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Florida Fish and Wildlife Conservation Commission
620 S. Meridian St.
Tallahassee, FL 32399-1600

Via First-Class USPS and e-mail: pythonchallenge@myfwc.com

Re: Python Challenge 2013

Dear Commissioners:

This letter is written on behalf of People for the Ethical Treatment of Animals (PETA) to request that the commission remove decapitation from the list of acceptable methods of killing pythons in the upcoming Python Challenge 2013 ("the Challenge"). It has been brought to PETA's attention by Dr. Clifford Warwick, one of the world's foremost experts in reptilian biology, behavior, and ecology, that decapitation followed by destruction of the brain, although a method deemed conditionally acceptable by the American Veterinary Medical Association, *cannot be performed in a humane manner in the field*. In light of this information, it is incumbent on the commission to revise its instructions to hunters prior to the start of the contest on January 12 to exclude decapitation as an authorized method of killing.

PETA applauds the commission for its repeated reminder to hunters in the materials associated with the Challenge that they have an "ethical obligation to ensure a Burmese python is killed in a humane manner that results in immediate loss of consciousness and destruction of the brain."¹ As you are aware, hunters also have a legal obligation to kill snakes in a manner that does not violate the state's cruelty-to-animals statute.² According to Dr. Warwick and other experts, hunters who use decapitation to kill snakes, as is currently authorized by the commission, will fail in their ethical obligation and, in PETA's opinion, their legal obligation.

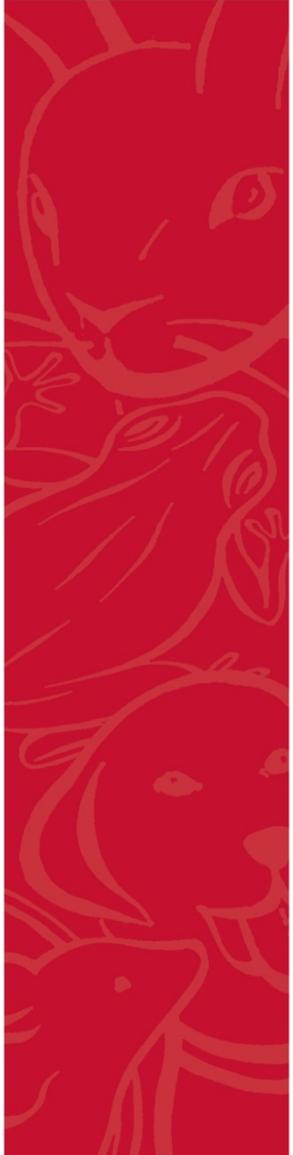
¹<http://pythonchallenge.net/toolkit/euthanasia.aspx>.

²Fla. Stat. Ann. § 828.12(2) states: "A person who intentionally commits an act to any animal which results in the cruel death, or excessive or repeated infliction of unnecessary pain or suffering, or causes the same to be done, is guilty of a felony of the third degree" Moreover, the Florida Supreme Court has held that the cruelty-to-animals statute is a general intent statute and "simply requires that the person '*intentionally commit[] an act to any animal* which results in the cruel death, or excessive or repeated infliction of unnecessary pain or suffering, or causes the same to be done.'" *Reynolds v. State*, 842 So. 2d 46, 50 (Fla. 2002).

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PETA also requests that the Commission remove its endorsement of unspecified "other methods" that will "result in immediate loss of consciousness and destruction of the ... brain."³ This endorsement is vague and offers no guidance to hunters. The general public is not qualified to assess the effectiveness—and thus the humane nature—or safety of various killing methods. Furthermore, although PETA would hope that all hunters embrace the ethical obligation to ensure the use of humane methods to kill snakes expounded by the commission, history shows that some do not.⁴ The endorsement of a catch-all category of "other methods," without explicit guidance from the commission, may open the door to the careless and perhaps intentional use of inhumane methods of killing as well as the potential for injury to contestants. PETA urges the commission to err on the side of caution and limit authorized methods of killing to gunshots and the use of a captive bolt gun.

As a final point, PETA has grave concerns about the use of what is, in effect, a bounty to encourage the killing of pythons. As explained in comments submitted to the commission in 2009, experts agree that bounties actually *thwart* eradication efforts. For example, a report prepared by the U.S. Geological Survey, in which possible solutions to the problem of invasive non-native reptiles were examined, concluded that "[b]ounties have never been used successfully with invasive reptiles."⁵ The report explains that bounties have been detrimental because "any feature that adds value to an invasive species ... creates economic pressure to assure the population's continuation, and further spread."⁶ The Python Challenge 2013 awards monetary prizes of up to \$1,500 to select contestants, not a paltry sum. Of additional concern is the fact that the commission provides contact information for businesses that will purchase python skins from contestants for up to \$100.

For the reasons stated herein, PETA respectfully requests that the commission revisit its decision to authorize decapitation of snakes by hunters who participate in the Python Challenge 2013 and carefully evaluate any future consideration of a permanent bounty on pythons.

Very truly yours,



Lori Kettler
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PETA

³<http://pythonchallenge.net/toolkit/euthanasia.aspx>.

⁴See, e.g., [Leonora LaPeter Anton](#), "Hunting Burmese Pythons in the Florida Everglades? It's a Thrill," *Tampa Bay Times*, October 25, 2009, <http://www.tampabay.com/features/humaninterest/hunting-burmese-pythons-in-the-florida-everglades-its-a-thrill/1046407> (snake's skull crushed with a bat).

⁵U.S. Geological Survey, *Giant Constrictors: Biological and Management Profiles and an Establishment Risk Assessment for Nine Large Species of Pythons, Anacondas, and the Boa Constrictor* (2009) p. 38.

⁶*Ibid.*