

**TESTIMONY OF
SCOTT HARDIN
PET INDUSTRY JOINT ADVISORY COUNCIL
BEFORE THE
SUBCOMMITTEE ON FISHERIES, WILDLIFE AND OCEANS
HOUSE NATURAL RESOURCES COMMITTEE
July 25, 2013**

Mr. Chairman and members of the Committee, I am Scott Hardin, Science Advisor to the Pet Industry Joint Advisory Council (PIJAC), on exotic and invasive species issues. I also serve as PIJAC's liaison to the reptile and amphibian community. PIJAC is a non-profit service oriented organization comprised of members who care about pets and the pet industry. As a national trade association, PIJAC represents all segments of the pet industry: companion animal importers/exporters/breeders, wholesale distributors, product manufacturers, retail outlets, and affiliated hobby clubs, aquarium societies, and other industry trade associations. PIJAC's members serve 63% of the U.S. households that care for and maintain pets of all types, sizes and descriptions, including four constrictor species addressed in HR 2158.

PIJAC's explicit mission is to:

"Promote responsible pet ownership and animal welfare, foster environmental stewardship, and ensure the availability of pets."

In addition, I am the executive director of the Florida Reptile & Amphibian Association, a not-for-profit incorporated to promote conservation and responsible husbandry of herpetofauna. Prior to this, I worked for the Florida Fish and Wildlife Conservation Commission for 35 years, serving as the Commission's Exotic Species Coordinator from 2004 through 2012, where I dealt with the management and regulation of introduced fish and wildlife.

Currently, reptile breeders wishing to export any of the four constrictors listed as injurious wildlife are not permitted to do so if the aircraft carrying the cargo makes an intermediate stop in a state or U.S. territory. These intermediate stops, some of which are solely to re-fuel the aircraft, are considered interstate transport by the U.S. Fish and Wildlife Service. This eliminates certain export markets without direct flights from U.S. ports (or serviced by flights that make intermediate stops in another country).

PIJAC endorses HR 2158, the Expedited Departure of Certain Snake Species, that would eliminate this technical restriction on exports. We are confident that the proposed amendment to the Lacey Act would provide additional avenues for exporting non-native constrictors that have been listed as injurious without additional risk. Further, we assert that this amendment is entirely consistent with the intent of the Injurious Wildlife provisions of the Lacey Act, namely to prevent importation and interstate transport of species with the potential to cause adverse ecological or economic impacts or to be harmful to human health and safety. Specifically, HR 2158 draws the important distinction between shipments consigned to a foreign country and those with a destination in another state or U.S. territory.

In support of our contention that the proposed amendment carries virtually no risk, consider the current state of the market for Burmese pythons, far and away the most popular of the injurious constrictors (there is very little trade of Northern and Southern African pythons or of yellow anacondas). Trade in Burmese pythons generally had been declining through the prior decade, in part due to the increased popularity of other snake species as well as in response to negative publicity from the established python population in south Florida. The listing of Burmese pythons as a federal injurious species led to a significant decline in the volume of Burmese pythons in trade in the United States, perhaps as high as 80 percent. The few breeders and dealers who continue to produce and sell this species do so because of their passion for Burmese pythons or because they already had existing international or very limited in-state markets. International trade to Europe and Asia continues through U.S. Fish and Wildlife Service designated ports, albeit at greatly reduced levels from a decade ago.

Another critical aspect of captive-bred Burmese pythons is the development of unusual colors and patterns, the so-called “designer snakes.” Today there are virtually no “normal” Burmese pythons in trade, which is substantially different from the 1990s when normals dominated the import and captive bred markets. The result of this shift is a significant increase in the price of a Burmese python, with individual snakes ranging from \$500 to \$1500. In terms of risk, designer Burmese pythons are very likely to be acquired by serious collectors and very unlikely to be released. Furthermore, the brightly colored morphs have little chance of establishing a population due to their visibility to predators, in contrast to the well camouflaged normal animals.

The situation addressed by HR 2158 is the circumstance of exporting constrictors to a limited number of destinations where an aircraft must land within the United States, either to re-fuel, take additional cargo, or transfer cargo to another aircraft. We believe that the risk of escape and subsequent establishment of a breeding population during these temporary stops is negligible. Above and beyond their concern for the welfare and safety of their animals, exporters have a financial incentive to take appropriate precautions to protect their investment. Every attempt is made to expedite and minimize the duration of the shipping process: preparation of export paperwork (including CITES documentation), proper containment, delivery of the animals to the port, and choosing the best flight arrangements. Most shipments reach their destination in less than 12 hours. This process is described in the Florida Reptile & Amphibian Association’s Standard Operating Procedures for Importers/Exporters (<http://flraa.org/importerexporter/>).

Another consideration is that many of the temporary stops en route to a foreign destination are in climates inhospitable to tropical constrictor species. For example, flights from the designated port of Miami to Jakarta, Indonesia make a re-fueling stop in Anchorage, Alaska, and constrictors in transit do not leave the plane. Notwithstanding the infinitesimal chance of injurious results from these and similar circumstances, we offer a suggestion to further reduce the risk of escape during transport. Injurious snake species in international transport should be double-bagged and then placed within a secure container as stipulated in State of Florida regulations for conditional species (https://www.flrules.org/gateway/RuleNo.asp?title=RULES_RELATING_TO_NON-NATIVE_SPECIES&ID=68-5.001). This dual redundancy eliminates the risk of escape during transport for all practical purposes.

In summary, PIJAC acknowledges the concern about importation and interstate transport of species deemed injurious. HR 2158 enables responsible breeders to export captive bred constrictors, which is clearly allowed under the provisions of the Lacey Act, without additional risk to wildlife or human health and safety in the United States. We endorse its passage.