

Aaron: Ladies and gentlemen, welcome and thank you for joining this afternoon's call, Handling of Dangerous Animals listening sessions. With that, I'll turn the call over to Kate Carter-Corker, Assistant Deputy Administrator for animal care. Kate, the floor is yours.

Kate: Thank you, Aaron. Well, good morning and good afternoon, depending upon your location. I am Kate Carter-Corker, the Assistant Deputy Administrator for animal care. Thank you for your interest and participation in this stakeholder engagement listening session.

USDA's Animal and Plant Health Inspection Service is considering whether to revise the Animal Welfare Act regulation, governing the handling of and public contact with dangerous animals. In 2012, a coalition of animal advocacy organizations petitioned APHIS to ban all public contact with dangerous animals exhibited under the Animal Welfare Act. The agency published the petition and received more than 15,000 comments.

APHIS is now reopening the comment period until August 31st, 2016 as it seeks the public input on additional questions that will help the agency better determine its course of action. The questions are listed in the federal register notice and on our handling of dangerous animals' webpage. We realized that three minutes is not sufficient time to respond to all eight questions, so if you wish to offer comments during this listening session, you may consider focusing on one or two questions.

With that said, we are interested in gathering all of the information you wish to present and encourage everyone to submit written comments on regulations.gov. Once again, the link to the official docket on regulations.gov can be found on animal care's website.

Today, we are looking forward to receiving your input on one or more of those questions addressing the handling of dangerous animals. Thank you in advance for your information and interest in this topic and this process. We are here to listen. I'll turn control back over to Aaron.

Aaron: Ladies and gentlemen, as we move to the presentation phase, please feel free to place yourself into the presentation queue by pressing #2 on your telephone keypad. You'll hear a notification when your line's unmuted. Please then identify yourself and your agency.

Each speaker will be allowed 3 minutes to present their oral comments. I would then let you know when you have 30 seconds left to speak. All comments will be recorded and a transcript of the session will be available on animal care's Handling Dangerous Animals website. We are now ready to start the speakers. We do have a speaker on our queue. Please go ahead speaker, the line is open.

Robbie: Hi, my name is Robbie Actin. I'm just a member of the public. I wanted to make a

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comment on question 1 and 8. The first one being, what factors should determine if an animal's suitable for public contact? I think other characteristics such as size and strength has been mentioned on here. Another one might be age because as an animal goes through the course of its maturity, there are a lot of times where as an infant that it isn't dangerous, but as adolescent or adult, it can be. I think it will be to the benefit of this body to consider that as well.

As number 8 says, what constitutes sufficient barriers and enclosures for dangerous animals? I feel like that also should be taken into consideration age and how [inaudible 00:04:04] the animal is because a lot of times these animals will thrive off of human contact because there's a lot of animals that are in there for the long haul. They're not getting released to the wild just because of being born and bred in captivity or not able to go out to the wild, so they need to thrive on human contact.

That constitutes my comments.

Aaron: Robert, thank you very much. We'll move to our next caller. Go, your line is open.

Marianne: Hi, my name is Marianne [inaudible 00:04:46]. I'm a member of the public. I would like to touch on question number 1, the invisible animal's temperament, I believe should be the primary factors in determining the suitability of public interaction plus contact.

Animal which [inaudible 00:05:03], they can harm people just like [inaudible 00:05:05] should have an age restriction on when they can be in public contact. The tendency is to believe that wild the animals in synonymous, which is synonymous with vicious killers and that is simply not the case. Animals do not kill for sport, only humans do that. While animals can be affectionate and loving given the right circumstances with their [inaudible 00:05:29], shouldn't you be able to determine the animal's suitability for public contact.

Any animal who thrives from the human interactions should be suitable for interaction. If it is an animal that can grow strong enough to overpower a human, then they would still be suitable before they reach that ability. Most animals are curious and playful, lions, tiger, bears and primates included. They thrive from stimulation including that provided by, multiple human.

They make very suitable candidates for public interactions while younger up to juvenile age. Some individual animals cross fight is dangerous they're fine candidates after the juvenile age, given the right temperament. Thank you.

Aaron: [Inaudible 00:06:25]. Let's go to our next caller. Caller, your line is open.

Monica: My name is Monica Welby. I have [inaudible 00:06:37]. We've had bears in our family for 90 years. I'm going to address question number 1. First of all, what constitutes a dangerous animal or what animals should be opposed for public

contact? What characteristics determine if a type of animal is suitable for public contact?

Well, of course, size, strength and age of the animal, but not all animals are dangerous. We've had bears in our family for 90 years. I have adult bears that are actually like a puppy dog. Every animal's an individual. You have to take into consideration their disposition.

Of course, once they get to adult size, it's up to the handler and the owners, the trainers to know their animals. We know our animals well. We've had them 90 years in our family. We never had any harm to ourselves, animals or public. You have to know what you're doing, you have to be experts and we are the experts.

The Animal Rights Movement is not expert. They have no expertise whatsoever in animal husbandry or the care of animals at all. They shouldn't even be considered on any of this. I'm sorry, you should be listening to the animal expert which is the exhibitors, the licensees and people who handle these animals on daily basis.

Not all animal ... Not all non-human primates are dangerous. Not all bears and cats are dangerous. Once again, every animal is an individual. We don't have public contact so much with our bears, but we do commercials and movies. Sometimes, that does call for public contact.

I don't know how you're going to take that into consideration. If you're in a movie industry, how are you going to differ that as opposed to being at a fair or something else? We don't do public contact with our large animals. That's what I want to say about that.

Aaron: All right, thank you very much. We will go to our next caller. Caller, your line is open.

C. Scaringe: Good afternoon, I'm Cristina Scaringe representing Animal Defenders International who supported the petition. ADI investigations, among others and the ever increasing breadth of study show that even under the best intentions and circumstances, these acts can't provide what wild animals really need, so put the animals and the public at great risk.

These animals are deprived with everything that is natural to them also their mothers to endure a life of severe confinement causes trouble and often physical abuse only to disappear when they've grown too old or too big to exploit in the hands of an unknowing public. It is an impoverished existence.

We will include with our written comments, among other items, a recent comprehensive analysis of the latest science in the industry worldwide completed to the University of Bristol and supported by the British Veterinarians Association which consulted more than 650 experts and organizations globally including industry representatives to conclude that this is no life worth living. There's no

conclusive evidence that wild animals habituate to confinement and no evidence that familiarity equates to security.

It's foolish to expect stressed out animals will never lash out or try to escape. As we've seen far too often, the result is the animal's death. The problem only arises because humans choose to ignore that these animals are not designed for petting, selfies and the like. Executive Order 13563 directs agencies and calls for the nation's regulatory systems to promote predictability and reduce uncertainty.

Yet the petition aptly points out that agency's standard currently rely upon vague subjective language which faces challenge in the field and the courtroom, including among others, [inaudible 00:10:24] in 2010 where the court states the administrator's view of more than minimal risk of harm to animals and the public. APHIS has expressed statement that exhibitors do not have a right to allow contact between public and dangerous animals.

Actually, the question under the AWA mandate is more appropriately, what is dangerous to the animal? Regardless as it stands, much of this juris prudence is spent communicating well settled positions to stakeholder the clarity is a mandate.

Since the 2013 petition, the cursory review of only just 75 exhibitors listed there, not including the 6 cancelled or revoked licenses since that time reveals at least 539 citations and at least 171 repeat offenses. That's only a few years and only those exhibitors listed in the petition.

One news piece aired last month describe yet another exhibitor continuing previously cited activities despite an ongoing investigation that has been pending for two years. The petition enumerates prolific scientific bases opposing the public handling, premature maternal separation and unmanaged breeding so prevalent in these operations.

Since then, we've learned more, underscoring the already well-supported principles, such practices are detrimental to the million mothers and babies in both the long and short term. Separating mothers from their babies again and again with unnatural induced birthing frequencies to repeatedly compound their suffering.

How unmonitored trade and breeding can provide cover for illegal trafficking and how improper, unnatural human-animal interactions promote altered viewpoints and perpetuate [inaudible 00:11:43] that negatively impact institute conservation. Absent monitoring, there can be no assumption, for example that the cycling of tiger cubs do not participate in a lucrative, but illegal parts and derivative trades.

ADI supports the petition and maintains that no public human contact with wild animals is ever suitable, safe or humane. The science doesn't support it. It's also unethical and [inaudible 00:12:04] to the AWA mandate and it compromises the survival of wild populations. Thank you.

Aaron: All right, thank you very much. We'll go to our next caller. Caller, your line is open.

Cristina: Hello. My name is Cristina [inaudible 00:12:23] and I'm the Vice-President with Wildlife In Need and have been for 8 years. I'd like to speak to questions 4 and 5, starting with 5. The most effective training techniques utilize positive reinforcement. The learning will last longer and the trained behavior will generalize more quickly to become automatic. For example, retreating from the door when it is opened.

Quite simply, if an animal understands its favorite activity or favorite snack will be gained by standing away from the door, it will quickly learn to do so with a hand gesture or a simple command. As the desired behaviors become more complex, the techniques and varying positive reward also increase in complexity, but the simple grandmother still prevail, "First, you do this, then you get that."

