



September 21, 2015

Stuart Levenbach, PhD
Natural Resources and Environment Branch
OMB, Office of Information and Regulatory Affairs
725 17th Street, NW
Washington, DC 20503

Dear Dr. Levenbach,

Please find below additional comments regarding Docket Number FWS-R9-IA-2011; 96300-1671-0000-R4.

Financial and Business Concerns:

- This ruling would put an unnecessary burden on the facility both with man-hours and financially.
- The CBW can take 4-8 man-hours to complete. Outside contractors charge \$500-\$1000 to prepare the CBW paperwork.
- The average wait time from application to receiving the CBW permit is 6 months. This process can take more than one year. This would have a negative impact in not being able to acquire an animal or being able to transfer an animal out in a timely manner.
- Having to provide food, staffing and vet care for one year while waiting on a CBW would cost approximately \$10,000 per year per adult tiger.
- If USFWS does not approve the CBW, the \$10,000 per tiger expense would be multiplied by 20, the average lifespan of the tiger.

Conservation and genetic value:

- The exemption was based on USFWS's perceived "lack of conservation value" of generic tigers. Since USFWS continues to believe that the breeding of generic tigers does not have a conservation benefit, nothing has changed, and therefore, there is no compelling reason to remove the exemption.
- Generic tigers have conservation education value and are valuable as ambassadors for tiger conservation. These ambassadors can educate the public about the plight of wild tigers and also help to support in situ conservation.
- The AZA's Tiger SSP Program, according to AZA's own evaluation, is unsustainable. To further restricting tiger reproduction in the U.S. by removing generic tigers would eliminate a safety net of animals that could be needed in the future.
- Dr. Steve O'Brian, geneticist, Natural Cancer Institute, concluded that one in seven generic tigers may in fact be purebred. These animals should not be removed from the population without further study. In

addition, many geneticists feel that generic tigers have genetic value since they carry a great diversity of genes.

- With climate changes, the natural habitat of tigers will be altered. Purebred tigers will not go back to the same climatic zones that their ancestors had lived.
- Restricting movement of the generic tiger may cause inbreeding and lessen the genetic diversity within the generic tiger population.

Misc:

- USFWS declared that a July 2008 TRAFFIC report, *Paper Tigers? The Role of the U.S. Captive Tiger Population in the Trade in Tiger Parts* (Williamson and Henry 2008), stating that the "report found no indication that U.S. tigers currently are entering domestic or international trade as live animals or as parts and products". There is no reason to remove the generic tiger exemption for an issue that does not exist.
- The majority of captive tigers in the U.S. are held by public or private commercial exhibitors, which, if open to the public, would be regulated by USDA. USDA does annual inspections and accounts for acquisitions and dispositions of the animals. Since USDA has oversight of these tigers, there would not be any improved oversight.

Recap:

- This ruling would be financially burdensome.
- Permits can take more than one year to process, causing added expense in caring for the animal (\$10,000/year/tiger)
- Since the exemption was based on the "lack of conservation value of generic tigers" and USFWS continues to view generic tigers as not having conservation value, USFWS has not shown evidence that they have a change in perception and therefore there should not be a change in the exemption.
- Generic tigers serve an education conservation value as ambassadors.
- Generic tigers provide a safety net of animals for the failing AZA Tiger SSP program and also can have great genetic diversity.
- USFWS did not show evidence that US tigers are entering domestic or international trade of live animals or as parts and products. In fact, USFWS has shown that there are no indications that US tigers are part of the illegal tiger trade. The exemption should not be removed for an issue that does not exist.

Sincerely,



Peter J Brewer, DVM

Chairman

Zoological Association of America