



Van H. Wanggaard

Wisconsin State Senator

August 29, 2023

Testimony on Senate Bill 126

Thank you Chairman Testin and members of the committee for hearing this bill today. Representative Dallman and I have brought Senate Bill 126 (SB 126) forward to create parity, and consistency in state law.

Right now, in order for both public and private zoos to buy, sell, possess, and exhibit animals, they must hold a valid license through the U.S. Department of Agriculture (USDA). In addition, the State of Wisconsin has its own licenses for buying, selling, possessing, and exhibiting animals. Public zoos are not required to have this duplicate license.

Here's where it gets muddy. When the State Legislature created Chapter 169 in 2001, they defined a "public zoo or aquarium" as one that is operated by a city, village, or county, **or** that is an accredited member of the American Zoo and Aquarium Association (AZA).

It is important to note that this chapter was created in 2001 because in 2005 the Zoological Society of America (ZAA) was formed. Today, the AZA and ZAA are the two largest major zoo accreditation organizations in the United States, and competitors.

SB 126 simply adds the ZAA to the definition of a public zoo, alongside the AZA.

Representative Dallman and I, introduced a similar bill last year, but not identical. We received a lot of feedback on last year's bill, and took that into consideration when drafting SB 126 this session.

I spent nearly 10 years on the Racine Zoological Society Board of Directors. When the Racine Zoo, a public zoo exempt from state licenses, would renovate exhibits or anything else that required animals to be moved, we often would send our animals to private zoos in the area to be cared for. We trusted those private zoos to care for our animals as we would – and they did. It simply does not make sense for the state to require additional state licenses because it uses different accreditation.

Wisconsin is home to many wonderful private zoos that offer awesome recreational and educational opportunities to children, and people of all ages. This is a common sense bill that will simplify our state licensing requirements, and get the State of Wisconsin out of the business of picking winners and losers when it comes to zoos and aquariums. I encourage you to support its passage.

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ALEX A. DALLMAN

STATE REPRESENTATIVE • 41ST ASSEMBLY DISTRICT

August 29, 2023

Testimony in favor of Senate Bill 126

Senate Committee on Labor, Regulatory Reform, Veterans and Military Affairs

Thank you Senator Testin and members of the committee for hearing Senate Bill 126 this morning. Senator Wanggaard and I introduced SB 126 and AB 124 to create uniformity in state law relating to the definition of a public zoo or aquarium.

Public zoos have been around in Wisconsin since 1892 and have grown to over 11 public zoos across the state, according to the Legislative Reference Bureau. Not only are these zoos a vital part of Wisconsin's tourism industry, they also provide school children the ability to learn about animals and their habitats. According to the Legislative Reference Bureau, there were over 2.5 million visitors to public zoos across the State of Wisconsin in 2021 and this only represents a fraction of the public zoos in Wisconsin.

I am fortunate to have the Timbavati Wildlife Park located in my district and have seen firsthand how private zoos like this provide valuable learning opportunities for adults and children across the state and nation. I have also witnessed the extensive and dedicated care the owners Matt and Alice Schoebel take in the welfare and protection of their animals and their habitats. The state trusts private zoos like Timbavati Wildlife Park to take care of wild animals but requires more bureaucratic red-tape and licensing than public zoos.

When the legislature created Chapter 169 by 2001 Act 56 relating to captive wildlife, they excluded reliable accrediting bodies from the definition of public zoos. It is unknown exactly why the legislature only chose one zoological and aquarium accrediting body. Chapter 169 also allows for local municipalities to operate a public zoo without any accreditation whatsoever. This essentially creates winners and losers which the government should not be in the business of deciding. We introduced this bill to resolve this by allowing competition and fairness.

Under current law, certain entities are exempt from the possession, exhibition, propagation, sale and purchase of wild animals, which includes public zoos. Chapter 169 defines a public zoo as one being operated by the State of Wisconsin, a city, village or county or one that is an accredited member of the American Zoo and Aquarium Association (AZA). This bill adds that a public zoo can also be an accredited member of the Zoological Association of America (ZAA).

The ZAA was created in 2005 and has over 60 accredited facilities across the United States. It also has some of the highest accrediting standards in the nation and are comparable to the AZA. Accreditation from the ZAA and AZA does not and should not be exclusive in Wisconsin.

Expanding the definition of public zoos in Wisconsin is the right thing to do and will allow more access for families and children to learn about conservation and wildlife protection. SB 126 and AB 124 will level the playing field and simplify the licensing process for zoos across Wisconsin.

Thank you again for allowing me to testify before you today and I look forward to answering any questions you may have.

A handwritten signature in black ink, appearing to read "Alex Dallman", with a long horizontal flourish extending to the right.

Alex Dallman
State Representative
41st Assembly District

Wildwood Wildlife Park Zoo & Safari
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Kimberlyn Domaszek
Director of Education



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Good Morning/Afternoon,

My name is Kim Domaszek and I am honored to be the Director of Education at Wildwood Wildlife Park Zoo & Safari. Thank you, Senator Felzkowski & Senator Wanggaard, Senator Ballweg and all cosponsor representatives for allowing me to testify on supporting the Senate Bill 126. I graduated from University Wisconsin Stevens Point in education and I am Wisconsin Department of Public Instruction Certified. I would like to Thank you for allowing me to speak on behalf of the educational & conservation programs that Wildwood Wildlife Park offers, they are key components to the Zoological Association Accreditation Standards (In other words ZAA Standards).

The bill before you today, provides a definition of a “public zoo or aquarium”. While Wildwood Wildlife Park Zoo & Safari is privately owned, we are nevertheless a very “Public” entity.

Wildwood Wildlife Park has been in existence for over 65 years to the public. This year alone, through our educational outreach and on-site programs, we served over 20,000 students ranging from Pre-K through High School. Annually, we have over 249 schools from Wisconsin and Michigan visit our facility.

Wildwood Wildlife Park’s mission has always been conservation- preservation- & education. We align our mission with ZAA’s mission to advocate, educate and conserve. We offer hands on Educational and Conservation based camps for children from age 4 through age 12. Zoo Camp is where campers enjoy special animal experiences and behind-the-scene opportunities while engaging campers in the scientific process of observation, scientific reasoning, and designing enrichment.

An administrator from one our local schools that visit our facility annually states, “Not only do students learn at the center, their park experts educate our students on conservation practices, wildlife habitats, and the importance of keeping our environment safe for these animals.”

Wildwood Wildlife Park meets ZAA’s high standards of education and conservation through the various programs and encounters offered here at the zoo.

As you can see while we may be privately owned, we are nevertheless a very “Public” entity. And of significance is that all of our endeavors are reviewed for both animal and public safety once every 5 years

during our ZAA accreditation inspections. There is little if any difference in oversight from the ZAA or AZA inspections as both are founded on the animal safety and welfare regulations established by the USDA. Both organizations place a very high emphasis on both animal and public safety.

Nothing in the Bill before you today, takes away from the authority and oversight of the USDA. They will remain the governing authority for all zoological facilities throughout the State of Wisconsin. The passage of this bill will not change this. What the bill before you will change, is the disparity that currently exists within the State of Wisconsin between the industries accrediting bodies- the AZA and the ZAA.

Submitted by

Kimberlyn Domaszek

Director of Education

Good morning,

My name is Judy Domaszek and I am the Director and owner of Wildwood Wildlife Park Zoo and Safari in Minocqua. Thank you, Senator Wanggaard, Senator Felzkowski, Senator Ballweg and all cosponsor representatives for allowing me to testify in support of Senate Bill 126.

Wildwood Wildlife Park is very reputable and highly attended zoological park and is the largest private zoo in Wisconsin. Wildwood Wildlife Park Zoo and Safari is operated by three generations and has been in existence for over 65 years. Our facility provides guests with a one-of-a-kind interactive experience.

I will take you on my journey as to why our zoological park selected The Zoological Association of American (ZAA) as our accrediting organization. I was a professional associate member for years with American Zoo and Aquarium Association (AZA) and decided to attend an AZA conference years ago at the Omaha Zoo to see if this organization was suited for our zoological park. Sad to say I found it difficult to network and exchange ideas with the attendees as they didn't appear to be interested in me, my comments or our facility as we were privately owned. From my perspective, it appeared that the attendees only wanted to network with the big city zoos resulting in what I found to be an extremely uncomfortable conference. After all, when I was a teacher, you went to conferences to network with your colleagues to share ideas and issues with the hope of finding solutions. I was looking for the same type camaraderie in a zoological based organization, but unfortunately, I didn't find it in the AZA. So, I began my search for another accrediting organization and that is when I was introduced to the ZAA.

Our zoological park started out as an associate ZAA member and only after meeting all of the stringent criteria for membership were we able to become a professional member. Our zoological park embraced the ZAA as the organization with which we would seek accreditation. This is a membership-based organization welcoming our input and expertise as private business owners.

Networking and problem solving is forefront within the ZAA. Our ZAA's mission is to advocate, educate and conserve. Our membership openly discuss and exchange ideas on many topics critical to the hosting of animals including animal welfare, training, animal safety and public safety. We also share ideas related to our business climate such as how to budget with limited funds, the many hats the directors wear on a daily basis, and employee issues. As a private business owner, we take great pride in all our accomplishments and through our affiliation we regularly share both our successes and failures with those just entering this business model. Seventeen years later we as owners and our entire staff are proud to be a part of this thriving and growing ZAA organization.

To be clear, ZAA is not an organization of just the "little guys" or an organization of privately owned facilities. The benefit of ZAA affiliation is now recognized by a significant number of members of the zoological community. Included in our membership are institutions such as the Fort Worth Zoo, the Pittsburgh Zoo, the Columbus Zoo, the San Antonio Zoo and the Denver Aquarium just to mention a few. And (of significance) membership within the ZAA continues to grow annually. At this point a number of states including; Ohio, Kansas, Florida, Illinois just to mention a few have already recognized the parity of the ZAA and AZA. It is the same parity we are seeking.

Wildwood Wildlife Park Zoo & Safari became accredited with ZAA for the first time in 2008. It is important to understand that being accredited by the ZAA does not mean your facility is accredited for life. On the contrary. To maintain your accreditation, member facilities must undergo a lengthy and grueling re-accreditation process once every 5 years. During this process ALL aspects of the facilities activities are inspected, reviewed and evaluated against both the USDA regulations and a "best practices" checklist established by the industry and our peers. In all cases the main focus of these inspectional efforts is the welfare and safety of our animals and

the safety of our guests. The accreditation process is extremely thorough, detailed and leaves no stone unturned. The accreditation committee monitors accredited facilities and helps facilities between cycles and provides mentoring, training and guidance to new facilities wanted to be accredited.

Wildwood Wildlife Park successfully went through this re-accreditation process in 2013, 2018 and most recently in 2022. And to be truthful, it wasn't easy. While we pride ourselves on the quality of our facility, even we had to undertake some corrective actions to retain our accreditation.

Make no mistake. Even though these accreditation inspections are being performed by our peers, this is not a slam dunk or wink of the eye endeavor. ZAA prides itself on being detailed, thorough and in assuring that ALL of its accredited facilities are not only in compliance with the regulations established by the USDA, but also that in some areas they go beyond the scope of these regulations to assure the safety and wellbeing of our animals and guests.

I personally believe in the ZAA to the point that I have now served 2 terms on its Board of Directors and I have also served on the organization's accreditation committee for the past 12 years. During this time, I have helped with inspector training, and the writing and implementation of new policies and procedures. All of these endeavors are routinely re-evaluated to assure that they remain current and up to date with modern zoological practices.

The ZAA has given our zoological park a great feeling of satisfaction and accountability. Through the accredited process we are very confident that our facility is not only in compliance with all Federal Regulations, but that in many areas we exceed the standards established for our industry by the USDA.

An important take away from our meeting today is the understanding that while we fully embrace and applaud the ZAA, we do not need to be ZAA or AZA to be in the zoo business. Our zoos need to be licensed and inspected by the United States Department of Agriculture (USDA). This regulator agency determines our fate and gives us our license to be open/operate for business. Nothing in the Bill before you today takes away from the authority and oversight of the USDA. They will remain the governing authority for all zoological facilities throughout the State of Wisconsin. The passage of this bill will not change this.

What the bill before you will change is the disparity that currently exists within the State of Wisconsin between the industries accrediting bodies – the AZA and the ZAA.

Several representatives here today have visited our facilities and can vouch how educational and wonderful our zoos are! We are thankful for the hard work of our staff and the oversight of ZAA to assure that our facility remains at the highest standard!

