

HCR-83

Submitted on: 3/20/2021 7:13:47 PM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Sylvia Dolena	Aloha Animal Advocates and PELE LANI FARM LLC	Oppose	No

Comments:

Rabbits could prove an environmental disaster if allowed to escape; DLNR has stringent rules about keeping rabbits; their cages are required to be kept well above the ground.

Does the WAL Committee members want to be known as the guys who want to eat the Easter Bunny? (Easter is April 4)

Without proper FSIS Veterinary inspection for ante mortem, the kill floor and the post mortem, there is no guarantee that sanitation and humaneness will occur;

Why are they avoiding the House Agriculture Committee , which is the logical venue for such discussion?

Rabbit farming is an animal cruel industry. Where is the Aloha? Even if you don't care about animal welfare, PLEASE care about the environment. When we introduce NON-NATIVE SPECIES TO THE ISLAND, THERE WILL BE UNINTENDED CONSEQUENCES.

The DOH has COVID-19 to deal with; do they even want the added burden?

This issue is not in the published purview of the WAL Committee

This is an ill conceived reso and should be shelved permanently.

Mahalo,

Sylvia Dolena

HCR-83

Submitted on: 3/22/2021 8:11:44 AM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Inga Gibson	Pono Advocacy	Oppose	No

Comments:

March 23, 2021 830am

Dear Chair Tarnas and Water & Land Committee Members.

RE: **Please hold HCR83**; Requesting DOH to amend rules to allow for commercialization of rabbit meat.

This measure is premature as it requests DOH to side-step federal recommendations for USDA FSIS voluntary inspections of rabbit breeding and slaughter facilities to instead be performed by local veterinarians, since rabbits have no protections under the federal Humane Methods of Slaughter Act, and prior to enacting standards of care, housing and addressing potential environmental and welfare risks.

Environmental Issues:

Hawaii has no native rabbit population. Fortunately, we also do not have any large established, introduced wild rabbit population. All production and slaughter would therefore be from human-introduced breeding and commercialization.

It would be an environmental disaster if any of the rabbits from a commercial facility became loose, or the facilities were struck by a natural or other disaster, where the rabbits escaped and became established in our fragile ecosystem. Rabbits are known to compete with native wildlife and can degrade our fragile environment. Rabbits have attempted to be eradicated, with little success and great expense, in Laysan Island, Australia and other island ecosystems.

Invasive species committees, including those on the Big Island and Maui, are already trying to deal with a small population of feral rabbits, likely offspring of abandoned pets or from unregulated breeding operations (see below articles).

Fortunately, all of the local Humane Societies statewide are doing their part to prevent reproduction, should a rabbit escape from his/her owner, by sterilizing all rabbits prior to adoption.

Welfare Concerns:

As noted above, rabbits are not protected under federal laws, therefore, the USDA recommends employing voluntary federal inspectors. The Resolution notes that the state does not want to pay any funds for federal inspectors and therefore suggests passing this off to local veterinarians.

It is unknown if the Hawaii Veterinary Medical Association or Board of Veterinary Medicine is even interested in or qualified to conduct such inspections. Further, since the producers would be paying a private veterinarian for their inspection services, rather than being performed by an independent state or federal agency expert inspector, there lies an inherent conflict of interest and potential for bias in approving such operations, including slaughter methods, which can only be performed efficiently and effectively by highly trained and proficient staff.

Rabbits do not fare well in Hawaii's warm and humid climate if kept in large numbers in commercial scale facilities. Rabbits are subject to many medical conditions if not provided adequate housing, flooring, ventilation and regular cleaning of their cages.

Rabbits are very sensitive and do not vocalize pain or discomfort as other animals often do. They are subject to a number of illnesses and diseases, most of which are extremely painful and difficult to treat. In a commercial operation some of these diseases are easily passed to other rabbits. See Merck Rabbit Disease below.

