

# Rare Pythons

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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

Dear USFW Representative:

Submitted for your review are my comments regarding the inclusion of pythons and boas under the Lacey Act. In your proposal you suggest snakes in this category are a danger to both US wildlife and human beings. I am baffled at how such a generalization for the category for pythons and boa genera can be suggested by a governing body.

First, Pythons and boas less than 15' in length possess less physical danger to human beings than almost any other animal within the typical U.S. pet category. As a breeder of ball pythons I have handled countless pythons both wild and captive and have never felt any threat to either my life or limb. Actually I have never even been bitten hard enough to draw blood by any of the snakes in the categories you are considering limiting as a matter of their 'danger to human beings'. Reticulating snakes by their nature tend to be very shy and I would feel more comfortable letting my 4 year old child handle a medium size reticulating snake over a dog of comparable weight. I would not however allow her near a venomous or extremely large reticulating snake.

In comparison with a household dog, a snake is far less of a physical threat. There are approximately 4.5 million reported dog bites annually in the United States (nearly 2% of the American population). However there is no pending ban on dogs as household pets, nor interstate sale. Injuries by non-venomous snake bites require little more a mild antiseptic, and instances of reticulating pythons/boas attacking humans are extremely rare.

Secondly, when it comes to any effects of reticulating snakes on wildlife, it is only pertinent in states with climates warm enough to support them in winter months. This accounts for a small percentage of the US, and as a resident of Buffalo, N.Y. I cannot imagine why a permit banning pythons, boas, or any snake that cannot survive in our climate would have any relevance.

However all pet owners should take care and responsibility not to release their animals into the wild. This is true for a wide variety of potentially invasive fish, almost all snakes, and a huge variety of reptiles. Banning all of these animals is an unfair prejudice against those who take great responsibility both for their pets and environment. If pythons and boas are to be considered banned for sale in the pet trade, then all potentially invasive species should be included. This would encompass virtually every pet for sale at any common pet store, from dogs to mice, and is not the answer for effective wildlife control.

What I suggest as a means of encouraging responsibility among pet owners is requiring written warnings by pet shops when selling any potentially invasive species whether it is pythons, boas, or even fish. In the case of pythons and boas a system of pet ownership tracking or registration for extremely large or potentially invasive species can be set up as mandatory. For example, a cheap IR chip can be installed under the skin of such snakes, and their proper registration can be required in states where invasive effects are a concern. All breeders, pet owners, and transfers of set snakes could thus be tracked by USFW. If any such animals are found in the wild then the party responsible could be levied a fine and or be stripped of their right to sell the animals. For those of us that are responsibly, a generalized ban is not the answer and will have deleterious effects across the board.

Thirdly, the economic effect of such a ban would virtually cripple the reptile trade industry. Our multimillion dollar industry relies heavily on the sale of snakes such as ball pythons. They are considered to be one of the best pet snakes due to their docile nature, small size limitation, and minimal care requirements. They also call sell for between \$10 and \$100,000 a snake, which accounts for a good deal of profit for most reptile dealers. If you visit any reptile show you will see virtually every booth

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selling ball pythons, and such a ban would have an extremely deleterious effect. There are also countless businesses that number at minimum in the thousands across the country solely dedicated to the breeding and import of ball pythons.

In conclusion I only ask that before making such an influential and generalized ban on snakes in the python and boa genera, you fully understand the economic impact and potential environmental 'relief' from such action. I feel snakes that can achieve over 15' in size should be registered and tracked, but not banned for public sale. This should also only be implemented in states that could feel a negative environmental impact from their release into the wild. This will help ensure the most important aspect of your intention, responsibility among those who choose to house such animals and avoiding environmental impact.

Once again the danger pythons or boas pose to humans is extremely small and only among a very limited percentage of large snakes in these categories. Taking the drastic measures suggested by including these snakes in the Lacey Act will absolutely have a very destructive impact economically on the reptile pet trade.

Sincerely,

Christopher D. Casacci