



**PET INDUSTRY JOINT
ADVISORY COUNCIL**

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**ADVICE FOR RESPONDING TO THE NOTICE OF INQUIRY ON PYTHON, BOA, AND
EUNETES GENERA**

APPROACH

Establish rapport and credibility. Rapport needs to be in place so that the agency reviewer wants to hear what you have to say. Credibility encourages them to take what you say seriously.

- Lay your submission out in a business letter format.
- Make the letter your own. Avoid duplicating what other people have written. Duplication gives the appearance of a pressure campaign and/or laziness (i.e. lack of concern for the issue). You can draw factual information from others, but package it in a way that is uniquely your own. Your individual voice matters.
- Limit the submission to 1-3 pages. Keep in mind that the agency staff will likely have to review over 1000 submissions. You want them to be able to process your message quickly.
- Strategically organize the letter so that the reviewer can easily find the main points (PIJAC provides a suggested outline below). Use bullets to “mark out” key information rather than burying it in long paragraphs.
- Use polite language throughout the letter.
- Present the information from the perspective of being “helpful” rather than “defensive.
- Refer to the federal register notice as a “Notice of Inquiry.” It is NOT a proposed rule or a ban and if you refer to it as such you will lose credibility.
- Stick to the facts and avoid being overly emotional.
- Spell check your letter and/or have someone proof read it.

CONTENT (The following can be used as your letter outline)

Be clear, concise, and accurate. Whenever possible, back your statements up by referencing credible literature (author’s name, publication title, date), websites (URL), and other resources. When you respond, please indicate if the figures you provide represent actual numbers, approximations, or averages.

- Open the letter with a polite address: “Dear Ms. Williams”

- State why you are writing: ‘I am writing in response to the Notice of Inquiry entitled, “Injurious Wildlife Species; Review of Information Concerning Constrictor Snakes From Python, Boa, and Eunectes genera,” dated 31 January 2008.’
- Establish your credentials. Indicate relevant academic degrees, business operations/occupation, professional memberships/affiliations (e.g., PIJAC membership), publications, and/or snake keeping experience. (Limit to one paragraph)
- To the best of your ability, respond to one or more of the questions listed in the Notice on Inquiry (One paragraph per question recommended):
 - What regulations does your State have pertaining to use, transport, or production of *Python*, *Boa* and *Eunectes* genera? [Note: If the States already have effective regulatory and/or non-regulatory in place, the U.S. Fish and Wildlife Service (USFWS) is less likely to perceive a need for Federal regulation].
 - How many species in the *Python*, *Boa* and *Eunectes* genera are currently in production for wholesale or retail sale, and in how many and which States?
 - How many businesses sell *Python*, *Boa* and *Eunectes* species?
 - How many businesses breed *Python*, *Boa* and *Eunectes* species?
 - What are the annual sales for *Python*, *Boa* and *Eunectes* species? [Note: If you provided confidential economic data to PIJAC, note this here.]
 - Please provide the number of *Python*, *Boa* and *Eunectes* species, if any, permitted within each State.
 - What would it cost to eradicate *Python*, *Boa* and *Eunectes* individuals or populations, or similar species, if found?
 - What are the costs of implementing propagation, recovery, and restoration programs for native species that are affected by *Python*, *Boa* and *Eunectes* species, or similar snake species?
 - What State-listed species would be impacted by the introduction of *Python*, *Boa* and *Eunectes* species?
 - What species have been impacted, and how, by *Python*, *Boa* and *Eunectes* species?

[Note: This is one of the most important questions for evaluating whether or not a species is “injurious.” Points to consider making include:

 - To the best of your knowledge, only two species in these three genera (*Python molurus bivittatus* and *Boa constrictor*) have established reproductive populations in the United States, both in southern Florida
 - The state of Florida, relevant federal agencies, and stakeholders are already working to understand the dynamics of these populations, limit their impact, and prevent future introductions into the environment;

- The establishment of both of these populations was likely aided by unusual circumstances (e.g., hurricane and/or intentional establishment by an individual), and there is *no* evidence to indicate that large-scale, repeated releases by or escapes from snake keepers are responsible.
 - The Everglades is a subtropical, highly modified environment with low human population density which offers a rather unique opportunity for the establishment of some non-native species.
 - At this time, there are insufficient data available for evaluation of the potential benefits (e.g., as prey for native wildlife and predators of invasive species), impacts (e.g., as predators of endangered species), or spread of *Python molurus bivittatus* and *Boa constrictor*.
 - There is a decline in the number of *P.m.bivittatus* being imported and propagated in the U.S. and thus the risk of this species being introduced into the environment is diminishing.]
- Provide information on projects/programs that you are involved with that limit the potential for *Python*, *Boa* and *Eunectes* species to:
 - Escape or be purposefully released into the environment,
 - Establish reproducing populations in the environment,
 - Spread over a wide geographic area, and
 - Cause harm to native species, humans, or the economy.

Examples include Habitattitude™ (www.pijac.org), “amnesty programs” (i.e. programs in which people can surrender unwanted pets without consequence), and your facility’s containment processes (including during transport).

- Conclude your letter by indicating that you:
 - Appreciate the opportunity to respond to the Notice of Inquiry;
 - Hope the USFWS will make a science-based evaluation through a transparent process that fully considers the costs and benefits of potential policy decisions to all relevant stakeholders; and
 - Will continue to follow the process and engage in it as necessary.
- Sign off formally, “Sincerely, X”

SEND TO

- Submit comments via Internet: <http://www.regulations.gov> Follow instructions for submitting comments.
- US Mail or hand-delivery should be addressed as follows:
 - Public Comments Processing: Attn: RIN-1018-AV68
 - Division of Policy and Directives Management
 - U.S. Fish and Wildlife Service
 - 4401 North Fairfax Drive, Suite 222
 - Arlington, VA 22203

NOTE: The FWS will not accept emails or faxes

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