

## **National Environmental Coalition on Invasive Species**

Alliance for the Great Lakes, Great Lakes United,  
National Wildlife Federation  
National Audubon Society, The Nature Conservancy  
The Wildlife Society

April 20, 2013

To all Member of Congress,

The above-listed member groups in the National Environmental Coalition on Invasive Species (see [www.necis.net](http://www.necis.net) ) strongly endorse HR 996, the Invasive Fish and Wildlife Prevention Act of 2013. This bill, if enacted, would advance our nation's laws on non-native animals from the 19<sup>th</sup> Century to the 21<sup>st</sup> Century by dramatically strengthening the ability to make rapid, science-based decisions on whether a non-native species is harmful or not.

The existing law on live animal imports, at 18 USC § 42 (part of the Lacey Act first enacted in 1900), provides the U.S. Fish and Wildlife Service only limited power to declare non-native species as "injurious" and prohibit their importation and interstate sales. This old approach is excruciatingly slow - the average time to complete a listing is now about **four years** - and only about 40 animal groups are listed. Experts and stakeholders repeatedly say this regulatory approach is ineffective. If Congress will strengthen this law it can stop introductions of scientifically-identified non-native species that pose high risk to the economy, the environment, human health or native wildlife, which can save taxpayers hundreds of millions a year in damages and control costs. Land and water managers, both government and private, should no longer have to confront the dilemma of expending scarce resources to control a harmful invasive species, such as the red lionfish or Nile monitor, at the same time the species is still sold as an aquarium fish or exotic pet, serving as a source for more introductions.

The Invasive Fish and Wildlife Prevention Act's benefits can be summarized as:

- **Benefits for the environment, the public, land owners and natural resource users and managers:** It provides the U.S. Fish and Wildlife Service with authority to prevent invasions using modern scientific approaches and directs the Service to expedite its decisions. It also gives the Service "emergency" authority, which it lacks now, but which USDA has long had to block imported livestock pathogens as well as invasive plants. HR 996 also gives the Service clear power and responsibility to regulate the extremely risky influx of zoonoses and other pathogens that can arrive with imported non-native wildlife. Finally we will have a handle on the flood of unwelcome, non-native invasive

species that have damaged this nation, from the Burmese python and nutria invading fragile wetlands to the Asian carp threatening major ecological and economic harm to the Great Lakes to the chytrid fungus, a disease devastating our native frogs.

- **Benefits for taxpayers:** The costs of risk analyses for potentially injurious species now are entirely borne by America's taxpayers. Given Federal budget constraints, that is a major reason why it takes the Fish and Wildlife Service four years to finish typical listing proposals. HR 996 creates a reasonable, limited, user fee for live animal importers to defray costs of monitoring the trade, which includes thousands of non-native species, and to do the needed risk analyses more rapidly. It is fair that the beneficiaries pay for the government services necessitated by their imports.
- **Benefits for zoos, aquaria and research institutions:** HR 996 creates a new category of "Injurious II" species, which are not suited as private pets or aquarium species, but that can be held safely by qualified zoos, aquaria, research facilities and other institutions without the need for a Federal permit. This exemption is broader than current law, which does require a Federal permit for transactions in all listed species.
- **Benefits for States:** Current Federal injurious animal law includes no recognition of the role of States. HR 996 requires the Fish and Wildlife Service to consult with States and recognize State actions when making risk determinations. It also creates a special trust fund in which fees and other revenues from the animal import trade are collected. Then, one-quarter of those revenues are to be given to States to help them improve their own monitoring and risk analyses for this trade.

Due to all these benefits, HR 996 is strongly in the national interest. We urge you to co-sponsor the Invasive Fish and Wildlife Prevention Act.

Sincerely,

Robert Bendick, Director of U.S.  
Government Relations  
The Nature Conservancy

Michael Daulton, Sr. Director of  
Government Relations  
National Audubon Society

Dr. Wini Kessler, President  
The Wildlife Society

John Kostyack, VP of Wildlife Conservation  
National Wildlife Federation

Jerry Rasmussen, Advisor  
Great Lakes United

Jared Teutsch, Water Policy Advocate  
Alliance for the Great Lakes