



ZOOLOGICAL ASSOCIATION
OF AMERICA

Advocate. Educate. Conserve.

February 24, 2025

The Honorable Donald J. Trump
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear President Trump:

Congratulations on your historic win! It is exciting to see your quick response to your campaign promises and the leadership team you have created. Being a former faculty member at The Ohio State University, I am also proud to have a fellow Buckeye serving as Vice President. I wish you great success with your endeavors.

Today, I am reaching out on behalf of the Zoological Association of America (ZAA). The ZAA is a non-profit zoological trade organization consisting of the best zoos, aquariums, wildlife conservation facilities, and education-based animal ambassador programs in the country. ZAA members and accredited facilities make significant contributions to global conservation through breeding programs, reintroduction programs, rescue efforts, and anti-poaching and rehabilitation work around the world. Our members work with and are licensed and inspected by the US Department of Agriculture (USDA) under the federal Animal Welfare Act and run some of the most respected facilities in the country. ZAA's accreditation process reflects a commitment to animal care and welfare, best management practices, staff, animal, and guest safety, and regulatory compliance.

While many ZAA facilities are small to medium size, often privately owned zoos, our list of accredited facilities also includes some of the largest and most well-known zoos in the country. ZAA facilities create jobs, boost tourism, and contribute enormously to local economies. And yet, often people are confused about the vital role of zoos and aquariums, as well as confusion between **animal welfare** (which is good, smart policy to protect and enhance the lives of animals) and **animal rights extremism** (which is often radical, misguided, and damaging). We need clear, common-sense policies that protect animals while allowing responsible organizations to do their important work.

A few key issues we would love your leadership on:

- USDA/APHIS Inspections: We're seeing inconsistent, overreaching regulations that hurt responsible zoos and conservation groups. Inspectors are being pressured to "find citations", even when there's no issue. That's not right. There needs to be fairness, transparency, and consistency. (We would like to acknowledge that the APHIS leadership has been very open to meeting with us on a regular basis and we do feel that our voices have at least been heard. Regardless, we do have some concerns that we hope to be addressed.)

- U.S. Fish & Wildlife Service Permits: The permitting system is effectively broken. Zoos are waiting for years for approvals, which is totally unacceptable. Good organizations – especially those not part of the bigger AZA group – are being blocked from conservation efforts. That needs to change.
- Common-Sense Conservation Policies: The government should work with zoological experts, not against them. Right now, policies favor activists over real professionals. That’s not how you protect wildlife.

Please see the attached Appendix A that provides a more detailed breakdown of our key issues.

ZAA’s goal is to be a resource for the Administration as issues or discussions occur regarding the zoological and conservation sector or the area of animal welfare. Our organization’s experts are ready to assist, and we look forward to working with you and your leadership team.

Thank you for your time and consideration.

Kind regards,



Kelly George, PhD
Executive Director

Enclosure: Appendix A

Cc: The Honorable John Thune, Senate Majority Leader
The Honorable Mike Johnson, Speaker of the House
The Honorable Steve Scalise, House Majority Leader
House Committee on Agriculture
House Committee on Natural Resources
Senate Committee on Agriculture
Senate Committee on Environment & Public Works

Appendix A

Key Issues Details

USDA/APHIS

Inspection policy and consistency concerns, including:

- Citations related to interactions between social animals, animals in more complex and stimulating habitats, and animals in multi-species exhibits are occurring at greater frequency.
- Licensees are frequently told by inspectors that the inspectors are expected to find a basis for citation.
- Inconsistent application of standards and regulations depending on the inspector and/or the facility is occurring.
- Inspections by inspectors from outside a facility's region where no specialized expertise is involved or required is becoming more frequent.
- Need for increased transparency as to how and why inspections occur and the factors that go into determining who gets inspected and how often.
- Failure of inspectors to consider the history of an animal or the recommendations of the attending veterinarian.
- The seizing of animals without first having secured appropriate and qualified housing.
- Citations for animal injuries that do not involve human errors or interactions, including instances when an animal is injured due to natural negative interactions that occurred because of socializing practices.
- Failure to communicate policy changes to licensees or to seek their input.

USFWS

These are some of the failures and inequities that should be addressed.

- Applications for CITES/ESA permits for interstate movement of captive animals or specimens are frequently pending for longer than two years without action and without any clear explanation for the delay. These applications predominantly involve foreign, nonnative species who have no wild presence in the US.
- The CBW registration permit system is being gradually put out of existence with USFWS actively discouraging applicants. Most of those facilities that have applied to obtain or renew a CBW are waiting as much as three years without approval or denial. This completely undermines the intended purpose of CBW registration to facilitate movement of animals without permitting delays.
- CBW permits are being denied or delayed unjustifiably because the applicant is not connected to an AZA SSP.
- Frequently permits are pending for so long that they become moot, e.g., young animals age out or are no longer viable.
- A fundamental flaw with ESA permitting is the draconian and overly strict application of the ESA enhancement requirement. The current system effectively operates as a "pay to play" system while ascribing no conservation benefits to the public display of and education about wildlife that zoos engage in every day.