Submitted by

Judy and Duane Domaszek

Director/Owner

Wildwood Wildlife Park Zoo & Safari

ZAA-AZA Accreditation Standards Comparison

July 2023

1.1 Animal Welfare, Care & Management

ZAA	AZA
1.1.1.1 Facility complies with all laws and/or regulations, for operation where local, state and federal standards are less stringent, ZAA standards apply.	The institution must comply with all relevant local, state/provincial, and federal laws and/or regulations, including those specific to wildlife. It is understood that, in some cases, AZA accreditation standards are more stringent than existing laws and/or regulations. In these cases the AZA standards must be met.
1.1.2.3 Facility provides staff access to ZAA standards, professional training and development tools.	As available, the institution must review and provide access for all paid and unpaid staff, to all AZA Animal Care Manuals (ACMs) that have been approved and that apply to species at the institution.
1.1.2.1 ZAA Accredited institutions should have or create a Facility Collection Plan (FCP) or Master Plan to guide future acquisitions and dispositions. Collection Plan submitted to USDA APHIS AWA acceptable.	The institution must follow an Institutional Collection Plan (ICP). The ICP must be re-evaluated and updated at minimum every five years.
1.1.2.2 Facility has a written acquisition and disposition policy.	
1.1.3.1 Facility shows on-going and sustained use of a zoological management system for managing animal records, veterinary records and other relevant information. The system should be readily accessible. Electronic or paper records require backup stored in a secure location that will ensure future access.	The institution must have a zoological records management system that provides sufficient detail to enhance husbandry, welfare, breeding, conservation, and medical health advancements to move forward the critical knowledge of the species through permanent and retrievable information and analysis.
1.1.3.2 Facility creates an annual animal inventory including: animal acquisitions and dispositions from the facility's collection whether by birth, transfer, death, or introduction to the wild.	At least one set of the institution's historical animal and veterinary records must be stored and protected. The institution should be able to demonstrate how it provides security, protection, and long-term access for vital animal and veterinary records that have enduring legal, research, or reference value, including, but not limited to permits, titles, declaration forms, and other pertinent information.
1.1.3.3 Facility inventory includes all specimens owned by, or on loan.	
1.1.3.4 Animals are identifiable by corresponding individual or group ID numbers. IDs include, but are not limited to tattoo, tags, photo, transponder ID, leg band, and/or ear notches. Animals maintained in colonies/groups or other animals not considered readily identifiable; facility provides a statement explaining how record keeping is maintained.	
1.1.3.7 Facility receives and/or provides all available data, including any historical data from previous holding facility, when an animal is transferred.	
1.1.3.5 Facility staff keeps all animal records current.	At least one member of an institution's paid staff responsible for animal record keeping must have the proper training required to properly manage the system.
1.1.3.6 Facility ensures consistent data access, entry, and management by providing training for staff (registrars, animal care, veterinarians, etc.).	
1.1.4.2 Facility has a documented process for assessing animal welfare and wellness, which is reevaluated regularly.	The institution must have a process for assessing animal welfare and wellness.
1.1.4.6 Facility has a clear and transparent process for identifying, communicating and addressing animal welfare concerns with staff, in a timely manner, and without retribution.	
1.1.4.8 Facility's critical life-support system(s) are equipped with a failure warning or emergency backup system.	Critical life-support systems for the animals, including but not limited to plumbing, heating, cooling, aeration, and filtration, must be equipped with a warning mechanism, and emergency

1.2 Veterinary Care

ZAA	AZA
<p>1.2.1.2 Facility's program of veterinary care is a written document that includes the preventative medicine schedule, including vaccines, parasite exam, routine exams, etc.</p> <p>1.2.1.3 Facility is alert to and responds to periodic disease outbreaks. Plans are instituted if/when an incident is identified.</p>	<p>The veterinary care program must emphasize disease prevention.</p>
<p>1.2.1.4 Facility maintains complete medical records on animals in the collection, including all preventative care, veterinary consults and treatment. Animal treatment(s) are easily searchable and retrievable.</p> <p>1.2.1.5 Facility maintains a written program of psychological wellbeing for any singly housed primate and/or behaviorally compromised primates.</p>	<p>Complete medical records must be maintained on all animals in the collection that have received veterinary attention. (See 1.4.7 for animal records.)</p>
<p>1.2.2.1 Facility employs or contracts a licensed veterinarian with zoo animal experience or in collaboration with an experienced zoo veterinarian, available as needed to serve as collection veterinarian.</p>	<p>A full-time staff veterinarian is recommended. In cases where such is not necessary because of the number and/or nature of the animals residing there, a consulting/part-time veterinarian must be under written contract to make at least twice monthly inspection of the animals and to respond as soon as possible to any emergencies.</p>
<p>1.2.2.3 Facility has a clear plan for communication with the veterinarian on medical concerns and documentation of daily observations.</p> <p>1.2.2.4 Facility has a designated area(s), on or off-site, to conduct minor/major veterinary procedures.</p> <p>1.2.2.5 Facility has the ability to safely transport animal(s) to a local veterinary clinic for exam/surgery. When off-site treatment is required.</p>	<p>So that indications of disease, injury, or stress may be dealt with promptly, veterinary coverage must be available to the animals 24 hours, 7 days a week.</p>
<p>1.2.3.1 Facility's contracted veterinarian is responsible for prescribing or coordinating the prescription, storage, distribution and use of all animal prescription drugs in a fashion that complies with all applicable state, federal and local laws and regulations.</p> <p>1.2.3.2 Facility's written protocols are available to animal care staff for the use of prescribed animal drugs. Displays appropriate security of drug inventory.</p> <p>1.2.3.3 Facility's controlled drugs are secured in an appropriate locked container.</p> <p>1.2.3.4 Facility's trained, emergency capture personnel have access to appropriate chemical immobilization drugs.</p>	<p>The use of drugs in zoos and aquariums must comply with federal Animal Medicinal Drug Use Clarification Act of 1994 (AMDUCA) and associated regulations, as well as all other applicable federal, state, and local laws and/or regulations.</p>
<p>1.2.6.1 Facility's animal food preparation and storage areas meet all applicable state, federal and local laws and/or regulations.</p> <p>1.2.6.2 Facility follows a written nutrition program including quality and quantity that meets the behavioral and nutritional needs for all animals in the collection.</p> <p>1.2.6.3 Facility provides separation between animal food storage and human food storage.</p>	<p>If not in separate buildings, animal food preparation areas must be physically separated from other functions such as the animal hospital (including animal treatment, isolation, holding, deceased animal storage) and employee lounges and offices. Animal food must not be stored in the same location (refrigerators, freezers, etc.).</p>
<p>1.2.6.4 Facility has identified, researched and reviewed for safety all browse plants prior to use for diet or enrichment.</p>	<p>If the institution uses browse plants as part of the diet or as enrichment items for its animals, the items must be identified and reviewed for safety prior to use.</p>

	<p>sustainability/green practices such as water conservation initiatives; energy use reduction and alternative sources; waste management for recyclables, compostable, combustibles, and toxic and hazardous materials; sustainable purchasing; green construction, and other green practices.</p> <ul style="list-style-type: none"> • Connecting the animal collection with saving species in the wild (e.g., conservation messaging, advocacy, supporting reintroduction programs, donating to and/or engaging in applied research, etc.) • Conservation education and advocacy programs measured against the written conservation goals of the institution. <p>Each institution must evaluate/measure the impact of its written conservation action plan/strategy.</p> <p>The institution must be involved in local, regional, or international wildlife conservation programs through paid and/or unpaid staff or resources.</p>
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1.4 Education and Interpretation

ZAA	AZA
1.4.1.1 Facility mission and goal key components are education and conservation.	<p>Conservation must be a key component of the institution's mission and messaging.</p> <p>Education must be a key component of the institution's mission.</p>
1.4.1.2 Facility has a written education plan that includes goals and objectives. This plan should include graphics, signage and AV technology (where possible) to support the educational mission of the facility.	The exhibit graphics and other interpretive devices must be in good condition and functioning and be based upon relevant scientific knowledge and reflect relevant interpretive methods.
1.4.1.3 Facility researches, evaluates, and implements scientific studies that pertain to the animals in their collection. Facility measures and evaluates the efficacy of graphics and programs for modifications needed to better serve the facility's animals, conservation and/or education messaging.	<p>The institution must have a demonstrated commitment to scientific study that is in proportion to the size and scope of its facilities, staff (paid and unpaid), and animals.</p> <p>Scientific studies must be under the direction of a paid or unpaid staff member or committee qualified to make informed decisions.</p> <p>The institution must follow a formal written policy that includes a process for the evaluation and approval of scientific project proposals, and outlines the type of studies it conducts, methods, staff (paid and unpaid) involvement, evaluations, animals that may be involved, and guidelines for publication of findings.</p>

1.5 Physical Facilities

ZAA	AZA
1.5.1.2 Facility has a preventative maintenance program, which outlines how the facility identifies and addresses maintenance, and a schedule including corrective maintenance and improvements.	All mechanical equipment must be kept in working order.
1.5.2.1 Facility required mechanical equipment is maintained	

<p>barrier dimensions, construction, and locking/latching mechanisms are present and in apparent good condition.</p>	
<p>1.6.5.1 Facilities maintaining venomous animals must have an appropriate anti-venom plan that includes availability, location and administration information.</p> <p>1.6.5.2 Facility's antivenom location is known by all staff members working in those areas. An assigned staff member is responsible for inventory, disposal/replacement, and storage of antivenom. It is the responsibility of the facility to ensure that appropriate antivenoms are available locally for all venomous species maintained at the facility, and for which antivenoms are produced. Facility may rely on antivenom supply of local hospitals and treatment facilities, but it is also the facility's responsibility to guarantee that these inventories are maintained adequately. MOU must be formally documented.</p> <p>1.6.5.3 Facility areas housing venomous animals are equipped with either appropriate alarm systems and/or have protocols and procedures in place which will notify staff in the event of a bite injury, attack, or egress from the habitat. These systems and/or protocols and procedures are routinely reviewed to ensure proper functionality, and drills are conducted on a regular basis.</p> <p>1.6.5.4 Facility has appropriate policies and protocols in place to prevent an unintentional encounter resulting in injury to a human. Facility has appropriate emergency protocols in place to respond to an unintentional encounter resulting in injury to a human. Facility documents incident, evaluates incident, and documents action taken to avoid similar incidents in future.</p> <p>1.6.5.5 Facilities housing venomous animals or other animals that pose a serious threat or catastrophic injury/or death, are equipped with appropriate alarm systems or have protocols and procedures in place to notify staff in case of accidental egress or injury.</p>	<p>Institutions maintaining venomous animals must have appropriate antivenin readily available, and its location must be known by all paid and unpaid staff working in those areas. An individual must be responsible for inventory, disposal/replacement, and storage of antivenin.</p>
<p>1.6.1.7 Facility has security protocols applicable for the size and nature of the zoo. (Example: monitored camera surveillance, live-on property management, security personnel (staff or contracted) all of whom are trained to respond to respective zoological emergencies.)</p>	<p>Security personnel, whether employed by the institution, or a provided and/or contracted service, must be trained to handle all emergencies in full accordance with the policies and procedures of the institution. In some cases, it is recognized that Security personnel may be in charge of the respective emergency (i.e. shooting teams).</p>
<p>1.6.6.1 Facility has adequate security protocol(s) in place.</p> <p>1.6.6.2 Facility stores firearms in a locked cabinet of sufficient construction and design to impede unauthorized access and the location is in a secure area, accessible to trained firearms team members at all times.</p> <p>1.6.6.3 Facility should have a recapture and immobilization protocol for escaped animals. Protocol should be reviewed by a veterinarian and if firearms are being used, by a firearms instructor or expert. Facility has drugs and equipment to deliver said drugs, should be specified for the species at the facility and must be available as recommended by a veterinarian. If the veterinarian uses vet techs or directs others to assist in the delivery of immobilization drugs, they should be identified in writing and practiced at least once a year as recommended by the veterinarian. Facility</p>	<p>Stored firearms must be in a locked cabinet of sufficient construction and design to impede unauthorized entry, and located in a secure area and accessible only to authorized personnel trained in their use. Personnel authorized to utilize firearms must have training and regular practice.</p>

<p>sections of the perimeter fence that are also the containment fence, must have written exemptions for USDA. Facilities that house only Class II and III animals, a fence of no less than six (6) feet in height with two (2) foot overhangs. Facilities that house Class I animals require a fence of no less than eight (8) feet in height and constructed of not less than 11.5-gauge chain link or equivalent material. There are rare instances where the terrain surrounding the facility provides a viable barrier with written exemptions from the USDA and local government agencies and upon approval by ZAA. Facilities which are entirely enclosed within a building may be exempt from the perimeter fence requirements.</p>	
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1.7 Governing Authority

ZAA	AZA
1.7.1.2 Facility's governing body is supportive and in agreement with ZAA's goals and objectives.	The governing authority must recognize and support the institution's goals and objectives.
1.7.1.3 Facility's governing body is supportive and in compliance with ZAA Accreditation Standards and professional ethics and bylaws.	The governing authority must be supportive of the institution abiding by the AZA Accreditation Standards, Code of Professional Ethics, and Bylaws.
1.7.1.4 Facility's governing authority consists of a professional(s) who are trained and dedicated to managing the facility's animals, staff, programs and day-to-day operations on a full-time basis. Facility is managed by groups of individuals (Boards of Directors) calling upon a paid CEO/Director to accomplish these tasks for them must include that individual in their governing decisions that pertain to day-to-day operations with clear protocols regarding who will make decisions and be responsible for animal welfare, animal acquisition and euthanasia, staffing and programs. Facility has defined and makes available their governing authority's chain of command and responsibilities.	<p>While the governing authority may have input, the decisions regarding the institution's animals must be made by the professionals who are specifically trained to handle the institution's animals, staff (paid and unpaid), and programs.</p> <p>The lines of communication between the CEO/Director, the governing authority, and the support organization must be clearly defined. Additionally, the governing authority and support organization must be structured so that their relationship to the professional staff (paid and unpaid) is clearly understood and followed.</p>
1.7.1.1 Facilities that are privately owned have a written contingency and/or succession plan, for both management and financing of the facility. The plan is shared with its leadership team in the event of death or incapacitation of the owner(s).	Institutions owned by individuals must have a written contingency and/or financial succession plan in place in the event of the death or incapacitation of the owner(s).

