



Irish Wolfhound Club of America, Inc.

20 April 2009  
House Committee on Natural Resources  
Subcommittee on Insular Affairs, Oceans & Wildlife  
187 Ford House Office Building  
Washington, DC 20515

Subject: The IWCA OPPOSES H.R. 669 – ‘Nonnative Wildlife Invasion Prevention Act’

Dear Mr. Chairman and Honorable Committee Members;

I am writing on behalf of the Irish Wolfhound Club of America (IWCA) Legislative Committee (IWCA LC). The IWCA is a member of the American Kennel Club with 14 nation wide Regional Clubs.

The IWCA is opposed to H.R. 669. H.R. 669 as currently proposed, is a disingenuous bill, containing nebulous, undefined requirements and regulations. Areas of concern include:

- H.R. 669 is an ‘open ended’, ill-defined piece of legislation granting ‘unlimited’ authority (SEC.3): ‘The Secretary of the Interior, acting through the United States Fish and Wildlife Service, ...’ to ‘promulgate regulations that establish a process for assessing the risk....’ ... to ‘include consideration of – (1) the identity of the organism to the species level, including ... information on its subspecies and genetic identity...’
- ‘Species’ and ‘subspecies’ (etc) may, by definition, include many of our domestic companions and commercial breeding stock of any genesis.
- Classification as to the ‘approved’ or ‘unapproved’ species is undefined and the criteria is to be ‘promulgated’ – i.e.: established in the future, unlimited.
- Our members are responsible owners, dedicated to the welfare and responsible breeding of the *canis familiaris* species, and associated sub-species (our Irish Wolfhound is native to Ireland, not to the United States of America). There is no reason to believe that the non-native species that we own and breed will cause future harm to the environment, to native species, or to human health. However, many of the recognized ‘breeds’ are, by definition, non-native. This bill, by its definition, may target our companions: ‘Sec. 5. LIST of UNAPPROVED SPECIES. ....(b)(1)(A) IN GENERAL – Any person may submit to the Secretary a proposal to add to the list under this section any nonnative wildlife species’.

As such, the IWCA, on behalf of its membership and its 14 Irish Wolfhound Regional Clubs, respectfully urges you to vote “NO” when HR 669 comes before the Committee on Insular Affairs, Oceans & Wildlife, a subcommittee of the House Committee on Natural Resources.

Respectfully submitted,

Nancy Munroe White  
Irish Wolfhound Club of America, Inc.  
Legislative Committee  
2113 Star View Drive  
Livermore, CO 80536