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Dear Mr. Solheim,

We the undersigned write today to address grave concerns regarding a recent transfer of extremely rare birds from the Commonwealth of Dominica to the Federal Republic of Germany under the Convention on International Trade in Endangered Species of Wild Fauna and Flora.

This transfer undermines decades of dedicated conservation work in the region and exploits a small island nation just as it begins to recover from the most devastating hurricane in its recorded history. Moving these wild-hatched birds from their home island to a private facility in Germany is not the first such event--endemic, endangered parrots have been transferred from other eastern Caribbean islands to the same private facility. Hence our collective concern that this will not be the last such transfer and our desire to prevent future actions which will further undermine legitimate efforts to save these rare species from extinction.

The justification for moving these birds, purported as an emergency action to protect their species from future hurricanes and volcanoes, is unfounded. In fact, these 12 individual parrots were already safely held in captivity and had survived catastrophic Hurricane Maria in September. They were being attended to by the CITES Scientific Authority for Dominica, the Forestry, Wildlife and Parks Division, with support from IFAW (International Fund for Animal Welfare). Likewise, in Puerto Rico, a similar captive population of threatened parrots survived the same storm, proving that preparations made on both islands effectively protect these birds from such threats, however severe.

Since both species involved in this shipment – *Amazona imperialis* and *A. arausiaca* - appear on Appendix I of CITES, a proper international transfer would require the issuance of both a CITES export permit from Dominica and an import permit from Germany. We urge close scrutiny of these documents given that, at the time of the transfer, Dominica was temporarily under a suspension of “All Trade” by the Convention (effective 30 January 2018) due to lack of reporting compliance with the Convention. This fact alone should have prevented the signing of both permits, and ultimately, the transfer itself. Additionally, Dominica's CITES Management and

Scientific Authorities of record, the Environmental Coordinating Unit, and Forestry, Wildlife and Parks Division, respectively, were not contacted about the transfer and neither signed the CITES export permit. The export permit was signed and executed by an Acting Permanent Secretary. Finally, the "special conditions" section of the permit references an agreement between ACTP and the Government of Dominica, but the CITES Management and Scientific Authorities have no knowledge of any such agreement, and it was not included in the export documentation.

Given the lack of facilities in Dominica to carry out pre-export testing for select pathogens, we urge additional scrutiny of these aspects of the transfer to determine if either the European Union's requirements or Germany's requirements for quarantine and testing prior to shipment were adequately met. Naturally, bio-security threats go in both directions, and untested imported live birds have the potential to introduce dangerous pathogens to threatened species already held in captive collections in Europe.

In closing, we thank you for your decades of commitment to ensuring that wildlife trade does not further threaten the survival of Endangered Species, and respectfully urge the thorough investigation of all aspects of these recent actions. With appropriate steps, ideally these detrimental actions can be mitigated and reversed, and preventative measures can be taken to ensure that no such trafficking of rare species occurs under the auspices of the Convention.

#### Signatory Organizations

American Bird Conservancy

Birds Caribbean

City Parrots

Defenders of Wildlife

Durrell Wildlife Conservation Trust

Echo Bonaire

NABU - Nature and Biodiversity Conservation Union

Pro Wildlife e.V.

Rare Species Conservatory Foundation

Species Survival Network

World Parrot Trust

CC:

EU DG Environment

Mr. Gael de Rotalier Team Leader - CITES and EU Wildlife Trade Policy

Ms Emmanuelle Maire - Multilateral environmental Cooperation

Mr. Jorge Rodriguez Romero - Multilateral Environmental Cooperation

Germany - Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety

Ms. Svenja Schulze - Minister

Mr. Gerhard Adams - CITES Management Authority

Mr. Jochen Flasbarth - State Secretary

CITES Secretariat

Mr. John Scanlon - Secretary General

Mr. David Morgan - Chief, Governing Bodies and Meeting Services

Mr. Tom De Meulenaer - Chief, Scientific Services

Mr. Juan Carlos Vasquez - Chief, Legal Affairs & Compliance

CITES Standing Committee

Ms. Carolina Caceres, Chair

Dominica

Mr. Roosevelt Skerit - Prime Minister

Mr. Minchinton Burton – Director, Forestry, Wildlife and Parks Division

Dr. Reginald Thomas – Acting Permanent Secretary, Ministry of Agriculture and Fisheries

US Fish and Wildlife Service

Dr. Rosemary Gnam – U.S. Scientific Authority