

**Rare Species Conservatory Foundation (RSCF) response to ACTP's
statement about exporting Dominica's parrots to Germany**

In its first written disclosure since secretly exporting 12 endemic parrots from Dominica's aviary to Germany, ACTP has provided an inflammatory *post-hoc* defense for its furtive actions. The self-professed "scientific, evidence driven, objective, conservation" organization fails to address any of the legitimate issues raised in a multi-NGO sign-on letter addressed to UNEP and CITES, and the rambling narrative ignores peer-reviewed, published, scientific literature and the qualified position statements of credentialed parrot conservationists. ACTP fails to provide any evidence of an *a priori* scientific proposal and/or properly vetted justification for the export, properly executed CITES import and export documents, signed health certificates, or a signed, executed, legal agreement between ACTP and Dominica's legally mandated wildlife authority.

Notably, ACTP has no history of conservation support or experience on Dominica whatsoever. The organization has published no scientific, peer-reviewed papers regarding Caribbean parrot ecology, reproduction, or wild population recovery and conservation. It boasts millions of dollars in facility expenses in Germany but does not provide any information about revenue sources, animal inventories, acquisitions or dispositions, organizational governance or the scientific qualifications of its directors.

ACTP slanderously attacks NGOs, experienced and respected conservation zoologists, and senior staff within Dominica's Forestry, Wildlife and Parks Division (FWD) who have successfully championed parrot conservation on Dominica for decades. ACTP's first and only action on Dominica was to coordinate with politically appointed government administrators to clandestinely export wild-hatched parrots to its parrot-breeding facility in Germany-- an action taken without authorization from Dominica's CITES Scientific and legislated wildlife authority (FWD), CITES Management Authority (Environmental Coordinating Unit), nor with consultation or discussion with FWD's longstanding, partnering conservation NGOs. While legitimate conservation NGOs including RSCF have provided millions in EC dollars over a 30+-year span to protect and conserve Dominica's wildlife, support the FWD, provide staff training, vehicles, research equipment, program running costs, aviary operational costs, secure and expand protected areas (including establishing the Morne Diablotin National Park) and provide conservation education and outreach-- all of which prioritize *in situ* conservation-- ACTP has done nothing on Dominica. Just since the hurricane, legitimate conservation NGOs have provided tens of thousands of dollars in essential equipment, supplies, aviary materials, medicines, a new Forestry vehicle, animal-care specialists and support for wild-parrot population surveys. In contrast, ACTP secretly exported Dominica's parrots.

The health examinations conducted on the parrots exported to Germany could easily have been accomplished on Dominica. Biological samples could have been collected and legitimately and legally sent off-island for processing, which would have required proper CITES documentation. This was not done. ACTP conducted tests on the birds after they were brought into Germany. Excluding the possibility that these birds were exposed to diseases after leaving Dominica, any diseases associated with the birds at the aviary represent diseases already found in Dominica's wild populations, since all of the birds tested came from the wild. Importantly, the health report does not discuss the failure to detect DNA from suspected pathogens, with the possible exception of one Jaco parrot suspected with herpesvirus. Furthermore, ACTP imported these same aviary birds into Germany, without proper CITES authorization or pre-shipment screening, potentially exposing European wildlife and the other parrots at its facility to non-native diseases. The test results reported by ACTP only bolster the case that none of the parrots should have left Dominica.

All recovery measures and hurricane-mitigation efforts for the birds could and should have been implemented on Dominica. Every exported parrot was hatched in the wild. The notion that a captive-breeding program for *A. imperialis* can be initiated with two birds-- one of which successfully reproduced in the aviary in 2010-- is insultingly absurd. Does ACTP now intend to collect *A. imperialis* from the wild? The resilient *A. arausiaca* is already rebounding post-Maria, just as it did post-David. There is no scientific justification for a Germany-based, captive-breeding program with 10 Jaco parrots.

Regarding the rescue, rearing and care for the first-ever, captive-bred *A. imperialis* chick, legally evacuated at 24 days of age for hand-rearing at RSCF in 2010, RSCF will not dignify ACTP's slander and lies with a line-by-line response. The full accounting of this bird's remarkable and challenging history was published as a cover article in the peer-reviewed, scientific journal *Zoo Biology* in 2011, co-authored with Dominica's FWD. All import/export procedures were scrupulously followed, with CITES documentation properly executed by Dominica's CITES Management and Scientific Authorities. ACTP's false attacks aim to deflect attention from its own improper, secretive export of Dominica's parrots, which has, justifiably, provoked outcries from the international wildlife conservation community, wildlife veterinarians, and Dominica's citizenry. ACTP's wildly unfounded claims about RSCF and ACTP's unauthorized use of photographs also indicates that ACTP has no knowledge of RSCF's husbandry or conservation practices and does not even recognize one of the world's most respected avian conservation zoologists.

Finally, RSCF will state for the record that if a scientifically justified proposal had been formally presented to Dominica's CITES Management and Scientific Authorities and the country's governing authority for wildlife-- the Forestry, Wildlife and Parks Division-- and if such proposal were openly shared, deliberated and discussed among all relevant and scientifically appropriate parties, including credentialed and experienced NGOs, with a formal decision having been rendered by Dominica's legislated governing authority,

then RSCF would fully accept such a decision, even if RSCF, as an organization, disagreed with it. That is the essence of transparency and scientific integrity. RSCF has clearly stated its position on the conservation issues, with supporting citations and hard facts, analyzing and discussing the conservation issue-- not the personalities or politics. RSCF reiterates its position, "to unconditionally support the country's conservation needs *in situ*, including enhancing FWD's professional capacity and physical infrastructure to enable Dominica to protect its wildlife on Dominica."

RSCF unequivocally stands with the other NGO signatories on the UNEP sign-on letter.