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February 15, 1983

Mr. Richard Parsons
Wildlife Permit Office
Fish and Wildlife Service
P.O. Box 3654
Arlington, VA 22203

Dear Mr. Parsons:

I am submitting this letter as testimony in strong opposition, on scientific grounds, to the Services' Notice of Intent to once again consider allowing the commercial importation of maricultured sea turtle products into the United States (Federal Register, vol 48, no 1, Jan. 3, 83). For the past 11 years I have been the principal researcher of sea turtles here in the Hawaiian Islands. For the past 5 years I have been a member of the Marine Turtle Specialist Group of the Species Survival Commission of IUCN. In 1974 I served on a task force convened by IUCN to examine the commercial exploitation of sea turtles, with special emphasis on mariculture. I have visited the Cayman Island facility twice on fact-finding missions. My personal library contains a comprehensive historical record of correspondence and published and unpublished reports dealing with sea turtle mariculture, especially for Cayman Island. In 1977 I served as a special consultant to the South Pacific Commission to constructively review their experimental sea turtle farming project in Fiji and the Cook Islands. In 1979 I attended the CITES conference held in San Jose, Costa Rica. In 1979 I also served on the Scientific Advisory Committee of the World Conference on Sea Turtle Conservation, which was sponsored in part by the Services. At this conference I presented two scientific papers covering the status and natural growth rates of sea turtles in the Pacific. At this same conference several other papers were presented dealing with sea turtle mariculture. A special session on the subject was held which included talks by present and past owners and scientific personnel of the Cayman farm. I have studied these materials, along with all others that have subsequently become available. It is with this informed professional foundation that I voice my opposition to the Notice of Intent issued by the Services. Briefly stated, my principal reasons are as follows.

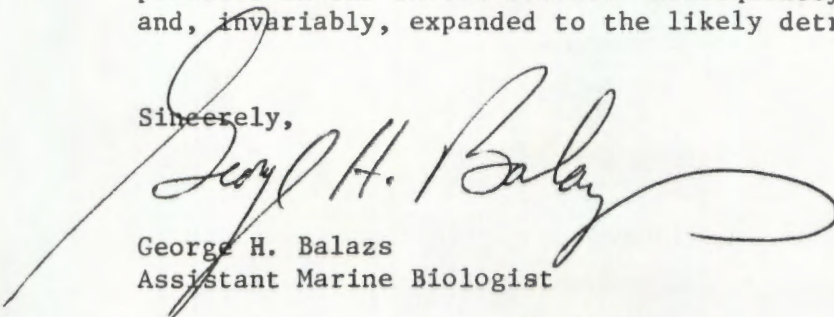
1. The question of whether or not the U.S. should allow commercial import of sea turtle products, including those from mariculture, has already been comprehensively reviewed within the recent past, both administratively and by the judiciary. A complete Final Environmental Impact Statement was prepared by the Services. The conclusion reached in each case has been to prohibit import. The Services themselves arrived at this decision after much time, expense, and scientific input from staff biologists and the public. There is

consequently no valid need to review the question again at present. There is nothing contained in the Federal Register Notice of Intent, or the ranching proposals submitted to CITES, to justify another review. No new scientific or economic information has surfaced since the last review was undertaken. The biologists and economists of the Services must surely be aware of this fact.

2. The Cayman Turtle Farm is still not a "farm" under the scientific and legal definition of being a closed-cycled operation. Recent assurances by the company's personnel that the operation is closed-cycled are not supported by scientific fact. Furthermore, it now appears even more unlikely that it will achieve this status anytime in the foreseeable future. In making this judgement I have relied solely on the available scientific data relating to the Farm's reproductive record. This same record is on file with the Services in the form of testimonies submitted by the Environmental Defense Fund and the Center for Environmental Education. The Cayman Turtle Farm does not fulfill the definition established by CITES. This definition is scientifically clear, and no real confusion exists on the subject as implied in your Notice of Intent.

3. If maricultured products are allowed back into the U.S., it is my scientific judgement that there will be a high probability of wild populations of Threatened and Endangered sea turtles being further jeopardized. The Environmental Impact Statement that would have to be prepared on this action would undoubtedly arrive at this same conclusion, as is contained in the original Environmental Impact Statement. There are currently no "established" commercial markets for sea turtle products in the United States. Consequently, markets will have to be redeveloped and, invariably, expanded to the likely detriment of wild sea turtles.

Sincerely,



George H. Balazs
Assistant Marine Biologist