



ENTERTAINMENT, INC.

July 19, 2012

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

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

Dear Chairman Hastings:

FEI is the world's leading producer of live family entertainment spectacles including *Ringling Bros. and Barnum & Bailey*[®], *Disney On Ice*, *Disney Live!* and Feld Motor Sports events. I am writing to express our opposition to H.R. 4122, the Big Cats and Public Safety Protection Act, which would severely restrict our ability to maintain tigers and other big cats as part of our public performances.

With 141 years of experience, *Ringling Bros.* is the most well-known traveling exhibitor of live animals in the world. Each of our traveling circus units typically will have big cats (tigers and/or lions), along with Asian elephants and a variety of other exotic and domestic species. While there is no question that the animal most closely identified with *Ringling Bros.* is the Asian elephant, big cats in general and tigers in particular figure prominently at *The Greatest Show on Earth*[®]. Currently, FEI is caring for more than thirty captive-bred tigers, lions and leopards. The majority are owned by FEI while the remaining animals are part of a contract act led by Alexander Lacey of England. Mr. Lacey comes from a well-known circus family with a long history of the captive breeding and public display of lions, tigers and other big cats. Mr. Lacey himself has over twenty-four years of experience in the husbandry of exotic animals, including the training, breeding and public display of captive-bred lions, tigers and leopards.

One of the stated goals of this legislation is to further the conservation of big cats, but the current language will produce quite the opposite effect. This legislation will impede the ability of *Ringling Bros.* and many other licensed exhibitors to engage in conservation through education, breeding, and research. For millions of families, the opportunity to see lions, tigers and other animals up close in a performance setting is a unique and treasured experience. It is well-established that the opportunity to experience animals in this proximity in zoos and circuses is a

Chairman Hastings

July 19, 2012

Page 2 of 3

crucial aspect of conservation education and significantly contributes to the public's awareness of and interest in preserving these endangered animals. In addition, *Ringling Bros.* and other exhibitors are engaged in the direct support of conservation efforts for tigers and other big cats around the world. It is precisely because of our activities and success as exhibitors that we have the resources and expertise that enable us to support the conservation of these and other endangered species, including elephants. In short, it is the ability to exhibit these magnificent animals to the public that allows us to financially support conservation efforts and to inspire circus goers to become more engaged in conservation. Yet, the impact of this legislation would prevent us from continuing to do so.

H.R. 4122 asserts that the private ownership and breeding of tigers in the United States contributes to a multi-billion market of illegal trafficking in animals and animal parts. However, there is no evidence indicating that this is the case. In fact, a rule recently proposed by the U.S. Fish and Wildlife Service (FWS) regarding Captive Bred Wildlife permits recognizes that reports from TRAFFIC, a joint program of the World Wildlife Fund and the International Union for Conservation of Nature, "found no indication that U.S. tigers currently are entering domestic or international trade as live animals or as parts and products." See **76 FR 52297 (August 22, 2011)**. The Agency further concluded "we are unaware of any evidence that tiger parts are entering into trade from the captive U.S. population of tigers." *Id.* It is evident that the stated impetus for this legislation is simply not valid.

In addition, H.R. 4122 discriminates against certain sectors of animal exhibitors by removing the current Captive Wildlife Safety Act (CWSA) exemption for federally licensed exhibitors and replacing it with an exemption exclusively for entities that are accredited by the Association of Zoos and Aquariums, a voluntary membership-based trade association. All circuses, zoos and other commercial exhibitors with animals must be licensed as exhibitors by the United States Department of Agriculture (USDA) and comply with the federal Animal Welfare Act (AWA), the regulations and standards for which are administered by USDA's Animal and Plant Health Inspection Service (APHIS). All such exhibitors are required to obtain the same type of license from USDA, with annual renewal requirements, and all licensees are open to regular, unannounced inspections by APHIS. To provide an exemption based on a paid membership is both biased against and exclusionary of other legitimate, licensed exhibitors, and it does nothing to address non-licensed, non-regulated owners and breeders.

Lastly, I am sure you are aware of the multiple legal and regulatory restrictions regarding tigers that are already in place. These include CITES, which includes strict controls on the international movement of tigers or tiger parts, the Rhinoceros and Tiger Conservation Act (RTCA), and the previously mentioned CWSA. The CWSA prohibits the movement of tigers in interstate or foreign commerce except by certain federally licensed or recognized entities, while the RTCA specifically prohibits the sale, import and export of products containing tiger parts. Thus, it is clear there are adequate lawful measures already in place on the federal level to prohibit and make illegal the kinds of activities this legislation purports to prevent.

Chairman Hastings
July 19, 2012
Page 3 of 3

We do not believe H.R. 4122 is the solution its proponents are seeking, and we strongly urge you to oppose the legislation. Please contact me should you have any questions or need further information.

Sincerely,

A handwritten signature in black ink that reads "Thomas L. Albert". The signature is written in a cursive style with a large, prominent initial "T".

Thomas L. Albert
Vice President – Government Relations