

Zoos & Other National Animal Welfare Organizations

In order to compare the approach to zoos of other national animal welfare organizations with that of The HSUS, a letter of inquiry not indicating any affiliation with The HSUS, (See sample letter, Appendix D) was sent to the American Humane Association, the Animal Welfare Institute, the Animal Protection Institute, the Society for Animal Rights, Friends of Animals, the Fund for Animals, and United Action for Animals. Among these, only the Fund for Animals failed to respond. The varied responses indicate that these organizations may be divided generally into two groups: those which oppose the continuation of zoos under any circumstances and those which accept the continuation of zoos if certain conditions are met.

No organization gave any indication of having an organized program like HSUS's for dealing with zoos or of having a published policy regarding zoos. Neither did any organization indicate specific criteria, akin to The HSUS's rating system, for distinguishing among zoos.

Due to the varied responses of the organizations and limited access to their materials and publications, the following comments constitute only general impressions and do not purport to be thorough analyses of their programs and policies.

American Humane Association

In his response to the letter of inquiry, Mr. Dennis White, Director of Animal Protection for American Humane, stated that his organization "is not opposed to certain types of zoos and aquariums and feels they have a place in the world that is becoming increasingly ecology conscious and it supports the activities of

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properly managed zoos and aquariums." Mr. White went on to describe American Humane's general requirements for humane treatment for captive wild animals as "proper housing; space and shelter; adequate food and water to fulfill the animals' biological needs; prompt and good medical treatment and professional animal management as dictated by the species involved." While stating the organization's opposition to any zoo or aquarium which fails to meet those requirements, he expressed the sentiment that "modern, well run zoos and aquariums benefit animals by breeding and saving endangered animals, by educating the public about the value of wildlife preservation, and the recreational facilities for the public." He also indicated that although he has personally inspected a number of zoos, American Humane "does not have any particular department specializing in wildlife, zoos or aquariums. . . ." and "relies heavily on the information and other consultant services of the American Association of Zoological Parks and Aquariums."

Several years ago American Humane did have a Wildlife Consultant. In 1973 the Consultant was Richard Denney, who reported in a presentation to the American Association of Zoo Veterinarians at their annual conference that AHA had established (probably in the late 1960's or early 1970's) minimum cage requirements for captive wildlife--though he did not indicate how these were used or distributed. He also pointed out that AHA had assisted the Department of Agriculture in drawing up the minimum regulations for exhibitors under the Animal Welfare Act of 1970. According to Denney, "it was recognized that insufficient data exist to specify precise space parameters for [wild animals]," thus, "it [was] felt that the discretion and judgment of the USDA inspectors can best be guided by the condition of

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the subject animals in regard to postural attitudes and behavior" (See: The HSUS, USDA, and the AWA-1970).

Denney also indicated that AHA had conducted a questionnaire survey in 1972 in conjunction with the AAZPA, "to assist Representative Whitehurst in obtaining supportive and background information for the bill he introduced to form the National Zoological and Aquarium Corporation."

The Animal Protection Institute (API)

Ms. Cheryl Mouras, an investigator for the Animal Protection Institute, stated in her response to the letter of inquiry that, "although API has not made an official statement about views on zoos, [it does] feel that as a general rule animals should be left in their own natural habitat." However, she also noted that API endorses the efforts of zoos to propagate endangered species. She also stated that API "has worked closely with agencies associated with zoos when their support of legislation was similar [to API's]." She suggested that more information might be obtained from the AAZPA and from Jerry Owens of the Fund for Animals, and that Living Trophies by Peter Batten would be an "excellent, up-to-date . . . reference" for a report on zoos. Ms. Mouras also included several articles from API's Mainstream magazine including a review of Living Trophies, a description of an attempt to make the orangutan enclosure at the San Francisco Zoo more suited to the animals' behavioral needs, and a general description of some of the changes which have taken place in zoos over the past few years.

API appears to have neither a zoo program, nor a carefully thought out approach to the problems and shortcomings of zoos.

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Friends of Animals (FOA)

Friends of Animals replied to the letter of inquiry with an assortment of newspaper clippings (one of which concerns the cruelty to animals found in traveling petting zoos and quotes Sue Pressman extensively), published statements, and a short cover note from an Administrative Assistant stating, "Friends of Animals does not have police power, so we can not [sic] hold official investigations. When we have an unofficial investigation, and find violations of the Animal Welfare Act, we present our case to the media."

