

**National Environmental Coalition on Invasive Species**  
**Defenders of Wildlife, Environmental Law Institute, Great Lakes United**  
**National Audubon Society, National Wildlife Federation, Natural Areas Association**  
**Natural Resources Defense Council, Union of Concerned Scientists**

January 9, 2008

Re: new legislation on pre-import screening of non-native animal species

Dear Members and Staff of the House Committee on Natural Resources:

The undersigned are part of a coalition of non-profit groups known as the National Environmental Coalition on Invasive Species (NECIS). The basic mission of NECIS is to improve Federal policy related to environmental, economic, and health threats posed by non-native invasive species of plants and animals. Together, our organizations have more than 6 million members and supporters.

NECIS applauds and strongly supports the following priority item included in the Fisheries, Oceans and Wildlife section of the *Agenda of American Values Continues in 2008*, issued in December 2007 by Chairman Rahall:

***Combating Invasive Species:** Efforts will be taken to examine the most effective means to address the impact of invasive species on marine and terrestrial environments. These efforts will include determining how best to ensure adequate screening and monitoring of fish and wildlife imported into the United States can be done to limit the potential risk of invasive species to the environment and the economy.*

Preventing further harmful imports of non-native fish and wildlife is one of NECIS' top priorities. The United States does not currently require that animal species being imported first be examined (or "screened") for invasiveness. This policy flies in the face of both common sense and scientific recommendations. The need for, and importance of, such a process has been noted in every major report on invasive species policy for more than a decade. Development of such a screening process was a high priority in the 2001 National Invasive Species Management Plan issued by the National Invasive Species Council. However, there has been little progress to date, and for major categories of animals, statutory authority is lacking under which pre-import screening could be implemented.

NECIS supports bill language that provides authority to implement pre-import screening for potentially **all** imported animal species, whether the species has been in trade in the past or not. We are pragmatic in that we support exemptions from screening for any obviously safe, long-imported species. We further support provisions designed to ensure individuals that their ownership of pets, hobby fish, and so on is not threatened; to ensure businesses that the screening process will be fair and timely; to ensure agencies that any

existing screening processes they may have will be acknowledged; and to ensure the public and stakeholders that the process will be science-based and fully transparent.

We look forward to working with you on passage of a highly protective, yet pragmatic, screening bill through the Committee on Natural Resources, a bill that would modernize the Lacey Act injurious animal provision, codified at 18 USC § 42. That provision is extremely old (enacted first in 1900); slow (listing process takes about 4 years, on average); reactive (most listings are after-the-fact of an invasion thus are largely ineffectual); and minimal in coverage (only about 20 taxa total are listed). Further, the Lacey Act does not even potentially cover the vast majority of the hundreds of imported invertebrate animal species, apart from molluscs and crustaceans.

In view of the globalized nature of today's animal trade and its associated invasion and disease risks, the need for improving the Lacey Act injurious species provision and modernizing its language is clear. Enacting legislation to create a pre-import screening process would be one of the most significant policy advances ever achieved to prevent harmful invasions in the United States.

Sincerely,

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