[Methods used to add or remove animals from Florida's list of imperiled species have engendered considerable debate. In November 2003 following months of controversy, the Florida Fish and Wildlife Conservation Commission (FFWCC) ruled there would be no more changes to the State's list until at least November 2004 (except for emergencies). The decision came during discussion of a controversial proposal to lower the status of Florida manatee and followed a vote taken in September 2003 to lower the status of Red-cockaded Woodpecker. FFWCC believed that too many questions and unresolved problems existed and it would take at least a year to correct its listing process.

The FOS Conservation Committee has been an active participant in the dialogue surrounding the listing process. The criteria FFWCC used in its recent decisions were adapted from methods proposed by the International Union for the Conservation of Nature in 1996. A central concern has been whether FFWCC's adaptation of IUCN criteria was appropriate. To provide a more in-depth look at this question, FOS solicited comments from Russell Lande, Professor at University of California, San Diego. Dr. Lande played a key role in the initial formulation of the IUCN criteria and has been an active participant in on-going debates concerning the IUCN process.

James Cox, Chair, FOS Conservation Committee]

## COMMENT ON EXTINCTION RISK CATEGORIES AND CRITERIA USED BY THE FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION AND THE STATE OF FLORIDA

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This comment concerns the system of assessing risk of species extinction in Florida developed and currently employed by the Florida Fish and Wildlife Conservation Commission (FFWCC) and officially adopted in 1999 by the State of Florida (Florida Administrative Code Rule 68A-27.0012, Cox et al. 2002). The system employs the categories and criteria developed by the International Union for the Conservation of Nature and Natural Resources (IUCN), also known as the World Conservation Union, used by IUCN from 1994 to 2001 (IUCN 1994, 2001) for their Red List of Threatened Species around the world (IUCN 2002). IUCN Categories and their underlying Criteria were developed from initial suggestions by Mace and Lande (1991) followed by an extensive process of testing, evaluation, and modification in numerous workshops and expert panels dealing with a wide variety of taxa (IUCN 1994, 2001). The IUCN Red List Categories and Criteria thus represent a consensus of international scientific opinion concerning classification

of species extinction risk. It is laudatory that a U.S. governmental organization has used the IUCN Red List Criteria and Categories, However, this apparent adoption of internationally recognized standards for assessing extinction risk disguises one minor alteration with major implications. Although the IUCN (1994) Criteria under each Category were adopted verbatim, the names of the IUCN Categories "Critically Endangered, Endangered, and Vulnerable" were altered by the FFWCC and the State of Florida to become "Endangered, Threatened, and Of Special Concern". The first two of these relabeled Categories correspond to terms in the U.S. Endangered Species Act. As one of the principal architects of the IUCN criteria (having coauthored the initial suggestions and attended several of the subsequent workshops), I can write with some authority that the relabeling of the IUCN Categories by the FFWCC and the State of Florida seriously violates the intent and the spirit of the IUCN Categories. The IUCN Category "Critically Endangered" was developed to draw special attention to species that are in extremely high risk of extinction in the immediate future without concerted conservation action. The relabeling also contradicts both common sense and plain English by equating IUCN "Critically Endangered" to Florida "Endangered". In discussions during the IUCN workshops mentioned above, Dr. Georgina Mace agreed that the IUCN Categories "Endangered" and "Vulnerable" logically correspond to the "endangered" and "threatened" categories of the U.S. Endangered Species Act. These considerations indicate that the system of assessing extinction risk recently adopted by the FFWCC and the State of Florida will facilitate downlisting and/or delisting currently listed species, accelerating the erosion of biological diversity in Florida.

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