

To those it may concern,

The primary threat to wild tortoise populations in Southern Spain is from industrial scale agriculture, which eradicates vital habitats, and from other human activities that affect these habitats such as the construction of roads, golf courses, housing estates and railway lines. These activities are not only directly responsible for the immediate deaths of thousands of tortoises during construction, but they split and divide habitats making it impossible for even the surviving population to remain viable in the medium to long term. In addition, roads cause continued casualties, further depleting surviving populations.

Compared to these very grave threats, the keeping of some tortoises as pets by the public is an extremely minor and relatively unimportant problem. It is also a problem that can be addressed in various ways, by better public education, and by the intelligent use of a legal and practical infrastructure that is carefully designed to achieve a positive result for conservation and for animal welfare. It is vital that the public understand the issues involved, and that they feel able to support them. Progress in conservation cannot be achieved without the understanding and support of the public in general.

We would point out that it is a complete and total waste of time, public funds and resources to concentrate on prosecuting private pet keepers while doing absolutely nothing to fully protect vital habitats from destruction. Unfortunately, this is exactly what is presently happening. Habitats are destroyed on a daily basis, killing countless tortoises and removing any suitable place for them to live, while a family with one pet tortoise in their garden is being threatened with prison. This is absurd and irrational. It actually brings conservation legislation into disrepute and cannot possibly make any useful contribution to the conservation of this species.

Tortoise conservation requires an integrated approach to achieve positive results. This must involve:

- 1) Effective habitat protection and management. Without this, every other effort will inevitably fail. This is so important, that unless it is the main priority any other efforts are completely useless. There is no practical point to conserving a species if it is left with nowhere to live. Tortoises have very specific habitat requirements. They cannot just survive anywhere. An effective system of conserving key habitats is critical.
- 2) Public education. This is especially important with a species such as *Testudo graeca* where the public might frequently encounter them. The public must learn that in most cases, if they see a tortoise they should not 'rescue' it but should leave it alone to continue in the wild, to reproduce and reinforce the population. There should also be a reliable and easy to access source of advice available when a genuine case requiring rescue is found, such as an injured tortoise. This is where the role of a rescue centre can be important. Such centres must operate under strict guidelines, however, including adequate biosecurity, and must also meet acceptable standards of animal welfare.
- 3) It needs to be recognised that the release of ex-pets is a very high risk option. The full reasons are explained elsewhere. It also needs to be realised that any actions that might encourage or frighten people into releasing ex-pets is also not desirable. Indeed, this could have devastating consequences for disease and genetic contamination. It is better that such animals are managed where they are, and are not moved unless absolutely necessary.

The policy of requiring existing keepers to surrender tortoises 'in bulk' to a "Rescue Centre" is extremely dangerous and will produce zero conservation benefits. None at all. The most obvious effect is to create a serious animal welfare and ethical problem where none existed before.

It is extraordinarily difficult to safely, effectively and humanely keep a very large number of tortoises in one location. There will be problems with meeting their very specific physiological and environmental needs, problems with providing a suitable diet, and severe problems with preventing cross-contamination with viral, bacterial and parasitic pathogens.

The animal welfare and ethical problems created by collecting pets from the public and concentrating them at a 'rescue centre' are very, very serious. **Recently, it has become clear that one centre alone where this has been attempted has succeeded only in achieving an overall mortality rate in excess of 90%.**

**These figures are absolutely unacceptable by any standards. There can be no possible excuse for causing the deaths of more than nine out of every ten animals received. It is not acceptable either scientifically, or acceptable ethically. The public will not accept it and neither will international organisations dedicated to tortoise conservation and animal welfare.**

Any policy or activity that generates such results must be considered a complete failure and cannot possibly be justified.

The reasons cited for such horrible results include the deliberate "sacrifice" (a polite name for killing) tortoises that had been donated to the centre by their ex-keepers. The reasons for these mass killings are said to involve "maladjustment", "morphological alterations" and "hybridization". It is completely unclear how accurate these assessments and diagnoses even were. What is very clear is that when the public knows that any tortoise they surrender has a better than 9 out of 10 chance of being slaughtered they will no longer support such laws and policies.

The numbers are truly shocking. **Out of 2,642 tortoises received between 2002 and 2015, only 76 survived.**

The Tortoise Trust is appalled by these numbers. We have worked for tortoise conservation all over the world for more than 35 years, and I cannot remember a worse case of failed management. We have also worked with seizures of animals from customs and from airports, often involving hundreds of animals at a time, and even in the case of the most fragile species in poor condition, would not expect mortality results on this scale. It is very obvious that something is seriously wrong with the management of this species by the regional government authorities in Spain.

We call upon the authorities to urgently reconsider these failed policies. It is completely wrong to demand that the public surrender animals to an almost certain death. This needs to stop now, before more unnecessary deaths occur.

It achieves absolutely nothing for conservation, but instead will cause the exact opposite effect as people release tortoises at random instead of sending them for neglect or execution, with all the risks of biological and genetic contamination that this generates.

A far more rational approach would be that proposed by ACUDE, which we find to be scientifically valid, ethically acceptable, and also to be very practical and economical. The policy proposed by ACUDE has our full support and we are prepared to work with them to achieve positive results for the conservation and welfare of tortoises in Spain. It is time for a new, innovative approach that can command the support of relevant experts and biologists. The proposals put forward by ACUDE are

an excellent basis for turning this situation from a shameful disaster into a world-leading success story.

We urge you to seriously consider the proposals of ACUDE. These proposals have our full support and we hope that you will also support them. It would be a major step towards the effective (and humane) treatment and conservation of tortoises in Spain.

Respectfully,

**A. C. Highfield**

Director: Tortoise Trust

Chairman: Jill Martin Fund for Tortoise Welfare & Conservation

Author: "Practical Encyclopedias of Keeping & Breeding Tortoises & Turtles", "Universities Federation for Animal Welfare Companion Animal Handbook" (Tortoise Chapter), Oxford University Press (in press).