With regards to question number 4, the best methods of permanent identification, I believe photographs over time of an individual animal along with its physical description with dates. Microchipping causes too many problems in animals and it's a huge health risk. Tattooing or branding is just cruel. If it's done wide awake, it's too painful. To do so under anesthesia is too risky for the animal.

I presume this question is being asked in anticipation that an animal might get loose or need to be identified, since this does not happen very often, recent photos would be the best measure. [Inaudible 00:13:57] at once. Tattoos or branding may be warranted, but that has not happened.

Even when Terry Thompson's animals were set loose, presumably by him, they did not leave the property, they did not pose a public threat. Most animals I know will not attempt to leave an enclosure when the door is open. This is partially due to proper training, it's mostly due to the fact that they're in their comfort zone, inside their enclosures and have no desire to leave.

I would like to speak to the last caller's allegations that the animals disappear after a period of public handling. That is not simply not true. There is no game hunting facilities in this country and it is impossible to ship them overseas. I would like to point out also that isn't death a little more depriving of their needs than living under human care? That's all I have to say for now. I'll be back.

Aaron: All right, thank you very much. We'll move to our next caller. Caller, your line is open.

Abbie: Hi, my name's Abbie. I'm with National Tiger Sanctuary. I just want to point out that we are a USDA licensed facility and I have worked in animal care myself since I graduated several years ago. I want to address one defense that we're hearing a lot from people that allow public contact with their animals.

One of those ideas is that somehow that fosters conservation mindedness or

contribute to education in the public. I think it's really important that we consider what the actual literature says about this, what real research supports.

For example, in one study about chimpanzees, they found that just by showing people an image that contained a chimp and a human in the same image that the people have saw the image were more likely to believe that a chimpanzee would make a good pet.

That kind of contact that suggest that we encourage exotics in the pet trade, we're actually creating more situations where animals end up with unqualified owners and receive inadequate care. By proxy, by ending contact, we will decrease that indiscriminate breeding of animals for the exotic pet trade.

In the same study, they also found that people that saw photos with humans and chimps in the same photo were less likely to believe that chimpanzees were endangered which obviously they are endangered. In fact, we're damaging people's conservation mindedness. If people believe an animal's not endangered, they are less likely to support conservation effort.

This type of research suggest the exact opposite of what facilities that are participating in public handling are suggesting or suggesting that they're educating and supporting conservation when in fact the literature would not agree with that statement.

In addition to public contact with dangerous animals damaging public's attitude about conservation, I've had firsthand experience with lots of cats that live at our facility that were at one time used in cub handling operations when they were young and I've seen the effects of that long term of animals over time in multiple scenarios, one thing that we've noticed is there's a really, really high mortality rates in cub handling.

I'm talking primarily about lions and tigers because that's where my expertise is, but we know that we have several cats where only one or two cats in the litters survived to adulthood. The rest died during handling or adolescents. I think that really speaks to the danger of public contact on the animals because of the lack of nutrition, lack of sleep, exposure to germs their immune systems fully developed, so I think that says a lot about the kind of care that they're receiving at the facilities that are facilitating public contact.

Besides just mortality rate, another really common thing that we see are the mental and emotional effects of the animals. I have several animals that were used in cub handling operations when they were young that had self-mutilating behaviors. I mean, animals that are ripping out their own hair, chewing their tails until they're bleeding and have developed very unnatural behaviors from [inaudible 00:18:14] on natural, neglectful life.

That has a long term impact of the animals that have been doing that for years,

even after coming to our facility. Although sometimes it can improve, you rarely see that resolved in the long run. I think that there's some really long term impact on the animals that you need to consider. What we're considering is not only is it safe for the public, but it's safe for the animals as well.

I also wanted to address the issue with, if we allow a certain window or a certain age range where dangerous animals can be handled by the public, is it realistic to think that we're going to be able to regulate that? Are we really going to know the age of the animal, because we know that people that are facilitating public contact, if they have a certain window where the animal can be handled, they're going to do anything to extend that window because it's money in their pocket.

I think it'd be very, very difficult to say that from 8-12 weeks old that cats can be handled, for example. Well, how do we know when they're 9, 10, 11 weeks? How do we know that they're not 16 weeks and now they really are particularly dangerous and becoming more dangerous with every day and not still being used with public contact?

The last thing that I wanted to touch on was addressing a little bit with question number 1. In a previous call and in question number 1, it says that certain characteristic can be used to classify animals as dangerous. One of those characteristics is instinctual behavior. If we're talking about instinctual behavior, all non-domestic felines are instinctually hardwired to hunt and kill.

We know that whether it is a tiger or a lion, but we even need to be thinking about [inaudible 00:19:44] all those smaller cats, well, they're hardwired to hunt and kill too. If they, even through play, even as young animals are practicing those hunting behaviors around young children or around the public, they present a danger as well. We're proposing that all non-domestic felines are dangerous and would not be suitable for any type of public contact.

I just want to be clear to articulate the National Tiger Sanctuary is definitely in support of a full ban on all contact between the public and all exotic animals of any age including smaller cats. I really appreciate USDA taking time to consider this. Thanks for looking to our concerns.

Aaron: All right, thank you very much. We'll go to our next caller. Caller, your line is open.

Lyn: My name is Lyn Colver. I'm a USDA licensed breeder with about 30 years' experience. I'm also on the Board of Directors and Executive Director of the Feline Conservation Federation, an international organization of feline owners and handlers, [inaudible 00:20:59] people, conservationists and feline lovers. My area of expertise is with the wild cats. I can't speak to the other species in the definition of dangerous animals so I'm going to limit my comments to the feline species only.

One of your questions, number 7, what industry, organization or government standards have been published for the handling and care of dangerous animals? I

want to make it very clear for the record that this organization has a 60 years history, published history. It founded the hand rearing of the small South American cats, the Ocelots, Margays. We pioneered proper husbandry through trial and error. Admittedly, there was many heartbreaks in the process.

Today, we have members who have vast experience breeding these animals, exhibiting these animals, running sanctuaries and zoos, working at facilities. I, myself, has plenty of experience. We have also developed several courses. One's a basic husbandry course where we touch on proper handling, vet care, hand rearing, containment-contingency planning. We also have modules on educating with the public, how to work with these animals as ambassadors.

I believe that you can find a lot of useful material in our organization. The classes are taught by USDA licensed educators. They draw upon the experiences of our successful outreach educators, published materials and the feedback of attendees.

Now, behavior training, that's a science. It's probably most applied to domestic animals, the same techniques apply to wild life. Use of voice commands followed by bridges and rewards. That can result in successful training of the animal being taught. There's no reason that we can't be doing this. There is a value to it.

As for factors and characteristic to determine the type of animal that's suitable for public contact, certainly, I would say number 1 is the personality of the animal. Some of that is inherited and some of it is environmental.

As someone who has raised hundreds of kittens over 3 decades, I can tell you, some cats love the public and some cats are insecure with the public. You want to encourage positive relationships, you want to lend hand rearing, you want to be a substitute for the mother, you have to feed their growing brain, you have to stimulate them, you have to take them places, show them things, enrich their minds. This is all positive experience.

We're a more intelligent species than their mother. We have the capability of enriching their lives beyond what their mother could, but it has to be done properly. So much of what I hear from the animal rights is depressing to me to think that there might be an issue in our industry where things are being done improperly and they're seeing abuse and abhorrent behaviors, but when done with the animal's needs in mind, it is an enriching and valuable experience.

Now, I'd like to touch on a couple of personal experiences. As someone who specializes in hand rearing animals, I believe there's a reason that they're removed from their mother and that's because they're going to spend their entire life in captivity. That life, they deserve to be comfortable and unstressed.

I have some experience with mother raised animals. Of all the animals I have, the mother raised animals are the most nervous, they are the most uncomfortable and I believe they are the most unhappy of all my felines. I feel sorry for them. I do my

best to respect their [inaudible 00:25:26] distances and not add to their stress, but I think it's a disservice to the individual animal.

It's a compromise. It can be done properly. I encourage the USDA to continue to try to address the overuse of young animals in public contact, but develop and listen to us about the proper use and the best management practices. I have found that animals that have very limited human contact are less confident and less able to adjust to new situations. It's a balancing act.

As a breeder, my obligation is to raise a healthy, well-adjusted animal for the educator or the zoo that has contracted me to take one of these animals. It's their job to take that healthy young mind and continue to enrich it, expose it to situations, use positive rewards and develop a wildlife ambassador that is comfortable in the presence of an audience and who can speak for all the animals in the wild.

As for public health risks, in the case of the wild cats, you're talking about the same risks you would have with a puppy or a kitten. Certainly, you have an issue with ringworm. If that were the case, you do not want the animal to be handled by the public. You have parasite risks, but parasites can be identified through fecals and they can be treated. It is nothing major to worm a cat and these risks are minimal.

The thought that there might be a risk for rabies, there's no documented case of rabies in any captive animal. There is no documented evidence that the rabies vaccine fails to work. In fact, there is plenty of evidence that [inaudible 00:27:33] and the immune system responds to these rabies vaccinations in feline. These public health risks, I believe, are controllable and minimal.

