

August 5, 2022

Robert Gibbens, DVM  
Director, Animal Welfare Operations  
USDA/APHIS/Animal Care

Via e-mail: [REDACTED] [animalcare@usda.gov](mailto:animalcare@usda.gov)

Re: Urgent Request to Investigate Apparent Animal Welfare Act Violations at  
Sea World LLC (License No. 93-C-0069)

Dear Dr. Gibbens:

I am writing on behalf of PETA to request that the U.S. Department of Agriculture promptly investigate Sea World LLC (license no. 93-C-0069) after an orca was attacked by other orcas and is in apparent need of urgent veterinary care.

Today, August 5, a concerned citizen observed and documented an orca being attacked by other orcas in the same tank. (*See Video.*) There is a large wound that can be seen on the right side of the caudal peduncle. (*See Photo.*) In the photo, another orca is blocking the caudoventral portion of the wound, so the wound could be even larger than what is visible in the photo. The wound appears to extend past the epidermis into the adipose or muscular tissues and will require medical treatment, including antibiotics and topical wound care and/or bandaging, in order to prevent infection and aid in proper healing. The orca can be seen in the video beaching themselves which is a highly unnatural behavior and appears to be the only way for the distressed orca to get away from their aggressors. Bullying among orcas is usually difficult to resolve once it starts and is often the result of stress due to confinement in crowded, cramped tanks. Because of this, separation of this orca in an adequately sized tank is necessary for the mental and physical well-being of this animal.

Please inspect this orca, as well as veterinary records, and ensure that she or he is receiving adequate veterinary care from a veterinarian who is trained and qualified for the species pursuant to 9 C.F.R. § 2.40. Sea World appears to be housing orcas who are not compatible in apparent violation of 9 C.F.R. § 3.109, which prohibits housing marine mammals who are not compatible in the same enclosure. "Marine mammals must not be housed near other animals that cause them unreasonable stress or discomfort or interfere with their good health." *Id.*

Please ensure that all animals at Sea World are being provided with adequate veterinary care, space, shelter, food, and water and are otherwise handled in accordance with the AWA. Please also hold Sea World fully accountable for all violations that you discover during your inspection.

Thank you for your attention to this important matter. Please inform me of the complaint number that your agency assigns to this correspondence.

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS  
FOUNDATION

Washington  
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

PETA FOUNDATION IS AN OPERATING  
NAME OF THE FOUNDATION TO  
SUPPORT ANIMAL PROTECTION.

ENTITIES:

- PETA U.S.
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Switzerland
- PETA Netherlands
- PETA Foundation (U.K.)

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. Payne', with a stylized flourish extending to the right.

**R. Mason Payne, DVM**  
Wildlife Veterinarian, Captive Animal Law Enforcement

[REDACTED]

cc: Laurie Gage, D.V.M., Big-Cat and Marine Mammal Specialist

[REDACTED]

**Photo Appendix**



Photo: A large open wound on the right caudal peduncle