

March 3, 2016

Jack Rector
Area Director, Fort Worth Area Office
Occupational Safety and Health Administration

Via e-mail

Dear Mr. Rector:

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) to request that the Occupational Safety and Health Administration (OSHA) investigate a worker injury that reportedly occurred at the Fort Worth Zoo, in apparent violation of the Occupational Safety and Health (OSH) Act's general-duty clause, 29 U.S.C. § 654(a)(1).

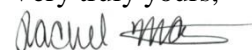
According to this [investigative report](#) and my conversations with the journalist who authored it, a Fort Worth zookeeper sustained a puncture wound during what the city ambulance service describes as an "elephant attack" that occurred when the keeper entered the enclosure of a male elephant calf. The worker was transported with serious injuries and hospitalized overnight. The zoo apparently failed to report the incident to OSHA. EMS records related to the attack do exist, but the city of Fort Worth has withheld them from PETA pending a decision from the state attorney general.

The hazards of managing elephants in "free contact," in which workers are not separated from multiton animals by a protective barrier, are indisputable. Since 1990, [dangerous interactions](#) with captive elephants in the U.S. have resulted in at least 18 human deaths—an astounding number given that there are fewer than 450 captive elephants in the country. And for each elephant-related death, elephants have caused numerous grave injuries to humans, including broken bones, crushed pelvises, collapsed and punctured lungs, degloving injuries, head wounds, and brain injuries.

Managing elephants in a protected-contact environment, where animals and keepers are always separated by a barrier, abates the danger that elephants pose to humans. Indeed, the Association of Zoos & Aquariums' [standards on the occupational safety of elephant care professionals](#) mandate that zookeepers "shall not share the same unrestricted space with elephants, except for certain, limited exceptions," including "crises or medical emergencies or for birth management." Elephant calf training is specifically "not considered to be [a] crisis or medical emergenc[y]" [*emphasis original*].

Please investigate this incident, hold the Fort Worth Zoo accountable to the fullest extent of the law, and require that the zoo implement protected-contact management. Please also hold the facility accountable for apparently failing to report its employee's hospitalization in accordance with 24 C.F.R. § 1904.39(a)(2). Thank you for your attention to this important matter.

Very truly yours,



Rachel Mathews
Counsel | Captive Animal Law Enforcement

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