The assorted materials accompanying the note included a memo from FOA President Alice Herrington to FOA "letterwriters" dated 14 October 1977. It indicates that one of FOA's "continuing drives," conducted primarily through letter-writing campaigns to newspapers and government officials at all levels, would center around the "phasing out" of all zoos. Phasing out would be accomplished by prohibiting both the further breeding of captive animals and the acquisition of any animals from the wild. Municipal funds would be expended only to provide good care for existing zoo animals. Ms. Herrington states quite flatly that:

The zoo is an antiquated process, no longer educational since it cannot compete with documentary films of animals in their native habitat. Animals incarcerated in prisons, whether safari park or concrete cage, become psychotic; those born in captivity are no longer wild animals, and across the nation the vandalism at zoos is rampant. . . . [zoos] must be likened to Medieval English entertainment--street caging of insane people to be laughed and poked at by the passersby.

Ms. Herrington states her contentions again in the lengthy memo, but provides very scanty documentation to back them up. She stresses the profit making aspects of

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performing animal acts associated with safari parks and of the breeding of zoo animals. She cites performance-related reptile deaths alleged by employees of a safari park in Largo, Maryland, and in the same paragraph makes reference to the death of a young lion in a territorial dispute in the same park. It is far from clear exactly what points she is attempting to make, but there seems to be some implication that the reptile deaths as a result of overhandling are typical of animal acts associated with zoos, and the indication that "tourists watched on the roadside" while the competing lions fought to the death would seem to echo her contention that zoo visitors take perverse pleasure in watching animals suffer.

She condemns breeding programs in zoos with a reference to surplus lions ending up on the menus of gourmet restaurants and as targets in hunting preserves. She also contends that "breeding for unnecessary studies on animals is becoming more and more prevalent," citing alleged sales of marmosets from the Lincoln Park Zoo to "a Chicago hospital."

With respect to mortality in zoos she states: "The in-zoo mortality rate is high. One director reported 15-20% deaths." There is no attempt made to interpret the percentages other than a vague reference to the many "internal and external parasites, bacilli and viruses" zoo animals provide "for the scientists."

The concluding paragraph of the memo makes the very sweeping statement that "a very small percentage of animals shipped to zoos survive the rigors and horrors of transportation." She cites an unnamed "Chicago reporter" as asserting that "a number of species have been nudged toward their present rare or endangered status

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by collecting." Although it is not so stated, the implication is that such collecting was done primarily for zoos.

The 1975 Annual Report for the Committee for Humane Legislation (the lobbying arm of Friends of Animals) indicates that representatives of the Committee testified against H.R. 70, the Federal Zoo Accreditation Board bill, on the grounds the bill would provide funding for research on zoo animals. CHL also maintained the bill would provide "no financial help whatsoever to the quality of care for the captive animal."

In his testimony for CHL on two bills which were similar to H.R. 70, Attorney Bernard Fensterwald offered conflicting statements regarding the continuation of zoos. On the one hand he claimed: "Zoos and Aquaria are outmoded, inhumane institutions which, year by year, serve a less important function in our society," and he declared that CHL opposed a "federal bail-out program" for them (U.S. Cong., 1974, p.36). But further in his testimony he stated that "we [CHL] are not in favor of abolishing zoos, and I very carefully steered clear of that because that is not our position" (p.41). Doubtless this equivocation led to the conclusion on the part of a number of zoo people that humane societies could not be trusted to state their true feelings about zoos: that zoos should be eliminated.

United Action for Animals (UAA)

Ms. Eleanor Seiling, President of United Action for Animals, indicated in her response to the letter of inquiry that UAA is presently so involved in lobbying for laboratory animals that it may never get to the "masses of new information" it has accumulated regarding zoos. She further stated that the considerable work

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that UAA did at one time with respect to zoos was "to no avail" because it was "'no-goal' work, with no legislation or other corrective measures to point to." Because of UAA's interest in the use of animals in reserach and testing, the information she refers to probably includes evidence of studies on zoo animals which Ms. Seiling would consider to be cruel--and no doubt useless--research.

