

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



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STAKEHOLDERS LETTER CONCERNING EXPORT OF DOMINICA'S PARROTS

1. This document has been submitted by the United States of America at the request of the World Parrot Trust, in relation to agenda item 33.8*. The document does not represent the viewpoint of the United States.

* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

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On 17 March 2018, associates of ACTP ("Association for the Conservation of Threatened Parrots"), aided by politically appointed senior administrators in Dominica's government, secretly captured 2 Imperial (*Amazona imperialis*) and 10 Red-necked (*A. arausiaca*) parrots from Dominica's Parrot Conservation and Research Centre in Roseau and exported the birds on a private charter plane to Germany.

The export was not authorized by Dominica's CITES Management and/or Scientific Authorities, and neither Dominica's wildlife authority, the Forestry, Wildlife and Parks Division (hereafter, "FWD"), nor its longstanding parrot-program leader within FWD, were consulted.

The only official document to have surfaced pertaining to the export is a CITES export permit: <https://goo.gl/dB9SF2> This document is also attached here for reference.

The undersigned challenge this transfer of Dominica's parrots to ACTP as follows:

- All trade involving Dominica was suspended by CITES in January of this year, so import and export permits could not legally have been issued or recognized as valid.

- Dominica's CITES Management Authority (Environmental Coordinating Unit, hereafter “ECU”) and Scientific Authority (FWD) were not consulted. They neither endorsed nor signed the export paperwork.
- The CITES export document, apparently processed by Dominica Customs when the birds exited the island, is signed only by an Acting Permanent Secretary from, what was at that time, the Ministry of Agriculture and Fisheries. This document is not accompanied by a health certificate or valid CITES import permit from Germany.
- An agreement between ACTP and the Government of Dominica is referenced as “essential” in the export document, but no such agreement was attached or has been disclosed. FWD, ECU and Dominica's parrot-conservation program partners have no knowledge of this agreement, how it may have been prepared, or by whom.
- No scientifically reviewed or vetted proposal for the transfer was presented to FWD or any credentialed and Dominica-experienced, conservation NGO prior to the export.
- According to a written statement from ACTP, the birds were not tested for diseases prior to shipping and were only tested after arrival in Germany.
- Adding wild-caught birds to a large collection of endangered parrots at ACTP threatens both groups with potentially dire health and disease consequences.
- There was no emergency to remove parrots from Dominica. All of these birds were wild-hatched and already held safely in captivity, so there was no reasonable justification for either expediting this transfer or violating many basic legal requirements for such an action. All had survived Hurricane Maria, were being attended to by an internationally recognized health-care team, and were deemed healthy. The *A. arausiaca* were in the process of rehabilitation for release into the wild.
- The female *A. imperialis* is 18 years old, rescued as a fallen pre-fledgling in 2000, and successfully reproduced in Dominica’s aviary in 2010.
- Moving these birds to a private facility without consulting FWD professionals responsible for Dominica’s parrot-conservation-and-management program undermines decades of proven conservation work by FWD and partnering NGOs.
- ACTP has provided no public accounting of its parrot inventories, import or export activities, finances or governance. ACTP has not shared collection or management information with the international conservation community (e.g., International Species Information System, European Association of Zoos and Aquariums, etc.). There is no evidence that ACTP’s principal officer has any zoological, scientific or veterinary

credentials. ACTP represents itself as a non-profit organization without providing public disclosure about its operations. The facility is not open to public inspection.

- CITES approval of such transfers for conservation breeding purposes should hinge on whether the action is in the species' and individual animals' best interests; whether key stakeholders have been formally consulted and approve of the proposed actions; whether the destination facility is operating in a legal and collaborative fashion; and whether the destination facility is, ideally, a member of, or participant in, the International Union for the Conservation of Nature—Captive-Breeding Specialist Group, or other formal zoological consortium or management system. In this instance, none of these basic elements were in place.
- There is a long history of rare Amazon parrots being taken from the Eastern Caribbean to Europe for captive breeding, with the expectation that their progeny will be released into the wild, enabling the recovery of these endangered species. None of these efforts have born fruit.

The undersigned urgently recommend the following:

- The immediate repatriation of the 12 Dominican parrots. The parrots should be returned via a neutral zoological facility for appropriate disease screening before being returned to the Parrot Conservation and Research Centre in Roseau, Dominica.
- A comprehensive investigation of all parrot imports by ACTP into Germany.
- A full, written accounting of ACTP's activities involving CITES Appendix I species, including inventories, acquisitions/dispositions, hatches and deaths, from any facilities under ACTP control or influence via ownership, agreement or contract.
- Pending investigation and formal review by CITES, a ban on all future transfers of Caribbean parrots to ACTP.

Left unchecked, the recent, furtive export of Dominica's endemic parrots establishes a dangerous precedent that facilitates illegal trade in formally protected species and corrupts longstanding, *in situ* parrot-conservation programs. The international conservation community will not tolerate such activities and implores the CITES Secretariat and the regulatory agencies in all CITES signatory countries to fully enforce the provisions of the treaty as written.

We cannot turn a blind eye. Decisive action must be taken. The futures of the Caribbean's endemic birds are at stake.

Signed,

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