

USARK Reptile Industry Economic Summary for the Office of Management & Budget RE: USFWS Proposed Rule Change to Injurious Wildlife List of the Lacey Act; March 1, 2010

Thank you for the opportunity to help paint an economic picture of the Reptile Industry in regards to import and trade of the 9 large constricting snakes potentially impacted by USFWS rule making. The trade in high quality captive bred reptiles is a \$3 billion dollar annual industry.

The animals potentially addressed by rule change make up approximately 1/3 of the total dollar value trade annually. Special emphasis must be given to the Burmese python, reticulated python and Boa constrictor as they are some of the most widely held and most valuable animals in the industry. These three animals represent the bulk of these trade figures. These numbers are estimates based on figures from CITES, TRAFFIC, APPA and our own industry surveys. We are currently engaged in having a third party Economist do a more thorough and precise analysis of the Reptile Industry.

There are many intangibles and compounding fundamentals involved in the trade of these 9 pythons and boas, but we will attempt to provide as accurate an assessment as possible. Along with our numbers on the annual commerce in these animals you must keep in mind the ripple effects on individuals, ancillary business, tax base and general spending. Many businesses that are involved with the production or sale of other animals not addressed in rule change would suffer unsustainable losses under these provisions that would make it impossible to continue at any level. Many that are involved in the breeding of these animals have their entire net worth, or a large percentage of net worth, wrapped up in their business. They have no 401k. Their retirement is in the value of their business. If the industry is crippled or destroyed there will be thousands of bankruptcies.

Herpetoculturists produce high quality captive bred animals for collectors, research, zoos, museums, TV and film. For reference, these animals can be valued at over \$100,000 for individual specimens. Millions of dollars flow into the national economy from the Reptile Industry. It is interlaced and interconnected with all levels of economies. Purchases of equipment, dry goods, bedding and cages channel money into U.S. manufacturing. Millions of dollars go to support American agriculture with purchases of food, including rodents, grain, bedding, vegetables and prepared diets. Millions of dollars more support airlines and parcel shippers. The Reptile Industry in the United States accounts for 82% of the export and trade in high quality captive bred reptiles worldwide. Thousands of American small businesses and their employees rely on the Reptile Industry. Even though there are more turtles and lizards in captivity in the US, the dollar value represented by the 9 snakes potentially impacted by rule change, and the dollars spent supporting them is proportionately higher. USARK estimates that if rule change is enacted as has been proposed by Secretary Salazar, it would destroy 1/3 of the entire US trade in reptiles.

It would also negatively impact large companies like Delta Airlines, UPS, Fed Ex, Pet Smart, Petco, Home Depot and Lowes. The exotic leather industry would be dramatically effected by a potential rule change hurting fashion industry representatives such as Saks Fifth Avenue, Neiman Marcus, Nordstrom's, Tony Lama, Charlie ONE Horse and many others.

Import/Export:

1. Annual import-export- \$10,000,000 (complicated- may be higher- not clear on breakdown of low value imports re-exported vs. high quality captive bred exports)

Captive Bred Trade:

1. Present Asset Value of approximately 2 million breeding age animals- \$800,000,000
2. Annual high end animal sales- 150,000 animal sales for \$60,000,000
3. Annual equipment sales- \$240,000,000
4. Annual feed rodent sales- \$200,000,000
5. Annual shipping sales- \$500,000,000

The extraordinary net result of breeding boas and pythons in this country is the establishment of a viable, self-sustaining, ancillary captive population of some of the most spectacular serpents in the world. Viable captive colonies of boas and pythons have been maintained by private keepers and businesses in the United States since the late 1970s. This is one of the most successful conservation projects accomplished for a vertebrate animal to date.

The captive population of boas and pythons in the United States is an excellent example of a decentralized, non-governmental economic model of conservation. The establishment of amphibian populations in captivity is now the model that the government, international conservation organizations, and American zoos are trying to create for disappearing amphibians. This is exactly the model of conservation that is proposed in H.R. 411 and S. 529, the Great Cats and Rare Canids Act, with requested preliminary funding of 20 million taxpayer dollars. In spite of significant costs and effort, private citizens maintain large self-sustaining populations of boas and pythons in this country.

While it can, and undoubtedly will be argued that at this time most boas and pythons are not endangered in their natural range, who among those critics has a crystal ball that shows the future of any species in nature? Ten years ago, few recognized the extraordinary rate of extinction that amphibians around the world now face. Only a year ago, the future of Nile crocodiles in Africa seemed absolutely secure, yet now it appears that, at least in some river drainages, the species faces extinction. The time has come around the world to work to establish as many animal species in captivity as is possible.

Few people would argue that since dromedary camels could establish in southern Arizona, their possession should be banned in the entire country. It is critically important to recognize that while Burmese pythons may now exist in the Everglades, they pose no threat to the environment or ecosystems of the rest of the United States, contrary to the prevailing media hysteria. The establishment of Burmese pythons in South Florida is a regional problem—Burmese Pythons are not a problem outside of south Florida.

The Lacey Act is a poor choice of tools to address a localized problem in south Florida. The animals in question are already held by millions of Americans in 48 states. It would be precedent setting to put millions of Americans in possession of 'Injurious Wildlife', and make them subject to Lacey Act violations for simply crossing state lines. Implementation of rule change regarding the 9 constrictors will do little or nothing to address environmental concerns, while crippling a viable industry that provides jobs and an expanding tax base.

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