



特定非営利活動法人

日本ウミガメ協議会 Sea Turtle Association of Japan

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May 6, 2011

Dr. Michael Seki
Deputy Director
Pacific Islands Fishery Science Center
National Marine Fisheries Service
2570 Dole Street
Honolulu, Hawaii 96822-2396

Dear Dr. Seki:

I am writing to you in regards to a paper published in the open-access journal PLoS ONE on April 27, 2011 by one of your staff, Kyle Van Houtan. The paper, entitled “Long-Term Climate Forcing in Loggerhead Sea Turtle Nesting”, used nesting data from Japanese rookeries. However, Sea Turtle Association of Japan (STAJ) was not consulted nor contacted at any point during the preparation of this paper. The data used in the paper were not properly cited, and we believe that the authors did not have rights to a portion of the data used in the analysis. As a result of this misuse of data, the trust we that STAJ built with our members has been compromised. The following details our complaint regarding this issue. We request a formal apology from the responsible party, as well as an apology and correction to be published in PLoS ONE.

I founded STAJ in 1990 as an organization where people in Japan working on sea turtles could gather and share information. Since the very beginning, the philosophy of STAJ has been to honor the people who work in the field and collect the data, and we believe that data ownership should belong to those who collected them. For the last 20 years, we have worked on this philosophy based on respect, and hundreds of volunteers and organizations who comprise the Association have entrusted us with their hard-earned, valuable data.

The paper by Kyle Van Houtan, which we understand was a result of the work commissioned by the National Marine Fisheries Service, referenced three publications and reports as data sources of the Japanese loggerhead population counts. These are:

1. Kamezaki N, Toji Y, Matsuzawa Y, eds (2002) *Current status of Japanese loggerhead turtle nesting and beach environment* (in Japanese). Osaka: Sea Turtle Association of Japan.
2. Matsuzawa Y (2010) *Nesting beach management in Japan to conserve eggs and pre-emergent hatchlings of the north Pacific loggerhead sea turtle, 2009 season*. Honolulu: NOAA Western Pacific Regional Fishery Management Council.
3. Takeshita H (2005) The current status of loggerhead sea turtle rookeries in Miyazaki, Japan. In: Kinan I, ed. *Proceedings of the second Western Pacific sea turtle cooperative research & management workshop*. Honolulu HI: Western Pacific Regional Fishery Management Council. pp 27–29.

The first publication listed above is a book that we published in 2002. The publication is an edited volume summarizing raw data generously provided to STAJ from over 60 individuals and organizations who were partners to STAJ at the time. To compile the data, we sent questionnaires to our partners requesting loggerhead emergence and nest counts by year, as well as the names of the people who collected those data, if such information was available. Due to the nature of the publication, we included a data use disclaimer in the book as follows (translated from the introductory pages of the book with editorial clarifications in brackets):

As described above, the emergence and nesting data included in this volume were gathered by a great deal of effort, and we must respect the accomplishment of that work. Upon publication of this volume, these data are considered published, even for previously unpublished data that have been ignored to date by the literature. As such, we request that the author of each dataset be referenced by the “data collector” [noted for each nesting beach], and if the “data collector” is not noted, be referenced by the “compiler” [noted for each nesting beach], as indicated in the following example:

Ohmura, K. (2002) Inakahama. In “Current Status of Japanese Loggerhead Turtle Nesting and Beach Environment” (Eds. Kamezaki, N. et al.), pp.30-31, Sea Turtle Association of Japan, 162p, Osaka.

Given the above, we do not protest the fact that data from our 2002 publication were used in the analysis. However, it appears from the paper that the entire dataset for Kamouda and Hiwasa, as well as pre-1999 data for all other nesting beaches came from the 2002 publication, but the authors did not appropriately reference each data source. Had the authors contacted STAJ prior to the submission of this paper, we could have advised them on the appropriate method of referencing the data providers.

In addition, the second and third publications listed as data sources do not include enough emergence and nest count data to complete the nesting time series that would have been necessary to conduct the analysis in the paper. The only possible explanation we see is that data points were estimated from the small time series figures included in the reports (Figure 1 in Matsuzawa, 2010; and Figure 5 in Takeshita, 2005). However, as a scientist, I argue that this is not an ethical method of extracting data to use

for further analysis without explicit permission from the authors.

Further, the authors note in the Figure 2 caption that “Japan total was provided by the Sea Turtle Association of Japan”. As previously noted, STAJ was not contacted by the authors to provide data or to ask for permission to use the total nest count data for the publication of this paper. I therefore argue that the authors did not have rights or permission to this particular dataset.

STAJ has established trust and working relationships with a number of U.S. scientists over the years, including your staff George Balazs and Donald Kobayashi. However, we are disappointed and discouraged by this incident, as it will potentially cost us the trust we have built with our partners in Japan over the last 20 years. We therefore request that the responsible party send a formal apology to STAJ and its Association members so that we may put this incident behind us. We further request that a follow-up be published in PLoS ONE to address this misuse of data, along with an apology and acknowledgement to STAJ. Lastly, we request that you advise your staff appropriately in the future so that such a situation is not repeated.

Thank you for your attention regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Naoki Kamezaki". The signature is written in a cursive style with a large, sweeping initial 'N'.

Naoki Kamezaki

Director

Sea Turtle Association of Japan

Cc: Sam Pooley, NMFS Acting Chief Scientist

Michael Tosatto, NMFS Pacific Islands Regional Administrator

Kitty Simonds, Executive Director, WPRFMC