

University of Hawaii at Manoa

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March 22, 1982

Mr. Harold B. Allen Acting Regional Director National Marine Fisheries Service 9450 Koger Boulevard St. Petersburg, FL 33702

Dear Mr. Allen:

I am sorry to have taken so long to respond to your letter of 16 February 1982, but other pressing research activities here in the Pacific have demanded my attention. I have now had the opportunity to study and review the petition you sent me requesting a "trade exemption for maricultured green sea turtle products." Briefly stated, I am unable to find any new biological or economic data in the petition that would support or justify granting the request. Basically the same arguments have been set forth that were previously rejected by the National Marine Fisheries Service, the Fish and Wildlife Service, the Courts, and even earlier by the State of California. The evidence and arguments set forth over the years to support the ban on maricultured products were, and still are, in my view, more than ample to show that protection of wild sea turtle populations would very likely be enhanced. Furthermore, if maricultured products are exempted, it is my view that the threat to wild turtles will increase by both the new additional "farms" that will surely come about, and by increased illegal posching.

In closing, I might add that I am convinced that the ban on maricultured products has served to decrease the illegal taking of green turtles here in the Hawaiian Islands.

Sincerely,

George HA Balazs

Assistant Marine Biologist (currently serving under an IPA contract with NMFS)