

Take Action!

USDA Considering Terrible Plan to Allow Animal Exploitation Industries to Self-Police

The U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS) is conducting in-person "listening sessions" and taking public comment as it considers delegating animal welfare inspection duties to industry trade groups. Zoos, breeders and research facilities would potentially be allowed to self-police, which would be nothing short of disastrous for the animals.

APHIS is responsible for enforcing the federal Animal Welfare Act and the Horse Protection Act. Under its proposal, the agency would determine how often federal inspectors visit licensed facilities, based on whether they are members of third-party inspection or "certification" programs. Members of an association for puppy mills, unscrupulous breeders, or roadside zoos could avoid independent scrutiny and easily hide critical information about animal welfare problems from public view. These facilities may not be inspected as often (the USDA usually conducts unannounced inspections of animal exhibitors once a year, for example), and would be alerted to inspections in advance, allowing a facility to conceal any welfare problems.

How you can help

1. Attend one of the listening sessions. Click [here](#) for information on dates and locations.
2. If you cannot attend a session, you can submit your comments directly to APHIS via email at james.m.tuck@aphis.usda.gov. **Comments are due by March 14.**

Here are points you can make in your comments or during a listening session:

I am strongly opposed to the USDA's proposal to recognize the use of third-party inspection and certification programs as a factor in determining the frequency of APHIS inspections of facilities licensed and registered under the Animal Welfare Act.

Animal welfare is sure to suffer if licensed and registered facilities are not subject to regular, unannounced inspections by trained inspectors who are unaffiliated with those industries.

Third-party programs may not inspect its members' facilities as frequently as does APHIS. Inspections are usually announced in advance, which would give a facility time to cover up any animal welfare violations.

Reports from third-party program inspections would be unavailable to the public, unlike USDA inspection reports, allowing facilities to easily hide deficiencies in animal welfare.

Association with a third-party or certification program does not equal compliance with the Animal Welfare Act. For example, zoos accredited by the Association of Zoos and Aquariums (AZA), which is considered to have more rigorous standards of care, are often found to be in violation of Animal Welfare Act regulations.

The industry trade groups that run third-party accreditation or certification programs have a strong vested interest in protecting their members, who pay costly dues to these

organizations. This incentivizes both the trade groups and their members to conceal serious animal welfare problems.

The USDA should base the frequency of inspections on that facility's history of compliance (or lack of) with the Animal Welfare Act. It should not offer fewer inspections as a way to promote third-party inspection, certification or accreditation programs.

Rather than relinquish its inspection duties to third parties, the USDA should strengthen its enforcement of the Animal Welfare Act and not weaken protections for animals by allowing trade groups to police themselves. Serious enforcement will send a message that facilities must meet the minimum requirements under the law. Non-compliant facilities should have their licenses permanently revoked, saving the agency and the public time and money.

Remember, the deadline for comments is March 14, 2018!