

WORLD PARROT TRUST USA, INC.
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22 April, 2009

U.S. House of Representatives Committee on Natural Resources
Subcommittee on Insular Affairs, Oceans and Wildlife

Dear Subcommittee Members,

We have reviewed the Nonnative Wildlife Invasion Prevention Act HR 669, and thank you for the opportunity to comment at this time. We agree that invasive species create serious risks to our native biodiversity, and we strongly support your interest in working to prevent future wildlife introductions in the USA.

The World Parrot Trust is an international, member-based organization, with a focus on the conservation of endangered parrot species in the wild, and the welfare of the millions of these birds living in captivity here in the USA and abroad. Because wild parrots are often threatened by both invasive species and the international trade in wild birds, we have extensive experience recognizing these threats and responding with creative and effective solutions.

For the past 20 years, the World Parrot Trust has been a leader in ending the commercial trade in wild caught birds. We are staunch supporters of the Wild Bird Conservation Act, and we recently lead a campaign to urge the EU to adopt a similar policy. This EU campaign - which was supported by the American Bird Conservancy, Defenders of Wildlife, and the Humane Society of the United States and 230 other NGO's - came to fruition in 2007 with the EU following the USA's example.

With regard to invasive species here in the USA, the best available science is remarkably clear; past introductions now have profound impacts to both our ecosystems and our economy. We applaud this committee's interest in meeting existing and future challenges of this kind. As we have outlined below, the risks created by the ownership of exotic pets are by-and-large inconsequential, and the most threatening risks both in the past and the present, come from a number of categorically different sources. We hope your review will help clarify these essential distinctions, and lead you in the direction of more focused and effective solutions to these problems.

Exotic pets and American ecosystems:

In their scientific review of the current state of invasive species in this country, Pimentel et al* compiled a complete and rigorous evaluation of the sources and the impacts of animal and plant introductions. Most crucially for HR 669, among the long list of important invasive mammals, birds, reptiles, fish, and insects (Table 1), none of these listed species were introduced as a result of the keeping of exotic animals. Not one.

The listed species of greatest ecological or economic impact fell into one of three categories: 1) accidentally introduced pest species like rats or the brown tree snake, 2) purposefully introduced biological control agents like mongooses and House Sparrows, or 3) escaped domesticated pet species or livestock like cats, dogs, and pigs. HR 669 makes no attempt to address any of these threat categories, but instead focuses on exotic pets which this research found to be comparatively inconsequential.

Naturally, there are a few exceptions, both because some species have great invasive potential, and because some parts of the USA which are uniquely capable of supporting non-native wildlife. However, when adopted in a timely fashion, legislation at the state level has been an effective response to these concerns, and we strongly support this targeted approach to prevent such invasions on a case-by-case basis.

As crafted, HR 669 ignores sound science on established problems and known risks, and instead targets millions of American's exotic pets which themselves create almost no measurable risk to native wildlife.

Foreseeable adverse consequences:

If the motivation of HR 669 is in fact to prevent the introduction of non-native species, it would appear counterproductive to take steps which will predictably lead to the liberation of millions of pets into American ecosystems. Should the bill be adopted, many pet owners will live in fear that their animals will be confiscated, or that they will be penalized for possession. Many will feel that releasing their pets into the wild is a better fate than turning them in to authorities or euthanizing them, leading to the liberation of large numbers of exotic animals into the wild. Although most of these animals will perish - itself a cruel and unnecessary outcome - some will survive and establish new populations of non-native wildlife all across the country, which is precisely the opposite outcome of what this bill intends.

In addition to encouraging the release of exotic species, HR 669 can also be predicted to cause millions of exotic animals to be relinquished to exotic animal rescue facilities which are already dangerously overpopulated. The

ownership provisions and the prohibitions on interstate travel with exotic pets coupled with our highly mobile society will ensure that millions of Americans will face the difficult choice of either acting criminally and continuing to care for their pets, or following the law and giving them up. This bill will therefore create an animal welfare crisis on a scale which is difficult to fathom. The current network of such facilities - accredited or otherwise - is already overburdened by an existing need which is tiny fraction of the demand created by HR 669.

In sum, we applaud this committee's willingness to address the risks of introducing non-native species into natural ecosystems here in the USA. However, as currently crafted, HR 669 avoids addressing the most serious invasive species problems and the most threatening risks of future introductions. Moreover, this bill would inevitably create problems of its own, including the release of millions of animals now in captivity and the relinquishment of millions of pets into institutions ill-equipped to cope with their numbers and diversity. We urge this committee to give due consideration to the best available science and to focus its invasive species concerns on a new and more practical solution which targets the root of the problem rather than avoiding it entirely.

Sincerely,

A handwritten signature in black ink, appearing to read "James D. Gilardi". The signature is stylized and cursive.

James D. Gilardi, Ph.D.
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* Pimentel, D., R. Zuniga, and D. Morrison. 2005. Update on the environmental and economic costs associated with alien-invasive species in the United States. *Ecological Economics* 52: 273– 288