



## **Accredited Zoos and Aquariums Essential to Conservation**

Zoos and aquariums accredited by the Association of Zoos and Aquariums (AZA) are vital contributors to the conservation of wildlife and natural habitats. Through policies and regulations that recognize and support the value of these institutions, Administration officials have the opportunity to advance the conservation goals of the President-elect.

AZA is a non-profit, independent accrediting organization that maintains high standards of animal care and welfare. The expertise of AZA-accredited zoos and aquariums in scientific research, conservation breeding, and endangered species rescue and rehabilitation is increasingly important to conservation.

Accredited zoos and aquariums reach 175,000,000 million visitors annually in 206 accredited zoos and aquariums in the United States; this includes 50 million children. This ability to connect with the American people is a unique asset that can be harnessed to advance the conservation goals of the Administration.

## **Strengthening Support for Accredited Zoo and Aquarium Conservation Efforts**

AZA-accredited zoos and aquariums are regulated by the Departments of Agriculture, Interior and Commerce under the authority of the Animal Welfare Act, the Endangered Species Act, the Marine Mammal Protection Act and other related legislation.

Across all platforms, the new Administration is urged to conduct a re-examination of Department policies and regulations, and their interpretation, to show a greater recognition of the role and value of zoos and aquariums, including:

- The public display of wildlife for educational purposes to build widespread public and community support for conservation programs;
- Independent accreditation standards that meet or exceed the requirements of the Animal Welfare Act; and
- Conservation breeding programs that are increasingly essential components in the protection and recovery of threatened and endangered species.

Zoos and aquariums have a long-standing history of cooperation with all Federal agencies. By recognizing this and updating specific policies to ensure that the United States has the finest zoological institutions and collections in the world, not only will the science of wildlife conservation advance, but the Administration's conservation priorities will also benefit from increased public engagement and support.



## **Specific Policy Recommendations Related to Accredited Zoos and Aquariums**

### ***Department of the Interior***

AZA and its member institutions have a long-standing partnership with the U.S. Fish and Wildlife Service (USFWS). Collaborative efforts have focused on:

- Engaging in endangered species recovery and reintroduction (black-footed ferrets, California condor, Mexican and red wolves, whooping cranes);
- Supporting multinational species conservation funds and state wildlife grants; and
- Collaborating on issues involving wildlife refuges, migratory birds, freshwater fisheries and invasive species.

The USFWS is urged to show a greater recognition of the role and value of AZA's conservation breeding programs for wildlife conservation, not just as a last resort for species preservation. While most policies are well-intentioned, some have served to severely restrict the ability of AZA members to carry out their conservation mandates. Below are some suggested changes/additions to current Department programs and philosophies:

- Streamlined processing times for ESA and CITES permits by USFWS through increased staffing levels at USFWS Divisions of Management Authority and Scientific Authority. The dwindling number of qualified biologists at both of these Divisions has created an 8-11 month backlog in the processing of permits for the time-sensitive movement of endangered species including genetic material by AZA institutions, hampering conservation breeding programs.
- The clear and consistent guidance of what constitutes enhancement by USFWS for the international movement of captive-bred Endangered Species Act-listed species. Enhancement findings are often inconsistent, making it difficult to anticipate USFWS requirements.
- The development of a marine mammal stranding program within the USFWS under the Prescott Marine Mammal Stranding and Rehabilitation Act. To date, only the National Marine Fisheries Service (NMFS) has requested appropriations for this program. AZA institutions conduct many stranding and rehabilitation efforts with those marine mammals that fall under the jurisdiction of the USFWS.
- Change the Department bias against for-profit zoos and aquariums. There is a Department-wide bias – rooted in policy interpretation decisions – against for-profit zoos and aquariums—especially related to threatened/endangered and migratory bird species. The tax status of these unique facilities should have no bearing on the display of threatened and endangered species for public education and conservation outcomes.
- Consistent interpretation of the requirements for public display of covered species under the Migratory Bird Treaty Act (MBTA). Currently, MBTA permits



are issued at the regional level, not at headquarters, and the regulations are interpreted differently by each regional office.

### ***Department of Agriculture***

AZA-accredited zoos and aquariums support strong enforcement of the Animal Welfare Act and believe that excellent animal care is of the utmost importance. Overall, AZA members have a solid working relationship with the inspectors and the senior staff at USDA. AZA members have partnered with USDA to:

- Provide facilities for inspector training;
- Coordinate responses to animal disease threats, including West Nile Virus, Avian Influenza, Foot and Mouth Disease, and Exotic Newcastles Disease; and
- Support increased appropriations for Animal Care, acting as the only regulated community doing so.

The Administration is urged to develop consistent, transparent policies related to Animal and Plant Health Inspection Service (APHIS) inspection and enforcement actions. There are more than 2,600 USDA-licensed wildlife exhibitors in the United States. Only 206 of these exhibitors have gone through the extra step of AZA's stringent accreditation process. APHIS expends considerable resources and time in the inspection and enforcement process, but does not formally acknowledge the additional assurance provided by AZA's independent accreditation.

While most USDA policies and regulations, and their interpretation, related to zoos and aquariums have been well-intentioned, some have served to restrict the ability of AZA members to carry out their important conservation and education mandates. In order to save resources for the Department and streamline its programs, USDA should consider:

- Consistent inspection. Animal Care inspectors have used different criteria in the evaluation of zoological institutions, making timely and efficient response to the Agency more difficult.
- Create a streamlined investigation process with clear rules of procedures and more due process. Rules should be promulgated in a regulation as opposed to APHIS policy not subject to the rulemaking process. For example, APHIS has given unreasonable weight to anonymous, unverified complaints, often generated by outside-the-mainstream activist groups. Once complaints are filed, the accused is not given a copy of the complaint but, rather, must apply to see any complaint against them through the Freedom of Information Act (FOIA).
- Greater understanding of complexities of animal management. The needs of more than 500,000 exotic animals, especially those animals that require social groupings, are complex and varied. APHIS inspectors must have better training in order to effectively interpret and evaluate AZA zoological institutions – where the world's experts on these species are found. Only APHIS inspectors and



investigators with experience in animal issues, not plant issues, should be sent to public display facilities for inspection or investigation.

### ***Department of Commerce***

AZA-accredited zoos and aquariums are partners with National Marine Fisheries Service (NMFS) in reaching millions of people about marine conservation and the need to help protect the ocean's resources. Collectively, these institutions represent the foremost authorities on marine fish and marine mammal care, husbandry, and behavior. Our message of respect, wonder and appreciation of the natural world contributes significantly to marine conservation. The display of live animals is central to this mission because our visitor research has demonstrated unequivocally that the presentation of live animals is a powerful mechanism for connecting people to wildlife and for communicating clear conservation messages.

The Administration is urged to acknowledge and strengthen these conservation partnerships through a realignment of NMFS programs and philosophies. Changes and additions to consider include:

- Increased funding for marine mammal stranding and rehabilitation program. Aquariums are on the front line in marine mammal rescue and rehabilitation, often serving as the primary liaisons to the public and local authorities on these complex matters.
- Streamline processing times for marine mammal permits. NMFS should grant more timely permits to facilitate, not hinder, important conservation breeding programs.
- Streamline processing and procedures for the export/import of wildlife genetic materials for conservation breeding purposes.