

LETTERS

edited by Jennifer Sills

Turkey's Biodiversity Funding on the Rise

THE NEWS & ANALYSIS STORIES "FRAGILE WETLAND WILL TEST TURKEY'S RESOLVE IN PROTECTING biodiversity" and "For scientists, protests morph into fight for academic freedom" (J. Bohannon, 26 July, p. 332) deserve to be set in a wider context. Turkey is covered by three global biodiversity hot spots and has 3000 endemic plant species and nearly 100 endemic vertebrates (1). Its wetlands lie on one of the three principal migration routes for Eurasian birds wintering in Africa (2). One might therefore hope for a strong financial commitment to biodiversity conservation, not least because Turkey has ratified the Convention on Biological Diversity (3).

We compared Turkey's biodiversity funding to other countries' for 2001 to 2008. We used newly acquired data (4, 5) to expand on a recent study (6) from which Turkey had been excluded due to inadequate information on its conservation financing. We estimate that Turkey's funding was \$13.5 million U.S. dollars (USD) annually (mean for 2001 to 2008). This level of expenditure ranks Turkey as one of the 20 worst countries in the world for funding biodiversity, alongside countries such as Republic of the Congo and Côte d'Ivoire (6). Indeed, Turkey's own 2007 Biodiversity Action Plan states that "the insufficiency of [financial] resources...and the ineffective use of resources...draw attention" (7).



Aras River in Turkey.

Such substantial underfunding represents a potential extinction risk for both local and global biodiversity, including nearly 2000 threatened endemic plant species (1). However, there are recent, promising changes. Turkey's 2012 and 2013 conservation budget was triple the 2004 budget in real terms (4, 5). This is roughly equivalent to jumping 20% up the rankings in 8 years (from 113th to 87th out of 128 countries analyzed). Turkey had also planted more trees than any other country except Ethiopia in 2009, even if largely in a production forestry context (4, 8).

The new level of funding effort thus represents one large step forward, although many more steps are needed to halt biodiversity loss (9). For one, we strongly encourage Turkey's government to make the unusually high 2012 and 2013 budget commitments a new baseline for coming years, pending further improvement. We must also work to increase international donor contributions to biodiversity in Turkey, which fell from \$6 million USD annually in 2000 to 2001 to \$0.75 million USD in 2007 to 2008 (10). Regardless of funding, to improve its environmental performance, Turkey will have to enforce its environmental laws rather than dismantle them (9).

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Waiving Concerns About Conflicts of Interest

IN THEIR POLICY FORUM "UNCAPPING CONFLICT OF INTEREST?" (7 June, p. 1172), S. F. Wood and J. K. Mador argue for caps on the Food and Drug Administration (FDA) waivers of conflicts of interest (COIs) among members of advisory committees, but they do not identify substantial weaknesses in their arguments.

A systematic study by an FDA contractor tested and rejected the hypothesis that advisers with waived and disclosed COIs vote in favor of those interests more frequently than advisers with no such conflicts (1). Golec *et al.* independently report similar results (2). If advisers with disclosed COIs vote like advisers with no such conflicts on questions such as product approvals and blackbox warnings, it is not clear how limiting the number of committee members with COIs would improve committee recommendations.

Wood and Mador claim that many able and willing experts lack conflicts, but do not mention descriptions of unsuccessful searches for COI-free advisers typically found in the FDA's COI waivers [e.g., (3, 4)]. Granting more COI waivers may increase