



**PET INDUSTRY JOINT  
ADVISORY COUNCIL**  
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June 3, 2009

The Honorable Madeleine Bordallo  
Chairwoman  
Subcommittee on Insular Affairs, Oceans and Wildlife  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Henry Brown  
Ranking Member  
Subcommittee on Insular Affairs, Oceans and Wildlife  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Chairwoman Bordallo and Ranking Member Brown:

During the Subcommittee's recent legislative hearing on the Nonnative Invasive Species Prevention Act (HR 669), it became clear that a significant amount of work is required to address a number of the issues raised during the Hearing, as well as in associated communications with Members.

As you are aware, the Pet Industry Joint Advisory Council (PIJAC) hosted a two-day multi-stakeholder workshop in March 2009 to review HR 669, line by line, with the goal of identifying elements that are likely to be implementable, unlikely to be implementable and which require further clarification. Copies of the Workshop Report were submitted to your Committee for the record. Workshop participants, as well as other interested parties, have expressed interest in participating in further stakeholder meetings and workshops addressing the invasive species issue.

We are very appreciative of the commitment of the Chair, the Ranking Member and other Members of the Subcommittee to work with us and other concerned stakeholders on issues relevant to HR 669. We believe that any federal policy and legislative proposals on invasive species must address the intentional introductions of species being imported, as well as nonnative species that are captive bred in the United States and are no longer imported. To that end, there needs to be a clear delineation between intentional imports (e.g., commercial and private activities such as sports fishing, food aquaculture, entertainment, pets) and unintentional imports (e.g., Brown tree snake, and Zebra and Quagga mussels entered the US in ballast water or as hitchhikers in ships or cargo). We also believe that the first National Invasive Species Management Plan, the product of a multi-stakeholder approach, needs to be revisited. It contains viable recommendations addressing imported nonnative species, recommendations that were arrived through extensive deliberations.

A constructive way forward, in lieu of HR 669, is for your Subcommittee to encourage the United States Fish and Wildlife Service (The Service) to host a series of multi-stakeholder workshops in Washington, DC and regionally around the United States with the purpose of exploring ways of reaching our common goal to minimize the risk of introducing invasive species into our environment. In our opinion, The Service can serve as a neutral party for bringing together diverse groups to discuss this important and sometimes controversial issue. In our experience, processes by the Service and/or Congressional staff to meet with stakeholders separately are likely to undermine, rather than build consensus and trust.

More importantly, The Service is the agency with the greatest experience in dealing with “injurious wildlife,” including implementing the existing Lacey Act listing process, regulating imports (e.g., inspections, licenses/permits), and evaluating mitigation and management regimens. Moreover, The Service would be the Agency responsible for implementing any new regulatory or legislative processes arising from the consultations.. Hopefully, the workshops would provide approaches and technical information that would aid legislators and regulators on how to best incorporate an implementable risk analysis process for evaluating potentially invasive species in a timely manner, without paralyzing activities involving species common in international and domestic trade as well as those species privately owned in the United States.

Finally, we believe it is equally important to construct a process that acknowledges the states’ expertise and preserves the states’ rights to regulate wildlife species within their respective jurisdictions. We encourage The Service, as part of the workshop process, to explore how to enhance and/or expand collaborative efforts with state agencies to improve enforcement at the ports as well as implement state processes for minimizing the introduction of invasive species in their ecosystems as an alternative to a one size fits all national approach.

The recommendations set forth above are supported by the organizations appearing below.

As always, we are available to discuss this issue with you or your staff should you have any questions.

Sincerely yours,



Marshall Meyers

Cc: Members of the Subcommittee on Insular Affairs, Oceans and Wildlife  
Gary Frazer, United States Fish and Wildlife Service

American Cichlid Association  
American Federation of Aviculture  
American Pet Products Association  
Alliance of Marine Mammal Parks and Aquariums  
Avicultural Society of America  
California Aquaculture Association  
Exotic Wildlife Association  
Federation of American Aquarium Societies  
Feld Entertainment, Inc.  
Feline Conservation Foundation  
Florida Aquaculture Association  
Florida Tropical Fish Farms Association  
International Air Transport Association  
International Association for Falconry & Conservation of Birds of Prey  
International Elephant Foundation  
Marine Aquarium Societies of North America  
National Animal Interest Alliance  
National Aquaculture Association  
National Association of State Aquaculture Coordinators  
North American Falconers Association  
North Carolina Aquaculture Association  
Pacific Coast Shellfish Growers Association  
Responsible Exotic Animal Ownership (REXANO)  
Retail Industry Leaders Association  
The Organization of Professional Aviculturists  
United States Trout Farmers Association  
Zoological Association of America