



May 11, 2010

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Public Comments Processing
Attn: Docket No. FWS-R9-FHC-2008-0015
Division of Policy and Directives Management
U. S. Fish and Wildlife Service
4401 N. Fairfax Drive, Suite 222
Arlington, VA 22203

RE: Docket Number [FWS-R9 FHC-2008-0015], Listing the Boa Constrictor, Four Python Species, and Four Anaconda Species as Injurious Reptiles

Dear Dr. Sir or Madame:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, the AVMA is the recognized national voice for the veterinary profession. The association's more than 80,000 members comprise approximately 83% of U.S. veterinarians, all of whom are involved in a myriad of areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

In response to the Proposed Rule by the U. S. Fish and Wildlife Service of "Listing the Boa Constrictor, Four Python Species, and Four Anaconda Species as Injurious Reptiles" (docket number FWS-R9-FHC-2008-0015), the AVMA provides the following comments.

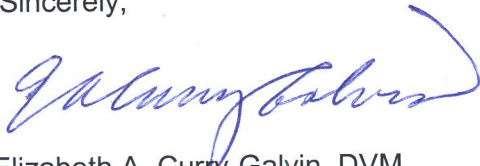
The AVMA recognizes the economic hardship this rule may pose upon those engaged in the exotic pet trade. Nevertheless, the AVMA supports regulatory efforts to prohibit private ownership and the importation for the purpose of private ownership of non-native animals that threaten public health, domestic animal health, indigenous wild animal health, agriculture, or the ecosystem, as well as those species whose welfare is unacceptably compromised. Furthermore, in order to protect animal, human, and environmental health, the AVMA supports the use of appropriate surveillance and control measures on international commerce and travel to prevent the entry of foreign disease vectors and invasive species into the United States.

The science based evaluation of each of the constrictor species in question by the United States Fish and Wildlife Services (USFWS) is a commendable effort. Doing so is vital to maximize effectiveness and minimize unintended consequences. Hybrids of these species should receive the same consideration and classification because of their inherent similarities to the contributing species. The AVMA supports scientific, risk-based decisions on the importation of animals and animal products, and believes that imported animals and animal products must present no more than a negligible risk. In addition, integrated and standardized regulations should be **developed and implemented nationally to address the import, sale, movement, and health of exotic, non-domesticated, and wild-caught animals.**

In summary, the AVMA agrees with the scientific based evaluation of each of the nine constrictor species (and their respective hybrids) individually and in light of the criteria for and repercussions of potentially listing each as an injurious species, and the AVMA supports the USFWS in listing each of these nine constrictor species as injurious under the Lacy Act.

The AVMA appreciates the opportunity to provide comment. For further clarification on the AVMA's comments, please contact Dr. Kristi Henderson at 800-248-2862 ext. 6651, or at khenderson@avma.org.

Sincerely,



Elizabeth A. Curry-Galvin, DVM
Assistant Executive Vice President
American Veterinary Medical Association