



## THE WILDCAT SANCTUARY



They will never know freedom.  
Can they at least know compassion?

March 10, 2012

Dear Sir or Madam:

Re: H.R. 4122 Big Cats and Public Safety Protection Act

I am the Director of The Wildcat Sanctuary (TWS) in Sandstone, Minnesota. We are an accredited natural sanctuary to wild cats in need and we inspire change to end the captive wildlife crisis.

I have helped draft legislation that restricts the breeding and selling of exotic animals as well as keeping exotic animals as pets. In 2004, I played an integral role in getting a Minnesota law passed to ban private ownership of wild cats, bears and non-human primates (346.155 Possessing Regulated Animals). Then, in 2006, the law was strengthened by improving public safety requirements. In 2007, I was a consultant on the Iowa law banning exotic animal ownership (717F.3 Iowa Exotic Animal Law).

I have experienced firsthand what has worked in enforcing wild animal laws, and what areas have been very problematic. I applaud you for this important effort and strongly support a law that would ban breeding of big cats in America but I also wanted to share with you my questions and concerns regarding H.R. 4122.

Breeding:

- I strongly support the verbiage in banning all breeding outside of the AZA and SSP Programs. Banning breeding eventually takes away possession (as older animals die) and will not displace current animals in private possession that still must comply with local, state or federal housing and care requirements.
- I am concerned there is not enough information yet on the protocol for enforcement.
  - Besides an on-site inspection to see if there are breeding cats or offspring, how would this be tracked? Many breeders and dealers currently do not fill out required legal paperwork (USDA disposition forms and state health certificates) for offspring sold. It is often done on a cash/no paper trail basis.
  - Who will enforce it? The USDA is already extremely understaffed for the current number of licensees.
  - Timing of enforcement? Within the current USDA system, it can take 5-10 years to close a substandard USDA licensed facility with multiple violations, injuries and/or escapes. Some cases continue to be open even after years of being “under investigation.” How long would prosecution take?



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### Possession:

- Registration – what is this process and what does it require (microchip, etc). I am concerned if registration requirements cannot be met that it will displace animals that are otherwise cared for into an already over extended sanctuary network. The banning of ownership outside of AZA and sanctuaries may put the lives of hundreds of animals in jeopardy.
  - Where would they go? Who will cover the cost including transport, lifelong housing, food and veterinary care?
- USDA already has too few inspectors. There are estimated to be about 10,000 big cats in private hands in the U.S., a small percentage of which are held in accredited zoos and sanctuaries. 680 facilities hold USDA licenses to use big cats for commercial purposes (breeding, selling or exhibiting). No one knows how many other owners have them as pets and do not have USDA licenses. The same inspectors who monitor big cat facilities are also charged with inspecting pet stores, dog, cat and other pet breeders and dealers, farms, slaughter houses, laboratories and other animal related businesses. As of 2011 there are only 105 inspectors charged with monitoring 7,976 such facilities.
- There are good USDA licensed facilities that provide homes for rescued big cats that may not qualify as a sanctuary and would be unable to provide a permanent home if the new law passes. For example, The Wildcat Sanctuary referred a privately owned cougar for placement at the Lake Superior Zoo in Duluth. All the sanctuaries that had been contacted were full. At that time the zoo was applying for AZA status, but had not received it yet. The zoo receives very little foot traffic and had a wonderful habitat for the cougar. They agreed to take in a rescue vs. buying an animal bred for captivity. This law would have prevented that placement and left the owner and cougar with no options.

In conclusion, I strongly support the breeding ban but hope there is more discussion and consideration regarding enforcement and possession.

Sincerely,

Tammy Thies  
Director