Public Health & Zoonotic Disease Issues:

There are zoonotic diseases specific to rabbits that could also pose a public health issue. Zoonotic diseases specifically associated with rabbits include **pasteurellosis**, **ringworm**, **mycobacteriosis**, **cryptosporidiosis** and external parasites.

Tularemia, or rabbit fever, is a bacterial disease associated with both animals and humans. Although many wild and domestic animals can be infected, the rabbit is most often involved in disease outbreaks.

Many routes of human exposure to the tularemia bacteria are known to exist. The common routes include inoculation of the skin or mucous membranes with blood or tissue while handling infected animals, the bite of an infected tick, contact with fluids from infected deer flies or ticks, or handling or eating insufficiently cooked rabbit meat. Less common means of spread are drinking contaminated water, inhaling dust from contaminated soil or handling contaminated pelts or paws of animals.

There is also concern as to what would become of the pelts from a commercial size operation. Would their pelts/fur also be sold or entered into commerce?

I understand that legislators are looking for other methods and sources of local food production, which is critical to our states food independence, however, efforts should instead be put into supporting the improvement of existing producers operations.

I urge the Committee to hold this Resolution, at the least until some standards of care and oversight are developed, outside of the purview of private veterinarians. It is premature to request this of DOH, and our veterinary community, at this time.

Please see below articles for more:

<https://www.usnews.com/news/best-states/hawaii/articles/2020-11-10/hawaii-island-group-aims-to-reduce-feral-rabbit-population>

<https://www.kitv.com/story/42898641/hawaii-island-group-aims-to-reduce-feral-rabbit-population>

<https://mauiinvasive.org/2020/04/15/why-cant-you-keep-rabbits-on-the-ground-rabbit-fever-affects-people/#:~:text=On%20Laysan%2C%20a%20small%20island,increase%20the%20risk%20of%20tularemia.>

https://www.huffpost.com/entry/rabbit-ethical-meat_n_7433192

<https://www.hawaiitribune-herald.com/2016/08/18/hawaii-news/rabbits-on-the-lam/>

Rabbit disease:

<https://www.merckvetmanual.com/exotic-and-laboratory-animals/rabbits/viral-diseases-of-rabbits>

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Hearing date: Tuesday, March 23, 2021

Time & Location: 8:30 am, via video conference

To: Representative David A. Tarnas, Chair
Representative Patrick Pihana Branco, Vice Chair
and Members of the House Committee on Water & Land

Submitted by : Lindsay Vierheilg, Hawaii State Director, the Humane Society of the United States

RE: Testimony in strong OPPOSITION to HCR 83/HR 71: Relating to the commercial sale of rabbit meat for consumption

Dear Chair Tarnas, Vice Chair Pihana Branco, and Members of the Committee:

Thank you very much for considering my testimony today. The Humane Society of the United States (HSUS), on behalf of our thousands of supporters across Hawaii, respectfully urges the committee to oppose HCR 83/HR 71, the resolution that would encourage the sale of rabbit meat for human consumption.

Millions of Americans share their homes with rabbits just like they do with dogs and cats. Rabbits are highly social and intelligent, and they can form close bonds with their human companions. These animals have the ability to feel pain and suffer, just like cats and dogs do.

Since rabbits are not covered under the Humane Methods of Slaughter Act, they do not have to be rendered insensible to pain prior to being killed. At slaughter, they are most commonly killed by blunt force trauma to the head or neck-breaking. There are virtually no regulations for even the worst abuses during their lives and slaughter. Thus, promoting the sale of rabbit meat for consumption would likely further this cruelty.

In addition, rabbits escaping from cage confinement is not uncommon, and captive rabbits entering the wild can create problems for local ecosystems as well as humans. According to Maui's Native Ecosystem Protection and Management program with the Department of Land and Natural Resources, there are not enough predators to control escaped rabbit populations, leading to unchecked increases in rabbit numbers.