I absolutely do not approve of a total ban on public contact. In fact, what is public? Gentle handling, occasional handling and even regular handling can be done properly and to the benefit of the animal. I would like to encourage the USDA to keep handling open, keep listening and learning. Perhaps the questions that the animal rights have about the age of the cat or the abuse of the cat, we can develop regulations that specifically state you cannot over-handle a cat. We already have standards on giving the animals rest. Maybe we need to look into that.

People who have these animals love them. They're not just doing it for the money, they have chosen this as a profession, their way of life. By and large, they take pride. This is an industry that is growing and developing.

As I said, we go back 60 years, the Feline Conservation Federation. There are other organizations out there that are developing useful information as well. The USDA needs to take into consideration the value of these animals and put in perspective the totally negative views of the animal rights and their investigations and their allegations.

These animals are not disappearing. They don't know where they go. It's not their

animal and it's not their transaction. They're not cooperative with us, why would we cooperate with them? Why would we facilitate information to them? They just want to use it against us, but USDA has this information and they have the ability to track it down.

We have the ability to identify these animals. As kittens, they could certainly be microchip. As they're older, tigers, leopards, they have identifying marks, stripes, spots. In the case of any cat, you can do a DNA test now. They're not that expensive. You can do DNA on hair. If you want to know what cat are owned by what people, there are numerous opportunities out there. There's no reason to say, "We can't figure out where these animals came from or where they're going to."

I really think the final thing on the sufficient barriers for dangerous animals, it worries me some of the proposals by animal rights have been 15 feet and they're including kittens here. If somebody was bottle-feeding a kitten at a zoo or private facility and these kind of regulations were passed, the animal rights view, you couldn't have somebody come, walk through the door and watch as the kitten is being fed. It's ridiculous. We have to separate this broad term of dangerous animal the fact that a young animal, a baby brain is not thinking of ... Is not capable and is not thinking about doing serious harm.

As for the cat species, I do believe that we can limit these definition of dangerous animal to the species-wise, to the large cats, cougars on up, but certainly not all individuals are suitable for outreach.

It cannot be defined on a species-level or an age level. Some animals love it, some animals are confident, some animals are controllable and some are different. It's the handler, the breeder, the trainer and the facility's job to recognize that, build on it, encourage it and make the distinction, show the professionalism not to put the public at risk. I appreciate the opportunity to give comments. Thank you.

Aaron: All right, thank you very much. Before we go to our next caller, just to reiterate, in order for everyone to have their chance to speak, please try your best to limit your comments to three minutes. All right then we go on to our next caller. Caller, your line is open.

Donna: Hi, my name is Donna. I'm with the public. I want to address question number 8 about sufficient barriers for enclosures. A sufficient barrier would keep members of the public just past the arm's length from the animal's enclosure so that even by leaning, reaching over the enclosure, it cannot be touched and/or injured.

Cincinnati Zoo just taught us that landscape barriers are not enough since that child climbed right through that landscape barrier. A continuous barrier which cannot be reached by humans is needed around the enclosures. The enclosure itself requires a barrier which cannot be breached by the animal. One answer will not fit all these situations. These barriers could be made with fencing, Plexiglas, iron rails,

depending on the situation. Thank you for listening.

Aaron: All right, thank you very much. We'll move to our next caller. Caller, your line is open.

Keith: Hello, my name is Keith Evans, Lion Habitat Ranch. I've been working with exotics for 46 years. All animals, depending on their age and the way they were raised could be suitable for direct contact. The problem comes not with the animal as much as it does with the trainers.

There's good trainers and bad trainers. Where most of the animal rights people are focusing are on the bad trainers. I don't think you should be able to operate if you continually are cited for problems with the USDA. I also believe USDA should regulate all Animal Welfare Act whether you're an exhibitor or not because if you're owning a cat and you're not licensed, then USDA can't come in and stop you from abusing that animal.

I would like to keep the public contact because done correctly by a proper trainer, it's safe. I've been doing it for 46 years. We've never had an incident with a guest. I have a mother lion who allows us to go into the cage when the babies are born. We can sit down with her and the babies, remove a baby and there's no problem and give it back to her.

She feeds, we feed. This routine about everybody pulls them, mutilates them and does all this stuff to them, it's not a fact for everybody. It might occur in some incidents, but it doesn't have to. Everybody that wants these cats to go back into the wild and not be in captivity must realize they're dying in the wild.

All the conservation methods in the world are not going to protect them in the wild. Human encroachment is taking them, so within 15 or 20 years, the only place you'll ever see these animals is in a facility. AJA doesn't have enough species, genetic diversity to sustain this forever. You need private owners. As far as barriers, it just depends on the individual animal and the age. They need to be sufficient. The most problems with that, basically, were with AJA do is you always get the exception. That's my comments. Thank you.

Aaron: All right, thank you very much. We'll move to our next caller. Caller, your line is open.

Katherine: Hi, good afternoon. This is Katherine McGill of the 401 Wildlife and Raccoon Solutions. Thank you for the opportunity to speak on this. As a stakeholder, I wish to address question number 2 pertaining to which species to include or exclude, specifically regarding the last sentence called 'uncommon animals known to carry rabies'.

We suggest those mentioned be eliminated and exempt from the proposed changes from physical strength to caging enclosure factors and needs, the tigers,

bears and the large primates. These are apples and oranges in comparison to smaller wildlife and therefore are relatively irrelevant.

There's no data to substantiate that these native, small animals are [inaudible 00:37:03] to this topics of dangerous animals as proposed and [inaudible 00:37:06] changes. In fact, these species are entirely separate classifications in many context even including the regulatory provisions for their safekeeping at both the state and federal level.

Adding them is conflating this issue at hand, again, largely irrelevant to the intent of the petitioner, the determination of the agency. Further, I feel compelled to remind any party generally concerned about animal welfare today that allowing this language to remain as stated and thereby allowing inappropriate [inaudible 00:37:36] as dangerous [inaudible 00:37:37] will jeopardize these animals in a manner and degree that we don't want to go there. I think you're acutely unaware of what this means and we don't want to be responsible for that.

But the brief note to address the rabies mentioned, I will respectfully mention that these animals are commonly vaccinated with virtually the same product, the same vaccine product that the USDA ... You just successfully vaccinate wildlife across the country with the LRB program. I feel safe in speaking for all that we're very grateful of that program and the progress on that front. Therefore, lastly, the implied supposition that rabies is a risk and throwing these animals into this group has no data to substantiate it. It further muddies these waters, it conflates the issue.

Addressing this discussion, we may need to have in a separate venue at another time and among those specific stakeholders, but not here. In light of the email from APHIS this morning, it appears we will be discussing this [inaudible 00:38:30] in the near future anyway. I strongly suggest, request the language in question number 2, the inclusion, be eliminated going forward and we stick to the intent of the original petition and the species specifically outlined.

That was the end of my comment, but in light of some of the comments that were made here, I'd like to address that there's no [inaudible 00:38:48] in this country as [inaudible 00:38:50].

I can look out in the window and see one from my Colorado property. That everyone engaged in animal welfare does not have hands-on experience is also false. The fact that any animal be bred as an attraction, then deemed unsuitable is misusing that life but that's not wrong. I agree that animal is an individual, but I think we need to stick to the topic at hand. Thank you.

Aaron: Thank you very much. We'll go to out next caller. Caller, your line is open.

Dr. Tromborg: Hello. This is Dr. Chris Tromborg, representing both Sacramento City College and University of California. My background is in captivity and behavior. I've worked in that field since 1979. Really, there are several topics that should be addressed

simultaneously, not any particular question.

The first has to do with a general issue of captivity. Even animals that are targeted for rerelease into the wild are going to find themselves at least in [inaudible 00:39:58] situations that are increasingly reminiscent of zoos and wild animal parks as the remaining wild animal habitats become increasingly discontinuous and compartmentalized, also are increasingly close to human settlement.

Repatriation is really not an issue anymore. Most animals that will continue like this [inaudible 00:40:24] will be existing in the artificial confines captivity, so we have to do our best to try to work out ways to improve the conditions of captivity. That's where the issue of behavioral enrichment comes in.

Virtually all are responsible holders of both exotic wild animals and even common wild life species try to do their best to maintain their animals in the best condition possible so that they provide the best educational experience with the public. In order to do that, some degree of handling is absolutely necessary. Again, the issue of animals being maintained in a completely wild state in captivity is just out of the question any longer.

As early as the 1930s, the founder of the modern science and zoo biology, [inaudible 00:41:27] realized that animals should be tamed in order to be better maintained in captivity. At least to facilitate handling by veterinarians. Then it became obvious to many people running zoos and other kinds of arenas where animals are exhibited that educational effectiveness can be enhanced with proximity to the animals. That culminates, of course, in physical contact. There are various perspectives on whether or not that should be allowed.

Aaron: Thirty seconds remaining.

Dr. Chris: Okay, thank you.

One thing that should be noted is that especially of mammals is plenty of evidence beginning as early as 1963 that early handling of animals reorganizes the brain in such a way as to facilitate a larger, more docile, eager to handle animal that can be used more suitably in educational outreach programs in animals that are not handled. The idea that early handling of [inaudible 00:42:34] detrimental to the animal, the data don't support that at all.

