

## **WORLD PARROT TRUST USA, INC.**

P.O. Box 935 . Lake Alfred . Florida . 33850



25 January, 2880

Pennsylvania Game Commission  
2001 Elmerton Avenue  
Harrisburg, PA 17110-9797

Dear Commissioners,

Thank you for the opportunity to provide comments regarding a proposal to amend 58 Pa. Code, Chapter 147.1.a(9) regarding parrot species in the Commonwealth of Pennsylvania. The World Parrot Trust is an organization devoted to the conservation and welfare of parrots, with thousands of members around the globe, including many members in Pennsylvania. As a parrot researcher with many years of experience with South American parrot studies, I would like to draw your attention to two crucial aspects of the biology of Conure-Nanday, *Nandayus nenday* which have direct relevance to this decision: biogeography and infectious disease. In sum, I urge the commission to delete this species from this amendment.

There are many feral parrot populations around the world, including many here in the USA. However, there are over 340 species of parrots, and only a small subset of these species have proven potential to establish populations outside their native ranges. The Nanday is indeed one of these species, which may explain why it has been included with the Quaker Parakeet in this proposed amendment. There is a crucial difference between these two species. On the one hand, the Quakers have established in many locations as far north as Pennsylvania, on the other, the Nanday has done nothing of the sort. In North America, these populations have established and remained limited just to Florida and California.

This difference is not unexpected. In the wild the Nandays are found in South America down to northern Argentina, ranging south to about 29° S latitude. The comparable limit in the northern hemisphere would predict that their distribution should range no further north than central Florida across to central Baja California. Given the mild climate of southern California, it's not surprising that small numbers have managed to survive in Los Angeles for the past couple of decades. And as it turns out, the Nandays appear to be constrained by climate in a manner parallel to that of citrus production, such that their range in Argentina, California, and Florida<sup>1</sup> appears to be limited by frost in a similar fashion to commercial orange groves.

In terms of long-term range extension, the Los Angeles population has been established since the 1960's<sup>2</sup>, so the birds have been breeding for over four decades and they have never expanded their range beyond the greater LA area<sup>3</sup>. Nor have their numbers increased dramatically, as the largest population along the Malibu coast still numbers in the low hundreds.

Taking these factors into consideration, based on biogeography and recent history alone, it is highly unlikely the Nanday will ever become established over 700 miles north of its current distribution in Florida.



If the USA were continuing to import wild caught birds from Argentina or Paraguay, the risks of introducing novel and infectious disease agents into Pennsylvania would be astronomically greater than they are now<sup>4</sup>. However, we stopped such imports in 1992, and there is no known illegal importation route nor is there demand for common wild caught birds such as Nandays in this country.

There is therefore no scientific basis for the apparent concern that captive Nandays represent any risk whatsoever to either the biosecurity or biodiversity of the Commonwealth of Pennsylvania. As such, we urge you to delete mention of this parrot species from the proposed amendment.

Sincerely,

James D. Gilardi, Ph.D., Director  
The World Parrot Trust

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Footnotes:

1. Current Florida distribution of Nandays: <http://myfwc.com/bba/maps/bhpa.htm>
2. Historic arrival of Nandays to southern California (note several spurious or non-established populations mentioned here suggesting inaccurate data, an inability to survive, or both): [http://www.californiaparrotproject.org/black\\_hooded\\_parakeet.html](http://www.californiaparrotproject.org/black_hooded_parakeet.html)
3. Most northerly range extension in California:  
[http://natureali.org/parrot\\_project/black\\_hooded.htm](http://natureali.org/parrot_project/black_hooded.htm)
4. Recent review of disease risk associated with imported wild vs. captive bred parrots and other birds: [http://www.efsa.europa.eu/EFSA/efsa\\_locale-1178620753812\\_1178620772933.htm](http://www.efsa.europa.eu/EFSA/efsa_locale-1178620753812_1178620772933.htm)