1.9 Finance

ZAA	AZA
<p>1.9.1.1 Facility follows best practices in fiscal sustainability.</p> <p>1.9.1.2 Facility has general comprehensive liability insurance, either by independent carrier or internal means with sufficient coverage to cover any incident.</p> <p>1.9.1.3 Facility provides a financial support plan that defines a current and future operating ability that supports the existing and proposed animal collection and facility.</p>	The institution, regardless of whether operating on a profit or nonprofit basis, must provide sufficient evidence of its financial stability by submitting adequate financial reports, including operating and capital budgets.
1.9.1.4 Facility complies with all state and federal wage laws while striving to compensate staff within the relative zoological trade norms in their geographic areas.	The institution must comply with all state and federal wage laws while striving to compensate staff within the relative zoological trade norms in their geographic areas.
1.9.1.5 Facility has in place a financial plan for ongoing capital improvements and maintenance.	The institution must indicate sources and amounts of funding for capital improvements and major maintenance,



Testimony in Opposition of Senate Bill 126
Presented to the Senate Committee on Labor, Regulatory Reform, Veterans and Military Affairs
Megan Nicholson, Wisconsin State Director, The Humane Society of the United States
August 29, 2023

Chairman Testin and members of the Senate Committee on Labor, Regulatory Reform, Veterans and Military Affairs:

On behalf of the Humane Society of the United States (HSUS), the nation's largest animal protection organization, and our Wisconsin supporters, thank you for the opportunity to provide our comments in opposition to SB126 that would exempt facilities accredited by the Zoological Association of America, or ZAA, from the state's permitting requirements for certain native species.

ZAA goes from state to state in an attempt to exempt the organization from state regulations and oversight and often represents itself as being on par with, or even superior to, the Association of Zoos and Aquariums, or AZA, which has accredited zoos such as the Northeastern Wisconsin Zoo in Green Bay and the Racine Zoo. In 2019, the Wisconsin Department of Agriculture, Trade, and Consumer Protection made a clear determination that ZAA accreditation standards were inferior to AZA accreditation when the agency approved an AZA exemption and at the same time declined a ZAA exemption to rules relating to animal importation. The department conducted a side-by-side comparison of AZA and ZAA accreditation standards relating to disease management and concluded that "current documented ZAA accreditation standards do not include sufficient requirements for veterinary oversight and disease prevention to warrant exempting ZAA accredited facilities."

Similar legislative attempts by ZAA to exempt its facilities from state oversight failed in Michigan, Louisiana, and just last year in Minnesota when legislators recognized that ZAA is significantly inferior to the well-respected AZA. ZAA attempts to argue that there is parity between its standards and those maintained by AZA. However, if that were the case, there would be no need for two separate zoo trade organizations.

There are two separate trade organizations precisely because ZAA standards and their implementation of those standards rise nowhere near those of the Association of Zoos and Aquariums. AZA has a proven track record of prioritizing safety and welfare whereas ZAA does not. In fact, the ZAA has repeatedly accredited facilities that failed AZA accreditation for serious problems such as financial instability, failing infrastructure, zoo executives misusing zoo resources for personal profit, plummeting attendance, federal Animal Welfare Act violations, insufficient staffing, and inadequate animal care.

Between 2010 and 2022, combined USDA enforcement actions against 26 facilities accredited by ZAA include more than \$135,000 in fines, 15 official warnings, and 28 direct and critical citations issued when inspectors find serious conditions that adversely affect the health and well-being of an animal. Since 2011, at least nine facilities that were once accredited by ZAA have closed. On top of this, the ZAA has an abysmal safety record. People have been injured by animals including an elephant, orangutan, pygmy hippopotamus, lemur, tiger, lion cubs, bear, jaguar, and camels at ZAA-accredited facilities.

ZAA opposes laws to protect public safety and animal welfare. This includes the federal Big Cat Public Safety Act that was supported by the National Sheriff's Association and prohibits keeping big cats as pets and bans direct physical contact between big cats and the public. The AZA supported this commonsense legislation, which was signed into law last year.

The facilities supporting this bill have been vocal about wanting a level playing field regarding state permit requirements. Rather than exempt a subpar zoo trade organization, we suggest making all things equal by removing exemptions for both AZA and ZAA. Additional oversight from the state will not be a burden to facilities that already comply with AZA's strict standards and would be consistent with other states. For example, the Florida Fish and Wildlife Conservation Commission provides oversight to zoos, regardless of their accreditation status. If creating a level playing field is truly the intent of this legislation, holding all facilities accountable to state oversight, regardless of accreditation status, would resolve the issue.

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ZAA's Troubling History of Accreditation

The Zoological Association of America (ZAA) accredits poorly run roadside zoos and private menageries with disturbing records of dangerous incidents, Animal Welfare Act (AWA) violations, outdated practices, financial instability, and zoos that failed to gain re-accreditation from the Association of Zoos and Aquariums (AZA), a zoo trade organization with a proven track record of accrediting facilities that meet high standards. The following table lists information concerning some current and former facilities accredited by ZAA.

Facility	State	Accreditation Status	Issues
Alabama Gulf Coast Zoo	AL	Accredited intermittently since 2005	The USDA issued a critical citation and an official warning in 2021 after a visitor was allegedly bitten during an encounter with a kangaroo and subsequently went to an urgent care facility to receive a tetanus toxoid vaccine. In 2010, 2014, and 2020, OSHA issued a total of \$8,468 in fines for ten violations, including six that were categorized as serious.
Animal Adventure Park	NY	Accredited since 2022	Allows the public to play with, hold, and/or feed various animals, including sloths, penguins, kangaroos, African lions, otters, alligators, and capybaras. According to Certificates of Veterinary Inspection, between 2018 and 2021, zoo owner Jordan Patch sent numerous baby animals, including a 5-day-old monkey, a 2-week-old hyena, an 8-month-old camel, a 3-week-old hyena, a 4-week-old binturong, and two 5-week-old lion cubs to animal dealers and roadside zoos. Three wallabies were sent to a roadside zoo in Ohio that previously sold meat from black bears and lions. A 9-month-old giraffe Patch sent to a Texas roadside zoo died 11 months later.
Animal Edutainment	TX	Accredited 2014-2019 USDA license canceled 2021	Small traveling zoo that exhibited animals such as birds, reptiles, and lemurs at schools.
Animal Junction (a.k.a. Jungle Joe's Wildlife Adventure and Bucks County Zoo)	PA	Accredited 2009 Closed 2011	The Bucks County Zoo (a.k.a. Animal Junction) was a privately-owned menagerie that consisted of a collection of caged animals—including primates and a tiger cub—displayed inside a warehouse at an industrial park. Just 2½ years after opening, the zoo went out of business in October 2011. It advertised its displaced and deadly reticulated pythons and a gaboon viper in <i>Animal Finders' Guide</i> , a publication that catered to the pet trade. After the zoo moved out, the property owner claimed the zoo had caused more than \$100,000 in damage.

Facility	State	Accreditation Status	Issues
Animal World & Snake Farm	TX	Accredited since 2011	Between 2010 and 2019, the USDA cited Animal World & Snake Farm 23 times, including for veterinary care violations, a prairie dog who died from internal trauma after being attacked by an armadillo, a man required medical care after being lacerated by a pig in the petting zoo, inadequate public safety barriers for the capuchin, cavy, and copybara cages, ten citations for enclosures in disrepair, including standing water in the hyena, warthog, and cougar cub enclosures, four citations for poor sanitation, including areas littered with trash and an ant-infested margay exhibit.
Austin Zoo	TX	Accredited since 2018	A 2019 report in the <i>Austin American Statesman</i> —based on the accounts of 24 current and former zoo staffers and various records—detailed allegations that the zoo mistreated animals and disregarded zookeepers’ concerns. Accusations included allowing suffering animals to languish rather than euthanize them, disregard of veterinary recommendations, animals attacking each other, and high staff turnover. Cited by the USDA eight times between 2013 and 2017 for issues including tiger, bear, and primate cages in disrepair, inadequate public safety barrier, and poor sanitation.
Bearizona	AZ	Accredited since 2011	Bearizona pulls bear cubs from their mothers—a practice condemned by experts—and sends bears to a facility that has used physical abuse on bear cubs while subjecting the cubs to public handling as well as to an outfitter that allowed a customer to illegally kill a captive-reared black bear named Cubby who was shot with a bow-and-arrow while confined in a 3-acre pen. Bearizona was cited by the USDA 16 times between 2010 and 2017, including five repeat and one <i>critical</i> citation. In 2016, the USDA issued an official warning for causing an animal trauma and harm and failure to provide adequate veterinary care.
California Living Museum	CA	Accredited since 2009	According to a USDA inspection report, “The records review revealed an uncharacteristically high mortality rate at this facility since 1 January 2018. Included among the deaths are one skunk that died with no food or feces in the intestinal tract and a fisher with a severe flea infestation that was noticed but not treated, and that ultimately led to the death of the animal. A second fisher living in the same enclosure died shortly before its cage mate (no necropsy was performed) and that death was likely due to the same cause.” In 2017, the USDA issued an official warning for inadequate veterinary care, failure to maintain enclosures after the decomposed bodies of two San Joaquin kit foxes were found entangled in pipes in a burrow, and failure to separate an aggressive animal who was injuring other animals.

Facility	State	Accreditation Status	Issues
Capital of Texas Zoo	TX	Accredited 2011-2013	AWA violations throughout 2013 led the USDA to issue an official warning for failure to provide veterinary care to underweight animals, repeated failure to maintain facilities in good repair, repeated failure to feed animals an appropriate diet, repeated failure to keep premises clean and in good repair, and inadequate pest control. Less than two months after the warning was issued, a series of three inspections days apart found several more violations for inadequate veterinary care for underweight animals, enclosures in disrepair, and inadequate shelter resulting in a \$2,929 penalty. A cougar twice bit volunteers in 2007 and again in 2008.
Catoctin Wildlife Preserve	MD	Accredited since 2005	In 2012, the USDA fined Catoctin \$12,000 after an inexperienced keeper was mauled by two jaguars and for inadequate veterinary care, enclosures in disrepair, insufficient space, inadequate shelter, a camel escape, filthy cages, and other issues.
Cougar Mountain Zoo	WA	Accredited since 2007	An 11-acre private menagerie that houses dangerous wild animals and is in a residential area next to a school. In 2015, the USDA cited the zoo for failure to have a complete perimeter fence to prevent unauthorized access to animals, an inadequate tiger enclosure that may not safely contain the animals, and an outdated program of veterinary care and primate enrichment plan. The agency issued an official warning for failure to provide adequate veterinary care to a severely underweight reindeer.
Exotic Feline Breeding Compound	CA	Accredited 2005-2021	Citing financial difficulties, the privately-owned breeding compound closed in 2023 and its roughly 50 wild cats were transferred to other facilities.
Gulf Breeze Zoo	FL	Accredited since 2011	Between 2011 and 2015, was cited 23 times by the USDA for repeatedly failing to provide sufficient public safety barriers around primate cages, causing trauma and stress after an untrained and unsupervised intern allowed the escape, and subsequent death, of a short-tailed opossum, unmonitored public contact that resulted in a child being bitten by a camel, enclosures in disrepair including an instance where a giraffe was euthanized after getting his head caught in a gate, inadequate veterinary care, inadequate shelter, and an unsanitary food preparation area. See also Virginia Safari Park.

