

GEORGE STEELE ASSOCIATES

September 20, 1985

The Honorable Robert Dole
141 Hart Senate Office Building
Washington, DC 20510

The Honorable Pete V. Domenici
434 Dirksen Senate Office Building
Washington, DC 20510

RE: S. 1233, Laboratory Animal Bill

Dear Senator Domenici:

The American Association of Zoological Parks and Aquariums (AAZPA) represents virtually every major zoological park, aquarium, wildlife park and oceanarium on the North American continent and the vast majority of the professional staff members employed therein. Collectively, zoos and aquariums in this country annually play host to more than 100,000,000 visitors.

Among other goals, AAZPA was established to aid, foster and engage in the exchange of zoological specimens for exhibition, conservation, scientific and presentation purposes, and to cooperate with governmental agencies for the health and welfare of animals. As is clear, from this mission statement, AAZPA acknowledges and respects the public's concern for the protection of domestic and non-domestic animal life.

We support the intent of S. 1233 to protect the welfare of animals and to ensure humane treatment, care and appropriate use of laboratory animals. We also believe in the utilization of alternative methods, where possible, to the use of live animals in research and testing.

We have several questions about definitions in the bill. Is it the intent of S. 1233 to amend the Animal Welfare Act to include zoological facilities as research facilities in all cases? Zoological facilities are licensed as exhibitors and thus are inspected by the Department of Agriculture to insure compliance with the standards of the Animal Welfare Act. Independently, the Animal Welfare Act also requires registration and inspection of research facilities.

Our concern is founded on the lack of a definition for the term "research" and on the definition of "Federal award" which includes cooperative agreements, loans and contracts. Many zoological institutions are involved in cooperative agreements, loans and contracts with Federal agencies. The majority of these are initiated by Federal authorities (Animal and Plant Health Inspection Service, Customs Service, Fish and Wildlife Service and National Marine Fisheries Service) for the purpose of placing confiscated, beached, stranded, sick, injured, or orphaned wildlife under the professional care of a zoological institution and its staff. Would these cooperative agreements, loans and contracts be classified as Federal awards?

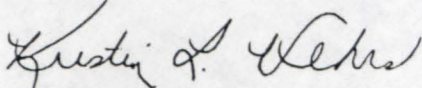
If they are, then are routine veterinary care, preventative medicine programs and reproductive husbandry techniques classified as research? Generally, research conducted by the zoological community with regard to wildlife is intended to enhance the propagation, survival or conservation of all wildlife.

In addition, we wonder if the permitting systems established by the Marine Mammal Protection Act, the Endangered Species Act and the Migratory Bird Treaty Act are to be included as a "Federal award"? Under the permitting regulations pursuant to each of these laws, an applicant applies to the appropriate Federal agency for a specific permit. These permits require compliance with humane care, handling, and transportation regulations promulgated pursuant to these statutes.

We urge that the term research facility not be broadened to include zoological institutions unless they receive Federal funding to conduct specific research as part of a Federal grant or unless they are already classified by the Animal and Plant Health Inspection Service as research facilities as well as exhibitors. We have included some report language and request that it be considered.

Thank you for considering the views of the American Association of Zoological Parks and Aquariums. I would be pleased to provide further information.

Sincerely,



Kristin L. Vehrs
Washington Representative
American Association of Zoological
Parks and Aquariums

Enclosure
KLV/vt

BOB DOLE
KANSAS

6063062111
United States Senate

WASHINGTON, DC 20510

STANDING COMMITTEES:
AGRICULTURE, NUTRITION, AND FORESTRY
FINANCE
RULES

January 13, 1986

E. L. Blakely
Director
Sedgwick County Zoological Society
5555 Zoo Boulevard
Wichita, Kansas 67212

Dear Mr. Blakely:

I appreciated hearing from you regarding my efforts to improve the treatment of laboratory research animals.

I also appreciated having your thoughts on an exemption for zoos in the bill and, as you may know, that exemption has been included in the bill language.

After three years of work on laboratory animals legislation, it is a pleasure to report that my "Improved Standards for Laboratory Animals Act" has been approved by Congress as part of the recently-passed 1985 farm bill. The merits of this measure have been recognized by legislators and animal rights supporters from across the country and I join them in their hope that unnecessary abuses in the care of research animals will finally be ended.

I am enclosing, for your review, copies of the animal welfare provisions of the farm bill and the appropriate conference committee explanation which accompanies the bill language. Thank you again and best wishes for the new year.

Sincerely yours,

BOB DOLE
United States Senate

BD:lm
Enclosures

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SEDGWICK COUNTY ZOOLOGICAL SOCIETY

003793



October 21, 1985

The Honorable Robert Dole
141 Hart Senate Office Building
Washington DC 20510

RE: S. 12., Laboratory Animal Bill

Dear Senator Dole:

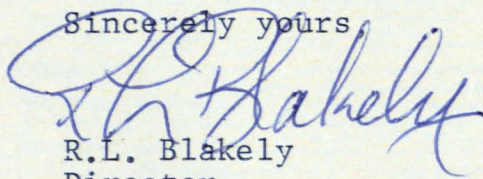
In reference to the above-mentioned bill I have attached a copy of a letter to Senator Domenci which states, in better words than I can manage, my concerns as a professional. I realize you have already received this attachment.

While zoos do list "scientific investigation" as one of their purposes, very few of us have either the staff or the money to carry this activity to any significant length. Indeed, and this is most important, we have a strong and clearly written Code of Ethics and Animal Disposition Policy that goes to great lengths to see that animals from zoos do not end up in situations where they may be subject to invasive research. Our activities which might be loosely termed "research" are limited to behavioral observations and advances in such areas as improved nutrition and husbandry.

I earnestly hope that in the eyes of this Bill we are not lumped into the same category as research institutions. Abuses by such institutions and consequent regulation to prevent abuses do not categorically apply to zoos. Zoos are at present, strongly regulated by not only our professional organization (American Association of Zoological Parks & Aquariums) but also by several federal agencies.

Your consideration of this and the attached will be greatly appreciated. I might add that questions you might have can be addressed to me or to Robert Wagner, Executive Director, AAZPA, Oglebay Park, Wheeling WV 26003, telephone (304) 242-2160.

Sincerely yours


R.L. Blakely
Director

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