

Yours sincerely,