In 1973 and 1974, UAA issued an "alert" warning that Representative Whitehurst's bill, H.R. 1266, to establish a National Zoological and Aquarium Corporation would "turn our zoos into centers for animal experimentation." UAA attacked both the American Humane Association for its open promotion of the bill, and The HSUS for what was referred to as its tacit promotion of the bill. The UAA alert charges: "The Humane Society of the United States in fact tacitly promoted the bill, calling for better 'conditions' in the zoos for purposes of 'education' which is precisely the aim of the bill, because today 'education' means the abuse and torment of animals."

In a 1975 UAA Report, "Time Runs Out For Zoo Animals," Ms. Seiling continues her attack on the federal zoo control bills--in this instance H.R. 70--and The HSUS. Also in this report she gives what amounts to UAA's policy on zoos. She argues against the captive breeding of endangered species on the basis that these animals would be used to restock the wild only to:

ultimately provide a 'sustained yield' of the animals and their products for man's continued consumption. . . . [including] research, hunting, trophy collecting, trapping for their skins, falconry. . . . In brief, the zoo bills would recycle zoo animals and wildlife to suffer the same fate to which mankind has subjected them throughout recorded history.

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The logical conclusion of Ms. Seiling's argument, of course, is that only extinction provides wildlife protection from suffering. The report, however, does not take the reader beyond the first premise.

Ms. Seiling continues her condemnation of breeding by making reference to the overcrowded conditions caused by surplus animals. She refers to the "millions of animals" in urban zoos, a statement not supported by fact as there are apparently only about 600,000 mammals, birds, reptiles and fish in all the zoos in the world (U.S. Congress, 1974, p.44).

Seiling makes a distinction between experimentation on, and observation of, animals. She states flatly that "it is NOT POSSIBLE to experiment on animals without interfering with their health and welfare." She considers any statements by legislators to the effect that research in zoos could only be of the sort to benefit the animals as "doubletalk." Seiling cites experiments conducted on deer mice at the Oklahoma City Zoo and blood studies on monkeys at the San Diego Zoo as evidence that zoos are involved in needless, painful research on their animals. The Report does not give sufficient evidence to enable readers to determine whether these experiments were needlessly painful, or whether they might have resulted in some tangible benefit to animals in the zoo or in the wild.

Seiling distinguishes in the Report between The HSUS's approach to zoos and her own. She charges that HSUS and Sue Pressman put a "stamp of approval" on prey killing experiments with captive animals and then kept the information "secret" from the Society's members. According to The HSUS files, Sue Pressman and Regional Investigator Bernie Weller did investigate reports of prey killing experiments at

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a Lion Country Safari in California. They were told, according to an official HSUS memorandum, that the experiments had already been discontinued because of the adverse reaction of the staff members.

If Ms. Seiling's reporting of The HSUS's Zoo Program is biased, her definition of research in the zoo is equally so. She states: "In nutritional research 'for the animals' own benefit', for example, the test animal must either die or be killed terminally from. . . . overdosing of nutrients, or deprivation of nutrients." Her definition of education is equally tendentious: "The HSUS wants more breeding and more education, as if people get 'educated' by staring at captive animals as they do at a freak show."

In addition to her objections to the alleged research conducted on zoo animals and the lack of educational value of zoos, Seiling also makes reference to the mortality rate in zoos. She cites a list of causes of death cited in the 1972 annual report of the National Zoo. She concludes with a statement that "a zoo director recently revealed that the usual mortality rate of captive animals in zoos range between 15-20%" as though a percentage should be meaningful in and of itself. This assertion is followed by the appeal to "phase out zoos and give the animals a chance to live - in their own way, in their own homes, without further harassment and exploitation by mankind." She argues that zoos should be phased out "because of the high mortality rate of captive animals that neither The HSUS nor any other wildlife groups talk about."

The Society for Animal Rights (SAR)

The Society for Animal Rights was formerly known as the National Catholic Society

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for Animal Welfare, and its President Helen Jones was one of the original founders of The Humane Society of the United States in 1954. No information has surfaced to indicate exactly when SAR began to make comments upon zoos, but its current position is patently anti-zoo.

