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September 8, 2022

Mr. Jorge Rodriguez Romero  
Head of Unit  
European Commission  
Directorate-General Environment  
Green Diplomacy & Multilateralism  
Global Environmental Cooperation & Multilateralism (ENV.F.3)  
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Sent by electronic mail ([envcites@ec.europa.eu](mailto:envcites@ec.europa.eu))

Re: CITES COP19 – Request for support to list glass frogs on Appendix II

Dear Mr. Rodriguez Romero,

Defenders of Wildlife, Animal Alliance of Canada, Animal Welfare Institute, Humane Society International, International Fund for Animal Welfare, Pro Wildlife, Species Survival Network, and Zoocheck, would like to urge your support for CITES proposal 34 submitted by Argentina, Brazil, Côte d'Ivoire, Costa Rica, Dominican Republic, Ecuador, El Salvador, Gabon, Guinea, Niger, Panama, Peru, Togo, and the United States to include the family Centrolenidae (glass frogs) in Appendix II at COP19.

If adopted, the glass frog proposal would lead to the inclusion of 12 species from the family Centrolenidae in Appendix II in accordance with Article II paragraph 2 (a) of the Convention and satisfying Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17), as these imperiled species are in trade. The proposal also includes all other species in the family Centrolenidae in Appendix II in accordance with Article II paragraph 2 (b) of the Convention and satisfies Criterion A in Annex 2b of Resolution Conf. 9.24 (Rev. CoP17), due to look-a-like concerns. All species of the family Centrolenidae (158 species)<sup>1</sup> warrant listing because it is often extremely difficult, if not impossible, to tell species of the family apart. If the entire family of species is not included in Appendix II, the identification challenges faced by law enforcement officers would quickly be exploited by traffickers and could lead to the

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<sup>1</sup> This family contains a total of 158 species (including 2 newly described in 2022).

rapid decline of non-protected species. Given this, effective implementation of a CITES Appendix II listing for glass frogs requires that all species be listed.

### **Conservation status**

The current conservation status of glass frogs is very concerning. Many glass frog species have small ranges and are threatened by ongoing habitat fragmentation, climate change, overexploitation for the pet trade, introduction of exotic species, chain extinctions, and disease, as well as other threats.

Of the species in the family Centrolenidae that have been evaluated by the IUCN Red List of Threatened Species (2020), 71 percent (69) of species are imperiled and declining in the wild<sup>2</sup>. More specifically, the proposal includes 10 Critically Endangered, 28 Endangered, 21 Vulnerable, 11 Near Threatened, and 28 species classified as Data Deficient (DD). Many of these DD species may be endangered,<sup>3</sup> but they are elusive species and therefore difficult to assess. In addition to these worrisome statistics, the biological characteristics of many of these glass frog species also render them especially vulnerable to exploitation. The males of certain species of glass frogs, for example, are known to actively defend their eggs against predators<sup>4</sup>, which can result in significantly higher mortality rates if these guardian males are removed<sup>5</sup>.

### **The growth of the pet trade**

A particularly concerning trend harming glass frogs is their increasing popularity in the international pet trade. Demand for the frogs as pets has recently soared by a factor of more than ten. While demand for the species is global, the USA, Germany, the Netherlands, and Spain, are the principal markets, with many traders offering glass frogs for sale online and at European reptile and amphibian fairs.

Although some permits are granted for the export of glass frogs from source countries, many range states (e.g., Costa Rica, Ecuador, Guatemala, Brazil, among others) protect the family at a national level. Therefore, much of the trade that occurs is likely illegal as evidenced by the regular discovery of animals being exported out of Central and South America. Due to the multitude of environmental pressures and pathogens already causing

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<sup>2</sup> See Centrolenidae proposal: <https://cites.org/eng/cop/19/amendment-proposals>.

<sup>3</sup> Borgelt, J., Dorber, M., Høiberg, M.A. et al. More than half of data deficient species predicted to be threatened by extinction. *Commun Biol* 5, 679 (2022).

<sup>4</sup> Vockenhuber, E., Hödl, W. and Karpfen, U. 2008. Reproductive behaviour of the glass frog *Hyalinobatrachium valerioi* (Anura: Centrolenidae) at the tropical stream Quebrada Negra (La Gamba, Costa Rica). *Stapfia* 88, Kataloge der oberösterreichischen Landesmuseen Neue Serie, 80 (2008): 335-348.

<sup>5</sup> Delia, J., Bravo-Valencia, L. & Warkentin, K.M. 2017. Patterns of parental care in Neotropical glass frogs: fieldwork alters hypotheses of sex-role evolution. *J. Evol. Biol.* 30(5): 898.

declines in glass frog species, any amount of unregulated trade could be detrimental to wild populations.

### **Need for sustainable, traceable and legal trade**

Based on the best available scientific information, most glass frog species are either declining or already threatened with extinction. It is in this vulnerable state that these species are contending with the growing threat posed by the international pet trade. Most range states have responded to this situation by protecting glass frogs, but seizure data and evidence of the availability of these species in key markets demonstrates that more must be done to halt the illicit trade and avoid utilization that is incompatible with their survival.

Given the threat posed by unregulated trade, this proposal complies with the Convention criteria for listing. Considering the evidence presented above and the precautionary principle, the family Centrolenidae warrants listing on Appendix II. Taking this step would improve data collection and put in place much needed safeguards for dozens of glass frog species that are increasingly being unsustainably exploited and traded.

### **Request for support**

As a key import market for glass frogs, we strongly urge the EU to take the opportunity to strengthen its leadership as a champion for the conservation of biodiversity and support the efforts of the range states that have submitted this proposal for consideration at CoP19. As is apparent by the list of the proponents of this proposal, as well as the logo for this year's CoP, this is an important proposal for the region these species call home.

At COP18, a previous proposal to list glass frogs on Appendix II garnered significant support and only failed by two votes. Consequently, the EU position on this proposal could be determinative. Therefore, we respectfully request that the EU demonstrate its support for species conservation and solidarity with the Latin American region by supporting an Appendix II listing for the glass frog proposal at CoP19.

Sincerely,

Defenders of Wildlife  
Animal Alliance of Canada  
Animal Welfare Institute  
Humane Society International  
International Fund for Animal Welfare  
Pro Wildlife  
Species Survival Network  
Zoocheck