Facility	State	Accreditation Status	Issues
Hernando Primate	FL	Accredited 2010-2013 USDA license canceled 2014	Between 2011 and 2013, Hernando Primate was cited for filthy cages, enclosures in disrepair, unsanitary food storage, housing together incompatible species, an unsafe lion enclosure, failure to have an environmental enrichment plan for a newly acquired chimpanzee, and for having only one inexperienced employee to care for all the animals at the facility.
Jackson Zoo	MS	Accredited 2016-2022	Struggled for years with financial woes, failing infrastructure, plummeting attendance, an audit that revealed misuse of state bond funds, and ongoing USDA citations for violations of the federal Animal Welfare Act. Four months after losing its AZA accreditation in 2016, the Jackson Zoo was accredited by ZAA.
Jungle Island	FL	Accredited since 2008	In 2010, a 500-pound tiger escaped by jumping over a 14-foot-high fence in pursuit of a primate who had also escaped and was running amok. The tiger came within 10 feet of a 2-year-old toddler and four people were hurt during the chaos. In 2012, the USDA issued an official warning in connection with the two animal escapes and for failure to have a responsible adult available to accompany USDA officials on an inspection.
Lion Habitat Ranch	NV	Accredited since 2013	A private menagerie that has kept as many as 46 lions, 1 giraffe, 2 emus, and 3 ostriches on just 6-acres. The county acted to permanently prohibit owner Keith Evans from allowing public contact with lions and established a breeding moratorium until the animal population falls under 40 at his crowded backyard facility. In 2014, the USDA cited the facility for allowing the public to have unsafe contact with adult lions. In 2010, the USDA issued an official warning for declawing two lion cubs. The many problems at Lion Habitat Ranch, as well as Roos-N-More, led Clark County commissioners to reject an effort to exempt ZAA when the county updated its exotic animal possession ordinance in 2015.
Mill Mountain Zoo	VA	Accredited since 2019	Lost its AZA accreditation in 2016 due to the zoo's precarious financial situation. In 2019, the zoo gained accreditation from ZAA. According to the zoo director, "They [ZAA] do not dive into the financials or relationships with municipalities [like AZA]."

Facility	State	Accreditation Status	Issues
Monterey Zoo	CA	Accredited since 2020	As of 2022, Monterey Zoo owner Charlie Sammut is a ZAA accreditation inspector. In an internal memo documenting a phone call with Sammut, USDA Veterinary Medical Officers discuss problems they found, but did not issue citations for, during a 2017 inspection of Sammut's facility. Sammut was described as "very argumentative." Concerns included a kangaroo with tremors and vision loss, long hooves and impaired gait on muntjac, inadequate veterinary care records, almost all medications were expired, unsecured controlled substances, a chain left dangling around the waist of a squirrel monkey that posed risk of entanglement, dirty water receptacles, broken plastic chairs with rough edges in the baboon cage, an alligator tank with mosquito larva, inadequate shade, a fennec fox exhibiting fear behavior, thickened skin on elephants, and lack of enrichment. In 2019, the zoo was fined \$2,250 by OSHA after an elephant became agitated and attacked a keeper who was handling her aggressively.
Montgomery Zoo	AL	Accredited since 2013	Switched its accreditation from AZA to ZAA in 2013 after AZA raised concerns about elephant deaths at the zoo. The USDA had also issued numerous citations, including for animal escapes, veterinary care issues, inadequate space, and enclosures in disrepair. In 2013, a zoo visitor was scratched by a jaguar who was able to reach his paw through the wires of the enclosure, and a tiger escaped from an enclosure through a break in the fencing. In 2022, the USDA issued a critical citation when a cheetah died after eating parts of a lunchbox dropped into the enclosure from an overhead ski lift by a member of the public.
Myrtle Beach Safari	SC	Accredited 2014-2019	Owned by Bhagavan Antle (a.k.a. Kevin Antle or "Doc" Antle), who was the cult-like character featured in the Netflix show <i>Tiger King</i> . Antle has bred hundreds of big cats, used the cubs for public handling, was ZAA-accredited until shortly before <i>Tiger King</i> aired, and has since been charged by the Virginia Attorney General and indicted for wildlife trafficking and cruelty to animals. In 2022, the Department of Justice charged Antle with alleged wildlife trafficking and laundering more than \$500,000 in a staged immigrant smuggling scheme.
NGALA	FL	Accredited since 2010	A party venue that offers close encounters with wild animals, such as a rhinoceros, panther, and a chimpanzee who "regularly visits" NGALA. In 2010, the U.S. Fish & Wildlife Service denied owner Donovan Smith a captive-bred wildlife permit for clouded leopards and cheetahs after determining that Smith and his staff lacked experience with handling or maintaining these species. In 2020, the USDA issued a teachable moment for a lack of enrichment for lemurs and a porcupine cage in disrepair.

Facility	State	Accreditation Status	Issues
Niabi Zoo	IL	Accredited since 2020	Lost its AZA accreditation in 2012 after the AZA found major concerns that included insufficient staffing and inadequate animal care. In 2020, a few months after trying, but failing, to regain its AZA accreditation, the Niabi Zoo obtained accreditation from ZAA.
Oswald's Bear Ranch	MI	Accredited 2013-2020	Fined \$2,400 by the USDA in 2021 after two black bears climbed over two fences and wandered onto neighboring properties in 2019. One bear was captured, and the other was shot and killed by a sheriff's deputy. Oswald's allows members of the public to handle bear cubs weighing up to 90 pounds. Between 2010 and 2021, cited by the USDA for using physical abuse to discipline bear cubs, allowing children to have unsafe contact with bear cubs, unsafe handling after a visitor was scratched by a bear cub, and for feeding bears an improper diet.
Panther Ridge Conservation Center	FL	Accredited since 2016	In 2010, a jaguar at the facility tore off a woman's thumb resulting in a \$2,786 fine by the USDA and in 2008, the owner was attacked by two cheetahs during a fundraising event and airlifted to a hospital. In 2005, a 500-pound Bengal tiger escaped from a cage by pushing past a woman who was feeding him. More than 20 sheriff's deputies and state wildlife officers responded as the tiger wandered the grounds for more than two hours. Cited by the USDA in 2009 for declawing two clouded leopards.
Pittsburgh Zoo	PA	Accredited since 2015	Despite an elephant attack that left a keeper dead, the Pittsburgh Zoo refused to comply with AZA's upgraded and safer elephant standards and switched its accreditation from AZA to ZAA in 2015 since ZAA standards permit unsafe contact with elephants. In 2016, the USDA issued an official warning for excessive chlorine levels in the sea lion pool that was causing eye disorders. In 2017, the USDA issued a critical citation after 36 Jamaican fruit bats died due to hypothermia. The recently retired president of the Pittsburgh Zoo serves as chair of ZAA's board of directors. A 2022 article in the <i>Pittsburgh Post-Gazette</i> stated that the zoo "has lost grant money, newly acquired animals and the chance to take part in global conservation efforts because of dropping [AZA] accreditation that's considered the 'gold standard for zoos.'"

Facility	State	Accreditation Status	Issues
Roer's Zoofari	VA	Accredited since 2020	In 2017, Roer's Zoofari, co-owned by one-time ZAA board member Vanessa Stoffel, was cited by the USDA for not providing shade to a giraffe, lemurs and guinea pigs on a hot, sunny, 90-degree day, for not shearing sheep who showed signs of heat stress, and, in two separate incidents, the zoo's safari bus ran over three aoudads. Their injuries were so severe they were euthanized. In 2021, two giraffes were killed in a barn fire. Roer's Zoofari has sent animals to a Tennessee auction plagued with problems and a Texas dealer that sells exotic animals to hunting ranches. Two years after being accredited, Roer's Zoofari was sold to a new owner, renamed, and remains ZAA accredited.
Roo Ranch	SD	Accredited 2008 Closed 2009	A private menagerie that opened on a whim in 2006 following the owner's trip to Australia and closed after the owner's death in 2009.
Roos-N-More	NV	Accredited 2008-2013 Closed 2016	After a 2014 inspection, county officials closed Roos-n-More, a 3-acre zoo with 385 animals, until it could remedy a long list of code violations relating to operating a business on residential property. After a few limited re-openings allowed by the county, the owners decided to close the zoo in 2016. Former zoo employees and volunteers, including a zoo board member, expressed concern to the county board that the menagerie was collecting too many animals, many animals were kept in deplorable conditions and subjected to stressful handling, dozens of deaths were being concealed from officials, and money raised was not going to animal care. One of the zoo owners served on ZAA's board of directors. The many problems at Roos-N-More, as well as Lion Habitat Ranch, led Clark County commissioners to reject an effort to exempt ZAA when the county updated its exotic animal possession ordinance in 2015.
Safari Adventures	OH	Accredited 2011-2016	Owner used tiger, lion, and bear cubs for public handling and had African lions and black bears slaughtered to sell their meat.

Facility	State	Accreditation Status	Issues
Safari Wilderness Ranch	FL	Accredited 2011-2017	Co-founded by Lex Salisbury, who was forced to resign as president of Tampa's Lowry Park Zoo in 2008 when an audit concluded: that Salisbury owed more than \$200,000 to the city for transferring some of the zoo's animals and equipment to his private properties that were under development to become his personal ZAA business venture, and that he made zoo employees work for his personal business venture, gave himself an unauthorized bonus, and took his wife on expensive zoo-funded trips. In 2008, fifteen patas monkeys escaped Salisbury's property by swimming across a 60-foot-wide moat and then climbing a 28-foot fence. One monkey was shot to death, and it took nearly eight months to recapture the rest. Salisbury served on ZAA's board of directors during the controversy.
Six Flags Discovery Kingdom	CA	Accredited since 2012	Cited by the USDA in 2021 and 2022 for repeatedly having high coliform bacteria levels in the walrus and pinniped pools, housing a marmoset and a pig in an office where the animals had access to potentially dangerous items, a crumbling dolphin pool, and storing fish for marine mammals at too high a temperature in a malfunctioning freezer.
Six Flags Great Adventure	NJ	Accredited since 2009	Cited by the USDA in 2014 after several university students were bitten during a public handling session with two 3-month-old, 30-pound lion cubs. The USDA issued an official warning in 2011 after a baboon escaped from the facility's drive-through park and was recaptured two days later at a farm 20 miles away.
Tanganyika Wildlife Park	KS	Accredited since 2005	The USDA issued two official warnings after a pygmy hippo bit a child in in 2016 and for subjecting three 20-day-old lynx kittens to stressful transport conditions in 2021. The facility was also cited for allowing a lemur to perch on the head of a human infant. For years, Tanganyika lobbied unsuccessfully to reverse a state ban on public contact with big cats, a law that was enacted after a teenager was killed by a tiger.
The Preserve (formerly Have Trunk Will Travel)	TX	Accredited since 2010	Cited by the USDA in 2012 for unsafe handling of elephants while giving rides to the public. In 2011, facility trainers, including one of the owners, were videotaped viciously jabbing, hooking, and striking elephants with bullhooks to make them perform circus tricks. Relocated from California to Texas after California passed a ban on the use of cruel training tools on elephants that was supported by the AZA zoos in the state.

Facility	State	Accreditation Status	Issues
Triple D Game Farm	MT	Accredited since 2013	In 2021, the USDA issued multiple citations for enclosures and a perimeter fence in disrepair, filthy drinking water, filthy cages, an insufficient number of employees, and a critical citation after a snow leopard apparently bit or tore off two-thirds of the tail of another snow leopard in an adjacent cage. In 2013, the USDA issued an official warning for declawing a tiger cub which can cause “ongoing pain, discomfort, or other pathological conditions in the animals.”
Two Tails Ranch	FL	Accredited since 2015	The USDA issued an \$857 fine after an unsupervised encounter with a bull elephant resulted in a woman being attacked and hospitalized for months with life-threatening injuries.
Understanding Wildlife	OH	Accredited 2013-2018 USDA license canceled 2018	Small traveling zoo that exhibited animals such as birds, snakes, primates, and alligators at schools.
Virginia Safari Park	VA	Accredited since 2005	Eric Mogensen owns Virginia Safari Park and the Gulf Breeze Zoo in Florida, both ZAA-accredited, and he formerly owned the unaccredited Reston Zoo in Virginia. In 2015, the USDA filed a complaint against Eric Mogensen, his daughter Meghan Mogensen, and Virginia Safari Park for numerous AWA violations at his three facilities. In a 2018 consent decision, respondents were assessed a \$99,999 civil penalty. One charge related to Meghan Mogensen drowning a wallaby with an eye injury in a bucket of water. Other charges included unmonitored public contact that resulted in a child being bitten by a camel (the girl was hospitalized for three days to treat a serious bite on her arm that nearly reached the bone and required at least 17 stitches), and repeated failure to prevent and treat illnesses and diseases such as diarrhea, dystocia, mastitis, stillbirths, lameness, eye and skin conditions, and coccidia. In 2023, Virginia Safari Park was cited after a newborn llama was run over and killed by a vehicle in its drive-thru park, and a giraffe with a heavy parasite load and poor body condition who was nursing a calf died after being kept outdoors in the cold.

