



From: 10/12/2011
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Docket ID: Docket No. FWS-R9-IA-2011-0027 RIN: 1018-AW81
Captive-Bred Wildlife Prohibitions; Generic Tigers
<http://www.regulations.gov/#!documentDetail;D=FWS-R9-IA-2011-0027-0001>

REXANO POSITION: **OPPOSE**

REXANO is opposing removing the "generic tiger" exemption from the Captive-Bred Wildlife Registration, CBW.

Since the comment period was extended by another month, and FWS published the FAQ sheet, REXANO has additional questions and concerns, in addition to our opposing comments already submitted on 9/16/2011.

Generic tigers:

Many animals at AZA zoos are managed at species, rather than subspecies level. Good examples would be a Clouded leopard (4 subspecies, one extinct),
<http://www.nagonline.net/Fact%20Sheet%20pdf/AZA%20-%20Clouded%20Leopard%20Species%20Survival%20Plan.pdf>

and chimpanzees (currently petitioned to be put on ESA endangered list), with 3+ subspecies, but managed by AZA on a species level.
http://www.aza.org/uploadedFiles/Animal_Care_and_Management/Husbandry,_Health,_and_Welfare/Husbandry_and_Animal_Care/ChimpanzeeCareManual2010.pdf

Asian and African elephants are managed by AZA on species only level, even though they too have known subspecies (African has 2, Asian has 3).
http://www.elephanttag.org/Professional/RegionalCollectionPlan_2011.pdf

Like tigers, elephants are wanted & killed for their parts/tusks, and just like with the tiger parts, the sale of ivory is heavily regulated.
http://library.fws.gov/IA_Pubs/asian_elephant_ivory03.pdf

In the FAQ sheet below, a reference is made to inbreeding and inappropriate mating. Could FWS clarify/define what do they mean by 'inappropriate' mating?

Even though thanks to animal rights propaganda, inbreeding (also called line breeding), carries a negative connotation, it has its place in the world. It is often used in the breeding of domestic animals to preserve desirable traits in a stock. Inbreeding also naturally occurs in nature. Since many wild tigers live in a very fragmented habitat, the wild tiger population is inbreeding already.

The wild tiger has a life expectancy of 10 years, captive American tigers, whether pure or generic, live 15-20 years. Is there a scientific study, FWS can provide us with, proving that pure subspecies tigers live longer and healthier lives than private 'generic' tigers? Or is this all just hearsay, based on few publicized deformed rare individuals being born in AZA and non AZA settings? Birth deformities occur in animal and human world, and are not necessarily a result of inbreeding.

<http://www.fws.gov/home/feature/2011/pdf/GenericTigersFAQsFinal.pdf>

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Proposed Rule

September 21, 2011

Q: What is a generic tiger?

A: Inter-subspecific crossed or "generic" tigers are of unknown genetic origin and are typically not maintained in a manner to ensure that inbreeding or other inappropriate matings of animals do not occur.

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Why are tiger subspecies so important? Why are generic tigers not OK for conservation, but generic elephants, chimpanzees or Clouded leopards are OK for conservation and not considered to be 'freaks', why this inconsistency?

Why is it OK to hybridize inbred wild Florida panthers subspecies and hail it a conservation success, but not OK to hybridize captive American tigers subspecies?

If FWS believes generic tigers have no conservation value and their owners should not be given CBW permit, will the same permit denial be applied to AZA animals that are managed at species only level?

Tiger subspecies 'proof':

What SCIENTIFIC tests does FWS recognize as a proof that the animals/tigers are indeed a pure subspecies? How can a person wishing to obtain a CBW permit prove that their tigers are indeed pure subspecies and not generics?

Tiger conservation:

What is FWS definition of tiger conservation? AZA tigers managed on subspecies level face the same fate like generic tigers: all will be display tigers that are born and die in captivity, since the number one threat to wild tigers is habitat loss and human conflict. The proposed rule change is

NOT addressing this threat. Since the number of wild tigers is declining, is donating money to various conservation projects considered conservation or failure?

Most tigers are in federally licensed USDA facilities requiring them to keep the animal inventory. This means the federal government, USDA, already has an access to the number/inventory of tigers being held. So why the double regulation of tigers thru USDA and FWS for 'inventory' purposes? (Especially considering current economic crisis and budget cuts).

The non commercial tigers that never leave the state they reside in are not included in the USDA inventory; however, this proposed rule will not require the non commercial owners to report their inventory to FWS either. (Exception is 501©3 sanctuaries exempt from the Captive Wildlife Safety Act, CWSA. Sanctuaries must keep their records up to date, retain them for five years, and make them or copies available to the Service on request. Records must include the dates of transactions and the names and addresses of the persons involved).

<http://www.fws.gov/home/feature/2011/pdf/GenericTigersFAQsFinal.pdf>

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Q: What is the Captive-bred Wildlife Registration Program?

A: In 1979, the U.S. Fish and Wildlife (Service) published the Captive-bred Wildlife (CBW) regulations to reduce federal permitting requirements and facilitate the breeding of endangered and threatened species for conservation purposes by establishing a registration program. Under the CBW program, otherwise prohibited activities, such as interstate commerce, are authorized, but only when the activities can be shown to enhance the propagation or survival of the species. Although no written annual reports are required, holders of these specimens must maintain accurate written records of activities, including births, deaths, and transfers of specimens, and make the records available to the Service when requested. <http://www.fws.gov/international/pdf/reg.pdf>

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As stated on its website, in its mission, the purpose of USFWS is to protect/save wild animals/tigers in the wild thru Endangered Species Act, (ESA), Lacey Act, CITES and Rhinoceros & Tiger Conservation Act. American 'generic' tigers are a self sustaining population and in no way endangering wild populations in any shape or form. Just the opposite, captive breeding has reduced the need to take wild animals from their wild habitat for exhibition purposes. We are not aware of any wild-caught tigers in the recent history being imported into the USA, and there is no proof American tigers are used in Asian medicine.

How will this proposed rule help wild tigers in real life?