



AAV Position Statement

House Resolution 669: Non-native Wildlife Invasion Prevention Act

The Association of Avian Veterinarians (AAV) is an international professional organization of 2,300 veterinary practitioners that promotes and advances avian medicine, welfare and conservation through education of its members, the at-large veterinary community, and the public.

The majority of our members also treat other exotic animals, including small mammals, reptiles, amphibians and fish. On behalf of our members and the public we swore to serve as part of our Veterinarian's Oath, we urge you to not support House Resolution 669: Non-native Wildlife Invasion Prevention Act (H. R. 669).

As veterinary professionals, we are concerned about the impact of invasive species and support the development of a strategic, risk-based process to prevent their introduction into the United States. However, we believe that this legislation, as written, will not achieve its intended purpose for these reasons:

1. The bill requires funds and staffing not currently available to the U.S. Fish and Wildlife Service (USFWS).
2. The timetable for H. R. 669 is not achievable given the thousands of species of mammals, birds, reptiles, fish and amphibians that will require risk assessment. The time required for risk assessment will leave millions of pet owners, pet retailers, breeders and millions of exotic animals in limbo awaiting their fate.
3. The bill restricts species in habitats where invasion is biologically impossible. Few species have a nationwide ecological impact. These restrictions are better handled at the state or local levels.
4. The bill legislates that the USFWS determine the potential harm of non-native species in all 50 states and territories. However, these areas comprise vastly different ecosystems. The assessment criteria used to place a species on the "Approved List" is difficult to accurately determine or define. If it does not already exist, scientific evidence may take years to develop and its interpretation may be highly subjective. Endless debates and challenges by animal rights groups will paralyze this process. H. R. 669 also lacks a process to verify the scientific data and conclusions presented in proposals. As a result, the litigious nature of this bill will be high.
5. Thousands of exotic species have been maintained in the U.S. pet trade for decades and most have never established feral populations.
6. The bill will have a substantial adverse economic impact on pet owners and many pet-related industries including veterinary practices. The establishment of a per species fee system "to recover costs of assessing risks of non-native wildlife species" also poses an unfair economic burden on those who lack financial means.
7. H. R. 669 implies that pet owners must prove that their pet or parental stock was legally imported. This places an extraordinary burden of proof on the pet owner. Pet owners in the U.S. do not have access to original importation documents. Even the USFWS is not required to maintain such records and, in fact, does not currently possess such records from the years of heavy importation of exotic birds.



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According to an American Pet Products Association national pet owners survey released in April 2009, 14 million U.S. households have freshwater or saltwater fish. Another 6 million households have pet birds while 4.7 million households have pet reptiles. More than 5.3 million households also keep small mammals as pets. H. R. 669 will negatively impact millions of companion animals and their caregivers' ability to provide for them. This could result in massive abandonment, release or euthanasia of these animals. We would like to be a part of establishing a practical regulatory framework, which will protect our environment and our pets.

If you have any questions, please do not hesitate to contact our Executive Director, Dr. Robert Groskin at rgroskin@aav.org.