With regard to, excuse me, which species are suitable for interactions with the public, again, there's an awful lot of individual variability in mammals. There's probably no need for a species-specific restriction. In terms of age of the animals that are appropriate for interactions with the public. Typically is the case that the younger the animals are when they're interacted with, the more effective training and taming years. That's essentially all that I need to say about this. Thank you and the USDA for the opportunity to engage in this personal and informed conversation.

Aaron: All right, thank you very much. We'll go to our next caller. Caller, your line is open.

Tom: This is Tom Albert with Ringling Bros. I really just wanted to point out and it's made apparent by most of the previous comments that the original petition was focused specifically on big cats, bears and non-human primates. I guess one of the things that this exercise is looking at is the possibility of expanding that to other species.

I would just point out that that petition has been pending or the comments on that petition has been pending at USDA for almost three years. I would hope that USDA would be able to address those comments and respond to the original petition in a timely manner and also explain what in those comments triggered this exercise. I just wanted to clarify that one point. Thank you.

Aaron: All right caller, your line is open. Please make sure that you haven't muted your own phone.

Carrie: Hello? Hello, my name is [crosstalk 00:44:48]. Hello, my name is Carrie Cramer, I'm with DeYoung Family Zoo. Our facility has been around for 30 years. During that 30 years, we've allowed public contact with lion, tigers, bears, primates including apes and chimpanzees.

I have been working with these animals for 13 years in direct contact. We have animals here at our facility that are now 15 years old and up to 20 years old as far as big cats that were handled as cubs through public contact and are healthy, well-adjusted adult animals.

I do not agree whatsoever with the so-called facts that animals that are handled at a young age suffer, that they have all of these issues and that they die at a young age. We have proof at our facility that that is not the case. I do understand that sanctuaries have a better view of the handling of young animals because of the situation of the animals in their care, but that does not constitute that that happens at every facility or with every animal that is exposed to this kind of handling.

The facts do point out that the animals thrive on human contact, taking facts from the British column has nothing with to do with the United States and what is happening here in our country, it does make a difference with captive animals that as stated earlier, keeping captive animals in a wild state is not beneficial to the animals nor the humans that care for them or that come to visit them at zoological facility.

It is once again proven that early handling can benefit the health and well-being of the animal and it helps them to be more well-adjusted as adults. One of the benefits, not only with handling young animals for public contact is having the conservation efforts that we are focused on as a facility does reach people at a greater value when they get the opportunity to get up close and experience those

animals.

It's been well-said famously that people only care for the things that they love and through hands-on experiences with these animals, we can help people to fall in love and appreciate these animals. They then are inspired to learn about conservation efforts and support the funds that we support that are actually making a difference out in the wild.

With handling the animal at a young age, it does benefit them throughout their entire life. It makes things less stressful on them. Here at our facility, once again we prove that with our animals having longer life spans, healthier breeding program.

We do have animals here where the mothers were hand-raised. They actually prefer our keepers to be with them while they are birthing. I have been down inside of a wolf den with a mother as she has birthed. I've been inside of a tiger den as she was giving birth to her cubs. I've been able to then handle them. Our veterinarian has also been able to handle them, do all necessary things. We've also been able to take them use them for handling with public contact or educational programs and return them back to their mother.

All of these false stories about animals being ripped away from their mother and being forced to do these things does not actually prove that represent an adequate story for what is happening at all facilities. I do understand though that there are facilities, handlers or people that do not properly do what a licensed facility does.

At our facility, we have a blended family here also. We've done rescue, we've worked with USDA that has taken animals from other facilities. We've worked with authorities where people have taken animals that should not have them as pets. Yes, those animals were not handled by professionals, did not have proper veterinary care and therefore they do have issues, but that does not mean that the facilities that you know, what they are doing through the proper guidelines should then have these restrictions put upon them because of these smaller incidences.

In everything in life, there is good and bad. Once again, you cannot affect the good because of what is happening with the bad. When you look at the ultimate numbers of cases, it is this minute number compared to proper facilities that are doing proper handling.

I also run a rescue facility. I can tell you that the animals that we have here, once they came here, after having these improper handlings and raising up, through our facilities who knows how to handle them with proper veterinary care, we have been able to turn those animals around as they have lived long and health life.

You cannot just take smaller incidences and force regulation on all facilities because of these small incidences. Although I do agree they're unjust, but by regulating it to make sure that proper facilities are allowed to do the handling, we will then make sure that these animals are properly handled and their health and

well-being is number one.

As far as barriers, I would like to comment that if we can do all the USDA regulations that we want to do as far as barriers, that when the large groups, they're able to go state by state and get exemptions for these things and they then have the issues where people are crossing barriers and interacting with animals, that is where the problem lies.

If we're going to have a barrier resolution, it should be across the board, everybody is required to have the same barrier and no exemptions, depending ... That shouldn't require if you have an entire fenced in facility that your barriers are lower, the barrier at every facility should be required to be at a safe height to protect the animals from incidences [inaudible 00:50:29], thank you.

Aaron: Right, thank you very much. We'll go to our next caller. Caller your line is open.

Abbie: I want to address the idea or the proposal that we use the disposition of individual animals to decide which animal should be considered dangerous. The idea that we're going to know lions, tigers, primates well enough to know which animal has a tendency to hurt a human being is absolutely unrealistic.

Wild animals are known for being unpredictable. You cannot predict which animals would be safe and at what moment they might participate in a behavior that could hurt a human even if they don't intend to harm a human, even a very young big cat can scratch or bite a human even just out of play behavior without intending to really hurt them. There's no way that we can decide which individual animals might be safe and which ones would not, based on this decision. There's no objective way to make that decision.

I also wanted to touch on the idea that animals that are raised by their mothers in captivity are unhappy or unsocialized or can't live positive lives in captivity. I've had firsthand experience with animals that have been raised by their mothers in captivity and they can have very enriching lives, they can still handle be through veterinary care, they can still be socialized to people. It does not necessarily mean because they're raised by their mother that they're going to be miserable.

In addition to that, it is very sad. I have seen mothers that have been needed to take from ... Cubs that have been needed to take from their mothers and it's very sad for the mother and for the cub when those animals are separated. I have seen mothers stand and call out and call out and call out for their babies, wanting to know where they had gone, once they've been removed. Even if it's an emergency situation or the cub needs veterinary care. We've had situations where we've been able to reunite cubs after veterinary care with their mothers and those reunions are some of the most touching moments I've ever seen personally because you can tell how happy it makes mother and cub to be reunited.

Kate: Speaker, could you let us know who you are. Your name and your first and last

name please.

Abbie: Sure, thank you. My name is Abbie Knudsen from National Tiger Sanctuary. Thank you.

Aaron: All right, thank you very much. We'll move to our next caller. Caller, your line's open.

Jenifer: Hi my name is Jennifer Nelson and I'm from Zoo Miami. I have over 20 years of experience, working with exotic animals and we would like to suggest that cheetahs not be classified with lions, tigers, leopards and jaguars. They are not behaviorally or physically the same as big cats.

Cheetahs lack fully retractable claws, they are not as powerful as big cats and they are historically, they've been easily trained and maintained, easily handled. Zoo Miami had a very successful Cheetah ambassador program for almost 20 years.

It participated in several conservation programs that have greatly benefitted wild cheetahs. Our animals that are healthy and more adjusted. We've raised 2 cheetahs close to longevity records for the species so we would like to ask USDA, to remove Cheetahs from the big cat classification. Thank you.

Aaron: All right. Thanks very much. I'm going to go to our next caller. Caller your line is open.

Robert: Hello my name is Robert Mullen. I'm a USDA licensed exhibitor and have been so for well over 25 years. As regards to number 1, I think that each animal is an individual species, this idea that we can come with one regulation to step all size is just not feasible or practical. Much of safe handling relies upon the trainer's experience and their knowledge of that individual species is much so as the animal.

A general comment to all these items is that many of the items we're discussing here today, there are current USDA regulations that already cover these items. I might suggest that we need to look at better enforcement of the current regulations, before expanding the regulations to help protect the animals.

As to training, I think, across the board most effective trainers are using positive reinforcement. It is definitely the most effective training method. There's this notion that many of the animals out there, that are being handled, are being abused, it's just simply false. Positive reinforcement is far more effective than any other training technique and it's what most trainers are using.

As to the tracking of animals, again I think there's a big disconnect that we don't have current good tracking of USDA licensed animals. It's just simply not the case that tigers are disappearing. USDA licensed animals are being tracked, USDA knows where they're at and they know who has litters, who doesn't. These animals are very well tracked currently by the USDA. Speaking of the same fact, many of the

animals outside of USDA, of course there's no tracking of them and I think that's something that needs to be looked at but probably not in the scope of these changes.

As to id-ing, photo Id's are extremely effective. They're used in wildlife research every day. A side shot, a head shot, animal species will effectively identify that animal and when appropriate and the animal is sedated, I do support micro chipping. I think it's hard to justify a sedated innocent procedure just for the purpose of placing a microchip. But when that animal has go under routine anesthesia for an event, I certainly support micro chipping of that species, in addition to their photo ids.

In regards to the public health risk ...

Aaron: 30 seconds.