Ms. Jones herself replied to the letter of inquiry and stated SAR's conviction that it "is opposed to zoos as to all forms of exploitation of animals. We believe that existing zoos should be phased out and that no new zoos should be built." She enclosed copies of SAR Reports which describe the organization's attempts to close the Central Park, Prospect Park, and Flushing Meadow Zoos in New York City and transfer the zoos' animals to the New York Zoological Society's Bronx Park Zoo. SAR suggested that the Bronx Zoo could afford to take the animals if it halted its 14 million dollar planned expansion including a new exhibition of Asian animals. The case was in the courts in New York from 1975 until 1978 when the Appeals Court, New York's highest, upheld a lower court decision that SAR did not have standing (the right to sue) in the case, although the judges apparently agreed that the charges of cruelty to animals were true (SAR Report, November-December, 1978).

Ms. Jones is adamant in her opposition to zoos, claiming they have only negative educational value. In response to the question, "what do children learn in zoos?", she replies:

They learn that adults sentence animals to life imprisonment behind bars although the animals have committed no crime. They learn that animals have been transported thousands of miles from their native habitat to cramped quarters where they are deprived of all of the natural stimulus of life, to be stared at and laughed at by humans. They learn that some animals rock back and forth and

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circle endlessly. No one tells the children that such stereotyped behavior is a sign of mental stress to the point where the animals are suffering from severe mental illness. They learn from signs on cages that animals capable of running great distances at high speed are confined to small concrete cubicles; that nocturnal animals are subjected to light; that animals are deprived of privacy; that boredom is so severe that some animals are given to pushing their own excrement around their cages; that climbing animals must sit on the floor. The list of maleducational effects of zoos is long.

The alternative to the "maleducational effects of zoos," she says, is films: "Children, and adults as well, can learn infinitely more about wild animals by watching films of animals in their native habitat, with an off-camera narrator but no on-camera humans, than they can by visiting zoos."

Though she does not cite in her SAR Reports any specific deficiencies in any zoos other than the three New York zoos included in the SAR lawsuit, Ms. Jones' catalog of the inadequacies of zoos includes all zoos--even the Bronx Zoo--by implication, and she does flatly assert that they should all be phased out.

The SAR Report for February 1980 indicates that the society has purchased all of the remaining copies of Living Trophies from the publisher and is making them available to its constituents at a special reduced price. SAR apparently does not question any of author Peter Batten's sweeping assertions (See: Criticisms and Praise of The HSUS Zoo Program, The Zoos' Consumption of Wildlife, The Disposition of Surplus Animals & Mortality Rates). SAR's subjective appraisal that "Living Trophies is unique among books on zoos because it is written with respect and concern for the captive animals and with a keen awareness for their needs" does not withstand close scrutiny, as there are a number of books about zoos which appear to express both concern for captive animals and awareness of their needs.

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Among them are: Man and Animal in the Zoo and Wild Animals in Captivity by Heini Hediger; Animal Gardens by Emily Hahn; The World's a Zoo by John Perry; and Lifeboats to Arrarat by Sheldon Campbell. All of these books reveal their authors' sincere affection and sympathy for wild animals as well as their understanding of both the strengths and shortcomings of zoos and their administrators.

The Fund For Animals

The Fund for Animals did not reply to the letter of inquiry, but information in The HSUS zoo files and a review of assorted literature from The Fund indicates the organization has been involved in zoo investigations from time to time. From a statement in one of its newsletters (undated, but probably from 1974, Vol. 6-No.2), it appears that The Fund makes the same distinction between good and bad zoos as The HSUS, but with less specific criteria:

Visit your local zoo. If the zoo is humane, congratulate the officials. If it's not, find out WHY. If money is the problem, form a group to help raise some. BUT, if money isn't really the problem, and they don't care about the animals, go to town. Get in touch with The Fund, ask for our Zoo "So You" pamphlet. Form a protest committee, get pictures, contact the local media, etc.

The same newsletter declares that "From New York to Los Angeles, The Fund for Animals is moving on a broad front on zoos, animal farms and pet shop exotics."

