

July 30, 2020

Gil McRae  
 Director, Fish and Wildlife Research Institute  
 Florida Fish and Wildlife Conservation Commission

Dr. Lisa Shender  
 Veterinarian, Fish and Wildlife Research Institute  
 Florida Fish and Wildlife Conservation Commission

Major Rob Beaton  
 Captive Wildlife, Division of Law Enforcement  
 Florida Fish and Wildlife Conservation Commission

Re: Request to Expend/Clarify Recommendations to Minimize Impacts  
 of SARS-CoV-2 to Non-Native Captive Wildlife

Dear Mr. McRae, Dr. Shender, and Major Beaton,

I am writing on behalf of PETA to request that the Florida Fish and Wildlife Conservation Commission (FWC) expand its [recently issued guidance](#) regarding minimizing the impacts of SARS-CoV-2 on wildlife to apply to all regulated captive species susceptible to the disease, including big cats and primates.

Earlier this week, the FWC [released](#) important recommendations to minimize the risk of potentially susceptible wildlife from contracting SARS-CoV-2 from humans. This guidance appears to be limited to species that the FWC specifically designated as susceptible or potentially susceptible to SARS-CoV-2, which includes: (1) Felids (cats, bobcats, panthers); (2) Mustelids (mink, ferrets, river otters, long-tailed weasel); (3) Canids (dogs, coyotes, fox); (4) bats; and (5) some rodents. Conspicuously absent from this list of susceptible species are regulated non-native felids (such as lions, tigers, cheetahs, jaguars, and leopards) and all regulated nonhuman primates. *See* Fla. Admin. Code Ann. r. 68A-6.002 (listing regulated non-native felids and primates). The existing evidence demonstrates that these species are highly susceptible to SARS-CoV-2, and thus should be included in the FWC's guidance.

The World Organisation for Animal Health (OIE) [has reported](#) that laboratory studies indicate that "cats are the most susceptible species for SARS-CoV-2." This susceptibility extends to captive, non-native felids. In April, five tigers and three lions [at the Bronx Zoo](#) all tested positive for SARS-CoV-2. It was initially [reported](#) that these animals were "infected by a staff person who was asymptotically infected with the virus." However, [additional analysis](#) found that while the tigers were infected with the same strain of SARS-CoV-2 carried by the New York based staff, the lions were infected by a different strain found in the neighboring state of

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Connecticut, suggesting “SARS-CoV-2 was brought to the zoo in two different ways.” On the heels of these transmission events—and in response to [an emergency rulemaking petition](#) from PETA—the United States Department of Agriculture (USDA) released [guidance](#) finding that big cats, such as lions, tigers, and cheetahs, were susceptible to SARS-CoV-2. The USDA’s guidance recommended suspending “[h]ands-on encounters with nondomestic cats” and advised that the public should stay at least 6 feet away and “be required to wear a mask when in the vicinity” of big cats. Indeed, the FWC’s [initial guidance](#) recognized that “all animals” in the felid family are highly susceptible to the disease and as such “extra precautions against virus transmission” should be taken with those species. In stark contrast to this initial guidance and the existing evidence of disease transmission, the FWC’s recent recommendations only identify cats, bobcats, and panthers as potentially susceptible to SARS-CoV-2. The FWC must clarify that *all* regulated felids are susceptible to this disease.

Equally concerning is the absence of nonhuman primates from the FWC’s list of potentially susceptible species. The close evolutionary relationship between human beings and nonhuman primates increases the risk of sharing communicable zoonotic diseases. Not surprisingly, [studies](#) have shown that nonhuman primates are susceptible to SARS-CoV-2. [Certain species](#) (orangutans, chimpanzees, bonobos, gorillas, and all African and Asian monkeys) are considered highly susceptible. Indeed, other types of coronaviruses have been [transmitted](#) from humans to chimpanzees. The FWC’s [initial guidance](#) recommended taking “extra precautions against virus transmission” when working with nonhuman primates. And yet, the FWC’s recent recommendations fail to identify nonhuman primates as susceptible to SARS-CoV-2. Consistent with the existing evidence of possible disease transmission, the FWC must expand its guidance to include *all* regulated nonhuman primates.

The lions and tigers at the Bronx Zoo contracted SARS-CoV-2 at a time when [New York City](#) was the “epicenter of America’s coronavirus crisis.” Last week, Florida surpassed New York and [currently](#) has the second highest number of coronavirus infections in the country. [Despite](#) its soaring infection numbers, Florida is “still welcoming tourists and most businesses other than bars remain[] open.” Including, for example, the Zoological Wildlife Foundation (ZWF) in Miami. This facility is [advertising](#) for direct contact encounters with non-native felids (including lion cubs, a jaguar cub, and a serval) and nonhuman primates (including a baby spider monkey, a baby chimpanzee, a capuchin, and a lemur). The ZWF’s website states these “[e]ncounters can be done without masks or gloves.” As written, the FWC’s recommendations do not appear to cover the animals that the ZWF is advertising for encounters, which leaves these susceptible species at risk of exposure to SARS-CoV-2.

The FWC must act quickly to expand its guidance to include *all* regulated nonhuman primates and *all* regulated felids. Thank you for your attention to this important matter.

Very truly yours,



Michelle Sinnott  
Counsel, Captive Animal Law Enforcement