



To the Ministers for the Environment of the European Union's Member States

25 January 2024

Dear Minister,

The undersigned organisations, aiming to ensure biodiversity conservation and animal welfare, are concerned about the predominant role of the European Union in imports of frogs' legs and call on you to take appropriate measures to minimize the ecological impact of this trade and the amount of cruelty it causes.

In particular, the European Union should urgently propose that species of the genera *Fejervarya* and *Limnonectes* imported from Southeast Asia and species of the genus *Pelophylax* imported from Turkey and Albania be included in Appendix II (i.e., control of international trade) of CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora). This trade in frogs' legs is neither regulated (as the target species are not covered by CITES) nor registered on a species-specific basis (only recorded as the product group "frozen frogs' legs"). Therefore, there are no measures in place to ensure the sustainability of this trade.

Recent studies^{1 2 3} confirm the following facts:

- The EU's annual imports of frogs' legs amount to more than 4,000 tonnes of frogs' legs, which corresponds to 81 to 200 million frogs, depending on the size of the species.
- For decades, the vast majority of these frogs have been and are still caught from nature, contributing to the decline of wild frog populations elsewhere.

¹ "Deadly Dish – Role and responsibility of the European Union in the international frogs' legs trade". Report by Pro Wildlife & Robin des Bois (eds), 28 pp., available at <https://www.prowildlife.de/wp-content/uploads/2022/06/DEADLY-DISH-frogs-legs-report.pdf>

² Auliya, M. et al. (2023): The European Market Remains the Largest Consumer of Frogs' Legs from Wild Species. *Conservation* 3: 53-58. <https://doi.org/10.3390/conservation3010004>. <https://www.mdpi.com/2673-7159/3/1/4/pdf>

³ Çiçek, K. et al. (2020). Unsustainable harvest of water frogs in southern Turkey for the European market. *Oryx* 55(3): 364-372. <https://rb.gov/siev>

- Belgium is the main importer for the EU market, accounting for 70% of imports, with France still being by far the largest consumer.
- While in the past India and Bangladesh were the main suppliers to the European market, both countries obtained the listing of two species in Appendix II of CITES in 1985 (*Euphlyctis hexadactylus* and *Hoplobatrachus tigerinus*) and banned exports in 1987 and 1989, respectively, because their frog populations had collapsed and, as a result, pests and insect plagues increased, leading to intensified use of pesticides.
- Ongoing overexploitation is now driving frog populations in exporting countries (e.g., Indonesia, Turkey, and Albania) to a significant decline. Turkish field biologists have warned that native edible frog species could become extinct by 2032 if current exploitation continues.
- DNA analyses of frog legs found in French supermarkets revealed that the once most sought-after frog species from Indonesia (*Limnonectes macrodon*) has already disappeared from the market. Careful monitoring of the market shows that distributors are deliberately keeping the origin and identification of species vague.
- The killing methods are cruel: most frogs' legs are cut off with scissors, knives or axes - without an anaesthetic. The upper half of the frog is disposed of in a dying state, the legs are processed for export.

Although the commercial capture of many frog species native to the EU is prohibited in the EU unless a derogation is granted (Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora), the EU is still responsible for the ongoing large-scale exploitation of wild frogs outside its border. It is also responsible for the imbalance of ecosystems in exporting third countries, notably due to the proliferation of mosquitoes and rice brown planthopper, of which frogs are the main predators. In a way, the health of human populations may also depend on conserving these frogs, since mosquitoes carry diseases such as malaria and dengue fever⁴.

Mass imports of wild frogs from third countries are incompatible with the biodiversity protection objectives set out in the EU's Biodiversity Strategy 2030. The EU cannot aim to protect biodiversity within its borders while at the same time over-exploiting it outside the EU.

Numerous recent articles in the international and European media, particularly in France, confirm that civil society is increasingly concerned about the fate of amphibians and frogs in particular^{5 6 7 8 9 10 11 12 13 14}.

We therefore ask you to propose at the next Conference of the Parties to CITES in 2025 that the frog species imported into Europe for culinary purposes be included in Appendix II. We also ask the

⁴ Springborn et al. (2022) 'Amphibian collapses increased malaria incidence in Central America *', Environmental Research Letters 17(10): 104012.