Another newsletter (not dated, Vol. 8-No.2, probably 1976) declares The Fund to be an "affiliate" of "United Animal Keepers," a "union" of zoo keepers, formed to "bring pressure on zoo administrations to correct instances of animal maltreatment." United Animal Keepers is also referred to as "a humane organization of animal keepers," and The Fund declares its feeling that "zoo problems originate largely

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from poor administrations rather than keepers." This same article contains The Fund's "Zoo Bill of Rights" which declares the rights of zoo animals:

to sufficient medical care to maintain health. . . . to quarters that are healthful, clean, safe, and as close to natural habitats as is humanly possible. . . . to a diet that is determined by qualified experts to be sufficient for [the animals'] healthy maintenance. . . . to freedom from harassment, whether malicious or innocent, and from being fed inappropriate food by visitors. . . . [and the right not] to be sold or donated to any individual without prior guarantee of the above rights.

The "Zoo Bill of Rights" also states that zoos shall:

maintain personnel in sufficient numbers and training to provide constant protection for animal health and comfort. . . . maintain sufficient equipment determined by qualified experts as necessary for the protection, health, and emergency care of each and every animal species; no animal shall be acquired by zoos unless and until such equipment and facilities are available. . . . [and] zoos shall not destroy or exploit exhibited animals in their care as fodder for any other animal; no animal shall be destroyed without the consent of medical personnel.

The tenth and last article declares: "The above enumerated rights of all animals in zoos shall not be abridged by any consideration of administrative convenience, ease, or any other reason."

While the "Bill of Rights" does cover most aspects of animal welfare, it does not indicate whether The Fund has any criteria for zoos regarding education or conservation. Absent also in the various newsletter articles is any mention of the problems of municipal interference or antiquated structures in zoos. It is also unclear how one would determine whether money is actually, rather than only apparently, causing a zoo to be substandard.

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In his book Man Kind? Our Incredible War on Wildlife (1974), Cleveland Amory, The Fund's President, dwells briefly on the negative aspects of zoos. He makes the rather garbled accusation (p.322): "Almost any animal in at least some zoos is subject to almost total persecution. And certain animals in even good zoos would qualify."

Earlier in the book he criticizes the New York Zoological Society for not openly opposing sports hunting "except of endangered species" (p.71). He mentions the zoo's famous collection of big-game trophies, the "National Collection of Heads and Horns," but gives the Society credit for closing the collection to the public. No mention of the Society's numerous conservation efforts is made.

Amory's only positive reference to zoos is his reference to the San Diego Zoo as "the greatest of American zoos" (p.326). The attribution is unaccompanied by any explanation.

In the Politics of Extinction: The Shocking Story of the World's Endangered Wildlife (1975), Lewis Regenstein, The Fund's Executive Vice President, speaks of the zoos' "decimation of wildlife" (pp.121-123). He gives no figures for numbers of animals imported specifically for zoos, but cites the total number of animals imported during a given period of time by zoos, the pet industry, and research interests (See: Zoos: Pro and Con/The Zoos' Consumption of Wildlife). He cites a statement made by former Assistant Secretary of the Interior Nathaniel P. Reed (though he fails to indicate that Reed's remarks were made at The HSUS Annual Conference in 1973) as saying that the Portland, San Francisco, Central Park, and National Zoos are "convincing evidence of inhumanity" (p.123). No specific examples of that inhumanity are cited.

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Regenstein makes no mention of the conservation efforts of zoos, but he does indirectly compliment the New York Zoological Society in his reference to the international conference in Washington in 1973 which led to the Convention on International Trade in Endangered Species (CITES). He mentions that Wayne King of the NYZS was among the delegates at the conference, and states that the U.S. delegation "working day and night, fought hard for a strong, effective treaty, and in the end managed to obtain most of the provisions wanted. . . . [including] a permit system clearly documenting trade in any individual animal, or any part or product thereof, listed as endangered" (p.151).

Regenstein has been quoted in the Christian Science Monitor (Van Slambrouck, 1978) as saying that The Fund is "an organization bent on improving zoos rather than phasing them out." The HSUS files indicate that workers from The Fund have been involved with a number of zoos, such as the Lion Country Safari in West Palm Beach, Florida, and the Audubon Park Zoo in New Orleans, at the same time as The HSUS. In one newsletter article (Vol.6-No.2), The Fund takes credit for "revamping" the New Orleans' Zoo by threatening the "arrest of [the] whole zoo." Another newsletter (tenth anniversary issue, 1977) indicates that Fund representatives filed cruelty charges against the foreman of the Van Saun Park Zoo in Paramus, New Jersey.