Facility	State	Accreditation Status	Issues
Vogel's Exotics	MN	Accredited 2009-2014	In 2014, a Syrian brown bear cub escaped as Vogel was transporting the animal between his two facilities. The bear got out of an improperly latched sky kennel inside the transport trailer and then broke through the trailer's sliding window when Vogel stopped at a restaurant. Vogel was unaware that the bear had escaped until he reached the final destination. In the meantime, the bear encountered people in the restaurant's parking lot and was ultimately recovered by local authorities. The incident resulted in a \$1,357 USDA fine.
Washington Park Zoo	IN	Accredited since 2014	In 2014, an alligator escaped and in 2008 a spider monkey escaped from the zoo. Both were found at a nearby boat dealership. In 2011, the zoo director, who also served on the ZAA board of directors, was suspended by city officials after he used the zoo for a personal after-hours party. During the party, the primate house doors were left open, allowing temperatures to fall into the low 60s, and partygoers consumed concessions without paying for them and left the grounds littered with trash. City officials fired the zoo director in 2014.
Wildlife World Zoo and Aquarium	AZ	Accredited since 2006	Cited 38 times by the USDA between 2010 and 2019, including a 2019 critical citation after a visitor was able to cross an inadequate safety barrier and was clawed by a caged jaguar. Other citations include unmonitored public contact, filthy cages, enclosures in disrepair, unsanitary feeding practices, filthy water receptacle, and housing animals near a foul-smelling garbage dump. Fined \$2,350 by the USDA in 2016 for concealing areas that contained regulated species from the inspector and poor sanitation. In 2013, the USDA issued an official warning for failure to safely handle a 3-month-old tiger cub brought to a television studio.
Wright Park Zoo	KS	Accredited 2010-2021	The USDA issued an official warning in 2015 for failure to provide clean, dry bedding to wolfdogs during bitterly cold temperatures and repeated failure to maintain enclosures in good repair. The USDA cited the zoo 60 times between 2010 and 2019, including 27 citations for enclosures in disrepair and 14 citations related to filthy conditions, filthy drinking water, and unsanitary feeding practices. A ZAA co-founder and Wright Park Zoo's veterinarian spent just 2-1/2 hours conducting the zoo's ZAA accreditation inspection in 2010.

Facility	State	Accreditation Status	Issues
Zoo at Forest Park	MA	Accredited since 2010	The USDA cited the zoo 43 times between 2010 and 2018 for problems including inadequate public safety barriers, inadequate veterinary care, and many enclosures in disrepair. In 2016, a guenon at the zoo escaped by opening the unlocked door of his enclosure. The primate was recaptured three days later. In early 2015, the public learned of two primate deaths at the zoo. A marmoset died from injuries sustained in a fight with other monkeys, and a tamarin died from exposure to cold temperatures after the zoo failed to have a back-up generator when an electrical malfunction shut off power to a heating system.
Zoological Wildlife Foundation	FL	Accredited 2014-2017	Fined \$1,313 by the USDA in 2015 after a tiger bit off the thumb of a construction worker and cited for failure to provide veterinary care to primates who were fighting and causing injuries to each other and failure to provide adequate enrichment to three solitary primates.
Zoosiana	LA	Accredited since 2009	Citing the Zoo of Acadiana's (a.k.a. Zoosiana) inadequate space and lack of cage enrichment, in 2009 the U.S. Fish & Wildlife Service denied a Captive-Bred Wildlife Registration application for numerous species of primates, big cats, and other animals. Between 2011 and 2016, cited by the USDA for failure to dispose of expired medication, enclosures in disrepair, unsanitary conditions in the food preparation building, roach and rodent infestation, and inadequate lighting in a capuchin enclosure.
ZooWorld Zoological	FL	Accredited since 2005	Crowded 5-acre park with 250 animals co-owned by ZAA board member Kayte Hogan since 2015. ZooWorld has been cited by the USDA for 71 AWA violations between 2010 and 2022, including for: unsafe animal handling after two children were attacked by lemurs in separate incidents; for failure to provide relief from a 115-degree heat index to primates showing signs of heat exhaustion; failure to provide veterinary care to wolves with irritated ears from fly bites and a lion with sores on her face; unmonitored public contact with animals; insufficient public safety barriers; enclosures for primates, bears, giraffes, jaguars, and other animals in disrepair; and filthy cages. In 2013, USDA fined ZooWorld was \$1,571 for repeated violations and issued official warnings in 2016 for repeated violations and in 2022 for unsafe handling.

Ten Problems with the Zoological Association of America

Formed in 2005, the deceptively-named Zoological Association of America (ZAA) is a Florida-based zoo trade organization with approximately 650 members and 66 accredited facilities, including poorly run roadside zoos and private menageries. ZAA promotes the private ownership of exotic pets and the commercialization of wildlife. In contrast, the Association of Zoos and Aquariums (AZA) is a highly-regarded and established zoo trade organization with 6,000 zoo and aquarium professionals, organizations, and suppliers worldwide and nearly 240 accredited facilities. Accreditation by the AZA ensures that knowledgeable and experienced professionals provide care for animals in a safe environment at modern facilities. In response to criticisms about its woefully inadequate standards, ZAA has started duplicating portions of standards developed by the AZA, but implementation appears to be severely lacking.

- 1.** ZAA accredits facilities that failed AZA accreditation for serious problems such as financial instability, failing infrastructure, misuse of zoo resources for personal profit by zoo executives, plummeting attendance, federal Animal Welfare Act violations, insufficient staffing, and inadequate animal care.
- 2.** ZAA accredits roadside zoos, private menageries, and exotic pet breeders with troubling records. Between 2010 and 2022, combined USDA enforcement actions against 26 facilities accredited by ZAA include more than \$135,000 in fines, 15 official warnings, and 28 direct and critical citations issued when inspectors find serious conditions that adversely affect the health and well-being of an animal. Since 2011, at least nine facilities that were once accredited by ZAA have closed.
- 3.** ZAA has an abysmal safety record. People have been injured by animals including an elephant, orangutan, pygmy hippopotamus, lemur, tiger, lion cubs, bear, jaguar, and camels at ZAA-accredited facilities. ZAA facilities also offer unsafe close encounters with elephants who are forced to perform circus tricks.
- 4.** ZAA opposes laws to protect public safety and animal welfare, such as the federal Big Cat Public Safety Act that prohibits keeping big cats as pets and bans direct physical contact between big cats and the public. The AZA supported the Big Cat Public Safety Act, which was signed into law in 2022.
- 5.** ZAA does not oppose keeping wild animals as pets, including animals such as sloths, kangaroos, kinkajous, coatimundis, raccoons, porcupines, fox, otters, skunks, opossums, capybaras, bats, and dangerous reptiles. AZA opposes keeping wild animals as pets because most people cannot meet their complex behavioral, social, nutritional, and psychological needs.
- 6.** ZAA members and facilities have sent animals to auctions and dealers who sell animals at auction or to hunting ranches. AZA facilities do not sell wild animals at auction because the animals can end up being used in unscrupulous ways, such as in canned hunts, circuses, poorly-run roadside zoos, and sold to unqualified people as pets.
- 7.** ZAA has apparently developed no animal care manuals detailing professional animal care standards. The AZA's biologists, veterinarians, nutritionists, reproduction physiologists, behaviorists and researchers have developed nearly three dozen species-specific animal care manuals that are often more than 100 pages. ZAA has also failed to issue its quarterly journal since summer 2022.
- 8.** Most, if not all, ZAA-accredited facilities with elephants utilize outdated circus-style training that includes the use of abusive devices such as bullhooks, which is not allowed at AZA facilities.
- 9.** ZAA lacks transparency. Unlike AZA, ZAA fails to publish publicly on its website its committees, the purpose of each committee, and the committee members and their affiliations. In addition to publishing committee lists, AZA also publishes a list of accreditation applicants and invites "anyone wishing to offer comments, positive or negative" to email the organization.
- 10.** Standards are meaningless if they are not enforced. ZAA has no information about filing or investigating a complaint concerning an accredited facility.

August 29, 2023

Prepared in support of 2023 Senate Bill 126

Good Morning. I appreciate being given the opportunity to speak with you today in support of Senate Bill 126.

My name is John Kunkel. I am a resident of Lac du Flambeau, Wisconsin. For the sake of full disclosure following my retirement I became a volunteer at Wildwood Wildlife Park in Minocqua. While I would love to spend my allotted time telling you about the Park and what a privilege it is to be associated with this facility, that's not why I am here.

Prior to my retirement I spent more than 30 years as an investigator for the United States Food & Drug Administration. I know and understand inspectional techniques and methods. I did inspections, taught inspectional methods and wrote inspectional procedures for the Federal Government. And since my retirement I have become familiar with the accreditation procedures employed by zoological facilities. It is from this background that I approach you today.

The bill before you is very clear. It is simply asking the State to grant parity to two fraternal organizations engaging in the review and accreditation of animal facilities in Wisconsin. As noted in the bill, these two groups are the Association of Zoos and Aquariums (AZA) and the Zoological Association of America (ZAA).

The best way for me to explain these two groups is to use an analogy that we all can relate too. Consider the ZAA to be the Green Bay Packers and the AZA to be the Chicago Bears. And as we know, both teams are under the oversight of the National Football League or NFL.

Now both the Packers and the Bears have their own playbook. And both organizations have established their own club rules. But when it comes to playing the game of football, both teams have to adhere to the rules, procedures and regulations established by the overseeing NFL.

The same is true for the ZAA and AZA. Both of these fraternal organizations have their own charters and rules. **BUT THE IMPORTANT PART IS – NEITHER IS A REGULATORY AGENCY.** Just like the football teams in my analogy, the foundation of both groups is the rules and regulations developed by a higher authority. In this case an actual regulatory authority with that being the United States Department of Agriculture.

The take away here is that the ZAA and AZA are two independent organizations conducting peer inspectional reviews of their affiliated member facilities. BUT neither wrote the rulebook by which they evaluate the facilities being inspected. The bases of the inspections conducted by BOTH

organizations are the regulations developed by the USDA. And should significant issues be encountered during an inspection, NEITHER group has the authority required to take legal action against the violator. BOTH organizations need to report their findings to the USDA to facilitate a regulatory action.

The AZA and ZAA are two parallel and equal organizations with respect to their abilities and limitations. But for whatever reason the Wisconsin Statutes don't recognize this equality. And that's the purpose of the Bill before you – to correct this disparity.

The ZAA is the younger of the two groups having been established in 2005 with the AZA established back in 1924. Perhaps this is why the Wisconsin Statutes don't recognize the ZAA – it wasn't in place when the current regulations were written. But the ZAA is here now and well founded. And in all aspects, just like the Packers and the Bears, both organizations are equal in the regulatory statutes to which they hold their member facilities. The inspectional approach used by both organizations is based on the regulations established by the USDA and these are equal within both groups.

Bill 126 finally recognizes the equality between these two organizations and when passed will simply provide parity to the accredited members of both organizations.

It is my hope that you will vote in favor of passing Senate Bill 126.

Thank you.

John Kunkel
2285 Circle Drive
Lac du Flambeau, WI 54538
(715) 588-3663



RE: Senate Bill 126 – Opposing

August 29, 2023

The Wisconsin Federated Humane Societies is a statewide association of more than 70 animal care organizations, municipal animal control groups, humane officers, and members of law enforcement. With nearly 60% of Wisconsin households owning pets, we help provide education and representation for the shelter professionals who serve them, while also serving as a voice for the animals of our state.

Senate Bill 126 is a dangerous path toward lower the standards in our state by limiting the DNR's ability to properly regulate animal welfare. SB 126 also provides no clear benefits:

- The monetary cost savings to businesses in this bill is almost non-existent.
- The regulatory requirements that exist under current law are only common sense items such as a zoo providing a list of the animals that it owns.
- The argument has been raised that the USDA already provides enforcement, but with 4 inspectors for our entire state, the USDA has instead been cited by the Inspector General for poor oversight of the Animal Welfare Act.

