



The Institute of
Greatly Endangered
and Rare Species



www.TigerFriends.com ♦ PO Box 31210, Myrtle Beach, SC 29588 ♦ (843)293-3067 ♦ www.RareSpeciesFund.org

June 7, 2012

The Honorable Doc Hastings, Chairman
House Committee on Natural Resources
1324 Longworth House Office Building
Washington, DC 20515

Dear Chairman Hastings,

On behalf of The Institute of Greatly Endangered and Rare Species and the Rare Species Fund, I write to you today to make clear our opposition to H.R. 4122, the "Big Cats and Public Safety Protection Act", as introduced.

By way of background, The Institute of Greatly Endangered and Rare Species (TIGERS) is a wildlife education organization based in Myrtle Beach, SC that is dedicated to promoting global conservation through a series of exhibits and interactive educational programs. Through our appearances on the Discovery Channel, Animal Planet, ABC's Nightline, CNN, and NBC's The Tonight Show we are able to reach hundreds of millions of people with our educational message of the importance of wild animal conservation. We also reach over three million people annually through operation of four public education exhibits; Two "Preservation Stations" in Myrtle Beach, SC; "Wild Encounters" located at Jungle Island in Miami, FL; as well as yearly productions of the highly acclaimed show "The Tale of the Tiger" in the Boston, MA area.

To serve as a complimentary piece to the educational programs and field research of TIGERS, we established the Rare Species Fund (RSF) to provide funding to critical on the ground wildlife conservation programs across the globe. Attached is RSF's most recent ICCF Partners in Conservation profile for further reference.

H.R. 4122, currently before the House Natural Resources Committee, seeks to arbitrarily restrict the display, captive breeding, and possession of over twenty species of big cats by certain private owners, breeders, exhibitors and conservationists, while excluding others. My letter today focuses on tigers, but I thought it important to clarify that the bill is much broader.

While the bill purports to address public safety issues and issues of illegal trafficking in tigers and their parts, we believe that it is misleading, and will ultimately have a negative impact on conservation and the survival of this critical and highly endangered species. Simply put, this bill attempts to chase recent negative headlines regarding animal welfare, but is poorly crafted such that it has a number of unintended consequences that will significantly harm many responsible owners.

Specifically,

Passage of HR 4122 will do nothing to curtail illegal trafficking in tigers

There is currently no evidence that tigers bred and held in captivity in the United States are entering the illegal markets, either as live animals or for their parts. Both the World Wildlife Fund (WWF) and the U.S. Fish and Wildlife Service (USFWS) have acknowledged this fact. [See USFWS proposed rule at 76 FR 52297 (August 22, 2011) Endangered and Threatened Wildlife and Plants; U.S. Captive-bred Inter-subspecific Crossed or Generic Tigers.]

Passage of HR 4122 will actually hinder efforts at conservation and education

Many of the breeders and exhibitors of tigers that will be impacted by this legislation are actively engaged in conservation through in situ programs, education through exhibition, or support of important on the ground research. For example, in addition to the education work of TIGERS, the Rare Species Fund, which is funded in part through our work at TIGERS, is currently involved in conservation projects in Africa, Southeast Asia, and South America. Further, continued captive breeding of these animals here in the U.S. ensures a diverse gene pool for the future while we continue to address challenges impacting wild habitat.

Passage of HR 4122 arbitrarily favors certain exhibitors over others

Under current law, all organizations that exhibit wildlife to the public must obtain what is known as a "Class C Exhibitors License" issued by the U.S. Department of Agriculture (USDA) under the Animal Welfare Act (AWA). Licensees must abide by AWA rules governing the housing, keeping and care of its animals and are subject to regular unannounced inspections by the Animal Plant Health Inspection Service Animal Care division (APHIS/AC). These inspection reports are public information and licensees that fail to adhere to the AWA are often subject to enforcement action by the Agency.

Nonetheless, HR 4122 removes the current exemption for USDA licensed exhibitors and exempts only those entities that are accredited by the American Zoological Association, a trade association, or "club" of zoos that restricts its membership to certain categories of facilities. AZA member zoos are subject to the exact same requirements under the AWA as all other public exhibitors, and yet membership in their organization is the new federal baseline for responsible breeding under this bill. Fundamentally, to base a legal exemption on membership in a private organization also raises serious concerns. As a result, the bill denies many legitimate, federally-licensed facilities access to animals for exhibition and breeding purposes, while at the same time, it does nothing to address the issues of breeding by non-licensed, non-regulated intrastate breeders, and, ironically, provides exemptions for unregulated sanctuaries established to house surplus animals.

Prior to contacting you, the ad hoc coalition of similarly concerned organizations we are working with made outreach to the office of the bill's sponsor, Congressman Buck McKeon, and offered to work with his staff to address our concerns. To date, their office has been unwilling

to engage in any constructive dialogue.

Therefore, we respectfully ask you to oppose H.R. 4122 to prevent the severe unintended consequences that passage of this bill would bring about. Thank you for all of your good work and please feel free to contact our federal representative, Frank Vitello at (703) 587-0066 should you have any questions or comments.

Best regards,

A handwritten signature in black ink, appearing to read 'B. Antle', with a small crown-like flourish above the 'A'.

Dr. Bhagavan Antle
Director
Rare Species Fund