

Inside the Labyrinth

Why Numbers of Iguana Imports Do Not Add Up

*Melissa Kaplan
melissk@sonic.net
<http://www.sonic.net/~melissk/>*

Opening Cans of Worms

It has long puzzled many of us observers of the pet trade in the U.S. that the numbers of imported reptiles being sold in the U.S. were greater than the numbers that one was able to get from LEMIS, the U. S. Fish & Wildlife Service's (FWS) data reporting system. For example, in a recent article in *The Bridge*, Paula Morris quoted a U.S. Fish and Wildlife inspector as stating that the number of iguanas imported in 1996 was 238,000.

I spoke to a FWS wildlife inspector and found out that, for the same year, Columbia had CITES approval to export 700,000 green iguanas, and Guyana approval for 840,000. Even given the fact that not all exported iguanas end up in the United States, the vast majority of them do, and 238,000 is quite a bit different from 1.5 million.

CITES Export Quotas

Countries who are signatory to CITES (Convention for International Trade in Endangered Species) and who are exporting wild-caught animals and plants are required to file their annual proposals for exports of those species with the CITES Secretariat. The proposals are supposedly reflective of the numbers of those plants and animals covered under CITES which can be harvested without adversely affecting the remaining wild populations. However, as Bruce Weisgold, of the FWS Office of Management Authority relates, quotas can be based on criteria in no way relating to the maintenance of sustainable wild populations. For example, Indonesia's quotas on reptiles are based on adding a small amount to the total numbers of animals exported the previous year. Other countries may base their quotas on what the anticipated maximum number of plants or animals that the ranches or farms may be expected to reasonably produce.

Since CITES is concerned with the threat to wild populations, the trade in captive bred CITES II animals and plants are of little concern to them

since their trade does not affect wild populations, aside from founder stock removed from the wild for breeding purposes. (The captive breeding of critically endangered CITES I plants and animals, however, opens a huge can of worms that is confusing even to those charged with administering the CITES and related management programs, as it gets into commercial and noncommercial use of live plants and animals and animal parts.) Technically, countries claiming to export only "farmed" or "ranching" iguanas do not have to submit their quotas to CITES for approval. However, most countries exporting green iguanas (and other live reptiles and reptile skins) are thought—some known—to be laundering wild-caught iguanas, often with the knowledge of their governments. El Salvador, whose government quietly admits it knows that its "farmers" are exporting wild iguanas along with their ranching ones, shrugs and says it can do nothing to control it...yet, since they claim to be exporting only captive hatched iguanas, they are not required to file annual quotas with CITES. The CITES Secretariat warned all signatory countries to CITES to not deal in CITES wildlife trade with Nicaragua due to the fact that Nicaragua had so stripped their wild populations (including exporting heavily parasited, sick, and injured wild-caught adults iguanas) that their exports could no longer be sustained. Apparently, we have to wait for the same to happen in El Salvador before anything will be done there.

Some countries, such as Mexico, just do not have the funds to pay biologists and law enforcement personnel to survey wild populations to be able to find out what, if any, export levels their country can sustain. There is a similar lack of funding to support monitoring of wildlife shipments, so these countries have simply closed their doors to wildlife export—legal wildlife export, that is. Wild-caught animals are still laundered throughout Central and South American countries, smuggled over ill-protected borders into countries that are exporting.

Enter the Labyrinth

CITES also gets information from countries importing plants and animals. In the United States, the FWS has their data system, LEMIS, which collects information on imports. U.S. Customs also has ABI, their data system used by Customs personnel and import brokers. By law, Customs is to upload the data they collect on wildlife imports to the LEMIS system. This data uploading is being done on a regular basis. The combined data in the LEMIS system are used to report data to CITES. However, if a private citizen or organization requests LEMIS data, what they get is only the data collected directly by FWS. The data will not include figures collected by Customs and uploaded from their system to LEMIS.

This means that any agency or individual trying to get information on just the numbers of plants or animals imported into the U.S. is getting data not reflective of what is actually coming in.

When asked about this, FWS said that they are currently bound by the Freedom of Information Act (FOIA) to release only their data. Customs, which, like the FWS law enforcement division that collects and disseminates data, is technically a law enforcement agency. They refuse to release data to any individual or organization. This is, apparently, not based on their law enforcement status but by their claim that to release such information violates trade secrets.

As it is, the data collected by Customs in their ABI system does not include all the information FWS needs for its LEMIS system, and it includes information they do not need. FWS is going to try to surmount this problem by inputting data from a paper form that is already required to be filed by all importers, whether or not the importers or their customs brokers file directly with the ABI system. An indirect benefit to organizations and individuals doing research in this area will be that the figures they will be able to obtain from FWS/LEMIS under the FOIA will represent the actual numbers of the plant or animal imported.

When talking with FWS officials in Los Angeles, San Francisco and their headquarters in Virginia, I found all of them to have rather strong feelings (generally of frustration and political wariness) about the interfacing of the systems and data access. The law enforcement inspectors and officials couched their words most diplomatically, but it is

significant, perhaps, that no one agreed to let me identify him or her by name.

Blackmail

One concern expressed by the FWS law enforcement official in Virginia was that there have been some mutterings by organizations or individuals who have talked about suing Customs to obtain access to the wildlife import data. Customs may lose such a suit, which would mean that they would have to release the import figures. The trouble, he says, is that if Customs wins, not only will they not have to release their data, but FWS will no longer be able to release their own LEMIS data to comply with the Customs position—that release of such data constitutes violation of trade secrets.

