

November 14, 2022

Via e-mail

Jan Fore
 Nonnative Fish and Wildlife Education and Outreach Coordinator
 Florida Fish and Wildlife Conservation Commission
Jan.Fore@myfwc.com

Re: Facilitating the Humane Removal of Green Iguanas

Dear Ms. Fore:

Thank you for speaking with me on September 19, 2022, regarding the Florida Fish and Wildlife Conservation Commission's (FWC's) commitment to ensuring that the removal of green iguanas in Florida is done using humane methods. The position of People for the Ethical Treatment of Animals (PETA) is that, if iguanas are to be removed, the removal must be done in the most humane way possible. To that end, on behalf of PETA, I am writing to request that the FWC offer a green iguana training program—similar to the FWC's training program for Burmese pythons—and link to the FWC's guidance for [Humane Killing Methods of Nonnative Reptiles](#) wherever your website references the “humane killing” of green iguanas. Additionally, because, under certain circumstances, green iguanas may be transported for eradication and control purposes and/or for commercial purposes out-of-state, we urge the FWC to provide more detailed intrastate transportation standards to ensure the welfare of these live reptiles while in Florida.

Florida allows green iguanas to be humanely killed on private property (with landowner permission) and on designated Commission-managed public lands but does not mandate that trappers—whether they are homeowners or licensed nuisance wildlife control operators—engaging in this conduct complete any training. Both homeowners and professional trappers have repeatedly requested guidance in this area. While mandated training should be a long-term goal, an immediate practical solution is to offer training options. For example, offering recurring scheduled training sessions with live instruction, supplemented with a self-guided version with video tutorials, would provide trappers greater access to information, and answers to their questions in real-time, concerning lawful eradication methods.

The FWC has already taken some steps to dispense this information, creating a platform on which to build. Periodically the FWC has hosted iguana workshops but the presentation material provides only minimal guidance on what “humane” killing means: “Inhumane treatment includes the use of

PEOPLE FOR
 THE ETHICAL
 TREATMENT
 OF ANIMALS
 FOUNDATION

Washington
 1536 16th St. N.W.
 Washington, DC 20036
 202-483-PETA

Los Angeles
 2154 W. Sunset Blvd.
 Los Angeles, CA 90026
 323-644-PETA

Norfolk
 501 Front St.
 Norfolk, VA 23510
 757-622-PETA

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poisons to kill iguanas.”¹ Virtual or in-person workshops are available but only upon request.² The green iguana portion of the FWC’s website includes a link to an academic article that advises on recommended methods of euthanasia for iguanas but viewers need to dig for the guidance to eventually find it there.³ The FWC dedicated an entire webpage to “Humane Killing Methods for Nonnative Reptiles” but did not link to this resource on its green iguana webpage. Rather, the guidance is housed in the portion of the FWC’s website dedicated to Burmese pythons.



Florida Fish and Wildlife
Conservation Commission

Home > Wildlife & Habitats > Florida's Nonnative Fish and Wildlife > Burmese Pythons in Florida > Humane Killing Methods for Nonnative Reptiles

Fig. 1 Navigating to the “Humane Killing Methods for Nonnative Reptiles” webpage

Inquiries into what qualifies as humane methods of killing, and complaints that inhumane methods are being used, have been made over the past several years as evidenced by public records obtained from the FWC.⁴ The Wildlife Incident Management System (WIMS) documented calls from homeowners and professional trappers seeking guidance on the humane euthanasia of iguanas and/or to report inhumane killing. *See, e.g.*, Ex. 1 (WIMS, Apr. 1, 2020) (“Caller advised that she has iguanas on her property that she wanted to get rid of. She wanted to know the most humane way to dispatch them.”); Ex. 1 (WIMS, Aug. 19, 2020) (“Caller advised that he is a trapper and was approached by a member of the public who asked him about what are the state-designated guidelines for humane euthanasia of iguanas. Caller stated to the person the policy he heard from FWC a while back was that the state doesn't have any guidelines except it to not be a cruel method of take. He wanted to make sure that nothing has changed in regards to this.”); Ex. 1 (WIMS, Apr. 30, 2021) (“Caller advised that his neighbors used an air gun to maim iguanas and leave them for dead.”); Ex. 1 (WIMS, Oct. 28, 2021) (“Caller wanted to know how to humanely kill iguanas. There was a trapper that was wounding iguanas and letting them die. He wanted to know if that was legal.”). More recently the complaints focused on the display of objectionable content involving iguana eradication methods on social media. *See, e.g.*, Ex. 2 (YouTube Content, Feb. 10, 2022) (“The most horrible videos are being put out on YouTube of people killing iguanas with bows guns bats knives etc etc etc how long till someone lets hurt or killed ‘by accident’ now who will be liable for this because eradication licensing permits this?”).

