



November 18th, 2014

Dan Ashe, Director
U.S. Fish and Wildlife Service
Department of the Interior
1849 C St NW
Washington, DC 20240

Re: Immediate Request to Protect Native Salamanders

Dear Director Ashe,

On behalf of the Society for Conservation Biology's North America Section (SCB-NA), we urge you to protect America's salamanders by taking action against a well-documented emerging wildlife disease, *Batrachochytrium salamandrivorans* (*Bs*). SCB is a global community of conservation professionals dedicated to the science and practice of conserving the earth's biological diversity. SCB has worked since 1985 to strengthen and defend policies that protect and enhance biological diversity due to its importance to the nation's natural and human environment.

The grave threat *Bs* poses to salamanders received recent attention in the scientific and lay literature. On October 30, 2014, the journal *Science* published a key study explaining this threat, "Recent introduction of a chytrid fungus endangers Western Palearctic salamanders," and an "In Depth" feature entitled "The coming salamander plague". The New York Times set forth the policy context in an October 31 article entitled, "Infection That Devastates Amphibians, Already in Europe, Could Spread to U.S." We understand that on October 29, 2014, Fish and Wildlife Service staff met with one of the *Science* paper co-authors, Dr. Karen Lips of the University of Maryland, and subsequently briefed you on this issue.

The threat from *Bs* can be summarized as follows: A very alarming emerging fungal pathogen of Asian origin, most likely carried into Europe via the pet trade, is now killing native salamanders in Holland and Belgium. *Bs* has not yet reached the United States, and all steps must be taken to keep the pathogen out of this country. Our native salamanders are potentially vulnerable to decimation via this new disease if it arrives. The arrival of *Bs* in the eastern United States is of particular concern, as that region is the global center of salamander diversity. As you are aware, salamanders play a vital role in their respective ecosystems, regulating prey species, enhancing biodiversity, and promoting ecosystem integrity. Ecosystem integrity, in turn, supports the human environment.

Comparable novel pathogen incursions in recent years have included West Nile virus in birds, chytrid fungus in frogs and salamanders, and white-nose syndrome in bats. America's native wildlife populations cannot withstand multiple devastating disease outbreaks. Fortunately, we have ample opportunity to prevent the arrival and spread of *Bs* in the United States. We ask you to use every possible authority to prevent the pathogen's arrival, including the Lacey Act and the Endangered Species Act (ESA). Such action will help protect the many salamander species already listed as threatened or endangered under the ESA, and prevent an avalanche of new listings.



Society for Conservation Biology

A global community of conservation professionals

We recommend that your agency promptly develop criteria to certify amphibians as free of *Batrachochytrium salamandrivorans* and other deadly salamander pathogens or parasites, and suspend all imports of any salamander or newt not certified by the Service as fulfilling those criteria. Such certification could be based on verified clean sources, reliable testing, treatment, quarantine, and/or other measures; the precise approach will require expert design and review. The sector of animal import businesses that handles salamanders is very small; they should be supportive of measures that ensure their shipments are certified free of a potentially devastating disease. Voluntary measures by live animal importers and information/education campaigns are all also vital.

Thank you for your attention to our concerns, and we look forward to your prompt response to this critical issue.

Respectfully submitted,

Carlos Carroll, President of SCB-NA

Doug Parsons, SCB-NA Policy Director

CC: David Hoskins, Craig Martin, Susan Jewell, USFWS

Martel et al. Recent introduction of a chytrid fungus endangers Western Palearctic salamanders. *Science* 346, 630 (2014).
Stokstad, E. The coming salamander plague. *Science* 31 October 2014: 346 (6209), 530-531.