



To whom it may concern:

Thank you for the opportunity to submit comments regarding the proposed rulemaking changes to 9 CFR 2.131 for Docket No. APHIS-2022-0022, Document Citation 88 FR 1151, Wild and Exotic Animal Handling, Training of Personnel Involved with Public Handling of Wild and Exotic Animals and Environmental Enrichment for Species.

Our organization, the Wisconsin Federated Humane Societies, represents more than 70 members comprising of individuals, law enforcement officers, animal shelters, and rescues. Our members encompass rural and urban animal welfare all across the state of Wisconsin and provide care for domestic, livestock, exotic, and wild animals.

Wisconsin is unique in that it is one of very few states that has limited restrictions on exotic animal ownership and does not require owners to hold a state permit for exotic animals. Wisconsin is also the historical home to the "roadside zoo" and has a long history of exhibition and public interaction with Category 1, Category 2, and Category 3 animals.

As a result, our state and our members face a wide range of challenges and have specific expertise when it comes to safely and adequately supporting the care of a wide range of animals and their environments.

In regards to the questions proposed in the advance notice our organization would like to offer the following comments:

What general requirements should apply to all public contact activities, regardless of category (or species) of animal involved? And what requirements and restrictions should apply to each of the four types of public contact for each Category.

- A written plan should be in place for organizational policies and procedures regarding human-animal interaction that includes procedures for safe interactions, training requirements for staff, and guidelines to allowable interactions between the public and animals.
- If a license holder is not able to show documentation of this plan and of staff training, this should be a non-compliance item and result in enforcement proceeding.
- License holders should be required to have an appropriate number of trained handlers present at all times and that number should always be greater than one staff member for Category 1 animals.
- USDA should reference American Zoological Association (AZA) standards when assigning requirements to public contact and appropriate protections with caging, barriers, and spacing.
- With the concerns over zoonotic transmission highlighted during the COVID-19 pandemic, license holders and anyone who provides public interaction with animals should have basic



reference standards around infection control, sanitization, cross-contamination between animals, and public information regarding risks for children and immunosuppressed people.

Should any specific type of public contact activity involving any specific category of animal (or species) be prohibited?

- With the level of risk involved in interactions with Category 1 animals, no full contact or protected contact activities should be allowed.
- Given the documented history of abuse, inadequate care, and illicit animal trade, performances involving any Category 1 or Category 2 animal should not be allowed.
- Animals known to be carriers of transmissible zoonotic disease should not be available for public interactions and animals at higher risk of specific types of zoonotic disease should be removed from public contact if there is a high level of transmission of that disease.

Should we require that an exhibitor file a written report within a specified period of time in the event of an animal escape, animal injury, or injury to the licensee or a member of the licensee's staff or the public? Should this requirement be limited to escapes or injuries involving specific categories (or species) of animals?

- Exhibitors should be required to file written reports for animal escapes. Preferably with all incidents for all animals, but at minimum for any instance of escape where the animal could potentially pose a danger to the public such as a large cat and/or could be involved in the transmission of zoonotic disease such as with Mustelidae.
 - a) As experts and/or the animal control of jurisdiction, law enforcement, zoos, and organizations like those in our membership can be left to deal with exotic animal escape. Having greater accountability and information regarding issues with animals kept within a jurisdiction lessens the burden on these responders.
- Exhibitors should be required to file a written report for any serious injury to an animal and or person.
- Exhibitors should be required to file a written report for any human injury related to an interaction with a Category 1 or Category 2 animal.

What, if any, general environmental enrichments should be required for all species?

- A general tenant now commonly accepted as best practice in animal shelter medicine is that all animals deserve what is known as the five freedoms: Freedom from hunger and thirst; freedom



from discomfort; freedom from pain, injury or disease; freedom to express normal behavior; and freedom from fear and distress.

- Animals in all categories as well as general domestic animals should have these freedoms met through environmental enrichment in a way that allows regular access to food and water, the ability to change position, resting and sleeping areas that are specifically designed to meet comfort requirements for the species, environmental areas that allow the animal to hide and/or avoid stressors, and environmental enrichment that allows the animal to express normal behavior such as play, foraging, stretching, roaming, and sensory stimulation.
- Additionally, USDA should require that animals in all categories be provided an environment and enrichment that prevents an animal from displaying stress behavior such as pacing, self-injury, or excessive grooming.

What environmental enrichments addressing psychological needs should be required for social species (in general or for particular species)?

- Enforcement activities, research, and practical experience has shown that mesh wire flooring and stacked cages in any environment does not meet the basic standards for comfort, care, or hygiene. USDA should not allow the use of stacked cages and wire floors for dogs, cats, or most other animals.
- Specifically for dogs, these animals need space to perform natural behaviors such as running, playing, and stretching and to take advantage of enrichment activities, USDA should at least triple the minimum enclosure sizes for dogs.
- Plans for dogs and cats should include regular access to toys and play structures as well as rotation of toys to ensure they remain stimulating.
- Dogs and other social animals should have positive interactions with humans beyond the amount of time that is needed for basic care and feeding, such as play, leash walks, petting, giving treats, etc.
- When creating standards for environment and enrichment we encourage USDA to reference the facility design and enrichment standards in the attached supplemental material from UW Shelter Medicine and the Journal of Shelter Medicine & Community Animal Health.

If environmental enrichment requirements were presented as performance standards, what guidance could APHIS provide to assist licensees and registrants to meet the performance standards?

- The AZA has created a robust set of standards for accredited members that is already informally considered a “gold standard” by USDA. This can be used as a reference by USDA when creating guidelines and by license holders in directing activities towards these best practices.



- USDA should require that all training of individuals handling wild or exotic animals should also include mandatory education on the feeding, behavioral, and enrichment needs of the species for which the person is trained to handle.

What direct costs may be associated with providing environment enrichment for the potentially affected animals in each category?

- While we understand that some of these changes may create additional costs for some license holders, in many cases the updates requested in this letter should serve as a bare minimum requirement for the holding, care, and interaction for these animals. As such, current license holders who have a genuine interest in the welfare of these animals and the safety of the public will already be meeting or exceeding these standards and should see a negligible increase in their cost burden. We caution the USDA from relying too heavily on cost considerations as anyone who is unable to afford the costs of providing adequate care and safety should not be allowed to own or profit from these animals.

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