Robin: [inaudible 00:56:43] few more comments. As far as the distance barrier, I think that we need to differentiate whether a trainer or staff member is present. Again one size fits all is very difficult if there's a staff member there that barrier distance changes accordingly.

As far as rabies, we have many other species that are greater [inaudible 00:56:59] of rabies than the species we're talking about. How is the current rate of human encroachment with wild habitat and extinction expanding at the rate they are at the wild, I am definitely opposed to any changes at this time but then unfortunately, the current regulations. Thank you so much for your time.

Aaron: Right, thank you very much and we'll go to our next caller. Caller your line is open

Susan: Yes, good afternoon. This is Susan Bass. I'm with Big Cat Rescue and I'm commenting in support of amending the AWA regulation, to prohibit the cub handling. I'd like to respond to part of question number 3, which is what risk does public contact with dangerous animal present to the individual animal and the species.

I've seen the risks and I wanted to share one example with you all today. In February of 2014, I got a call that there was a tiger cub on display at the Florida State Fair which is here in Tampa near Big Cat Rescue. I hurried over to this fair with a couple of my friends to see for myself.

When we found the exhibit, there was a 4 month old tiger cub named Takara on the display. She was all alone, living in a tiny dog carrier inside a small fence, chained in linked area and she was going to be this, all 11 days of the fair. For \$20, the exhibitor was charging, up to 6 people at a time, could enter her cage, take photos etc.

The cub exhibit was in the middle of the midway area of the fair, so she was also

subjected to all the loud music blaring from the rides which go on all day and all night. When we looked at her condition, it was appalling. She seemed heavily drugged. Her behavior was well beyond just being sleepy or lethargic. When the handler roughly pulled her out of the dog carrier and placed on top of it so we could see her better, she was limp like a ragged doll and barely opened her eyes.

One of the colleagues, I was with is a veterinary tech and it was her professional opinion, the cub was drugged. We were inches away from this cub so she could easily evaluate the cub's eyes and behavior. The handler even opened her mouth, the cub's mouth and put his fingers in it. She didn't move or wake up. Her fur was filthy and there were areas of diarrhea in the saw dust around the dog carrier. It was just heart wrenching to see this poor cub and this is the everyday experience of these cubs, not a particular situation from a poor exhibitor.

Today, if she's even still alive, Takara's almost 3 years old. She's long past this first few months where exhibitors and owners and people that have been talking on this call today about the money they can make, the handling of these cubs which is the only reason they do it. Takara is no longer lucrative. I often wonder what's a happened to her and frankly it haunts me. I'm sure she's still being exhibited and exploited somewhere at a roadside zoo or circus and she's even still alive. Drugging cubs so that they can be subjected ...

Aaron: 30 seconds.

Susan: Okay. Drugging cubs so that they can be subjected to public handling like this is a huge and unnecessary risk for the animals. It's inhumane, cruel and abusive. We can do better than that in America. I urge USDA to amend the Animal Welfare Act, so the public contact with cubs, primates and baby bears is banned. Thank you.

Aaron: Thank you very much. We'll go to our next caller. Caller your line is open.

C. Varallo: Hi. My name is Christine Varallo, I'm with CSA. I have a problem with number 5. What are the most mainstreaming techniques to use with dangerous animals? Anything can be labeled a dangerous animal. I have been around all kinds of animals and never had problems, issues or being bitten, hurts, chucks anything, by large animals, like elephants, chimps, bears, tigers, lions. I have been bitten by people's dogs at their house. Anything can be labeled dangerous.

I'm really upset about USDA opening this to the public because experts don't pretend or actually know about all species. They admit, they our only trainers for specific animals. You can't ask a cat lady to train a tiger and this is basically what all this is doing.

I think USDA needs to tell everybody who has animals, work together to preserve all species because right now we're just pointing fingers and attacking everybody instead of getting to the root of the problem and the root of the problem is protecting animals. I think that I have a big problem with, this person said that,

everybody is an individual case. All animals are individuals. Not all dogs are good, not all dogs are bad.

You need to listen to the experts, the trainers has done this for many many years and not little kids that are out of college, that've been working elephants or tigers or bears or dogs for 5 years. There's plenty of perfectly good experts that USDA is not helping and is basically pushing them back against the wall. I think everything needs to be an individual case or no.

I think that USDA should take a little trip to Mexico and see what the damage is going on over there. There's a lot of problems and we need to learn from them. We are losing all species, not just certain kinds, all kinds. I would appreciate USDA, learn to listening to the experts, not just people who can pick up a phone, and make their opinion. Thank you for giving me the time, good bye.

Aaron: All right. Thank you very much. Our next caller. Caller your line is open.

Robbie: Hi this is Robbie Atklin I was wondering if I could amend a comment.

Kate: Sure go ahead.

Robbie: Okay, in ...

Kate: First, would you tell your name again?

Robbie: Robbie Atklin, I'm with the public ...

Kate: Okay, thank you.

Robbie: 2 callers ago, there was a person who had an individual case and maybe that would go under 8th. Maybe there should be by animal size, there should be cage restrictions like 4 foot for every one set of animal. That's not a hard number but just something like that.

If there was abuse, why wasn't anything said? That maybe there should be something to ... Some addition to report suspicious activity and animal trainers or any situations. I don't think there should be any exemptions being given and if seeing pictures ... Again this is reference to number 8, seeing videos of humans with animals is more likely to make them own animals they shouldn't.

Quite frankly, the Crocodile Hunter was a great show but if that's so true then why didn't they ban it. I feel like that comment is absolutely ridiculous and that's all my comments.

Aaron: All right, thank you. Then we'll go to our next caller. Caller your line is open.

Kerry: Hello, I would also like to comment on the earlier comment that said that showing

people picture of animal with a human immediately means that people think that this animal makes it a good pet and that is why having hands on with animal is detrimental to the animals themselves.

In a proper facility, educational programs our key when it comes to getting people, especially in this day and age where people barely slow down to pay attention to anything and if they do that, that moment is sliding and in the run to the next thing, that having the ability through a proper facility that has the means to care for this animals for their entire life and knows proper training techniques and has proper veterinary care that the hands on is not only beneficial to the animal for its life and health and wellbeing but also to the public, to get them to understand and appreciate the animal and to have more of a connection to the natural world and not so much the things they see and pictures are on TV, it's the actual physical connection that leaves the lasting impression on a person.

I hear it every single day at my facility about how amazed they are, about how they could get up close to these animals, how they never realized things about these animals, how they were so appreciative that they actually learned something about the animals rather than walking through the [inaudible 01:06:54] facility where you just look at an animal at a distance and read a sign, be hands on with professionals handlers and trainers, makes the most impact in the individual and gets them invested in the animals and conservation. Looking at things at a distant, reading a sign, or looking at a picture does not have any affect as far as what the actual hands on effect of an animal is.

Again, I hear of these individual incidences, again not at actual facilities where the animals live and that they are cared for, for the rest of their life. Individual incidences like that, there're regulations already and I know the general public cannot understand that but USDA does have regulations as far as size, requirement ...

Aaron: 30 seconds.

Kerry: Of cages. These things, it's just like we're reiterating things that already exist. If we need to go over what the regulations already are and maybe reinforce them for certain individual situations, that's great. As far as putting a ban strictly across the board for all of these animals and all incidences and all facilities, I don't see that being beneficial to the animals or the people.

Kate: Caller could you identify yourself please?

Kerry: Yes, my name is Kerry Cramer. I'm an animal handler. I handle lions, tigers, bears, primates and from [inaudible 01:08:28].

Kate: Thank you.

Kerry: Thank you.

Aaron: All right, we'll go through our next caller. Caller your line is open.

Christina: Thank you. My name is Christina [inaudible 01:08:43]. I am the Vice President in Wildlife in Need. I would like to comment on few of the other comments that have them made. First off being heavy, with the National Tigers Sanctuary, you identify with yourself as being with the sanctuary and when you talk about breeding lions and those 2 comments are in direct opposition to each other.

I am sorry that your facility had a high mortality rate but that has not been our experience. I am sorry that your facility allowed public handling and those animals later exhibited self-mutilating behaviors. It makes me wonder why your volunteers don't continue the interaction to prevent such atrocities.

You question, how we know the ages of the animals and you said that you are a USDA member so you know that we register animals when they're born so that means documenting and on file.

Lastly for you, you talk about animals being unpredictable and I argue that to a great extent. Humans are unpredictable, animals are very predictable and yes some of their behaviors can be dangerous and a good trainer knows how to identify those.

Second is the women from BCR, didn't catch her name. Gave quite the heart wrenching description of a cub that was being held in horrendous conditions, I agree with you on that. If your story is even true, I can tell you stories of child abuse that are equally horrendous. That does not mean, no parents should have interaction with their child. That one experience of yours does not cause a blanket ban for the country.

I'd liked to applaud Lin Colbert and all that she had to say. I liked to agree with her that having contact with young cats is not detrimental to them. We have many babies that are taken from their mother, human babies I would like to add, right after, immediately following birth and there's few documented adverse effects regarding that. The same can go for animals. Chris ...

Aaron: 30 seconds.

Christina: Our researcher from California ... Am I almost done? I appreciate his research and sharing. I think he addressed Abby's claim that animals die after being handled which is just ludicrous. That's all I want to say for now, thanks.

