

PUBLIC SUBMISSION

FWS-HQ-LE-2025-0572 Assoc of Zoos and Aquariums

11122025

Posted by the **Fish and Wildlife Service** on Nov 24, 2025

Docket Document (FWS-HQ-LE-2025-0572-0001) Comment

Comment

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Attachments

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FWS-HQ-LE-2025-0572 Assoc of Zoos and Aquariums 11122025



Comment ID

FWS-HQ-LE-2025-0572-0009



Tracking Number

mid-73dy-7qpc

Received Date 

Nov 12, 2025

Page Count 

1



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November 7th, 2025

Service Information Collection Clearance Officer
Attn: FWS-HQ-ES-2025-0176
U.S. Fish and Wildlife Service
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Falls Church, VA 22041-3803

Re: Docket No. FWS-HQ-LE-2025-0572; Agency Information Collection Activities; Federal Wildlife Applications and Reports – Law Enforcement.

The Association of Zoos and Aquariums (AZA) respectfully submits the following comments on Docket No. FWS-HQ-LE-2025-0572; Agency Information Collection Activities; Federal Wildlife Applications and Reports – Law Enforcement. As global leaders in wildlife conservation, we commend the U.S. Fish and Wildlife Service (USFWS) for the work they do in protecting wildlife through law enforcement actions and port inspections. We are grateful for the opportunity to share our thoughts on ways to improve the application process of Designated Port Exception Permits for both applicants and USFWS.

Founded in 1924, AZA is a 501(c)3 non-profit organization dedicated to the advancement of zoos and aquariums in the areas of animal care and welfare, conservation, education, science, and guest experience. AZA members are the foremost authorities and practitioners of animal care, wellbeing, husbandry, conservation, and research. AZA's 254 accredited aquariums, nature centers, science centers and zoos are leaders in conservation efforts through Species Survival Plans® (SSPs), Taxon Advisory Groups (TAGs), Scientific Advisory Groups (SAGs), Saving Animals from Extinction® (SAFE) conservation programs, the Wildlife Trafficking Alliance (WTA), and member committees. AZA members annually host more than 209 million visitors, collectively generate more than \$35 billion in annual economic activity, and support more than 254,000 jobs globally. The cornerstone of AZA is our strict accreditation standards and process, viewed as the global gold standard of animal care and welfare. AZA accreditation involves a thorough review and inspection process examining all aspects of an institution and its operations; our accreditation standards are available on our [website](#).

AZA members are the foremost authorities and practitioners of animal care and wellbeing, are deeply involved in our local communities through outreach and education programs, and have a deep and abiding commitment to conservation education, conservation science, and field research. AZA members reached over 330 million people in 2024 through educational programming and spent over \$30 million on mission-focused research on 652 species in 55 countries, 148 of which are listed under the Endangered Species Act (ESA). In addition, AZA institutions have established SSP and SAFE programs that develop long-term plans involving genetically diverse breeding, public education, field conservation, and supportive

research to ensure survival for many threatened and endangered species. AZA members also participate in the Wildlife Confiscations Network, a partnership with U.S Fish and Wildlife Service (USFWS) law enforcement that provides care and placement of animals confiscated from illegal trade.

AZA TAGs examine the sustainability needs of an entire taxa and develop recommendations for population management in regional collection plans. Each TAG coordinates, facilitates, and reviews progress toward goals for its cooperative animal management under the supervision of the Animal Population Management Committee. TAGs manage their taxa's SSPs and studbooks and coordinate with other regional and international entities to lead, develop, oversee, promote, evaluate, and support their cooperative animal management and related scientific initiatives. TAGs serve as the AZA experts regarding husbandry, veterinary care, research priorities, ethical considerations, and other issues applicable to their taxa.

AZA members periodically submit applications for Designated Port Exception Permits to USFWS to best facilitate their many critical wildlife conservation and breeding projects and plans. While these moves are often coordinated by AZA TAGs, SSPs, and studbooks for the best welfare and genetic diversity for managed populations, many are done in accordance with national and international recovery plans and programs run by government agencies and conventions. These programs require frequent international movement of wildlife among institutions to maximize genetic diversity and sustainability of managed populations, important for release and rewilding efforts. Many species have specific needs that require transport through non-designated ports and therefore require a USFWS Designated Port Exception Permit.

AZA believes that the information collected in the Designated Port Exception Permit, Form 3-200-2, is necessary, practical, and useful for USFWS in managing wildlife permits and combating illegal trade. Issuing these permits allows movement of wildlife through non-designated ports for the purpose of creating the most direct route and shortest travel time for transport, with less frequent stops, reducing any increased stress to the animal being moved. We do believe the 1.25 hour estimate for completing the form is generally not accurate. Since the application now requires specific scenarios for each port exception, the process is taking much longer and can sometimes take days, especially when considering the number of questions an applicant may get back from the agency.

AZA recommends that USFWS implement changes to the application to make sure that the information the agency is seeking matches what is being asked of the applicants. Whether this is a guided table or form, or a change in questions to more clearly ask for the information expressly needed by the agency, clarifying will allow applicants to better answer the questions and provide information required on the initial application.

Another way the Service may reduce the burden on USFWS staff and respondents is to make the Designated Port Exception Permit, Form 3-200-2, and all permits available through ePermits, as it still currently requires paper copies of the application to be mailed to offices. Furthermore, accepting online payments of these permit application fees would minimize burden on agency staff and applicants as, currently, the only way to submit payment is through mailing a paper check.

AZA greatly appreciates the Service's commitment to protecting endangered and threatened species, their work in law enforcement, and facilitating continental and international movements of animals. These movements are key to genetic diversity and sustainability of animal populations for the conservation and recovery of these important species. We are grateful to the Service for continuing a pathway to use non-designated ports and hope to streamline the process further to minimize burden on agency staff and applicants. We look forward to continuing to partner with you in the movement, conservation, and recovery of threatened and endangered species.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Ashe". The signature is fluid and cursive, with a large, stylized "D" at the beginning.

Dan Ashe
President and CEO