Escaped rabbits can spread potentially deadly bacterial diseases like tularemia. In recent outbreaks in Nebraska, Colorado, Wyoming, and South Dakota, the Centers for Disease Control and Prevention suspected that the outbreaks could be traced to rabbit populations.

For these reasons, we ask that you please oppose HCR 83/HR 71.

Sincerely,

Lindsay Vierheilg
Hawaii State Director, The Humane Society of the United States
lvierheilg@humanesociety.org

HCR-83

Submitted on: 3/22/2021 11:43:50 AM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Asgard (Catherine Goeggel)	Animal Rights Hawai'i	Oppose	No

Comments:

Animal Rights Hawai'i strongly opposes HCR 83. Rabbits could prove an environmental disaster if allowed to escape. DLNR has stringent rules about keeping rabbits; their cages are required to be kept well above the ground.

Without proper FSIS Veterinary inspection for ante mortem, the kill floor and the post mortem, there is no guarantee that sanitation and humaneness will occur;

Why are they avoiding the House Agriculture Committee , or the Board of Agriculture which is the logical venue for such discussion?

The DOH has COVID-19 to deal with; do they even want the added burden?

This issue is not in the published purview of the WAL Committee

This is an ill conceived reso and should be shelved permanently.



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Comments on HCR 83 re Commercial Sale of Rabbit Meat

House Committee on Energy and the Environment

March 23, 2021 8:30 am

Aloha Chair Tarnas and Vice-Chair Branco,

The Big Island Invasive Species is concerned about this resolution and offers the following comments. Rabbits are among the highest risk species, in terms of the potential economic harm to farmers and ranchers and environmental harm to watersheds and biodiversity, that can legally be kept as pets in Hawaii. They are one of the only species risky enough to have detailed regulations regarding their containment codified in law (HRS 142-95).

BIISC is annually awarded competitive state grant funds to respond to outbreaks of invasive pests, and rabbits, by virtue of their astonishing reproductive capacity, are high on our list. BIISC typically captures or shoots a dozen rabbits each year. Many are escaped pets, captured singly or in pairs, but some have been colonies of 15 or more. We are awaiting FY21 funds to contain a colony of an estimated 70+ rabbits, well-established on a dozen small ag lots in the Kona District. These are believed to have come from a subsistence meat production operation that was abandoned or fell into disrepair. They are well-positioned to spread into neighboring ranch lands and state forest reserve.

No commercial meat species imported to Hawaii has failed to escape and establish a feral population in Hawaii. Our croplands and state forests are browsed by wild game like axis and black-tailed deer, domestic and hybrid breeds of pigs, sheep, goats, cattle...The remarkable images of bison stranded on a sandbar after the floods in Hanalei a few years ago underscored the limitations of contained animal operations—the animals, in all cases, eventually escape.

We are concerned that there is no special fund available to a state agency or BIISC to respond to any new outbreak of an invasive species, whether imported or escaped. The Department of Agriculture can cite a producer for failing to contain rabbits properly but is unable to send staff to recapture or shoot the rabbits. DLNR is limited to response in forest reserves. We are left to fill the gap but made our case to multiple funders for several years before receiving a grant to respond to the rabbits in Kona, as the population ballooned in size. It's not that our funders don't see it as a priority, there just isn't enough money to go around.

Raising rabbits puts other farms and natural areas at risk. To better manage that risk, this resolution, if passed, could direct the Department of Health to require a bond sufficient to fund the recapture and re-housing or eradication of escaped rabbits associated with any commercial meat operation. Referencing HRS 142-95, requiring secondary containment, and requiring regular inspection of hutches would also help reduce risk exposure.

