



ZOOLOGICAL ASSOCIATION  
OF AMERICA

February 2, 2014

Representative Hugh Crawford  
Chair, Regulatory Reform Committee  
Room 521  
House Office Building  
Lansing, MI 48909

**Re: Comments regarding HB 5163**

Dear Honorable Chairman Crawford:

The Zoological Association of America (ZAA) is an alternative trade organization which supports responsible animal management and safety. As such, ZAA should be written into HB 5163 just as the AZA has been included in the existing law.

**OVERVIEW of ZAA**

ZAA is a 501c3 professional trade association formed in 2005 to promote high standards of animal management practices through our Accreditation Program with an emphasis animal welfare, public education, and safety. Additionally, our aim is to support responsible legislation to enhance these goals while protecting the rights of our members. Our association membership consists of several hundred members and is comprised of both publicly funded and privately funded zoological facilities throughout the US, Canada and several foreign countries. Our Board of Directors represents decades of experience in the zoological field. Our member organizations are also committed to promoting global conservation education internally through thousands of educational programs presented annually and externally through media appearances including the Discovery Channel, National Geographic, Animal Planet, ABC, CNN, Fox, NBC and CBS. Many of our members provide critical funding for in situ conservation programs across the globe. ZAA is an association which cares deeply about the welfare of our animal ambassadors, the safety of our visitors, and our role in ensuring the continued survival of some of the world's most endangered species.

ZAA and its members are tirelessly dedicated to the constructive advancement of sound animal welfare and management principals, safety, conservation through captive breeding, in situ conservation, and our education programs. ZAA believes its focus should be on matters of animal management and public safety while all other aspects of facility management should be left up to the facility management.

Our membership consists of both large and small publicly funded zoos, and from small privately funded collections that practice a higher standard of animal care to large privately funded public zoos and collections, some of which cover thousands of acres.

Our stringent accreditation process encompasses a review of general facility management, animal care, exhibit design, employee training and safety protocols, risk management, conservation education, in situ conservation, as well as compliance with all local, state, and federal regulations, and record keeping. ZAA published standards are minimum standards, which are generally exceeded by our accredited members. The standards are updated annually to keep up with newly identified or recognized animal keeping standards. Facilities are reaccredited every five years. We are the only zoological organization with published minimum caging standards.

ZAA's Conservation and Animal Management Programs are based on a different philosophy from AZA and are approved by the United States Fish and Wildlife Service. Our initial Animal Management Plans include breeding programs for endangered species such as cheetahs, and siamangs, as well as for more common species such as Schmidt's guenons and toucan sp., with others being formulated.

ZAA members hold a large reservoir of rare and endangered species in their collections, many of which will form the nucleus for future cooperative breeding programs. Species include: *Amur, clouded and snow leopards; fishing cats; Indian, black, and white rhino; many species of primates including colobus, guenons, mangabeys, gibbons, lemurs; a vast variety of hoof stock species, along with many species of birds and reptiles. Several of our members are cooperating with the International Rhino Foundation in the Southern Black Rhino Sustainability Program.*

Accreditation is a two-step process. The first step is becoming a facility member (non-accredited). This requires sponsorship by two ZAA professional members and a site inspection. For facility membership, all standards relating to class I animal must be met. Following facility membership approval by the Board of Directors, the facility may move onto the second step of accreditation. Facilities must become accredited within five years from membership approval. Accreditation involves additional site inspections by a professional inspection team. Upon review by the inspection team, recommendations are made as to whether the applicant is qualified for accreditation and if not what standards must be met in order to comply. Several visits may be required over several months to ensure all standards are met prior to approval and in some instances the applicant will be denied. Where possible ZAA believes mentoring is in order to bring the levels of animal care and public safety to a higher standard.

### **OUR COMMENTS REGARDING HB 5163**

We are growing steadily as an alternative to AZA and have recently been written into similar rules and regulations of several other states including Ohio, Nevada, Kansas, Nebraska and Connecticut with others pending including Arizona and California. ZAA is also recognized by USDA and the USFWS as a credible organization working to improve animal welfare standards in collections throughout the country and as a player in conservation issues through our education and animal management programs. ZAA is clearly a supporter of responsible animal management, and as such, we are confident you will agree that as an accrediting organization ZAA should be written into HB 5163 just as the AZA has been included in the existing law. Failing to include ZAA in the bill will result in unnecessary damage and hardship to our members in Michigan who practice sound animal management and play a vital role in public education and conservation throughout the state.

To be fair and equitable, please include ZAA in the final draft of HB 5163.

Sincerely,

A handwritten signature in cursive script that reads "Peter J. Brewer DVM".

Peter J Brewer, DVM  
Chairman  
ZAA