This opens up as many questions as it answers. We now know why the figures released publicly from LEMIS do not match actual imports. But what is it in the data that constitutes “trade” protection? Since countries must apply to export CITES plants and animals, apart from any quotas applied for with the CITES Secretariat, and their export permits must contain the exact numbers of plants and animals, by species, who is being harmed by these data being released? The names of importers and exporters are not part of the data released. Not all of the data entered into the LEMIS system or into the new and improved LEMIS II system are or will be released to the public. Some of the data are proprietary and confidential, but not all of it needs to be. So, one wonders why Customs feels it must protect all of its data, even those items related to the monitoring of protected species and having nothing to do with protecting trade interests, just the monitoring of protected species.

Cyberlinks

If anyone is interested in finding out more about Customs, FWS, CITES, and the trade in wildlife, information can be obtained on- and offline from the following agencies and organizations:

U.S. Customs
1301 Constitution Ave., NW
Washington DC 20229
202-927-1210
<http://www.customs.ustreas.gov/>

U.S. Fish & Wildlife Service
 Division of Law Enforcement
 P.O. Box 3247
 Arlington, VA 22203-3247
 703-358-1949
<http://www.fws.gov/>

CITES Secretariat
 15 Chemin de Anemones
 Case Postale 456
 CH-1219 Chatalaine
 Geneva, Switzerland
 41 (22) 979 91 39
<http://www.unep.ch>

TRAFFIC (USA)
 World Wildlife Fund
 1250 Twenty-fourth Street, NW
 Washington, DC 20037
 (202) 293-4800
<http://www.panda.org>

World Conservation Union (IUCN)
 IUCN/US
 1400 16th Street, NW
 Washington, DC 20036
 202-797-5454
<http://www.iucn.org>

Mood Swings for Iguanas

Musician and songwriter Stevie Legend seems to have a passion for something in addition to music—iguanas. Besides being pictured on the back cover of his CD, *Mood Swings*, with two of his iguanid friends, he is also responsible for the illustration on the front cover. Legend has also decided to donate part of the proceeds from the sales of the CD to the International Iguana Society, as stated on the back cover.

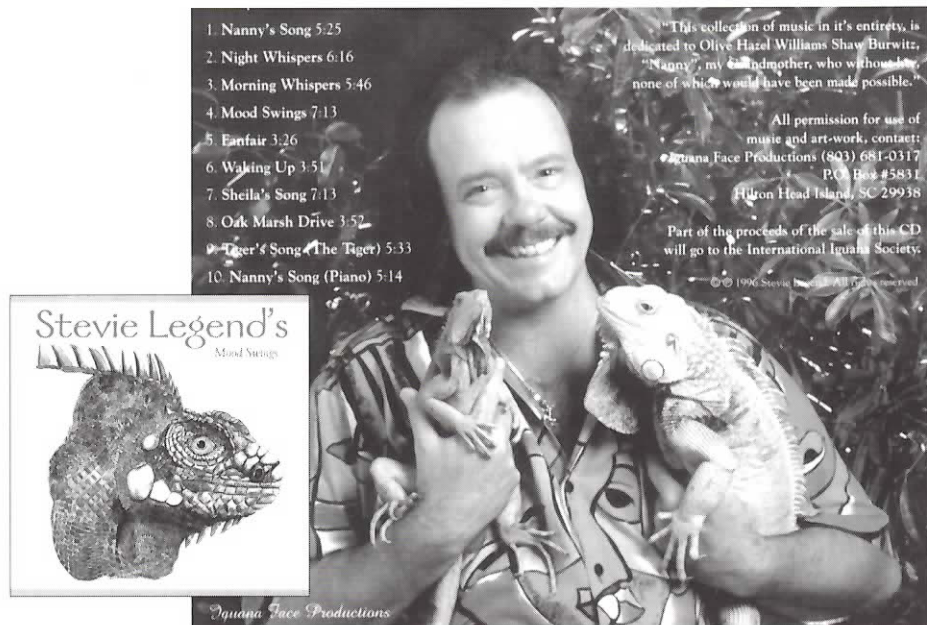
The following is an excerpt from a recent review of the CD:

“With the exception of an occasional riff or two, there is nothing bluesy about Stevie Legend’s first solo CD release *Mood Swings*. As a consummate keyboardist with a reputation for strong R&B/Jazz performance, this full 10-piece effort is in stark contrast and clearly represents another side of the man’s diverse talents. *Mood Swings* is an all instrumental work and with the exception of some guitar and percussion

work on three of the cuts, is performed entirely by Legend using piano, organ, bass guitar and synthesizers.”

If you’re unable to find a copy in your local music store, you can order it by mail. Send a check or money order for \$10.00 + \$3.50 for shipping and handling to:

Iguana Face Productions
 P.O. Box 5831
 Hilton Head Island, SC 29938
 (803) 681-0317



1. Nanny's Song 5:25
 2. Night Whispers 6:16
 3. Morning Whispers 5:46
 4. Mood Swings 7:13
 5. Fairfair 3:26
 6. Waking Up 3:51
 7. Sheila's Song 7:13
 8. Oak Marsh Drive 3:52
 9. Tiger's Song (The Tiger) 5:33
 10. Nanny's Song (Piano) 5:14

This collection of music in its entirety, is dedicated to Olive Hazel Williams Shaw Burwitz, "Nanny", my grandmother, who without her, none of which would have been made possible.

All permission for use of music and art-work, contact:
 Iguana Face Productions (803) 681-0317
 P.O. Box #5831
 Hilton Head Island, SC 29938

Part of the proceeds of the sale of this CD will go to the International Iguana Society.

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Iguana Face Productions