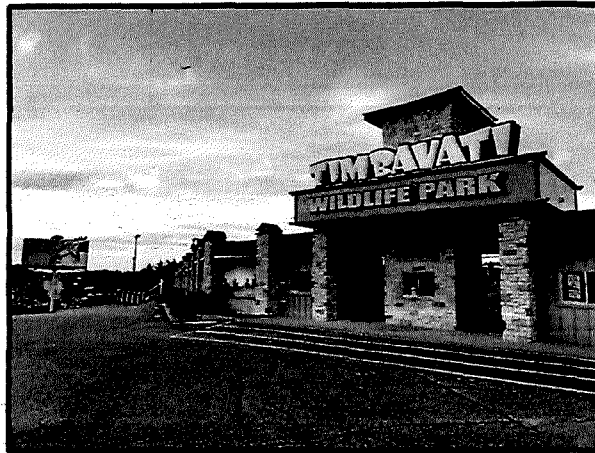
Most concerning is the fact that this bill which limits DNR oversight only applies to one company in the entire state of Wisconsin. That company has been cited this year by the DNR for multiple violations. The idea that this legislature would pass a bill that lowers protections for animals in Wisconsin and would only benefit a single company that has been accused of mishandling animals, should be a non-starter for everyone involved.

While the language of this bill to add an exception for the Zoological Association of America (ZAA) sounds harmless, ZAA accreditation is significantly less rigorous than AZA accreditation and in some cases the ZAA has even been accused of providing accreditation without inspection. The "rubber stamp" nature of the ZAA means that bad actors can more easily commit crimes and illegally traffic animals under the guise of accreditation.

In fact, nearly half of ZAA accredited institutions have had a history of serious violations including animals attacking the public, animal escapes, as well as citations for failing to provide veterinary care and even animal abuse.

We ask that you vote NO on SB 126 and help to maintain this important protection for the animals and people of Wisconsin.

DNR cites Dells zoo attraction owners for recordkeeping deficiencies



Timbavati Wildlife Park was given three citations by the DNR for violations of recordkeeping laws regarding animals after a PETA complaint to the agency prompted an investigation into the park's owners' records of animal affairs.

JOHN GITTINGS

May 10, 2023

The Wisconsin DNR has recently cited a Dells area's tourist zoo attraction for recordkeeping deficiencies, including unreported animal deaths.

The DNR confirmed that it issued three citations for violations of captive wild animal recordkeeping and reporting rule provisions. ~~Supporting documentation showed the citations — each being \$238 — were issued following the findings of DNR warden Benjamin Nadolski.~~ Nadolski discovered there was missing information regarding numerous animals when he met with the owners on March 3.

DNR Conservation Warden Major Shaun Deeney said that the agency's investigation following the complaint resulted in the citations. Two of the three citations, which are not criminal charges, were dismissed in Marquette County Court on May 8. Animal Entertainment Inc. paid the other one.

Deeney did not have specific details about what was reported to the DNR, but said that activities concerning certain animals must be reported to the department, including those of dog and cat species, as well as bears, badgers, minks, otters, skunks, and wolverines.

According to a release from People for the Ethical Treatment of Animals (PETA), deaths and disappearances of various animals have gone unreported. The organization submitted a letter to DNR chief warden Casey Krueger on Nov. 29, 2022.

In their letter, they documented evidence of at least seven years of inadequate reporting of animal deaths and sales to the cub petting industry by Animal Entertainment Inc. Alice and Matt Schoebel, mother and son, own Timbavati Wildlife Park in Wisconsin Dells and Shamba Safari near Neshkoro in Marquette County.

Several attempts were made to reach Schoebel for comment but were unsuccessful. According to the Timbavati website, Schoebel and her son are “fourth-generation authorities in global wildlife education and conservation committed to visitor experience and animal care.” The park has been in existence since 2001 and has more than 75 species of exotic animals in its care.

David Perle, a spokesperson for PETA, indicated in his release that evidence of animals’ disappearance had been discovered between reports and that those animals remain unaccounted for. Sales and deaths of black bears and cougars, as well as deaths of bobcats, gray foxes, and skunks were allegedly reported months late, or not at all, to the DNR, according to Perle’s release.

“PETA applauds the agency (DNR) for holding the shady exotic animal dealer accountable for what’s been years now of sloppy recordkeeping,” said Alex Baldwin, the Captive Wildlife Advocacy Specialist for PETA. “This carelessness has been typical of roadside zoos where animals continue to suffer and die.”

Zoological Association of America DISCREDITation

2022 – ZAA Accredited, Wright Park Zoo, Kansas

- Official warning from the USDA after 40 citations including injuries and deaths of animals

2020 – ZAA accredited, Myrtle Beach Safari, Virginia

- Closed due to federal felony trafficking, conspiracy, and animal cruelty counts. Implicated in the infamous Tiger King series

2016 & 2019 – ZAA Accredited, Wildlife World Zoo & Aquarium, Arizona

- Cited for failure to provide shelter, veterinary care, and public safety barriers, and a jaguar attack. Also cited for hiding regulated species from inspectors

2015 – ZAA members, Karl and Debbie Mogensen of the Natural Bridge Zoo in Virginia

- Closed due to 31 violations of the Animal Welfare Act

2014 & 2016 – ZAA Accredited, Bearizona

- Cited for inadequate veterinary care and animals killed by other animals. USDA license revoked for multiple violations including illegal bear hunting

2016 – ZAA Accredited California Living Museum, California

- Cited for inadequate veterinary care and failure to separate incompatible animals

2016 – ZAA Accredited, Virginia Safari Park, Virginia

- 10 year old hospitalized by a camel attack

2015 – ZAA Accredited Cougar Mountain Zoo, Washington

- Official warning by USDA for failure to provide veterinary care to a starving animal

2012-2014 – ZAA Accredited Montgomery Zoo, Alabama

- Cited for failure to provide minimum adequate space for bears, failure to provide veterinary care resulting in death, and fined by USDA for the escape of a tiger and hyena

2014 – ZAA Accredited Six Flags Discovery Kingdom, California

- Cited for the deaths of two dolphins and had 3 public injuries from lions

2013 – ZAA Accredited Two Tails Ranch, Florida

- Cited for failing to report a life threatening elephant attack

2008 & 2010 – ZAA Accredited Panther Ridge Conservation Center, Florida

- Cited for a cheetah and a separate jaguar attack, both resulting in human injury

2009 – ZAA Accredited Catocin Wildlife Preserve, Maryland

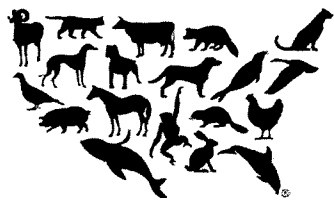
- Cited for failure to train employees after a keeper was mauled

AZA standards versus ZAA standards

Accreditation by the Association of Zoos & Aquariums (AZA) ensures that highly qualified, knowledgeable, and experienced professionals provide care for animals in a safe and secure environment at modern facilities. In contrast, the deceptively named Zoological Association of America (ZAA) has weak standards, accredits poorly run roadside zoos and private menageries, and promotes the private ownership of exotic pets and the commercialization of wildlife. The comparison chart below illustrates a few of many important differences between the two organizations.

Category		ZAA	AZA
FINANCE	Financial stability	X	✓
	Succession plan for privately-owned facilities	X	✓
SAFETY	Supports a federal bill to ban unlicensed individuals from keeping big cats	X	✓
	24-hour security system	X	✓
	Safety Committee	X	✓
	Tuberculin (TB) testing/surveillance program for staff	X	✓
POLICY	Policy against selling wild animals at auctions	X	✓
	Policy recognizing that wild animals do not make good pets	X	✓
	Policy against sending animals from the zoo to facilities that allow the animals to be hunted	X	✓
	Grievance procedures	X	✓
	Minimum square feet/vertical height for chimpanzees	240/8	2,000/20
WELFARE	Minimum square feet for lions	360	10,000
	Minimum square feet for sun bears	200	5,000
	Prohibits the use of bullhooks to train elephants	X	✓
	Tigers must be provided with a pool	X	✓
	Female elephants must be in kept in social groupings of at least three elephants	X	✓
	Must follow formal written enrichment program that promotes species-appropriate behavior	X	✓
	Animal Health and Welfare Committees	X	✓





**THE HUMANE SOCIETY
OF THE UNITED STATES**



Factsheet

Exempting the Zoological Association of America (ZAA) severely weakens laws and regulations intended to restrict the private possession of dangerous wild animals to qualified facilities

In vetoing changes to Michigan's Large Carnivore Act, Governor Rick Snyder said that expanding permission to ZAA facilities to keep large carnivores in Michigan "could lead to gaps in public health protection and animal welfare."¹

ZAA's Exploitation of Tigers

Rampant breeding and exhibition of tigers, particularly white tigers, is popular with ZAA, despite the fact that it serves no conservation purpose and even undermines conservation efforts. White tigers are not a sub-species, but simply an aberrant color variation of Bengal tigers. All captive white tigers are inbred and many suffer serious congenital defects, such as shrunken hearts, kidney ailments, cataracts, club feet, and crippling hip dysplasia. The Association of Zoos and Aquariums (AZA) Tiger Species Survival Plan condemns the breeding of white tigers.

The ZAA also opposes a regulation proposed by the U.S. Fish & Wildlife Service that would provide an important monitoring tool to help prevent captive tigers in the U.S. (estimated to be in the thousands) from fueling the illegal black market for tiger parts.² Such opposition demonstrates a callous disregard for conservation and welfare issues.

The deceptively-named Zoological Association of America (ZAA) is a fringe group with weak standards that endorses poorly run roadside zoos, traveling zoos, and private menageries and promotes the private ownership of exotic pets as well as the commercialization of wildlife. Despite threats to public safety and animal welfare, ZAA standards allow public contact with dangerous wild animals. In 2011-2013, The HSUS helped defeat attempts to exempt ZAA facilities from state dangerous wild animal laws in Louisiana, Michigan, and Texas, and similarly played a role in defeating a proposed regulation to exempt ZAA from the California Restricted Species Law.^{3,4,5} ZAA has no affiliation with the highly respected Association of Zoos and Aquariums (AZA), which has a long history of setting industry standards for zoological institutions.

Concerns about ZAA's facilities, members, and activities include the following, which are detailed in Appendix 1:

- Individuals convicted of felonies, wildlife trafficking, and cruelty to animals
- Animal attacks and escapes
- Allowing the public to have direct and unsafe contact with dangerous wild animals
- Disposing of unwanted wild animals in harmful and irresponsible ways
- Inexperienced staff and insufficient staffing levels
- Numerous USDA fines and official warnings for serious and chronic problems
- Serious welfare concerns found at ZAA facilities include:
 - inadequate veterinary care
 - inadequate feeding
 - filthy drinking water
 - lack of shelter from sunlight and the elements
 - cramped, undersized, and filthy enclosures
 - little to no environmental enrichment
 - depriving newborn bears, big cats, and primates of maternal care
 - subjecting big cats to declawing—a procedure that does not comply with the federal Animal Welfare Act requirements for adequate veterinary care because it causes considerable pain and chronic health problems

ZAA standards pale in comparison to AZA standards, as detailed in Appendix 2: ZAA's vague standards allow conditions that were common at zoos 30 or 40 years ago, but which are totally inconsistent with modern husbandry practices. On the other hand, the AZA has a rigorous and comprehensive accreditation process and the organization has strong standards and policies to address safety, provide for animal health and welfare that greatly exceeds the minimum standards of the federal Animal Welfare Act, ensure fiscal responsibility, and prevent wild animals from entering the pet trade and canned hunting facilities.

