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May 24, 2011

Kristin L. Vehrs
Executive Director
Association of Zoos and Aquariums
8403 Colesville Road, Suite 710
Silver Spring, MD 20910-3314

Dear Ms. Vehrs,

As I write this letter, I continue to be astounded by the intransigent attitude of AZA and the misinformation promulgated by your organization regarding sanctuaries, particularly PAWS' ARK 2000 in San Andreas, California, information that, in my opinion, is defamatory.

Our management program (protected contact), barns, habitats and protocols are meticulously presented on our website. Therefore, when you suggest "so-called sanctuaries" such as PAWS are staffed with volunteers or untrained individuals, maintain inadequate fencing and barriers and cannot meet the so-called "rigorous" AZA *Standards for Elephant Management and Care*, I must assume that your organization has, at best, failed to do its research or, at worse, has no regard for the truth about our sanctuary.

For that reason, I find AZA's statements unfortunate, especially in the wake of the disturbing news reports concerning the training of elephants at the Have Trunk Will Travel movie compound, an AZA affiliated facility, and an organization that promotes its participation with the Elephant Managers Association, the AZA, and the Species Survival Plan.

The decision of some AZA zoos to send elephants to sanctuaries such as PAWS demonstrates that AZA's pronouncements do not reflect the opinions of all AZA accredited zoos, notwithstanding that those zoos are bound by an agreement to abide by AZA policies with which they may not concur. It is arrogant and disrespectful to those individuals who are committed to the welfare of elephants that their opinions are ignored.

What I have learned and I am sure you well know, there is a wide diversity of opinion and ethical concern within the AZA community regarding the AZA's posture concerning sanctuaries such as PAWS and that this has exacerbated anger and frustration among many zoo professionals, humane organizations, government officials and members of the public who support sanctuaries.

I suspect the support for sanctuaries such as PAWS within some segments of the AZA community results from the adverse publicity which occurs whenever an accredited AZA facility sends surplus animals to

hunting ranches, movie compounds or AZA accredited facilities with neither the space nor the expertise to properly house or integrate them socially.

Sadly, this is evidenced by the transfer of Ruby, an older African elephant, from Los Angeles Zoo to Knoxville with the full support of AZA, EMA and SSP; a plan that failed miserably because there was no plan and no physical plant to facilitate her socialization. In the past, Los Angeles Zoo has also traded elephants with Have Trunk Will Travel with disastrous results for Los Angeles Zoo and San Francisco Zoo.

These irrefutable incidents, and PAWS has documentation of many more, invalidate the AZA assertion that: "the only way to assure that these elephants receive the highest level of care is to send them to an AZA-accredited facility."

Ruby suffered unnecessarily because of AZA's insistence that she be sent to an AZA accredited facility; a facility with limited space for socialization, rather than to a sanctuary with the capability to improve her quality of life. One wonders how these pedantic and unreasonable decisions can be construed as "contributing to professional and humane animal management and care."

Perhaps this contumacious campaign against sanctuaries is fomented by those in AZA who do not conform to their standards and who do not share the proclaimed advocacy for animal welfare and conservation.

The continuing misinformation published by AZA is defamatory and untrue as we have stated for 20 years. In an effort to once again inform you of the true protocols and policies of PAWS, I am listing some of the most egregious misstatements in your publications:

"Non-accredited zoos and private elephant facilities (so-called sanctuaries) are not an appropriate alternative. These are places where elephants live with assistance from people who provide food water and shelter but are not required to meet the rigorous AZA Standards of Elephant Management and Care."

Unlike most AZA "accredited" facilities, PAWS maintains 24-hour trained keeping staff at our sanctuaries. This eliminates the possibility of leaving a mobile animal at night and discovering a downed animal when keepers return in the morning. This has been our practice for many years and should be part of AZA's so-called "rigorous" standards, particularly for facilities housing aging arthritic elephants.

While many zoo elephant keepers care for other species as well, our nine experienced elephant keepers, and four apprentice elephant keepers, do not take care of other species. Their time is devoted exclusively to the elephants. We do not utilize volunteers or interns for the care of elephants entrusted to our sanctuary.

Ed Stewart and I (PAWS founders and directors) personally train each of our keepers in hands-on, humane, bull hook-free Asian and African elephant care. This training also includes bull elephants. Together, Ed and I have more than 70 years of experience in elephant care. Brian Busta, our Elephant Supervisor, has more than 15 years of experience with both species, including bulls, and we regularly utilize the services of Protected Contact Management consultants, Margaret Whittaker and Gail Laule of Active Environments.

"Not all sanctuaries are open to the public or support education and worldwide conservation."

For many years most zoos have collected elephants and other species from the wild, transporting them to small spaces with artificial habitats, separating them from families and their natural surroundings, to be "ambassadors" for their more fortunate relatives who avoided capture.