Aaron: All right, thank you very much. Caller your line is up.

C. Scaringe: Hello, it's Christina Scaringe from Animal Defenders International once again. I just wanted to respond to 1 or 2 of the comments that were made, anecdotal stories aside. There is extensive study in this regard, there is extensive science available in

this regard and for instance the Terrence report that I mentioned that we will be submitting, was a worldwide analysis of existing science and the industry and included members of the industry including zoos and sanctuary and including animal trainers.

But that report nonetheless concluded that any marginal education or conservation roles outweighed by the negative impression generated by using wild animals for entertainment. There has been no scientific data to support the educational claim that is often used. There was a 2007 study that is often put forth by Falk, a subsequent 2010 study, to quite a bit of issue with its methodology, then I will be providing those as well.

There are however 2 studies in 2010 and 2014 which draws into question, the educational impact and usually both of the studies said that exhibits such as these require 2 things, to have that the minimal impact.

What they found, the 2010 and the 2014 studies, sound zero to minimal impact. To get that minimal education impact required 2 things. One is a very natural environment for the animal, which I would argue, human handling of wild animals is neither natural nor comparable to child abuse or interaction with human children.

The other thing was a very interactive engaging exhibit, noting what one caller mentioned earlier today that most people typically walk by, even interactive exhibits. The exhibit had to be particularly engaging.

The other thing I wanted to mention was one caller either earlier took issue with the question of the number and monitoring of captive tigers of United States. It is false. There is no current monitoring. We have no idea, how many tigers who live, born and bred and die here in the United States. There is a patchwork of laws regulating tiger ownership but we have really no idea. Best estimate put up between 5 and 10,000 but we do not have monitoring currently of these animals, thank you.

Aaron: All right. Thank you very much. We'll go to the next caller. Caller your line is open.

Keith: Yes, a couple of comments. BCR, if the lady actually saw that tiger suffering and she had a vet tech there that was within inches, why didn't they call USDA or forest official wildlife, to rescue that cat immediately and she wouldn't have to wonder what's happening to it at this point.

Second comment would be, we've had lots of lions born at our ranch that have grown up from cubs, had human contact, had grown up and had their own cubs. I've had generations of successful breeding, haven't had a problem. We don't place cubs with strangers. We do place adult lions with facilities that had their animals pass on for old age. We've got cats that are 15 to 20 years old continually. They've had human contact and our doing great.

It's not detrimental to their physical health just because they associate with humans except if the humans are shooting them with a gun like they do in Africa that all of these animal rights groups can't stop, no matter what they're doing, but they sure want to punish everybody here in the United States for having contact with humans.

That's about it for the moment. Oh, yes and the tiger rescue lady. Forgot her name, I apologize but she has 8 years experience, I've got 46 years experience. If you're in this business and you can't tell the difference like animal's attitude and what it's going to do, you shouldn't be in the business, thank you.

Kate: Sir, can you tell us your name please?

Keith: Sure. Keith Evans, Lion Habitat Ranch.

Kate: Thank you.

Keith: Thank you.

Kate: We're going to go to our next caller. Caller your line is open.

Judy: This is Judy Mcgee with the National Tiger Sanctuary and there's a couple of points I'd like to make. I've been doing this for over 20 years and prior to that, I dealt with a lot of different animals, [inaudible 01:16:48] animals and spent a lot of time with them on ranches. I didn't know that animals have a different instinct towards their babies and humans.

I don't understand why there needs to be handling of animals at any point, why do humans need to touch and handle something to understand it. The whole point is to understand with big cats that they were born and put here to live the life of being wild. Unfortunately, some of them are in captivity, kept in captivity. At that point, they have to be treated differently, I agree.

But to tell the public that touching and handling is the way to better understand conservation is insulting to public. I believe the public has more intelligence than that. We don't have to hold baby rhinos or baby whales to understand what it is to conserve them.

An instinct of an animal is hair triggered. I've been around cats quite a bit in my life and I highly recommend that people not handle them. If you think that you can read a tiger's mind, than I think you should think again. No matter how often you've been around him or how many you've been around, you don't know how he's feeling that day.

I can guarantee you that he can hear, see, smell and instinctively think about things that don't even occur to you that may have effect him in a hair trigger way that day

and when that happens, then there is a kneejerk reaction to what should happen to that cat and other big cat.

I think you simply put them in danger when we try to handle them. I don't think it's necessary for them and it's certainly not necessary for the public to understand. There are many ways the public has been educated about many things, without holding it, kissing it, hugging it and handling it and big cats are certainly one of the things that needs to be educated in a different manner than that.

I don't understand other than financial, why there would be any reason to take cubs around to places and exhibit them. I've seen a lot of that and it's certainly better than it used to be I believe but the circumstances have always been bad. I believe that most of those cats do die. When they do get passed on, they have a lot of behavioral baggage just like a human would have, only more so because you can't explain things to them in the way you can a human.

I do think and the evidence and the science show that there are cracks and they're real and they don't support the handling of young animals particularly big cats, that it helps the cats or it helps conservation in any way.

Aaron: Mam, could you tell your name again?

Judy: My name is Judy Mcgee and I'm with the National Tiger Sanctuary. Thank you.

Aaron: All right and we'll go to our next caller. Caller your line is open. Caller your line open, please be sure to unmute your own device. Caller your line open, please be sure to unmute your own device.

Jennifer: Hello, this is Jennifer from Big Cat Rescue. I want to address some of the recommendation that have been made by few of the speakers on this call, including recommendations such as these animals should be regulated on a individual basis, based on their temperament and personality and that they should be protected potentially from over handling additionally that some ways of ensuring positive reinforcement for training, one way of ensuring positive reinforcement for training is to ensure that a staff member or trainer is present.

It's fair to say that the reason this petition came forth is because the regulations currently in place, do not accurately ensure the welfare of these animals and the regulations currently in place are loosely enforced to suggest even more unenforceable regulation, how would a government agency ensure the individual temperament of an animal at all time? How would Government agency be able to regulate over handling or to assure that a staff member or a trainer is present at all times?

These are offerings or suggestions that [inaudible 01:22:07], this particular issue is obviously very important to Big Cat Rescue and I would ask that the USDA APHIS department, Animal Care Department really focus a lot on the evidence that has

been provided by quite a few of the organizations who support this decision and not put so much weight on the anecdotes being provided.

You can say one thing, if evidence proves otherwise, if evidence is showing that public contact does not support the conservation of these creatures, if evidence is saying that it's unsafe for these animals to be handled by the public that should be what is focused on. It's important to know that many of the speakers today have had incidence of their own. I just ask the USDA, properly weigh their comments being made today, thank you.

Kate: Jennifer, what's your last name.

Jennifer: Leon, L-E-O-N.

Kate: Thank you.

Jennifer: Thank you.

Aaron: All right, we'll go to our next caller. Caller your line is open.

Kerry: Hello this is Kerry Cramer, I'm a licensed and I'm an animal handler. I've a few comments. Again this is a USDA regulation that we are talking about and if anything I do feel it is very important for the people who are actually USDA, licensed facility and member who are the people who deal with these regulations and these animals on a day to day basis, who are the professionals, who are the ones that handle and raise the animals that they're opinion should be listened to, instead of outside people that are not the ones who are dealing with them on a regular basis. The professional are the ones who understand the animals, the situation and who do know the current regulation.

As far as the comment, there's no monitoring on the tiger and how many tigers are in the US and how many deaths there are. How can we be asking for restrictions on handling of them because of the parent's death and problems when there is no monitoring? They don't even know how many there are apparently and they don't know how many have died, so why all of a sudden are we saying that they're all dying because of this over handling.

As a animal handler, I always have my animal health and well being at number one priority and I think that a lot of the incidences are happening, this facility ... The people that don't have the proper facilities or the proper ability to handle these animal throughout their lifespan and maybe that is something that should be more focused on instead of a broad ban against all people and all facilities.

There is a lot of evidence that handling animals is a benefit to their health and well being throughout their life, especially the ones that live at a facility like mine where handling them at a young age gets them adjusted to their lifestyle, the routine of their care and the animal human bond goes back thousands of years. For someone

to be upset with people having the contact with animals, you must also have a common issue with people having contact with a dog or cat, a horse or cow. These animals are handled every day. Cows kill more people in the US...

Aaron: 30 seconds.

Kerry: Than any other animal. Cows kill more people in the US than any other animal does. People are bitten more by dogs than any other animal in the United States. I feel that some of these things are been taken out of context and that important issues are not being addressed, thank you.

Aaron: Right thank you very much and we'll go to our next caller.

Susan: Yes, hi. This is Susan Bass again from Big Cat Rescue. I was the one that spoke earlier with the example which is just one example of the tiger cub that was at this Florida state fair, 2 years ago. I'm the person at Big Cat Rescue that receives all of the concerns, complaints, emails and calls about lion and tiger cubs, generally being abused and treated inhumanely in this country.

I get calls and emails every single week and I often ... After I heard the story, suggested the person that they do send in a complaint to USDA so that they know what's happening with these particular animal, whether it's a cub or an adult. In this case specifically, of the Florida state fair cub Takara, not only did I contact the Florida's Wildlife Commission and obviously USDA but also the Attorney general of Florida, Pam Bondi got involved in this case and even she could do nothing to take that cub away from the owner.