Appendix 1 – Problems with ZAA facilities and members

Detailed concerns about ZAA’s facilities, members, and activities include the following:

Attacks	<ul style="list-style-type: none"> • In 2013, a visitor at the Montgomery Zoo* in Alabama was scratched by a jaguar who was able to reach his paw through the wires of the enclosure.⁶ • In 2009, an inexperienced and unsupervised animal care worker at Catoctin Zoo* in Maryland was attacked and critically injured by two jaguars.^{7,8} • In 2008, Judy Berens†, owner of Panther Ridge Conservation Center in Florida, was attacked by two cheetahs during a fundraising event and airlifted to a hospital. • In 2008, Mark McCarthy†, owner of McCarthy’s Wildlife Sanctuary in Florida, suffered bone-deep bite wounds from an adult tiger during a photo shoot for a music video. The tiger began to choke and panicked when a chain tightened around her neck and body.^{9,10} • In 2004, in two separate incidents at Wild Wilderness Safari†, a woman was bitten by a tiger and a worker lost two fingers when she was bitten by a chimpanzee.^{11,12} • In 2002, two workers were attacked by cougars at Wild Wilderness Safari†.^{13,14}
Escapes	<ul style="list-style-type: none"> • In 2013, a tiger at the Montgomery Zoo* in Alabama escaped from an enclosure through a break in the fencing and was loose in the adjacent enclosure that housed gazelles and other animals for about 30 minutes.¹⁵ • In 2012, Wild Wilderness Safari† in Arkansas was cited for the seventh time in about a decade for allowing primates, including macaques, to escape and run loose in the park.¹⁶ • In 2011, a baboon escaped from Six Flags Great Adventure’s* drive-through park in New Jersey and was recaptured two days later at a farm 20 miles away.^{17,18} • In 2010, a 500-pound tiger at Jungle Island* in Florida escaped by jumping over a 14-foot-high fence in pursuit of a primate who had also escaped and was running amok. The tiger came within 10 feet of a 2-year-old toddler and four people were hurt during the chaos.^{19,20} • In 2010, a 100-pound tiger broke through Plexiglas at Tiger World† in North Carolina and passed “just feet” in front of families with young children.^{21,22,23} • In 2008, fifteen patas monkeys escaped from Safari Wilderness Ranch* in Florida by swimming across a 60-foot-wide moat and then climbing a 28-foot fence. One monkey was shot to death and it took nearly eight months to recapture the rest of them.^{24,25} • In 2008, a spider monkey escaped from Washington Park Zoo* in Indiana and was found at a nearby boat dealership.²⁶ • In 2008, a lion and tiger, both adults, escaped overnight from their cage at Mark McCarthy’s Wildlife Sanctuary† in Florida. Three area schools were placed on lockdown while law enforcement searched for the animals. The big cats were captured the next day.^{27,28} • In 2007, a Syrian brown bear burrowed out of an enclosure and escaped from Safari Niagara* in Canada, leading authorities on a 14-hour chase through wooded areas.²⁹ • In 2003, two Asiatic bears escaped from their enclosure at the Natural Bridge Zoo† in Virginia. The bears broke into a nearby home and nearly attacked the homeowner. Both bears were shot and killed.³⁰
Additional safety concerns	<ul style="list-style-type: none"> • Oswald’s Bear Ranch* in Michigan allows members of the public to handle bear cubs weighing up to 90 pounds and was cited by the USDA for using physical abuse to discipline bear cubs being used for photo opportunities with the public as well as allowing children to have unsafe contact with bear cubs.^{31,32,33,34}

	<ul style="list-style-type: none"> • Wild Wilderness Safari† was cited by the USDA for repeatedly failing to provide sufficient safety barriers, including for enclosures containing rhinos, hippos, and clouded leopards.³⁵ • Zooworld* was cited by the USDA for: <ul style="list-style-type: none"> ○ Insufficient safety barriers that could allow members of the public access to primate and big cat cages.^{36,37} ○ Failure to quarantine a recently acquired wild skunk—a species considered a significant carrier of rabies in the United States. The skunk was kept in the gift shop and taken off-site by a keeper. After one week, the skunk developed symptoms of a neurological illness and was euthanized.³⁸ • Walking with Lions† in California was cited repeatedly by the USDA for allowing members of the public to have direct contact with big cats.³⁹ • Have Trunk Will Travel* in California was cited by the USDA for unsafe handling of elephants while giving rides to the public.⁴⁰ • DeYoung Family Zoo† in Michigan was cited by the USDA for having three tiger cages and a cage containing three adult lions that were “not adequate to ensure containment of the animals.”⁴¹
Declawing big cats	<ul style="list-style-type: none"> • In 2013, Triple D Game Farm* in Montana was cited for declawing a 2-month-old tiger cub.⁴² • In 2010, Lion Habitat Ranch* in Nevada was cited for declawing two lion cubs.⁴³ • In 2009, Panther Ridge† in Florida was cited for declawing two clouded leopards.⁴⁴
Welfare concerns	<ul style="list-style-type: none"> • In 2013, a 7-month-old lion at Wild Wilderness Safari† in Arkansas was found dead in an enclosure, apparently strangled to death by a collar an employee had left on the lion.⁴⁵ • In 2013, Zooworld* in Florida was cited by the USDA for:⁴⁶ <ul style="list-style-type: none"> ○ Staff unilaterally ignoring instructions from the attending veterinarian, including feeding sugary foods to a diabetic tamarin, failing for months to provide supplements to squirrel monkeys suffering from a calcium deficiency, and feeding a lion the morning after anesthesia, which interfered with the veterinarian’s ability to evaluate the lion’s condition. ○ inadequate drainage in a lion’s cage that resulted in an anesthetized lion being dropped by staff while wading through knee-deep mud and causing an extremely painful injury that led to the lion’s euthanasia.
Insufficient and untrained staff	<ul style="list-style-type: none"> • Hernando Primate* in Florida—which had been cited for filthy cages, enclosures in disrepair, unsanitary food storage, housing together incompatible species, an unsafe lion enclosure, failure to have an environmental enrichment plan for a newly acquired chimpanzee—was cited by the USDA in 2013 for having only one inexperienced employee to care for all the animals at the facility.⁴⁷ • Catoctin Zoo* in Maryland was cited by the USDA in 2009 for failure to adequately train and appropriately supervise employees after a keeper who had been on the job for only two months was mauled by two jaguars.⁴⁸ • Citing NGALA’s (a.k.a. Close-up Creatures)* inexperienced staff, the U.S. Fish & Wildlife Service denied a Captive-Bred Wildlife (CBW) registration application for numerous species of big cats in 2010.⁴⁹ • Following the deaths of approximately 25 animals in a 9-month period at Animal Source Texas‡, the USDA inspector wrote on a 2010 inspection report, “Current animal care personnel do not have experience working with the exotic species brokered through this

	<p>facility. This could be a contributing factor to the high number of animal deaths this facility has experienced ...”⁵⁰</p>
<p>Financial stability and succession planning</p>	<ul style="list-style-type: none"> • The Bucks County Zoo (a.k.a. Animal Junction)* in Pennsylvania was a privately-owned menagerie that consisted of a collection of caged animals—including primates and a tiger cub—displayed inside a warehouse at an industrial park. Just 2½ years after opening, the zoo went out of business in October 2011. It advertised its displaced and deadly reticulated pythons and gaboon viper in <i>Animal Finders’ Guide</i>, a publication that caters to the pet trade (see Appendix 3).⁵¹ After the zoo moved out, the property owner claimed the zoo had caused more than \$100,000 in damage.⁵² • In 2014, county officials closed Roos-n-More*, a 3-acre zoo with 385 animals in Nevada, after an inspection revealed several violations related to operating a business on residential property. The zoo began soliciting money from the public to raise the more than \$100,000 needed for upgrades in order to re-open.⁵³ • Roo Ranch* in South Dakota, which opened on a whim in 2006 following a trip to Australia, closed after the death of the owner in 2009.⁵⁴
<p>Inadequate space</p>	<ul style="list-style-type: none"> • The Montgomery Zoo* was cited by the USDA in 2012 for failure to provide minimum space to a surplus black bear who was kept in an undersized cage that prevented her from standing upright on her hind legs.⁵⁵ • Catoctin Zoo* was cited by the USDA in 2007 for failure to provide minimum space to three sun bears kept in an 8.5’ x 8.5’ x 8’ cage in the off-exhibit area.⁵⁶ • Buddy Jordan’s† NBJ Zoological Park was cited by the USDA in 2013 for failure to provide minimum space to a male gibbon who was housed in a 4’ x 4’ x 4’ cage.⁵⁷ • Wildlife Wonders* in Georgia has been cited repeatedly by the USDA for failure to provide animals, including a primate, with minimum space as well as filthy, rodent-infested conditions and feeding a diseased goat carcass to wolves.^{58,59} • Citing Zoo of Acadiana’s* inadequate space and lack of cage furnishings, the U.S. Fish & Wildlife Service denied a Captive-Bred Wildlife (CBW) registration application for numerous species of primates, big cats, and other animals in 2009.⁶⁰
<p>Disposing of animals in harmful and irresponsible ways</p>	<ul style="list-style-type: none"> • William Coburn†, operator of Wild Acres Ranch and Safari Adventures* at Kalahari Resorts in Ohio uses tiger, lion, and bear cubs for public handling and has African lions and black bears slaughtered to sell their meat. Coburn has also been cited by the USDA for numerous serious violations of the Animal Welfare Act.^{61,62} • ZAA co-founder Jim Fouts was exposed in a <i>60 Minutes</i> piece for selling endangered antelope at an auction where animals may end up at canned hunt facilities.⁶³ • Buddy Jordan† has sold animals to hunting ranches and operators of exotic-animal auctions and is on the board of directors of the Exotic Wildlife Association, a group that advocates for canned hunting of rare and endangered species.^{64,65} • Zooworld* in Florida placed a “free to good home” classified ad for a 7-year-old cougar in <i>Animal Finders’ Guide</i>, a publication that caters to the exotic pet trade (see Appendix 3).⁶⁶ • Wildlife World Zoo* in Arizona transferred a tiger cub to a roadside zoo in Pennsylvania and sent five New Guinea singing dogs to a roadside facility in Oklahoma.^{67,68} Both facilities had been repeatedly cited by the USDA for failing to provide animals with veterinary care.^{69,70} • Nevada-based Dirk Arthur† sent three tigers and one leopard to a Colorado roadside zoo with pending USDA charges that include failure to provide adequate veterinary care, improper and unsafe handling, and filthy and deteriorating conditions.^{71,72,73} • Living Treasures Animal Park† in Pennsylvania sent a 4-week-old tiger to Plumpton Park Zoo

	<p>in Maryland (a facility that has accumulated 109 USDA violations since 2006). The tiger was kept in a keeper's home and died a few months later after ingesting plastic materials and cloth. A necropsy revealed the tiger was anemic, had a heavy flea infestation, and suffered from metabolic bone disease, which is often associated with an improper diet.^{74,75}</p> <ul style="list-style-type: none"> • Conservators' Center† in North Carolina sent two tigers to an unstable environment at the Baghdad Zoo while Iraq was embroiled in military conflict and many citizens were without access to basic necessities.⁷⁶
Criminal records	<ul style="list-style-type: none"> • Mario Tabraue†, owner of Zoological Wildlife Foundation, was released from prison in 2000 after serving just 12 years of a 100-year sentence. Tabraue, described by a federal agent as a "ruthless and violent drug dealer," had been charged in a federal racketeering indictment that included murder, drug trafficking, corruption, and obstruction of justice. Tabraue used a machete and circular saw to cut up the body of a murdered federal informant. Before his arrest, Tabraue used an exotic animal business as a front for his drug trafficking.⁷⁷ • Meghan Mogensen, director of Reston Zoo in Virginia—one of three zoos owned by Eric Mogensen†—pleaded guilty in 2013 to cruelty to animals and was sentenced to one month in jail after she was charged with drowning a sick wallaby and possession of ketamine, a controlled substance.^{78,79,80} • In 2002, Tim Rivers† of Animals in Motion was sentenced to six months in federal prison for selling endangered big cats, including a tiger and leopards, to an animal-killing ring. Rivers, who has admitted to at least nine arrests related to cruelty to animals, toured the country for years with an act that forced a mule to jump from a 30-foot ramp into a pool.^{81,82}
Unprofessional conduct	<ul style="list-style-type: none"> • Lex Salisbury†, former president of Tampa's Lowry Park Zoo, was forced to resign in 2008 and the zoo temporarily lost its AZA accreditation when an audit concluded that Salisbury owed more than \$200,000 to the city for taking the zoo's animals and equipment to his private ZAA properties, making zoo employees work for his personal ZAA business venture, giving himself an unauthorized bonus, and taking his wife on expensive zoo-funded trips. As of 2013, Salisbury was a member of the ZAA board of directors.^{83,84} • In October 2011, Johnny Martinez†, then ZAA board member and director of the Washington Park Zoo, was suspended by Michigan City, Indiana, officials after he used the zoo for a personal after-hours party during which the doors to the primate house were left open, allowing temperatures to fall into the lower 60s, and party-goers consumed concessions without paying for them and left the grounds littered with trash.⁸⁵ • In 2008, Safari Niagara* in Canada was fined \$2,000 after pleading guilty to making a false statement to a conservation officer regarding native wildlife kept at the facility.⁸⁶
USDA Enforcement Actions	<ul style="list-style-type: none"> • In 2013, the USDA fined Zooworld* \$1,571 after a 5-month-old giraffe sustained cervical injuries due to unsafe conditions and was euthanized, having an insufficient public safety barrier at the dingo enclosure, a muddy tiger enclosure, and rodent-infested conditions in primate and bear enclosures.⁸⁷ • In 2013, the USDA issued an Official Warning against Capital of Texas Zoo* for failure to provide veterinary care to underweight animals, repeated failure to maintain facilities in good repair, repeated failure to feed animals an appropriate diet, repeated failure to keep premises clean and in good repair, and inadequate pest control.⁸⁸ • In 2013, the USDA issued an Official Warning against Wildlife World Zoo* for failure to safely handle a 3-month-old tiger cub brought to a television studio and failure to maintain facilities to protect the animals from injury and contain the animals.⁸⁹ • In 2013, the USDA issued an Official Warning against Susan Bradshaw† of Zooville USA in Florida for repeated failure to provide animals with clean drinking water and remove excess

