

## Oppose dangerous amendment to SB 241

A draft amendment (LRBa0786/P2) to SB 241 would defeat the bill’s purpose to ensure public safety by limiting the possession of dangerous exotic animals to qualified facilities. The amendment would add unacceptable exemptions for the Zoological Association of America (ZAA) and facilities licensed by the U.S. Department of Agriculture as well as remove an important prohibition on public contact with animals such as tigers, lions, bears, and chimpanzees.

### Exempting the Zoological Association of America (ZAA) severely weakens laws and regulations intended to restrict the private possession of dangerous wild animals to qualified facilities.

The deceptively-named Zoological Association of America (ZAA) has weak standards and endorses poorly run roadside zoos, traveling zoos, and private menageries, and promotes the private ownership of exotic pets. Despite threats to public safety and animal welfare, ZAA standards allow public contact with dangerous wild animals, including 90-pound bears, tiger and lion cubs, and chimpanzees and orangutans. In 2011-2013, attempts to exempt ZAA facilities from state dangerous wild animal laws were defeated in Louisiana, Michigan, and Texas, as was a proposed regulation to exempt ZAA from the California Restricted Species Law. ZAA has no affiliation with the highly respected Association of Zoos and Aquariums (AZA), which has a long history of setting industry standards for zoological institutions.

**“[Expanding permission to ZAA facilities to keep large carnivores in Michigan] could lead to gaps in public health protection and animal welfare.”**  
**Michigan Governor Rick Snyder, in vetoing changes to Michigan’s Large Carnivore Act**

**“[The ZAA is] an advocacy group for private (animal) owners that does not represent the national or international zoo and aquarium profession.”**  
**Steve H. Taylor, director, Cleveland Metroparks Zoo**

**“Most of these [ZAA facilities] are what I refer to as ‘roadside menageries.’”**  
**Mark Reed, director, Sedgwick County Zoo**

#### Concerns about ZAA’s facilities, members, and activities include the following:

- Individuals convicted of felonies, wildlife trafficking, and cruelty to animals
- Animal attacks and escapes
- Allowing the public to have direct and unsafe contact with dangerous wild animals
- Disposing of unwanted wild animals in harmful and irresponsible ways
- Inexperienced staff and insufficient staffing levels
- Numerous USDA fines and official warnings for serious and chronic problems
- Serious welfare concerns found at ZAA facilities include:
  - inadequate veterinary care
  - inhumane methods of euthanasia
  - inadequate feeding
  - filthy drinking water
  - lack of shelter from sunlight and the elements
  - cramped, undersized, and filthy enclosures
  - little to no environmental enrichment
  - depriving newborn bears, big cats, and primates of maternal care

#### ZAA standards pale in comparison to AZA standards

ZAA’s vague accreditation standards allow conditions that were common at zoos 30 or 40 years ago, but which are totally inconsistent with modern animal care practices. On the other hand, the AZA has a rigorous and comprehensive accreditation process as well as strong standards and policies to address safety, provide for animal health and welfare that greatly exceeds the minimum standards of the federal Animal Welfare Act, and prevent wild animals from entering the pet trade and canned hunting facilities. Unlike AZA, ZAA has no requirement for insurance or fiscal stability to ensure a facility can provide long-term quality care to animals.

**Exempting USDA licensees severely weakens laws and regulations intended to restrict the private possession of dangerous wild animals to qualified facilities for the following reasons:**

**“[C]urrent APHIS regulations and procedures allow Animal Care to renew a license based on the licensee’s stated intent to exhibit, rather than on any proof of actual exhibition. As a result, we believe it is still possible for individuals to obtain and keep APHIS exhibitor licenses to assist them in circumventing State and local laws which restrict the ownership of dangerous exotic animals.”**

**Office of Inspector General, Controls Over APHIS Licensing of Animal Exhibitors, Audit Report 33601-10-Ch, June 2010**

- Pet owners can easily acquire a USDA license to circumvent state laws
- With only 126 inspectors who are responsible for inspecting more than 10,433 facilities, there are not nearly enough USDA inspectors to provide regular inspections and follow-up.
- USDA licensees can—and do—keep animals in inhumane and unsafe conditions, yet still be in compliance with the Animal Welfare Act (AWA)
- USDA licenses are easy to obtain, but difficult for the agency to revoke
- USDA licenses are automatically renewed every year, even when a licensee has had serious and/or repeated AWA violations
- USDA licenses are not species-specific
- USDA licensees are often the biggest problem

For example, in 2008, Casey Ludwig in Lakewood, Wisconsin, began collecting dangerous animals as pets until he ended up with 15 tigers, 4 African lions, and 5 Syrian brown bears among many other animals. Despite his lack of resources and qualifications, he invited the public to visit his personal menagerie. Three years after it began, this ill-conceived and poorly run USDA-licensed menagerie closed, but not before it became a burden to taxpayers since government officials at the town, county, state, and federal level had to deal with many serious problems that went uncorrected for years, including unsafe conditions, a lack of veterinary care, malnourished animals, and inexperienced staff.

**Allowing public contact with dangerous wild animals is unsafe for the public (especially children), harmful to animals, and leads to excessive breeding of animals such as tigers to ensure a steady supply of cubs are available for petting, handling, and photo sessions.**



**This tiger cub, supplied by a ZAA zoo and used for public handling, was punched, slapped, dragged, and choked as a means to make him cooperate during photo sessions.**

In 2005, an 8-year-old girl was bitten on the chest by an 80-pound, 7-month-old lion cub at Creature Features Pet Store in Baraboo after she was invited to play with the lion during a store promotion. The girl had to undergo rabies shots. In 2007, Mark Schoebel, who operates Timbavati, was cited by the USDA for endangering public safety for using a juvenile tiger for public handling at Kalahari Resort in Lake Delton, Wisconsin. These are just two of many incidents of a largely unregulated industry since USDA inspectors are rarely present during public contact activities.

States that allow public contact with animals such as tigers typically have higher captive populations of these animals due to constant breeding, which increases the risk of attacks and escapes and puts first responders in grave danger. For example, in Kansas, where public contact is banned, there are only 17 tigers in facilities other than those accredited by the Association of Zoos and Aquariums (AZA). In neighboring Oklahoma, where tiger cub photo ops flourish, the captive tiger population is a staggering 123 since tigers are continually bred to produce babies for public handling. This activity, which is opposed by experts, also results in malnourished, unhealthy animals who are subjected to stress, maternal deprivation, and physical abuse.