PAWS indeed provides public education but does so without subjecting the elephants in our care to the often times inadequate facilities of some AZA accredited facilities. We provide this in the form of periodicals, educational "Seeing the Elephant" weekends, educational seminars and conferences, as well as guest lectures by such esteemed scientists as Joyce Poole, Cynthia Moss, Ian Redmond and others — all focusing on the protection and conservation of the animals that zoos capture in the name of conservation.

i.e. — The highly unacceptable capture of young elephants from Swaziland to replace aging African elephants at the San Diego Wild Animal Park. The older "surplus" elephants were sent from the balmy San Diego climate to the frigid cold of Chicago. They all died within a short period of time. Another AZA-sanctioned transfer that resulted in the deaths of three African elephant "ambassadors" who were the victims of AZA's carefully conceived public relations campaigns to justify wild capture.

As I write this letter, my colleagues and I are protesting a similar effort by Auckland Zoo, an accredited zoo in New Zealand. This was promoted as a worldwide conservation bid to save elephants in the wild; the zoo is negotiating with an elephant orphanage in Sri Lanka for two juvenile elephants. This can in no way benefit the wild elephants of Sri Lanka.

ARK 2000 is not open to the public. Our time is devoted to the care of the animals who live here. We do, however, conduct controlled tours which are often free for school children and at-risk youth. (View our website.) We also provide educational programs about elephants which promote conservation and habitat protection for wild species. We do not attempt to persuade the public and the media that we are performing some panegyric service to the species that we are forced to confine; we demonstrate the need for conservation of wildlife and habitat.

"AZA accredited zoos have carefully planned elephant breeding programs, which help build the North American herd."

Sanctuaries do not breed. We are often the recipients of "surplus" animals resulting from breeding programs that are certainly not well planned. The hypocrisy of breeding animals in captivity who will be doomed to live in unnatural enclosures in the name of conservation and science is a practice which should be eliminated by the AZA and replaced with truthful information about captivity and the compelling need to protect wild species and habitat.

AZA zoos have been passing elephants around like baseball cards, trading individuals who have bonded with companions for years to be transported from familiar surroundings and companions, traumatized with the sudden appearance of an aggressive bull or the unpleasant procedures involved in artificial insemination.

If captive breeding programs were incredibly successful, producing a profusion of healthy calves, there would be no benefit to wild elephant populations and the resultant surplus bull elephants would be in need of sanctuary.

AZA is aware of this dilemma since some of the more prolific breeding facilities have for many years been sending surplus bulls and cows to circuses and other facilities with questionable standards of care.

Other comments about the financial incapability of sanctuaries and the lack of accountability is outrageous and insulting. Sanctuaries are 501(c)3 non-profit organizations operating within the strictest financial guidelines of the federal and state governments. We are audited annually and our 990 is always available on our website.

PAWS has been operational for more than 27 years, growing and improving annually with no support from city, state or federal tax funds. The continuing complaint of zoos with substandard housing for

elephants is their inability to fund improvements for the animals in their care. Today, with city, state and federal funding at a record low, many zoos are forced to make drastic cuts in their budgets.

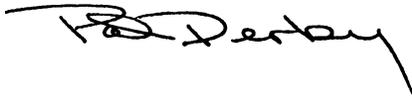
For many years, PAWS has attempted to establish good working relations with AZA to no avail. While we have respected the progressive zoo directors and dedicated keeping and veterinary staff at many zoos, the animosity and defamatory statements generated by AZA undermines these efforts and does not reflect the opinions of many wonderful zoo directors and staff that we have met. Our relationship with those special facilities, despite the deceptive propaganda distributed by AZA, is a source of pride to PAWS.

PAWS has great respect for those individual facilities, but we are opposed to the philosophy of the Elephant Manager's Association and the brutish proponents of dominance training, who feel that electricity and bullhooks (or other weapons) are "acceptable training tools" and who ridicule members who practice Protected Contact in elephant management.

AZA professes to be professional and the leader in elephant care, yet the history of AZA and their lack of enforcement of their own standards which are considerably lower than sanctuaries, repudiates this shallow posturing, and the frequent exposures of abusive training at AZA approved facilities indicates a critical need for reform.

For all of the reasons stated above, and many others which are well documented, PAWS proudly declares **we are not an AZA accredited facility**. Furthermore, we insist that AZA cease from publishing defamatory statements about our sanctuary. The quotes of Toronto Zoo staff based on your misinformation have led Toronto media and the Zoo Board to make public statements about "fearing the animals may be mistreated at a sanctuary." This is reprehensible, unprofessional, false and damaging to our reputation.

Sincerely,



Pat Derby
Director and Founder
Performing Animal Welfare Society

cc: Board of Management of the Toronto Zoo
Mayor Rob Ford, City of Toronto
USDA Secretary Tom Vilsack
USDA Deputy Under Secretary John Ferrell
Toronto Sun
Toronto Life
Associated Press International
Richard Bickelman, Esq.