



CALIFORNIA FISH AND GAME COMMISSION TO CONSIDER TWO ITEMS IMPORTANT TO THE PET INDUSTRY

Meeting on March 3, 2010
Ontario, California

The Issue:

The California Fish and Game Commission's March 3 Meeting Agenda includes two items that could affect not only the pet industry, but also hobbyists and pet owners.

Agenda Item 12 calls for Commission consideration and possible action on "Draft Findings Regarding the Detrimental Effects of Non-Native Frogs and Turtles." PIJAC has not been able to determine whether the Draft Findings will be made public prior to the meeting. PIJAC suspects that the findings will be revealed orally during the meeting and possibly handed out immediately prior to the start of the meeting.

Agenda Item 14 provides for the Commission to receive public testimony on a series of proposed amendments to Department Regulations 671, 671.1, 671.7 and 703 of Title 14 dealing with "Restricted Species Permits and Requirements". You may review the proposed rule changes at <http://www.fgc.ca.gov/regulations/new/2009/671regs2.pdf>. The proposal also includes the addition of several species to the list of restricted species, such as *Bufo marinus*, *Bufo paracnemis*, *Bufo horribilis* (Giant toad or marine toad group) and all large toads from Mexico and South America and *Eleutherodactylus coqui* (Common Coqui or Coqui frog). Also check the list of other species being added to the list that may be of interest.

You may also watch a video of the February Commission meeting when Agenda Item 12 arose: <http://www.fgc.ca.gov/meetings/2010/2010mtgs.asp>.

The Impact:

While the immediate issues before the Commission are not likely to lead to an immediate ban on the importation, possession or trade of all non-native amphibians and turtles, it can start a process involving protracted stakeholder meetings, opportunities to comment on proposed regulations, and numerous Commission meetings and the adoption of regulations which lead to potential wholesale bans of species.

There are numerous species of amphibians and turtles in the trade that are not a threat to California ecosystems or native wildlife. The adverse economic impact the pet industry, however, is enormous if the Commission and/or the Department of Fish and Game were to adopt wholesale species bans or adopted a burdensome and costly permit system which the

Department, could with the blink of an eye, start denying permits because some interest group is opposed to these animals as pets.

Any ban must be justified only after a credible risk analysis is completed that takes into account a science-based risk assessment as well as evaluation of socio-economic and other relevant factors. Moreover, the public would be provided opportunities to submit comments at each stage of the process.

Recommended Action:

Banning all non-natives and revisiting the process at a later date to see how it worked out is an overly simplistic approach that surfaced during the February meeting. Establishing a complex and burdensome permit system will not achieve the desired result. Adoption of a wholesale ban by taxonomic groups is either scientifically nor legally justified. To paraphrase H. L. Mencken, “for every complex problem, there is a simple solution, and it is wrong.” While PIJAC does not believe that is the intent of the Commission or the Department, to adopt such simplistic solutions, we must remain vigilant and be heard or the eventual outcome of the upcoming meeting could lead to such a result.

Interested industry members, hobbyists and pet owners should attend the Meeting on March 3 to listen carefully to what is recommended by the Department as well as the Commission Members. Those interested in addressing the Commission should be prepared to sign up to speak and present your concerns.

Be careful to AVOID confusing Agenda Items 12 and 14.

The Meeting will be held at the DoubleTree Hotel Ontario Airport in the DoubleTree Ballroom (222 N. Vineyard Avenue, Ontario, California). The meeting starts at 8:30 a.m. The Agenda Items may be heard in any order so be prepared for a long day!

Also, prepare written comments which you may send to the Commission prior to the Meeting at <http://www.fgc.ca.gov/contact/contact.asp> or deliver them to the Commission at the Meeting. It is preferable to send your comments to the Commission’s staff at least two days prior to the Meeting so staff may try to have copies circulated to the Commissioners prior to the Meeting. Otherwise, provide copies at the Meeting after you speak for inclusion in the record. If you have any questions, please feel free to contact PIJAC’s Bambi Nicole Osborne by phone at 202-452-1525 or via email at bambi@pijac.org or Marshall Meyers at marshall@pijac.org.

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The Pet Industry Joint Advisory Council (PIJAC) has been protecting and promoting responsible pet ownership for nearly forty years. Follow our successes, events, and action alerts through Facebook and/or Twitter at PIJAC4pets. If you are not already a Member, please join us today by visiting www.pijac.org/membership. For additional information on PIJAC and its many exciting campaigns, please visit: www.pijac.org and www.dontmesswithmypet.org. Or, contact us at 1-800-553-PETS (1-800-553-7387); members@pijac.org.