accumulations of feces from numerous cages.⁹⁰

- In 2013, the USDA issued an Official Warning against Scott Edwards† of Sharkarosa Exotic Park in Texas for failure to provide animals with clean drinking water and repeated failure to maintain the perimeter fence, which may have allowed predators to enter the property and kill numerous animals.^{91,92}
- In 2012, Catoctin Wildlife Zoo* in Maryland, was fined \$12,000 by the USDA to settle charges of repeatedly violating the veterinary care, handling, housing, and husbandry standards of the federal Animal Welfare Act.^{93,94}
- In 2012, Animal Source Texas‡ was fined \$59,777 by the USDA to settle charges of repeatedly failing to provide veterinary care, including to animals in obvious distress, and inexperienced staff that may have contributed to the deaths of 25 animals in a 9-month period.^{95,96,97}
- In 2012, the USDA issued an Official Warning against Leesburg Animal Park, operated by Shirley Johnson† in Virginia for repeated failure to construct a perimeter fence of sufficient height.⁹⁸
- In 2012, the USDA issued an Official Warning against Jungle Island* in Florida for failure to construct and maintain cages to safely contain a gibbon and a tiger who had both escaped and failure to have a responsible adult available to conduct an animal welfare inspection.⁹⁹
- In 2011, the USDA fined Panther Ridge, owned by Judy Berenst†, \$2,786 for allowing a member of the public to pet a jaguar through its enclosure, resulting in the jaguar biting the woman's thumb.¹⁰⁰
- In 2011, the USDA fined Tiger World, owned by Lea Jaunakaist†, \$2,571 for a tiger escape.¹⁰¹
- In 2010, the USDA issued an Official Warning against Hemker Zoo* for repeated failure to maintain enclosures in good repair to protect animals from injury and failure to provide animals with shelter from sunlight and inclement weather.¹⁰²
- In a 2009 USDA administrative court proceeding, Mario Tabraue†, owner of Zoological Wildlife Foundation, admitted providing falsified documents and making false statements to the USDA while helping an unlicensed individual acquire a tiger.¹⁰³

*Currently or recently identified as an accredited facility. Accredited facilities can vote for the Board of Directors.

†Individual, facility owner, or facility representative currently or recently identified as a professional member. Professional members can vote, run for the Board of Directors, and conduct facility inspections. Professional members are sponsored by two individuals and approved by the Board of Directors.

‡Currently or recently identified as a commercial member.

Appendix 2 – AZA standards versus ZAA standards

Accreditation by the Association of Zoos & Aquariums (AZA) ensures that highly qualified, knowledgeable, and experienced professionals provide care for animals in a safe and secure environment at modern facilities. In contrast, the deceptively-named Zoological Association of America (ZAA) has weak standards, accredits poorly run roadside zoos and private menageries, and promotes the private ownership of exotic pets and the commercialization of wildlife. The chart below illustrates a few important differences between the two organizations.

	AZA	ZAA
Year established	1924 ¹⁰⁴	2005 ¹⁰⁵
Accredited Facilities	223 ¹⁰⁶ (primarily city-run zoos or zoos operated by a non-profit zoological society).	52 ¹⁰⁷ (primarily privately-owned roadside zoos and menageries).
Mission	"Provides members the services, high standards and best practices needed to be leaders and innovators in animal care, wildlife conservation and science, conservation education, the guest experience, and community engagement." ¹⁰⁸	One stated purpose of ZAA is to "Protect and defend the right to own exotic and domestic animals, both privately and publicly ..." ¹⁰⁹
Accreditation Application	A comprehensive 29-page document that requires detailed information about the facility's animals, ¹¹⁰ veterinary care, ¹¹¹ physical facilities, ¹¹² safety and security, ¹¹³ conservation, ¹¹⁴ education, ¹¹⁵ research, ¹¹⁶ governing authority, ¹¹⁷ staff, ¹¹⁸ operating budget and sources of funding, ¹¹⁹ and also requires copies of the facility's policies, procedures, records, lists, and reports.	A simple 8-page document that requires the candidate to provide basic contact information as well as very minimal information about the facility's animals, physical site, and programs, only three short questions about safety, as well as a section dedicated to hunting ranches seeking ZAA accreditation. ¹²⁰
Insurance	Insurance required covering visitors, staff, volunteers/docents, and physical facilities. ¹²¹	No reference to insurance in its standards or accreditation application.
Fiscal responsibility	Institution must demonstrate financial stability. ¹²²	No reference to financial stability, operating budgets, or funding sources.
Inspection process	A team of specially-trained inspectors, including at least one veterinarian as well as animal and operations experts spends several days visiting every area of an applicant's facility, interviewing staff, checking records, reviewing protocols, ensuring financial stability, and examining physical facilities and animals. ¹²³	A two-member inspection team separately evaluates the facility. One team member may be a local veterinarian chosen by the applicant. ¹²⁴
Safety and security for potentially dangerous large carnivores, large reptiles, medium to large primates, and large hoofstock	<ul style="list-style-type: none"> Alarm systems in place for animals posing serious threat of catastrophic injury and/or death.¹²⁵ Protocols and procedures in place to notify staff in the event of a bite injury, attack, or escape. Conducts routine emergency drills to insure procedures are followed in the event of an attack or escape. Submits a written report to AZA within 30 days of an escape or serious injury, detailing the incident and describing actions taken by the facility, and may result in a special inspection.¹²⁶ 	The new 2014 animal care standards (although copied in part from AZA) do not specifically include safety standards for inherently dangerous large carnivores, large reptiles, medium to large primates, or large hoofstock, contain a simple 1-page risk management section with few details, and has no requirement to notify ZAA of attacks or escapes.
Public handling of big cat cubs, bear cubs, and primates	Largely supports a proposal under consideration by the U.S. Department of Agriculture to ban public handling of big cats, bears, and primates under the federal Animal Welfare Act.	At least a dozen ZAA facilities and members offer public handling of big cat cubs, bear cubs, and/or primates.

	AZA	ZAA
Zoonotic diseases	Detailed information regarding zoonotic diseases, preventive measures, staff training, the use of personal protective equipment, and quarantine areas in compliance with standards developed by the American Association of Zoo Veterinarians. ¹²⁷	One sentence about minimizing zoonotic disease risks during quarantine of fish and one sentence about “sanitary precautions” for wildlife used in public contact.
Safety committee	22-member Safety Committee disseminates best practices, recommends changes in best practices and professional training, and addresses emerging safety issues. ¹²⁸	No safety committee.
Security	Security on a 24-hour, year-round basis. ¹²⁹	No requirement for 24-hour security. ¹³⁰
Controlled substances	Written, formal procedures must be available to the animal care staff for the use of animal drugs for veterinary purposes and appropriate security of the drugs must be provided. ¹³¹	No references to use or secure storage of controlled substances.
Exotic Pets	Policy recognizing that wild animals do not make good pets. ¹³²	ZAA defends the right for individuals to own exotic animals and accredited facilities and members breed and sell a variety of wild animals to the public. ^{133,134,135}
Sample animal disposition policies (primates, auctions, and hunting)	<p>Primates may not be sold, traded, or given to individuals or to animal dealers known to place primates with individuals.¹³⁶</p> <p>Non-domesticated animals shall not be disposed of at animal auctions or to any organization or individual that may use or sell the animal at an animal auction, and animals shall not be disposed of to organizations or individuals that allow the hunting of these animals or their offspring.¹³⁷</p>	<p>Members sell primates to pet monkey dealers.^{138,139,140,141,142,143}</p> <p>No policy against hunting zoo animals or selling them at auctions. Evidence of facilities selling wild animals at auction, to hunting ranches, to exotic-animal breeders and dealers, as well as slaughtering African lions and black bears, once used for public handling, for the sale of their meat.^{144,145,146}</p>
Illegal trade in tiger parts	Supports proposed federal regulations to help prevent captive tigers in the U.S. from fueling the illegal black market for tiger parts by monitoring breeding and disposition. ¹⁴⁷	Opposes proposed federal regulations to help prevent captive tigers in the U.S. from fueling the illegal black market for tiger parts by monitoring breeding and disposition. ¹⁴⁸
Animal welfare	<ul style="list-style-type: none"> Facilities provide species-specific behavioral enrichment and husbandry that greatly exceed the minimum standards of federal law.¹⁴⁹ 16-member Animal Health Committee ensures high quality and comprehensive animal health care.¹⁵⁰ 31-member Animal Welfare Committee develops assessment tools and drives the creation of detailed, species-specific animal care manuals.¹⁵¹ Veterinary coverage must be available to the animals 24 hours a day, 7 days a week.¹⁵² Keepers trained to recognize abnormal behavior and clinical symptoms of illness and dietary and husbandry requirements.¹⁵³ Necropsies performed on deceased animals to determine if the cause of death may be related to nutritional status or other aspects of husbandry.¹⁵⁴ 	There is no reference to routine veterinary care requirements or species-specific animal care manuals, references to psychological well-being of animals are few and vague, dietary and husbandry standards are very brief and lacking in detail, and there is no mention of conducting necropsies to determine what caused the death of an animal. ^{155,156}



August 29, 2023

OPPOSE AB 124 / SB 126

Don't Change the Definition of Public Zoos

There are thousands of roadside zoos in the U.S. that are unable to provide the level of animal care needed to become accredited by the Association of Zoos and Aquariums (AZA). The deceptively named Zoological Association of America (ZAA) "accredits" those roadside zoos that don't meet the AZA's strict standards. The ZAA stamp of approval leads roadside zoo visitors to falsely believe these menageries are legitimate, while the zoos profit off the exploitation of captive exotic animals.

- Wisconsin is one of only four states in the U.S. with **no laws regulating or prohibiting dangerous wild animals as pets.**
 - ZAA promotes and supports private ownership of exotic animals, allows hands-on public interactions with wild animals and opposes legislation to regulate exotic animals.
- The director of ZAA is Judy Domaszek, who is also the owner of Wildwood Wildlife Park in Minocqua. Wildwood Wildlife Park is the only ZAA accredited facility in Wisconsin.
 - This bill would exempt Wildwood Wildlife Park from state wildlife regulations. ZAA could then rubber stamp accreditation so any roadside zoos that apply would no longer be subject to state regulations.
- ZAA standards are lax and pale in comparison to AZA standards. ZAA often doesn't enforce its standards at violative roadside zoos.
 - The ZAA's administrative director, Meghan Lampert née Mogensen, has a past conviction for intentionally drowning a wallaby in 2012 and served jail time; which is in violation of ZAA standards that members "have not been convicted of charges laid by a regulatory or enforcement body that is linked to the zoo and aquarium community."
 - When the Columbus Zoo in Ohio lost its AZA accreditation due to a 2021 documentary showing its participation in the underground big cat trade and later evidence that zoo officials misused \$630,000, ZAA accredited the zoo.
 - Several ZAA accredited zoos are prolific wildlife traffickers, with records showing transactions with Joe Exotic and Doc Antle of Tiger King infamy.
 - There are no publicly available records indicating a zoo has ever lost ZAA accreditation due to noncompliance with animal care standards or other violations.
- Changing the definition of zoo to include ZAA accredited facilities is a veiled attempt to remove state oversight at roadside zoos, putting the public at risk of disease and injury and exposing thousands of animals to poor care and conditions.

Wild animals are NOT pets. Please don't exempt ZAA accredited roadside zoos from state regulations.

Respectfully submitted,

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Senate Committee on Labor, Regulatory Reform, Veterans and Military Affairs

SB 126

The Definition of Public Zoos and Aquariums for Purposes of Captive Wildlife Regulations *August 29, 2023*

The Wisconsin Department of Natural Resources welcomes the opportunity to provide written testimony on Senate Bill 126, related to amending the definition of public zoos and aquariums for purposes of captive wildlife regulations.

Current statute exempts “zoos” or “aquariums” that are operated by the state; or by a city, village, or county; or that are accredited with the American Zoo and Aquarium Association (AZAA); from needing a license issued by the Department of Natural Resources (DNR). Senate Bill 126 would add institutions accredited with the Zoological Association of America (ZAA) as another associated organization to that list of public zoos and aquariums that are exempt from department license requirements.

The DNR recognizes that by exempting this organization, members of the ZAA will no longer be under the regulatory consideration of DNR. In reviewing the AZAA and ZAA requirements for accreditation and affiliations, DNR finds that there will be limited oversight effects from this change.

Thank you for the opportunity to provide this written testimony. If you have questions or if there is any further information the department can provide, please contact Calvin Boldebeck, DNR Legislative Director, at Calvin.Boldebeck@Wisconsin.gov.