

# National Environmental Coalition on Invasive Species

National Wildlife Federation ♦ American Bird Conservancy ♦ Environmental Defense Fund ♦  
Center for Invasive Species Prevention ♦ Ecological Society of America ♦ Alliance for the Great Lakes  
♦ National Association of Invasive Plant Councils ♦ Natural Areas Association ♦ The Wildlife Society

13 November 2018

Senator Kirsten Gillibrand  
478 Russell Senate Office Building  
Washington, DC 20002

Dear Senator Gillibrand,

The above-listed member organizations of the National Environmental Coalition on Invasive Species are writing in strong support of your reintroduction of the “Invasive Fish and Wildlife Prevention Act” (S. 3210).

As NECIS member organizations, we are focused on promoting scientifically sound policies that prevent the introduction and spread of invasive species in the United States. The policies proposed in this legislation would dramatically improve the ability to make rapid, science-based decisions on whether a non-native wildlife species should be considered harmful to human, economic, or environmental health under the Lacey Act.

S. 3210 would accomplish this through several common sense and cost-effective regulatory provisions that would provide the U.S. Fish and Wildlife Service with the **regulatory certainty** needed to prevent the introduction of new invaders, including a provision that would make USFWS less vulnerable to litigation by providing the agency explicit authority to regulate wildlife diseases. The bill language also includes the codification of longstanding USFWS policy to regulate the interstate transport of federally listed injurious species. The regulation of interstate transport will allow USFWS to once again work in cooperation with states on criminal enforcement of individuals illegally transporting listed species.

In addition, S. 3210 would provide a **streamlined process** for reviewing the designation of injurious species under the Lacey Act. Currently, it can take upwards of four years for potential and current invaders to be vetted for listing. This legislation would provide the USFWS with a clearly defined process and timeline for listing and delisting as well as the solicitation of state, tribal, and public input.

This streamlined process will only be successful if adequate federal funding is available to complete risk assessments on these species. S. 3210 would address this need by creating a limited user fee for live animal importers to defray the costs of monitoring the trade and to conduct the needed risk analyses more rapidly. These fees would also go towards the creation of a grant program in support of state and tribal best practices and capacity building in order to work in **cooperation with states and tribes** on the prevention of new invaders.

Your continued leadership in invasive species prevention and management is commendable, and we look forward to working with your office towards Congressional and Committee action on this legislation.

Sincerely,

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