It's not as simple, yes we have current USDA regulations and they're working. Why they're not working right now and we need to completely ban all contact with all cubs of all ages. There is no way to regulate around that. They're not enough USDA inspectors to inspect every facility and every handler and often enough so that they don't see any abuse. This the only way that we're going to stop the abuse to these cubs, thank you.

Aaron: All right thank you very much. We'll go to our next caller. Caller your line is open.

Lindsey Hi, my name is Lindsey [inaudible 01:28:12] and I'm from Lions, Tigers and Bears an accredited [inaudible 01:28:17] big cat and exotic animals sanctuary in Alpine, California. I just wanted to say that I do not support any form of public contact of big cats, bears and non human primates.

I'm going to be addressing questions under one, in my comment. The only animal that assures safety and control of the animals in all situations are domestic animals and farm animals. Domestic and Farm animals are predictable and have been companion animals for thousands of years, unlike the wild and apex predators.

Permitting public contact with these wild and undomesticated animals is a huge

danger to both the individual and the public. Public contact with big cats, bears and non human primates, exposing these animals to serious health risks and psychological stress. When these wild animals are used for public contact such as cub petting they're often over handled and over worked, constantly transported and are often defanged and declawed which are both extremely painful, physical operations for these animals.

Even more as babies, these wild animals are stripped from their mothers which causes a weakened immune system and malnutrition. For the safety of the public and to protect animals, I ask USDA to please prohibit public contact with big cats, bears and non human primates, thank you.

Aaron: All right, thank you very much. We'll go our next caller. Caller your line is open.

Keith: Yes, as far as the response to ... This Keith Evans again Lion Habitat Ranch. I do not why there wouldn't be a count of the animals because every year when I fill out my USDA renewal, you have to list the animal that you have in your control. I don't know why somebody can't [inaudible 01:30:12] and find out exactly how many lions, tigers and bears or any of that is based at least under USDA control rather than guessing. The disposition of those have to be accounted for under USDA and transfers. All that paperwork is there if USDA will supply it, maybe it will alleviate some of these questions.

If I was understanding correctly the tiger at the fair in Florida, nobody could do anything but yet you stated that the tiger was obviously drugged which under my impression is illegal to exhibit a drugged animal. If that was the case I'm really curious is why USDA didn't stop that exhibitor from handling the animal. That's all my comments for now. Thank you.

Aaron: Thanks very much. All right we'll go through our next caller. Caller your line is open.

Christina: Hi, this Christina [inaudible 01:30:12] again from Wildlife in Need. I'd like to speak to a few comments that has been made. One of which, I didn't catch the woman's name but she worked with raccoons and want them to be removed from the list. She said there is a canned hunting facility right outside her back door and I would really like to know if there were exotic cats in that canned hunting facility or if it is deer, that would be a very important distinction.

Jennifer from BCR, your argument is weak. You say you have evidence but your evidence is pure rhetoric and it's not based in science. We are speaking from experience. You seem to be speaking from hearsay. You speak of incidents between human and captive animals but the majority of those are in the GFAS facility, or zoos. To go straight to a total ban is exactly the type of kneejerk reaction that has this country in trouble.

Lindsey, if there are so many incidences then why are there more people killed by cows every year and why are most of the incidences between humans and animals

are result of dogs. Again, between exotic animals and humans, most of those incidences are not the type of facilities we're talking about. They are from GFAS facility and zoos.

Lastly, Judy, not sure where you were from. You say that the only reason we want to do this is to make people better understand conservation. Not what I hear people saying. We're socializing these animals towards the lives in which they are going to live. You say you believe that they die and we don't really care what you believe. I believe that USDA is acting towards the science behind this and the actual numbers behind this, so show me your real facts because there's not many of them on your website.

Lastly, I would like to applaud Lin Colbert again, regulation of course it is in order. It would seem logical ...

Aaron: 30 seconds.

Christina: That people who are in the industry would be given more weight, then the people with no actual handling experience and that any new regulation, would be formed of a group of people, both Government and those actively in the industry at this time. That's all from me for now, thank you.

Aaron: All right, thank you very much. We'll go to our next caller. Caller your line's open.

Bobbi: Hi, my name is Bobbi Brink. I'm the founder and director of Lions, Tigers and Bears in Alpines. I would like to thank the USDA for opening this petition to public comment. I would like to say, I've been working with exotic animals, hands on because of injury, care and everything since 1990.

When I first began working with exotic animals, in Texas, I started working with a breeder. I worked in the cage with animals, I worked free contact and now I work what we call protective contact. I started on one side of the fence and I ended upon the other only because I have myself, witnessed the horrible abuse that these animals suffer while living in captivity.

Most of these animals that are [inaudible 01:35:04] around from place to place, to be petted and cuddled and kissed on by the public, knows absolutely nothing about animal training, end up living in just the most terrible conditions and I myself have moved over a 130 lions, tigers and bears in the last 2 years from abuse to sanctuary.

We can say that the abuse isn't going on, but the abuse is going on and that doesn't mean that everybody is doing it but to have an animal that's bred for no more reason than be [inaudible 01:35:35] around for public to pet on is just wrong. I'm hoping that the public contact for those type of facilities will stop.

I have hand reared babies and I understand the touching and the positive

reinforcement and what is needed to make the animal secure. Animal who live in captivity, they do love people, people love animals. But the public doesn't know how to train animals, they don't know how to handle animals. I've seen them throw them on their back and push the bottle in their mouth.

For all of us professionals who work with animals, we know that's the wrong way to do it. Unfortunately, a lot of bad eggs have just made this an incredibly sad industry for animals and I'm for stopping public contact with cubs.

Thank you, and primates. Not to mention for the disease, ring worm, parasites. No there's no rabies but what about the primates. I just witnessed a monkey bite somebody 2 weeks ago. It does happen, thank you.

Aaron: All right, thank you very much. We'll go to our next caller. Caller you line's open.

Judy: Yes, This is Judy Mcgee with the National Tiger Sanctuary. Everyone keeps saying that the science is behind the handling of the animals and that GFAS and other facilities don't have the science. I believe that they do have the spine.

If you want to get together and compare scientific information, while I think that's the way to handle that rather than to just say, "I know the science." I mean anyone can say that. For instance statistics about more people being killed by cattle than by tigers and lions, that's relatively easy statistic to understand since people handle thousands of cattle every day. There's no comparison.

This act that people think that possibly passing a cub around at a fair all day is a good thing. I've met many people that have actually held a cub at a fair. When you explain to them ... Because who doesn't want to hold a cub. Everybody wants to hold a cub. But if you explained to them, if you had a baby and you took it to the fair, and you let a 100 people that day hold that baby, do you think that people would get sick. If we're going to compare them to humans, they can be like humans, yes. Or possibly they could have even more problems because they're an exotic animal. Certainly diseases from primates are many. Ring worm is amongst the few. There's also a lot of scientific evidence back data.

I just again don't understand the purpose behind it. I guess there needs to be a purpose behind it. The only way I can see coming to any real conclusions about this or anything being really done about is for the USDA to look closely at these things and see what they can do for the public and for the animals. Public handling is not good for either one. I believe the evidence backs that up. We're not talking about individuals in their own private places. There may be handlers that believe that they can handle an animal, a wild one ...

Aaron: 30 seconds.

Judy: They may believe that. The public is not those people. They don't have that experience and they should not be led to believe that they can or do have that

experience. That's a danger to them. Thank you.

Aaron: All right, thank you very much. We'll go to our next caller. Line is open.

Diane: Hi, this is Diane Dodson from [inaudible 01:39:59]. I like to voice my support for amending the Animal Welfare act regulation to prohibit public contact with big cats, bears and non-human primates. Without complete prohibition of allowing public contact with these animals, exhibitors will continue to find loopholes and always find ways to cheat the system. With that in mind, there are also a variety of reasons that the public should not have contact with exotic animals, especially big cats, bears and non-human primates.

Wild animals are first and foremost wild and should be respected as such. By allowing the public to have contact with these animals, they aren't promoting conservation or education, but rather encouraging private ownership of these dangerous animals. 2We shouldn't be teaching our children that wild animals should be tamed but instead teaching how to respect and confer them in the wild.

Incident after incident I show that animals and wild ... Or that humans and wild animals don't mix well and this even includes impacts on humans who have trained and raised these animals. Many injuries and deaths did not occur by a malicious act of animals but rather a result of the animals being much stronger and much more dangerous than the trainer could ever account for. Many exhibitors use cubs as a safer alternative to the adult version of these wild animals, which only perpetuates trauma and fear of humans in these juveniles.

APHIS is already stretched thin inspecting the enormous amount of exhibitors of big cats, bears and non-human primates. While doing the absolute best they can, much of the abuse falls under the radar. By prohibiting public contact with big cats, bears and non-human primates with no exceptions, USDA will be able to more efficiently and effectively inspect all exhibitors and protect the lives ...

Aaron: 30 seconds.

Speaker 6: Of many wild animals in captivity. This is the only way we can ensure the safety of both animals and people, thank you.

