



March 25, 2025

The Honorable Bruce Westerman
Chair
Committee on Natural Resources
The Honorable Harriet Hageman
Chair
Subcommittee on Water, Wildlife and Fisheries
US House of Representatives
1324 Longworth House Office Building
Washington, DC 202515

Re: Statement of Support for HR 1897 – ESA Amendments Act of 2025

Dear Representative Westerman and Representative Hageman:

The Zoological Association of America (ZAA) appreciates your leadership in introducing the ESA Amendments Act of 2025. This legislation takes significant steps to address the bureaucratic delays and obstacles that zoos face in conserving endangered species due to the application of the Endangered Species Act on zoo animals. By restoring the ESA to its original intent, this legislation will truly create more opportunities for zoos to enhance and expand valuable ex-situ conservation efforts.

ZAA is one of the largest nonprofit zoological trade organizations in the country, representing professionally managed zoos, aquariums, conservation breeding facilities, wildlife conservation ranches, and animal ambassador programs focused on conservation education. Many of ZAA's member facilities are privately owned, often family-run businesses that contribute locally and regionally by providing economic benefits through employment and tourism spending.

The fundamental issue is that the ESA, in its current form, does not distinguish between animals in their wild, natural habitats and those in controlled, managed care settings like zoos. This means that when a species is listed under the ESA, all prohibitions and requirements that apply to wild populations also extend to those in U.S. zoos. That means that zoos are required to obtain permits from the Fish and Wildlife Service to hold, acquire, transport, care for, breed, import, or export animals in their collections. To complicate matters further, the Service's ESA permit system is plagued by delays and bureaucratic red tape. I encourage you to review the report on the Service's website, which outlines numerous problems and inefficiencies (for example, 89 separate decision points for a single permit!) and makes specific recommendations to improve the permitting process. <https://www.fws.gov/media/international-affairs-permitting-review-report-phase-1>

These permit requirements impose significant financial burdens on zoos. This includes not only the actual costs of preparing and submitting applications, but also the substantial expenditures mandated by the Service as part of the Enhancement requirements under Section 10 of the ESA. For instance, recent ESA permits issued by the Service obligated the zoos involved to make annual financial commitments of at least \$8,000 and, in some instances, over \$20,000 to conservation organizations outside the United States. These funds are directed to support international conservation efforts that do not directly pertain to the care of the captive-bred animals covered by the permit applications. Furthermore, they are seldom audited, as evidenced by the recent investigation into zoo funds sent to China in exchange for Giant panda loans.

ZAA members and accredited facilities play a significant role in global conservation through breeding programs, reintroduction initiatives, rescue efforts, anti-poaching measures, and rehabilitation work worldwide. Furthermore, ZAA organizations provide educational opportunities and programs designed to help the public connect with wildlife and understand the critical importance of conserving various species, including those classified as endangered or threatened under the Endangered Species Act. Our members offer millions of visitors enriching experiences while also contributing millions of dollars to conservation efforts across the globe.

Title VI of HR 1897 would make significant improvements in how nonnative species in U.S. zoos are regulated by aligning more closely with international standards set by the Convention on International Trade in Endangered Species (CITES) and eliminating duplicative permitting requirements. This change would alleviate some bureaucratic obstacles that zoos face and also streamline the ESA permitting process in a way that supports rather than undermines species conservation.

Thank you for considering these comments. We ask that they be included in hearing records of the Subcommittee on Water, Wildlife and Fisheries regarding this legislation.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Kelly George', is positioned above the typed name.

Kelly George, PhD
Executive Director