

December 12, 2018

Mary Cogliano
Acting Chief, Branch of Permits, Division of Management Authority
U.S. Fish and Wildlife Service

Via email

Re: Request for Suspension of CITES Permit Held by Zoological Society of Pittsburgh Authorizing African Elephant Semen Import (PRT-69379C)

Dear Ms. Cogliano,

Earlier this year, the U.S. Fish and Wildlife Service (FWS) granted a permit to the Zoological Society of Pittsburgh ("Pittsburgh" or "the zoo") authorizing it to import multiple shipments of African elephant semen from Canada under the Endangered Species Act (ESA) and the Convention on International Trade in Endangered Species of Wild Fauna and Flora and Fauna (CITES). I'm writing on behalf of PETA to request that the FWS suspend that permit and deny any future applications for similar permits from the zoo in light of new information about the zoo's failure to adequately care for an elephant calf who died in 2017.

As detailed in [PETA's comments](#) opposing the permit, zoo staff were "[shocked](#)" last year to find that an African elephant named Seeni had given birth to a sickly calf at the zoo's so-called International Conservation Center (ICC). The zoo had allowed Seeni to breed even though she [reportedly](#) rejected a previous calf who died after just three weeks. It then left Seeni unmonitored overnight in the last weeks of her pregnancy, though it had [concerns](#) about her health. Staff quickly removed the calf from her mother and took her to the zoo to be raised by humans, [claiming](#) that Seeni wasn't producing milk and had rejected the calf. Soon after, it put the baby elephant on display. Her health quickly [declined](#), and she [died](#) without the comfort and care of her mother or other elephants.

Around the same time that the calf made her public debut, the zoo quietly euthanized a young male African elephant named Umasai. The zoo never announced his death.

Newly released U.S. Department of Agriculture (USDA) [inspection reports](#) confirm that the zoo was unprepared for the calf's birth and incapable of giving her the best shot at survival in the company of her own mother.

Following an inspection on July 12, 2017, the USDA found that the ICC had too few employees to care for five elephants and a calf, and they were not prepared for the calf's birth because they could only work with Seeni "as time allowed due to limited staffing." The zoo took the calf from Seeni "in part because of this limited staff and their inability to care for this animal . . . thereby placing its welfare at significant risk."

The USDA also cited the zoo for failing to protect the elephants from harm and safeguard their well-being—noting that the survival rate for human-reared calves is very low. The agency suggested that the zoo's decision to remove the calf from her mother just after she was born was primarily driven by "logistical issues related to personnel and location." Specifically, reasons for the move included "Seeni's

PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS
FOUNDATION

Washington, D.C.
1536 16th St. N.W.
Washington, DC 20036
202-483-PETA

Los Angeles
2154 W. Sunset Blvd.
Los Angeles, CA 90026
323-644-PETA

Norfolk
501 Front St.
Norfolk, VA 23510
757-622-PETA

Berkeley
2855 Telegraph Ave.
Ste. 301
Berkeley, CA 94705
510-763-PETA

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intractability" and the fact that "the ICC site was not adequately staffed or prepared to provide the intensive 24/7 care required for hand-rearing the compromised calf." Though the zoo stated that Seeni was not showing signs of producing milk, its records showed that she was lactating three days after the birth. The USDA noted that "adequate maternal lactation might have been a possibility" had the calf remained with her mother, and suggested that Seeni may have bonded with her baby had she been given more time.

The agency also noted that the calf was exposed to numerous hazards at the zoo, which had failed to adequately limit the risk of exposure to pathogens. The calf had a two-inch wound on her head from scraping it on a manure conveyor, and she walked over "electrical wires on the wet ground" during the inspection. She also entered a utility room containing bleach and cleaning supplies that could have injured her. The report concluded: "The facility must protect this elephant calf from hazards from this time forward."

The zoo did not disclose these inspection reports in its permit application, and because it appealed them, they were never previously released to the public. Although the USDA [later removed](#) many of the reports' details, the fact remains that the ICC was understaffed and therefore unprepared to keep the calf with or near her mother. The FWS was apparently never able to consider this highly relevant information, which shows a lack of responsibility and failure to provide humane and healthful conditions for elephants.

A leading text on elephant veterinary care supports the USDA's conclusions, explaining that a facility's "primary goal" should be to "to keep the elephant calf with the elephant mother" because calves rarely survive without their mothers. Karen Emanuelson, *Neonatal Care and Hand Rearing, in Biology, Medicine, and Surgery of Elephants* 233, 233 (Murray Fowler & Susan Mikota, eds., 2006). In the case of "forced separation," reuniting the calf and mother "is of paramount importance," and "continued attempts should be made for the calf to spend significant time (most of the day and night) near the mother." *Id.* at 233, 237. By moving the calf across the state, the zoo foreclosed this option for her.

These inspection reports confirm that the zoo failed to make the requisite showing of responsibility to hold ESA and CITES permits, and is not qualified to breed African elephants. *See* 50 C.F.R. §§ 13.21(b)(3), (b)(5), 23.35(c). Pittsburgh bred an elephant who [allegedly](#) "[didn't] understand how to care for a young calf," only to take that calf away for human convenience and against best practices. It then put the sick baby on display, even when she was "[miserable](#)," and she died soon after. The fact that the zoo breathlessly reported the calf's birth and rushed to put her on display—while never even mentioning Umasai's death—demonstrates that the zoo's elephant breeding is for the primarily commercial purpose of attracting the ticket- and concession-buying public. *See id.* § 23.55(a) (prohibiting the use of CITES specimens for primarily commercial purposes after import).

The FWS can suspend a permit at any time "if the permittee is not in compliance . . . with any applicable laws or regulations governing the conduct of the permitted activity." 50 C.F.R. § 13.27(a). These newly-revealed citations are evidence that Pittsburgh has violated federal regulations governing the care of African elephant babies and should be grounds for permit suspension. Should Pittsburgh apply for a new permit to import elephant semen for breeding, the FWS should also deny that permit. Thank you for your time and attention to this important matter.

Very truly yours,



Rachel Mathews, Esq.

Deputy Director | Captive Animal Law Enforcement