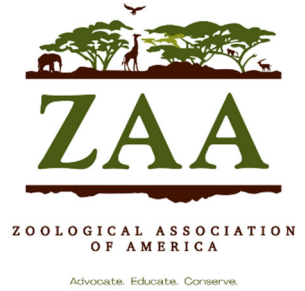


April 22, 2025

The Honorable Venicia Considine  
Nevada State Assembly  
401 South Carson Street  
Carson City, NV 89701-4747  
Room 4115



**Re: Comments on AB 136 relating to animals**

Dear Assembly Member Considine:

I write to you today on behalf of the more than 1000 professional members and accredited facilities who make up the Zoological Association of America (ZAA) to express our concerns about AB 136, as amended, a bill which we only recently became aware of that would impact some of our members.

ZAA is a non-profit, membership-based accrediting organization dedicated to responsible wildlife management, conservation and education. ZAA has more than 70 accredited facilities counting among its members many of the finest facilities in the United States, including three in Nevada:

**Animal Ark Wildlife Sanctuary (Reno)**  
**Camel Safari (Bunkerville)**  
**Lion Habitat Ranch (Henderson)**

Many of ZAA's accredited zoos, including those in Nevada, offer managed animal interaction programs, consistent with both ZAA standards and policies and federal requirements. It is not clear if such activities would fall under the signage posting requirements of your bill. Our members believe safe, direct interaction with animals is a profoundly impactful educational tool that inspires conservation action while enhancing the guest experience and can be accomplished while maintaining human safety, animal safety and animal welfare. Animal interactions build invaluable human-animal connections that expand an understanding of and appreciation for wildlife and the importance of protecting wild places. Moreover, public contact activities provide among the most rewarding enrichment experiences for the animals. For that reason, we would welcome some clarification as to exactly what kinds of activities would fall under the bill.

That said, our biggest concern is with the provision of the bill that would exempt zoos that are accredited by the AZA (Association of Zoos and Aquariums) from the bill's requirements. We do not understand the need for such an exemption as I am not aware of any AZA accredited zoos in the state. Regardless, ZAA asserts that affording AZA facilities an exemption while excluding facilities accredited by ZAA is discriminatory and not justified. ZAA and AZA are both professional trade associations that accredit zoological facilities. The accreditation standards and requirements of ZAA are comparable to those of AZA. ZAA's standards require a commitment to staff, animal, and guest safety, as well as proper animal husbandry, proper veterinary care, and animal enrichment. ZAA also has policies that specifically address public contact with animals including prohibiting public contact with large carnivores (e.g. big cats, bears, etc.) and large primates. All ZAA accredited facilities are also United

States Department of Agriculture (USDA) licensed Class C exhibitors. See the attached copy of the ZAA Standards.

The Nevada Administrative Code already recognizes ZAA, along with AZA, in Section 503.110 (Restrictions on importation, transportation and possession of certain species). Furthermore, multiple other states have laws and regulations in place that provide equal recognition to ZAA as to AZA. These include the following:

Arkansas - ACA 20-19-603

Connecticut - C.G.S. 26-40a

Illinois - 510 ILCS 68/110-5

Montana - MCA 87-4-801

Ohio - 9 ORC 935.03

Texas - 8 OC 801.004(10)

Arizona - AAC 12-4-420

Florida - FAC 68-5.007

Kansas - KRS 32-1308

Nebraska - NRS 37-47

Oregon - OAR 635-044-0400

**While we understand your bill has passed out of the Assembly, we are asking you to support amending it in the Senate to extend the exemption language to ZAA accredited facilities.**

ZAA is proud of its membership and their standards of care and commitment to safe and educational exhibition of animals. Thank you for your time and attention. Please contact me if you have any questions and/or visit [www.ZAA.org](http://www.ZAA.org) for more information about ZAA accreditation.

Sincerely,



Kelly George, PhD  
Executive Director