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March 30, 2006

Mr. Bruno Tobbyack
Ministre de l'Environnement
Rue Ernest Blerot 1, 9e étage
1070 Brussels BELGIUM

VIA FAX: +32 (0)2.230.38.95

Dear Minister Tobbyack,

The undersigned organizations, which represent hundreds of thousands of concerned individuals throughout the United States, Canada, Mexico, Europe and the Caribbean, want to draw your attention to the illegal shipment of green sea turtles (*Chelonia mydas*) from the Cayman Islands, through the United Kingdom, and on to your country. These green turtles were bred and raised in captivity at the Cayman Turtle Farm and exported, possibly in violation of CITES regulations, to Sea Life Centres (SLC) aquariums in the UK. If they have not already done so, it is the intent of SLC to transfer some of these turtles to one of their business locations in your country.

While the shipment of these turtles from the Cayman Islands to the UK received a questionable approval from the UK CITES Authority, we believe the UK was not authorized under CITES guidelines to approve this shipment. The Cayman Islands are a quasi-Party to CITES, as the UK acceded to the Convention on their behalf. However, as the Caymans have failed to pass implementing legislation, at the very least, the approval from the UK CITES Authority was contrary to the spirit of the CITES Convention. Furthermore, the planned shipment of these turtles to a for-profit Sea Life Centre in your country would constitute an additional CITES violation.

As you no doubt are aware, green turtles are listed under Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora. Therefore, all international shipments of green turtles or their parts are strictly forbidden except under unique circumstances which are very clearly spelled out in several CITES resolutions. This prohibition extends to farm-raised or ranched turtles and their derivatives, unless a facility has been duly registered as a captive breeding facility and approved by a Conference of the Parties (COP) of CITES. No such facility for sea turtles has ever been authorized by a CITES COP.

At the Twelfth meeting of the Conference of the Parties of CITES, the UK submitted a proposal on behalf of the Cayman Islands seeking to register the government-owned Cayman Turtle Farm as a captive breeding facility. Several criteria were to have been met in order for a facility such as this to be approved by CITES. For example, the facility had to document that it legally obtained all of the founding stock for the operation. In addition, it must be shown that the facility's operations result in a net benefit for the conservation of wild sea turtle populations. In these matters, the Cayman Turtle Farm could not meet the criteria. Among the most vocal entities opposing the registration of the Cayman Turtle Farm was and still is the Government of Costa Rica. At COP 12, the Costa Rican delegation distributed documentation demonstrating the illegality of the acquisition of green turtle eggs from a Costa Rican beach—eggs used to establish the Cayman Turtle Farm breeding stock. Shortly thereafter, the UK withdrew its application to register the Cayman Turtle Farm before the measure came up for a final vote.

Upon learning about this recent shipment of Cayman Farm turtles, Costa Rica's Minister of Environment sent a letter to the CITES Secretary General voicing his country's objections and asking the Secretariat to reprimand the UK and prevent any further shipments. Since the Cayman Farm has never been registered as a legal captive breeding facility, it has never been authorized to carry out any international shipments of its turtles or their meat and shell.

Many of the organizations that have signed this letter have spent decades working to protect wild populations of green turtles. Indeed, our efforts to reduce the illegal trade of turtle products and to protect critical marine and coastal habitats have achieved measurable results. These results in large part are due to the elimination of international demand for sea turtle meat and shell products. While the species is responding to conservation efforts, the Appendix I listing is still warranted. Just as we are beginning to see measurable results for wild populations, now is not the time for CITES countries to let their guard down by ignoring an illegal shipment of sea turtles from an unauthorized captive breeding operation to numerous countries in Europe.

We recognize that the Sea Life Centres may intend to display these animals alongside educational displays. However, we believe the message presented by displaying sea turtles generated at the Cayman Turtle Farm, a facility that has as part of its goal the establishment of international markets for turtle products, is not a message that should be supported. Nor is this educational goal something that should cause CITES Authorities throughout Europe to ignore international regulations that are in place to prevent shipments such as this. Furthermore, it should be noted that SLC is a for-profit corporation, and they are using the display of these Appendix I turtles to attract paying customers.

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In closing, we are writing this letter to bring this important matter to your attention. We are not clear on whether the Sea Life Centres have already shipped some or all of the turtles on to additional countries within the EU. However, we urge you to join us in opposing this unauthorized shipment. If the shipment has not yet taken place, we hope you will be vigilant in opposing the transfer of these turtles into your country. If the shipment has already taken place, we encourage you to enforce laws you have in place to reprimand or hold accountable anyone who violates CITES regulations by shipping unauthorized endangered species across your borders.

Thank you for your attention in this important matter. We invite any feedback you care to share.

Sincerely,



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Caribbean Conservation Corp.

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The Ocean Conservancy

Lily Venizelos
MEDASSET, Greece

Annelise Sorg
**Canadian Marine Environment
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CC: Carlos Manuel Rodriguez, Costa Rica, Minister of Environment and Energy
Ben Bradshaw, Minister for Nature Conservation and Fisheries, UK
William Wijnstekers, Secretary General, CITES
Mark Oakley, Sea Life Centres