

Open letter to all Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)



Impact of international frog' legs trade on biodiversity

Dear CITES Parties,

We, the undersigned scientists including specialists in the ecology and diseases of amphibians, are very concerned about the high volume of the international trade in frogs' legs and the impact of this trade on wild amphibian populations and ecosystem function. We encourage the international community to take measures to restrict, regulate, and monitor this exploitation to ensure the long-term survival of the targeted frog species, subspecies, and populations and to protect biodiversity.

Amphibians play a crucial role in ecosystem function. Amphibians are important predators of many insects and agricultural pests and are therefore valuable for natural biological pest control. Frogs are significant prey source for a wide variety of species and their tadpoles, as filter feeders, contribute to stabilize water quality in ponds and streams. As a consequence, scientists have warned against the fatal impact of amphibian extinctions on whole food chains and ecosystems.

According to the IUCN Amphibian Assessment "nearly one-third (32 %) of the world's amphibian species are known to be threatened or extinct, 43 % are known to not be threatened, and 25 % have insufficient data to determine their threat status." Furthermore, the IUCN notes that "at least 42 % of all species are declining in population, indicating that the number of threatened species can be expected to rise in the future." Habitat loss and the chytrid fungus are the major threats to the survival of amphibians. International trade, including both extensive illegal trade and inadequately or unregulated legal trade, is putting additional pressure on declining wild populations.

Over the last two decades, Indonesia has been the world's largest exporter of frogs' legs. Though Indonesia reports that its exports are of captive-bred frogs, there is evidence suggesting that many of the exported frogs are wild caught but mislabeled as "captive-bred". Before that, India and Bangladesh were the main suppliers, but due to the significant ecological impacts of the large-scale off-takes, CITES, in 1985, listed two heavily traded frog species in Appendix II. Consequently, in response to these listings and the documented ecological impacts of off-takes, India banned frogs' legs exports in 1987 with Bangladesh following suit in 1989.

Presently, the European Union (EU) alone annually imports 4,600 tons of frogs' legs from Indonesia, which corresponds to an estimated average of 160 million frogs every single year. This trade has contributed to the local disappearance of frogs and, consequently, reports from middlemen of decreasing catch yields in, for example, many parts of Sumatra and Java.

With annual imports of 2,149 tons, the United States is the world's second largest importer of frogs and frogs' legs. In contrast to the EU, where frogs' legs are imported as skinned, processed, and frozen products, a large portion of the frogs imported into the USA, which are destined for the food trade, are imported live. Hence, these imports are not only contributing to the plundering of wild frog populations in the countries of origin, but are also a potential pathway for both invasive amphibian species and amphibian diseases, such as the deadly fungus *Batrachochytrium dendrobatidis*.

Accordingly, we, the undersigned scientists, urge the CITES member states to:

- Recognise the wide-ranging negative impact of the international frogs' legs trade by adequately reflecting these concerns in discussions at the forthcoming CITES Animals Committee Meeting in March 2012.
- Consider submitting and/or supporting CITES listing proposals for discussion at the next Conference of the Parties, CITES CoP 16 in March 2013 for those species most heavily impacted by the frog leg trade from the wild and by developing a mechanism to continuously identify species exploited for the frogs' legs trade that would benefit from CITES listings.
- Promote and/or support a resolution at CITES CoP16 which calls on exporting and importing countries to: consistent with the precautionary principle, reduce trade volumes; ensure such trade of listed and non-listed species is sustainable through credible scientific study; and, for listed species, ensure the preparation of valid non-detriment findings and to improve monitoring of ongoing trade including by documenting species-specific trade volume.
- Agree on a set of measures to appropriately monitor and regulate the trade in frogs' legs using a precautionary approach including the need for field surveys in the countries of origin to identify size and trends of frog population and to, consequently, define sustainable off-take levels based on credible scientific studies and, for listed species, through the making of credible non-detriment findings.

Yours sincerely,

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