



ZOOLOGICAL ASSOCIATION
OF AMERICA

May 13, 2022

Representative Mike Quigley
2078 Rayburn House Office Building
Washington, DC 20515

RE: NO on H.R. 263 Big Cat Public Safety Act

Representative Quigley,

Thank you for acknowledging ZAA as a legitimate stakeholder at yesterday's hearing at House Natural Resources. However, the characterization that, "the Zoological Association of America is not opposed to H.R. 263" is inaccurate and should be corrected. **The Zoological Association of America opposes the measure as currently written.**

We want to be clear, ZAA opposes the practice of keeping big cats as pets, "cub petting," and the revolving door policy associated with this practice of abuse created when cubs "age out" and their final disposition is unknown. Our accreditation standards expressly prohibit public contact with big cats, and transfer of big cats to unlicensed facilities. Unfortunately, proponents of the bill refused to consult with ZAA in the bill writing phase, and have ignored our comments to date. Otherwise, with input, ZAA's concerns would likely have been addressed which would have met with our support of HR263.

The Zoological Association of America (ZAA) is a zoological trade organization that represents professionally managed zoos, aquaria, conservation breeding facilities, wildlife conservation ranches, and conservation education-based animal ambassador programs. With more than sixty accredited facilities, the ZAA is the second largest trade association in the zoological sector, including many of the finest facilities in the United States.

The primary purpose of the Lacey Act is to combat "trafficking" (import, export and interstate transport) in "illegal" wildlife, fish, and plants. To that point, Section 3 Prohibitions, (e) Captive Wildlife Offense, paragraph (2) Limitation on Application, subparagraphs i, ii, iii, iv, v, vi, vii and viii presumes to rewrite and supersede an area of established law pertaining to the "animal welfare" of "legal" wildlife that is already regulated by USDA/APHIS under the authority of the Animal Welfare Act. The FWS, under the authority of the Lacey Act, was never intended to regulate animal welfare. The FWS has neither the resources nor the expertise to address animal welfare issues that are already regulated by USDA.

Further, the bill continues to favor the Association of Zoos and Aquariums (AZA). Although no longer exempting them by name, HR263 creates a veiled exemption for by writing provisions of their Species Survival Plan (SSP) into the bill as a qualifier for the USDA exemption language. This amounts to a political "*quid pro quo*" being extended by the Humane Society of the United States to our rival trade organization. Ironically, AZA does not

prohibit "cub petting," nor unprotected "close encounters" with big cats for programs used to attract wealthy donors.

Additionally, it is important to note, most states already regulate the ownership and use of big cats in captivity. There are only 3 states that do not.

Proponents of the Big Cat Public Safety Act have misled bill sponsors and committee members. There is no crisis looming. The Big Cat Public Safety Act is not about public safety. It is about picking favorites and eliminating zoos and aquariums that will not voluntarily adopt the policies of the animal rights movement.

The answer is fairly simple, a clear cut carveout exemption for USDA licensed facilities, without the qualifying laundry list of AZA/HSUS negotiated policies inserted into the bill language. This compromise would avoid using the Lacey Act to usurp the integrity of the Animal Welfare Act— and this compromise would satisfy ZAA concerns.

Thank you for your consideration,

Sincerely,

A handwritten signature in black ink, appearing to read "John Seyjagat", with a long, sweeping horizontal line extending to the right.

John Seyjagat
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