The FWC responded to the need for guidance on safely capturing and humanely killing Burmese pythons by implementing Python Patrol. Python Patrol training options include a recurring scheduled monthly virtual presentation with live instruction from an FWC biologist and real-time question-and-answer opportunities, a self-guided version of the training (including videos and the

¹ *Nonnative Wildlife Public Workshops*, FWC, <https://myfwc.com/wildlifehabitats/nonnatives/public-workshops/> (last visited Nov. 10, 2022); Jan Fore, *Iguana Technical Assistance Workshop*, FWC 28, <https://myfwc.com/media/18685/iguana-presentation.pdf> (last visited Nov. 10, 2022).

² *See Nonnative Wildlife Public Workshops*, *supra* note 1.

³ W. H. Kern, Jr., *Dealing with Iguanas in the South Florida Landscape*, UNIV. OF FLA. (Nov. 19, 2018), <https://edis.ifas.ufl.edu/publication/in528> (explaining that the article was part of series of articles of the Entomology and Nematology Department at University of Florida).

⁴ The Public Records Request reference number is W149863-021722.

Python Patrol Presentation), two-to-three hour in-person training sessions for specific segments of the population (e.g., natural resource professionals, utility workers, and law enforcement), and the FWC’s recommended guidelines for “Humane Killing Methods for Nonnative Reptiles.” Whenever the FWC’s website references “humanely killing” with regards to pythons (e.g., on the [Burmese Pythons in Florida](#) webpage and [Removing Python in Florida](#) webpage), a hyperlink allows viewers to directly link to this guidance.

Borrowing from Python Patrol, the FWC should implement similar measures to further aid the public in understanding and undertaking humane methods of killing green iguanas. These include:

- Offering recurring scheduled green iguana training sessions, directed towards homeowners and professional trappers, to make interactive training opportunities more readily available.
- Offering a self-guided version of the training using videos and a PDF of the presentation.
- Adding a hyperlink, wherever FWC references “humanely kill” (including derivations of the word “kill”—e.g., “killed” or “killing”) on its website with regards to green iguanas, to facilitate easy navigation to the FWC’s guidance on “Humane Killing Methods of Nonnative Reptiles.”
- Adding the “Humane Killing Methods of Nonnative Reptiles” guidance as an “Important Link” on the FWC’s green iguana main webpage.

Lastly, during our call I inquired about the FWC’s standards governing the transportation of live green iguanas. A spreadsheet provided by the FWC (via Public Records Request number W149863-021722), that documented a permit holder shipping 5,308 green iguanas out-of-state over a six-month period, prompted this inquiry. *See* Ex. 3 (Van Nostrand Report, Nov. 30, 2021). We discussed that the FWC regulates intrastate movements of exotic and captive wildlife species (and not exportation). However, the FWC’s regulations provide limited guidance regarding transporting green iguanas intrastate, requiring only that they be placed in cloth sacks and locked containers labeled “Prohibited Reptiles” prior to transport. *See* Fla. Admin. Code r. 68-5.007(7)(g). It was clear from our conversation that the FWC is committed to ensuring the humane removal of green iguanas. Since we know that this removal, in some instances, involves transporting green iguanas, we urge the FWC to provide more substantive standards to ensure the welfare of green iguanas during such transport.

To prevent the unnecessary suffering of green iguanas, please address these requests. Thank you.