Mahalo for your consideration,

Springer Kaye, Manager
Big Island Invasive Species Committee

HCR-83

Submitted on: 3/22/2021 9:10:24 PM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
AMANDA HENSON	Animal Rights Initiative	Oppose	No

Comments:

Speaking on behalf of my organization, Animal Rights Initiative and its many local supporters, we strongly oppose the decision to allow rabbit farming. Factory farms come with inherent animal cruelty. These living beings with conscious minds of their own are forced to live in small areas that do not allow natural movement causing psychological problems and disgustingly awful, unsanitary conditions. If an act is unnecessary for survival it becomes a choice, and it is morally reprehensible to condone such acts of cruelty to animals. Factory farming animals is also quite toxic to our environment and Hawaii does not need another cesspool of manure and blood nor do we need phosphorous and nitrogen released into the water and air we depend on to live. To allow new animal farms to be developed is a step backwards in regards to climate crisis and will directly contribute to the acceleration of climate change. Kindly act in regards to what is best for Hawaii, and that is to oppose this bill.

HCR-83

Submitted on: 3/20/2021 10:34:47 PM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Cory Harden	Individual	Oppose	No

Comments:

Aloha legislators,

I oppose this measure because escaped rabbits can impact Hawai'i ecosystems, and rabbit production and slaughter are not regulated by the federal Humane Methods of Slaughter Act.

mahalo,

Cory Harden

HCR-83

Submitted on: 3/21/2021 9:35:31 AM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Deborah Ward	Individual	Oppose	No

Comments:

Aloha, friends,

Rabbits, like eels, and taape, are eaten all over the world but that doesn't mean that they should be grown in captivity in Hawaii. The problem is that there are inevitable escapes, casued by weather events, water events, and break-ins; excapes can cause havoc on the natural enviroment, and removal of escapes is expensive if not impossible. The purveyor is not held accountable, and we all, as taxpayers, must pay. Please do not encourage this venture. Thank you!

HCR-83

Submitted on: 3/21/2021 11:04:33 AM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Vivian S. Toellner	Individual	Oppose	No

Comments:

Total oppose. Have you ever eaten rabbit ? Dark wild meat, not a big seller any where on mainland either. A relative tried to raise rabbits on the mainland, and could not make a go of it.....just another wild idea of how to get rich. Use your common sense. Rabbits get out and breed and eat the plants up that we are growing. Another invasive species in Hawaii is the last thing we need. What we need is more pig harvesters, there are herds of them here on the Big Island in the Puna area ! Free meat, already here !

HCR-83

Submitted on: 3/21/2021 1:21:50 PM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Suyin Phillips	Individual	Oppose	No

Comments:

I strongly oppose this resolution. It is a terrible idea that will be looked back on with deep regret as damaging and costly issues are born. Rabbits could prove an environmental disaster if allowed to escape; DLNR has stringent rules about keeping rabbits; their cages are required to be kept well above the ground.

I understand that legislators are looking for other methods and sources of local food production but I'm afraid this is not the way to do so. It would be best to instead support improving existing producers operations.

Also, why are they avoiding the House Agriculture Committee , which is the logical venue for such discussion?

HCR-83

Submitted on: 3/21/2021 5:58:09 PM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Hannah	Individual	Oppose	No

Comments:

O'ahu does not need the commercialized breeding of another invasive species. Rabbit meat is not sustainable, and rabbits are not protected under the Humane Slaughter Act. Commercialized meat factories are unsanitary and pose a public health issue.

HCR-83

Submitted on: 3/21/2021 8:32:57 PM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
ellen jackson	Individual	Oppose	No

Comments:

Dear Chairman and Committee:

Please do not allow this rule change to go through. Rabbits would wreak major havoc on our environment here should they escape which is entirely likely, and this has happened occasionally already with pet rabbits. Rabbits also carry a lot of diseases that could be potentially transferred to humans. There are many safer ways to expand agricultural self reliance in the islands.

Thank You.