Aaron: All right, thank you very much. We'll go to our next caller. Caller you line is open.

Gloria: Yes, hello this Gloria Johnson from Blue Ridge Educational Center. First I would like to thank Lin Colbert for all of her insightful comments and I agree with all of them wholehearted. I just want to ... Listening to the previous caller, I just want to really make one comment.

I keep hearing terminologies such as cruel, inhumane, tearing them from them mother, educated imaginative opinions fed to the public by those with an agenda. I've read the comments in previous calls and there were many of them that were

identical from the public that were obviously cut and pasted by animal rights activists who prey on their imagination. The public really shouldn't be a part of this discussion.

They don't know and they are brainwashed by people within an agenda. Let me tell you quickly of 17 years of doing educational programs, I ... One animal, to schools and then most of them were at my facility and I talked about engaging these [inaudible 01:43:34]. If at any time during the presentation, I think a child say ... child say, "Oh cool, I want one." Stop and I say, "No you don't, these are not pets, they are helpful as an ambassador to teach you about extinction," and I hand out materials.

I don't charge for any of these presentations either, nor do I charge for anyone for pictures. I have not used the cub handling. But I certainly understand those animals need to be handled, to be adapted to their life situation of captive living. They are given vitamins and nourishment and love and enrichment every day. I don't understand why would anyone go to the cost and the trouble to obtain these animals only to discard them. Where are all these discarded animals? It really doesn't make sense. Thank you.

Aaron: All right, thank you very much. We'll go to our next caller. Caller you line is open.

Lauren: Hi, my name is Lauren Kirks and I'm a volunteer for Wildlife in Need. I would like to touch base on question number 2. Specifically, are all non-human primates dangerous?

I want to step outside the box a little bit here. I don't know if capuchin monkeys should be on that list specifically because these particular primates have been used to help quadriplegic make their lives, a little bit better. They do that in many ways that other service animal cannot. They learn to open bottles, turn off lights, retrieve dropped objects, just to name a few. They're also good for this test because of their long lifespan which can be 30 to 40 years as opposed to other service animals such as dogs.

If this ban is passed, what will that mean for these types of animals? They are very truth oriented and if they rift away from what they know as family, they will easily become depressed most likely quit eating and possibly die. I ask all of you this question. Is this really better for them?

Helping hands has been a very successful nonprofit organization since 1979 doing this. I urge you to watch a video. It's a beautiful, beautiful story. If you Google Judy and Sophie story Helping Hands the video will pop up. I also wanted to ask the lady about the canned hunt in the United States. Is this for actual big cats, exotic animals or is it just deer and I would also like to ask the USDA if there are canned hunts in the US, why are we not hearing about these currently being shutting down. That's it, thank you.

Aaron: All right, thank you very much. We'll go to our last caller in queue. Caller you line is open.

Janet: Yes my name is Janet Boyer. I'm with Wildlife in Need Inc in Charlestown Indiana and I am actually a member of the board of directors. I would like to address question number 3 if I could, please on what animals may pose a public risk and why and what risk does public contact with dangerous animals present to the individual animal and the species in wild.

There're very few exotic issues of the large cats and bears, they're very few. [inaudible 01:47:18], they cannot tolerate the Herpes's virus and with its prevalence in humans, non-human contact is what we actually use at our facility. We do not allow even our handlers, our trainers or our feeders to actually have contact with any of our primates when they exhibit such a virus. Whenever there are a health risk and involved and we can pre determine that, we always make sure that doesn't take place with any kind of contact.

Although we are a facility that does have contact with the public, we do a thing called tiger baby playtime where people are actually able to come in and they're able to interact with these animals. I want to say this. In my experience with doing these things, we always have 2 handlers that are right there, with these tiger babies at all times, to ensure safety for the public but we also have instances where we have kids from Make a Wish foundation that have come in and been granted their final wish and that is to come and pet a tiger baby or to be able to see one up close and personal.

We have individuals that come in on ventilators and wheel chairs that are maybe not able to interact with animals but they are able to actually be able to touch them when they're at our facility. I think that is something that we need to also take into consideration is that it's not always just considered to be a money maker. We also do educational programs and we also educate the public.

When I stand up as an educator, I always make sure that I ensure that these animals are not meant for household pets. That there is a lot of work involved and there's long term work involved, a long term commitment that is involved. We don't just do it as a money making scam. We also ensure that we enrich the lives of these animals and that we are there 7 days a week, 365 days a year and we are fully committed.

What also, I like to touch space on the lady talking about the poor tiger at the fair in Florida. Quite frankly, I can't think of a volunteer that walks on our property or even a member of the public that's walked on our property that would have ever walked away from that animal that day, without contacting the proper authorities and ensuring that I didn't leave until something was done about that poor animal, if in fact if it is a true story. Thank you for your time.

Aaron: All right, thank you very much. At this time, we have no further questions in our

queue. Okay I will swing it back to you.

Kate: Is there any other comment or question from anybody that weren't allowed to speak?

Aaron: Caller your line is open.

Brian: Hi my name is Brian Williams. I'm a keeper at Lions, Tigers and Bears. From working with the public, I read a lot of the visits here. I find that the public are just engaged with these large cats from the perimeter fence, where we also have a feed experience where they use a feed fork, about 4 feet long and feed the animal from a distance behind a safety rail. That gets them very engaged with the animal. They have a great time out here.

The cub petting, the touching the animal, they're not that interested in once they get here. When they get engaged, they forget about that. It's not important in being able to have the public come out and feed these animals and really enjoy the time that we get to see them and spend with them.

Aaron: All right, thank you very much. We'll go to our next caller. Caller you line is open.

Keith: Yes my question is ... Keith Evans. I know that we could submit a written thing. Is there a way to submit videos?

Kate: Keith, there's a size limit on the file.

Keith: File?

Kate: Yes.

Keith: [inaudible 01:52:08] ship it to you on a thumb drive?

Kate: Everything has go to regulations.gov and there's a limit on the amount of size.

Keith: Yes, that I can transfer. Right so you can't submit a video then.

Kate: There's a limit on the file of the attachments that go within top.

Keith: Yeah, okay. All right, thanks, next question.

Aaron: To our next caller. Caller your line is open.

Kim: Yes my name is Kim McDaniel. I have been over to Wildlife In Need several times, over 20 actually and watched how they handled the tiger cubs over there. There's always 2 handlers on each cub, to make sure that the public does not hurt them. They don't hurt the public. There's absolutely no standing so then nobody can step on them. You're not allowed to pick them up, you're not allowed to restrain them.

You can only pet them as they go by you.

The animals are in no danger whatsoever and neither is the public. It is very educational over half the times you are there, they're talking to you about conservation and about how many tigers are left in the wild and all the other animals that they have over there. They get great History lessons. They'll tell you all about the mothers and fathers and everything that they do over there. They rehabilitate a lot animals and then release then back into the wild. There is no harm that ever comes to these animals.

I think that if you want to weed out bad people, maybe you should just go to individual places and see how the animals are actually treated there. Thank you much for your time.

Aaron: All right, thank you. We'll go to our next caller. Caller your line is open.

Joseph: Hello? Can you hear me?

Aaron: Yeah, we can hear you loud and clear.

Joseph: I would like to give a comment about teaching and educating the public about saving something that they will never see without public contact. But what I would like to, also make a comment that some of the people that are calling in and requesting laws to be changed, don't even live in this country.

Not to mention that [inaudible 01:54:31] at Big Cat Rescue is paying people \$5 a piece to make comments on your website, in order to impose laws on us. My name is Joseph Maldonado with Big Cats at Joe Exotic in Oklahoma and I just think it's extremely unfair for the USDA to even impose changing rules on us with paid comments and people that don't even live in the United States of America and that's pretty much all I've got to say.

Aaron: All right, thank you very much. Then we'll go to our next caller. Caller you line is open.

Lauren: Hi this is Lauren Kirks again. I would like to ask the lady that works with Big Cat Rescue, how could you morally walk away from an animal that you say was clearly abused? If that's what you guys do is rescue animals, I would like to know why this animal was not rescued and why you do not know the current status of that animal. Could you please answer that, thank you?

Aaron: All right, thank you very much and to our next caller, your line is open.

Christina: This is Christina [inaudible 01:55:59] again from Wildlife in Need. I would like to point out that the single document that started this entire proposal is based on a lion being presented on The Tonight's Show, 3 or 4 years ago. The owner of that lion was ... The case was redacted. He was considered to be in compliance.

We're taking a petition where a owner is in compliance and turning it into a blanket ban. There is no logic there. I appreciate the ability to beat towards this today and I will be adding comments as well.

The woman who said that we need to compare science. That's what the comment section is for. We can't do that in 2 minutes time. I appreciate everybody who has been opposed to this ban and I look forward to reading the transcript. Thank you.

Kate:

Well thank you again for providing us your input to help better determine our course of action, regarding the handling of and public contact of dangerous animals.

The recoding and transcripts of this session, will be accessible via our webpage. If you were not able to speak during the listening session, you can provide additional comment on [regulation.gov](https://www.regulation.gov). We encourage you to submit your written comments on [regulation.gov](https://www.regulation.gov).

Now the operator will close out the session.