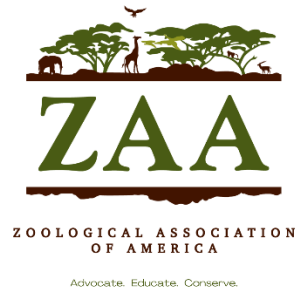


February 2, 2026

The Honorable Paul Gosar
US House of Representatives
2057 Rayburn House Office Building
Washington, DC 20515



RE: HR 7159 “Protecting Local Zoos Act of 2026”

Dear Representative Gosar:

I write to you on behalf of the Zoological Association of America in strong support of HR 7159, “Protecting Local Zoos Act of 2026”, your proposed legislation to help local zoos and animal care facilities by addressing disconnects in existing federal law and regulations that have created confusion and unintended consequences regarding the care and handling of certain big cat species.

Zoological Association of America

The Zoological Association of America (ZAA) is a non-profit zoological trade organization that represents professionally managed zoos, aquariums and zoological professionals. With more than seventy-five accredited facilities and nearly 1000 professional members ZAA is the second largest trade association in the zoological sector, counting among its members many of the finest facilities in the United States, including Wildlife World Zoo in Litchfield Park, Arizona.

ZAA members contribute to global wildlife conservation education and conduct programming designed to help the public connect with wildlife and understand the vital importance of preserving it. ZAA members and accredited facilities also make significant contributions to global conservation through reintroduction programs, rescue efforts, and rehabilitation work around the world. In addition, they also provide economic benefits both locally and regionally in terms of employment and tourism spending. Many of ZAA’s member facilities are privately-owned, often family run, businesses like Wildlife World Zoo and meet the Small Business Administration’s size standard for zoos and botanical gardens of \$34 Million in annual receipts and thus are considered small businesses under federal law.

ZAA’s stringent accreditation process establishes an extremely high bar with respect to professional animal standards, best management practices and exemplary animal care and welfare. All ZAA accredited facilities are also licensed and inspected by the United States Department of Agriculture as Class C (Exhibitors). Plus, any ZAA member that holds endangered or threatened species or certain other federally regulated animals is also subject to oversight by the US Fish and Wildlife Service.

Protecting Local Zoos Act of 2026

HR 7159 makes important corrections to existing federal legislation and regulations regarding the keeping and handling of certain “big cat” species, i.e., the Captive Wildlife Safety Act (CWSA) and the Big Cat Public Safety Act (BCPSA). To be clear, ZAA supports the underlying purposes of both the CWSA and the BCPSA, i.e., to ensure the safety and proper care of animals and the people who care for them as well as the public. ZAA has policies that specifically address public contact with animals including prohibiting public contact with large carnivores such as tigers and lions and with large primates, as well as the proper way to conduct public interaction programs with any species.

Unfortunately, the language of the BCPSA, which amended CWSA, created confusion on a number of points. For example, the BCPSA exempts USA Class C exhibitors from its prohibitions on import, export, transport, sale, receipt, acquisition, purchase in interstate or foreign commerce, breeding, and possession. However, because it requires that for any animal movement both the sending and receiving facility meet the requirements, by its clear and plain language, the BCPSA effectively prohibits exports to (and arguably imports from) non-US zoos since there is no way a foreign facility could meet those same requirements. This is not a question of interpretation as noted by the USFWS in its interim and final rule under the BCPSA:

For additional example, under the BCPSA a prohibited wildlife species may not be exported from the United States to a foreign entity except for purposes of reintroduction to the wild in coordination with and under the authority of a foreign government.... The only foreign entity that might qualify for a BCPSA exception to possess the wildlife in captivity would be a wildlife sanctuary under 16 U.S.C. 3372(e)(2)(C), and at this time we have no ability to verify and enforce compliance with the requirements of the BCPSA for a potential foreign wildlife sanctuary. Thus, at this time we would be unable to issue a permit to authorize export to a foreign entity for holding in captivity, even if all of the other requirements of subchapter B of chapter I of title 50 CFR are met (including parts 13, 14, 17, and 23).

88 FR 38358, 38358 (June 12, 2023).

While even the sponsors of the BCPSA have stated that this result was not part of the Congressional intent behind BCPSA, because the language of the now statute is clear, the only way to address this is through new legislation and this is one of the key reasons why HR 7159 is needed.

Other provisions of HR 7159 are equally important including:

- Reinstating the exempt status of USDA Class B Licensees (Breeders). These licensees, who are subject to the same federal regulations and oversight as exhibitors, had equal status under the CWSA but were excluded in the BCPSA.
- Correcting the erroneous inclusion of clouded leopards and snow leopards in the BCPSA and its implementing regulations. The CWSA defined covered species as “(A) any live species of lion, tiger, leopard, cheetah, jaguar, or cougar; and (B) any live hybrid of any of those species.” However, in CWSA implementing regulations the CWSA wrongly included both clouded leopards (*Neofelis nebulosa*) and snow leopards (*Uncia uncia*) in

its definition of covered species even though neither is mentioned in the CWSA nor a subspecies of leopard (*Panthera pardus*). Because the BCPSA changes were only reflecting the FWS practice and not the CWSA itself, the BCPSA codified the prior overreach of FWS.

Neither of these species is generally considered to be a “big cat” and should not be regulated as such.

- HR 7159 addresses another problem stemming from the plain language of the BCPSA which is overly narrow regarding who may care for and have contact with big cats at zoos. For example, while it allows veterinarians and veterinary students to have contact it omits other veterinary and medical professionals whose assistance is often needed. It also overlooks the fact that some facilities, particularly non-profits, rely upon trained and experienced volunteers to help care for animals and their enclosures. The commonsense clarifications in HR 7159 will address these inadvertent complications to the care and welfare of these animals.

ZAA strongly supports HR 7159, and we greatly appreciate your leadership role in sponsoring this legislation. Thank you for considering these comments. If you have any questions or would like additional information, please contact us.

Sincerely,



Kelly George
Executive Director
Zoological Association of America

Cc: House Committee on Natural Resources, Subcommittee on Water, Wildlife and Fisheries
The Honorable Darren Soto