HCR-83

Submitted on: 3/21/2021 9:07:49 PM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Nadine Chiang	Individual	Oppose	No

Comments:

Dear Leaders of our gentle land of Aloha,

Please consider voting no to the request to add Rabbitt as a meat to be sold commercially. The farming and slaughter of these animals is done in unethical and inhuman ways as are many animals in the meat industry. There is no need for this addition as there are plenty of other options already available and costs affordable to all socioeconomic circles. Please extend the aloha to other forms of life that also have feelings, thoughts and emotions including pain and suffering. The addition of rabbit meat is absolutely unnecessary and adds nothing to our ability to tsurvuv e and thrive.

kind regards

Nadine Chiang

HCR-83

Submitted on: 3/22/2021 10:14:32 AM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Margie Gillman-Wolfe	Individual	Oppose	No

Comments:

Are you out of your minds? Let them eat mongose, pig and goat. Trying to get the cats and dogs S/N ed is hard enough. Please don't pass this.

HCR-83

Submitted on: 3/22/2021 1:29:32 PM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Erin Pinto	Individual	Oppose	No

Comments:

I strongly urge you to vote no on HCR83. This is a terribly misguided resolution for the state. Commercial sale of rabbit meat is going to result in a tremendous threat to our fragile ecosystems and result in cruelty and slaughter of what are widely considered pets.

Rabbits will inevitably escape or get dumped, and will become a threat to native plants and animals. The breeder and slaughter "operators" will not take responsibility and it will fall to sparsely funded taxpayer efforts to try to control rabbit populations. Feral rabbit populations will quickly get out of control because there are no predators.

If we wouldn't breed and slaughter dogs and cats, we should not breed and slaughter bunnies.

My name is Sandra Tsukiyama. I am the current president of the Hawaii All-Breed Rabbit Club and have been a continuous member since its founding in 1986. The Oahu-based Club is sanctioned with the American Rabbit Breeders Association, an international organization, dedicated to the promotion, development and improvement of the purebred, domestic rabbit. I also serve as its representative for the State of Hawaii.

The introduction of H.R. 71 and H.C.R. 83 fully supports the current practice of local people raising rabbits for self-sufficiency. Considering the limited land area on our islands to raise rabbits, this makes sense as they are the most efficient meat producers, regarding the use of space, plant-based feed, water and time. Historically, during World War II, there was a shortage of meat in the islands and many people raised rabbits.

Rabbits are efficient meat producers; gestation is 31 days. Average litter size varies from four to ten young. After weaning the litter at approximately six to eight weeks, the doe can be rebred, producing up to four litters per year. A 12-week-old, fryer rabbit dresses out to 3 pounds and can easily feed a family of five. The edible portion of the carcass is all white meat, is easily digested and produces the highest level of protein and lowest of fat, compared to that of other animals, according to the USDA Circular #549.

Currently, I can think of over 30 people across the islands, actively raising rabbits for meat. It can replace chicken or pork in local, favorite dishes such as Adobo, Nishime, Katsu, Stir Fry, Kalua, Lulau, Smoke Meat, Vinha d'Alhos and Portuguese Sausage, delighting the previously uninitiated consumer. Rabbits are consumed worldwide, and in fact, in Southeast Asian, Caribbean and African countries they have been introduced as a viable protein alternative to replace beef, etc. Locally, there has been a considerable demand from upscale, resort-type as well as neighborhood restaurant chefs who want to include it as a regular item on their menus.

The passing of this resolution would lead to a win-win situation for Hawaii's agricultural industry, the economy and overall health of the people of this State. I ask that all who are interested in improving those areas, to please give it their hearty support.

HCR-83

Submitted on: 3/23/2021 1:19:32 AM

Testimony for WAL on 3/23/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Mary James	Individual	Oppose	No

Comments:

The chance that rabbits raised for commercial sale of the meat could escape into the environment should be enough to stop this legislation from continuing. Our environment is already facing many introduced animals (and plants) and rabbits would be an additional and extremely serious threat. We don't need rabbit meat for sale commercially and I can't imagine a child's reaction to seeing rabbit meat for sale in the grocery store. Please don't let this measure continue.