<https://doi.org/10.1088/1748-9326/ac8e1d>

⁵ <https://reporterre.net/Plusieurs-especes-de-grenouilles-menacees-a-cause-de-notre-appetit-pour-leurs-cuisses>

⁶ https://www.liberation.fr/environnement/biodiversite/importation-massive-de-cuisses-de-grenouilles-il-y-a-de-quoi-bondir-20231208_7YS6URRFQJD2NCNA5RDTJXWFMU/

⁷ <https://www.leparisien.fr/environnement/faut-il-arreter-de-manger-des-cuisses-de-grenouille-23-06-2022-U7JBQHYRV5EWLJUJU4PBOUHTJQ.php>

⁸ <https://france3-regions.francetvinfo.fr/grand-est/vosges/la-foire-aux-grenouilles-de-vittel-fait-scandale-350-000-animaux-amputes-vivants-a-l-autre-bout-du-monde-2758606.html>

⁹ https://www.lemonde.fr/planete/article/2023/12/07/souffrances-animales-et-declin-des-amphibiens-la-face-cachee-de-la-consommation-de-cuisses-de-grenouilles_6204359_3244.html

¹⁰ <https://www.politico.eu/article/stop-eating-frogs-ngos-robin-de-bois-pro-wildlife-criticism-france-christmas/>

¹¹ <https://www.nationalgeographic.com/animals/article/eu-frog-leg-trade>

¹² <https://www.scmp.com/news/asia/southeast-asia/article/3229561/france-loves-its-frogs-legs-indonesia-and-vietnam-thats-becoming-problem>

¹³ <https://www.spiegel.de/panorama/froesche-verzehr-von-froschschenkeln-in-der-eu-gefaehrdet-arten-a-c394f650-6392-4de5-8286-94b9769236cf>

¹⁴ <https://www.thecanary.co/global/world-analysis/2023/01/25/eu-under-pressure-to-act-over-extinction-risk-from-its-massive-frogs-legs-trade/>

Government of your country to suspend imports of frogs' legs in your country, for which the killing methods are not acceptable in the EU.

We look forward to your reply.

Charlotte Nithart

Your sincerely,

1. Charlotte Nithart, Robin des Bois, France – on behalf of:
2. Dr. Sandra Altherr, Pro Wildlife, Germany
3. Jill Roberts, Animals Asia, Hong Kong
4. Benoît Thomé, Animal Cross, France
5. Jan Creamer, Animal Defenders International
6. Lorena Herceg, Animal Friends Croatia
7. Elaine Toland, Animal Protection Agency, United Kingdom
8. DJ Schubert, Animal Welfare Institute, USA
9. Marc Giraud, ASPAS (Association pour la Protection des Animaux Sauvages), France
10. Christophe Coret et Sylvie Cardona, AVES (Agir pour le Vivant et les Espèces Sauvages), France
11. Dr. Mark Jones, Born Free Foundation, United Kingdom
12. Ericka Ceballos, CATCA Environmental and Wildlife Society, Canada
13. Alexandra Morette, Code Animal, France
14. Alejandra Goyenechea, Defenders of Wildlife, USA
15. Dr. Barbara Felde, Deutsche Juristische Gesellschaft für Tierschutzrecht, Germany
16. Geit Karurahu, Eesti Loomakaitse Selts, Estonia
17. Dr. Marion Garai, Elephant Reintegration Trust, South Africa
18. Nicolas Clark, Eurogroup for Animal Welfare, Belgium
19. Giovanna Costantini, FAADA (Fundación para el Asesoramiento y Acción en Defensa de los Animales), Spain
20. Christophe Marie, Fondation Brigitte Bardot, France
21. Vera Weber, Fondation Franz Weber, Switzerland
22. Rüdiger Jürgensen, Four Paws, Germany
23. Antoine Gatet, France Nature Environnement, France
24. Martine Esther Petit, France Nature Environnement Bourgogne-Franche-Comté, France
25. Gérard Groubatch, France Nature Environnement Territoire de Belfort, France
26. Dr. Joanna Swabe, Humane Society International / Europe, Belgium
27. David Germain-Robin, IFAW (International Fund for Animal Welfare), France
28. Gianluca Felicetti, LAV (Lega Anti Vivisezione), Italy
29. Allain Bougrain Dubourg, LPO (Ligue pour la Protection des Oiseaux), France
30. Brigitte Gothière, L214, France
31. Arnaud Greth, Noé, France
32. Muriel Arnal, One Voice, France
33. Amandine Sanvisens, PAZ (Paris Animaux Zoopolis), France
34. Dr. Tanja Breining, PETA Germany
35. Dener Giovanini, Renctas, Brazil
36. Dr. Andrzej Kepel, "Salamandra", Polish Society for Nature Conservation, Poland
37. Brian Noseworthy, Secret Bay Project Society, Canada
38. Rémi Luglia, SNPN (Société Nationale de Protection de la Nature), France
39. Claude Miaud, Société Herpétologique de France, France
40. Ann Michels, Species Survival Network, international
41. Stefania Falcon, Wild Animal Protection Forum (for its 28 member organisations), South Africa
42. Dr Alain Moussu, Vétérinaires pour la Biodiversité, France