The HSUS files also indicate that on at least one occasion a Fund representative asked for Sue Pressman's assistance with a zoo. Fund Representative Florence Schippert asked Sue to inspect the Lowery Park Zoo in Tampa, Florida in 1971. Although The Fund has not taken an overtly anti-zoo position, its stance has been interpreted as such by some members of the zoo world. In a booklet distributed by

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ZOOACT (See: Zoos Respond To Their Critics), George Steele makes a reference to Amory's book:

A favorite propaganda device [of humane organizations] is to carefully select isolated examples of bad zoological management and practices and then unfairly paint all zoos with one brush, falsely alleging, or implying, widespread mismanagement and inhumane treatment by all zoos. For example, the renowned columnist Bob Considine, in reviewing the recent book Man Kind written by Cleveland Amory, President and founder of The Fund for Animals, directs a scathing attack at all zoos in the U.S., saying "zoos by and large are operated today with all the insensitivity and neglect that prevailed in this country a century ago."

Apparently the relationship between zoos and The Fund has improved in the past few years. In his "Legislative Update" to the AAZPA in 1979, George Steele reported:

Speaking of telephone calls, perhaps nothing more dramatically demonstrates the point that we are trying to make [that ZOOACT has been effective in improving relations between humane organizations and the AAZPA] than an early morning phone call we received recently from Mr. Louis Regenstein of The Fund for Animals. Many of you will recall that Lou was one of the most severe critics of the zoological profession, our requests and applications for permits, and our efforts to simplify permitting procedures. Lou's last telephone call, however, was not to challenge or question or criticize, but was rather to inform us that the environmental community had suggested to the President that he send us one of the pens used to sign an amendment to the Fishery Conservation and Management Act, providing additional protection for whales. Lou indicated that the environmental community had informed the White House that without our assistance, this amendment would probably have never passed.

The Animal Welfare Institute (AWI)

Through its "lobbying arm," the Society for Animal Protective Legislation, the Animal Welfare Institute and its well-known spokesman, Mrs. Christine Stevens, have presented more testimony on zoo-related legislation than any other national animal welfare organization. Mrs. Stevens' participation in the hearings which

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led to the passage of the Animal Welfare Act of 1970 has already been discussed, as has, to some extent, her testimony on the bills to provide federal assistance to zoos and aquariums (See: The Federal Regulation of Zoos, and The HSUS Zoo Reform Program).

The Publications Secretary who responded to the letter of inquiry did not indicate that AWI had a written policy regarding zoos or had ever instituted any organized program of zoo reform. She indicated only that although the AWI "does not lobby," it does "consider the Animal Welfare Act to be valuable legislation and think[s] the regulations should be strengthened." The AWI publications she enclosed contained two very different sorts of references to zoos.

One AWI publication, Comfortable Quarters for Laboratory Animals, which deals primarily with the kind of confinement usually associated with research facilities, contains an article by Drs. Markowitz and Schmidt on "Behavioral Engineering As An Aid in the Maintenance of Healthy Zoo Animals" (See: Zoos: Pro and Con/Modifying Zoo Exhibits to Meet the Animals' Needs). This is a very positive article from the zoos' standpoint which describes the efforts made in three zoos to provide more stimulating environments for certain animals, and the added benefits they provide for the health care of the animal and the education of the public.

The article pertaining to zoos in the other publication, Humane Biology Projects, encourages students to conduct behavioral studies of zoo animals (as an alternative to performing painful experiments upon animals as part of their school science training), and also warns them to be alert to the "thoughtless exploitations" they might find in zoos. This very short article also contains a list of questions

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to be asked in "Evaluating Your Local Zoo." The questions are taken from Living Trophies by Peter Batten, and end with Batten's own caveat:

The first part of each question should be answered YES. If this is not so, ask to see the zoo director or his assistant--not the public relations person or 'educational curator'--and ask WHY; then brace yourself for evasive answers or rhetoric.

This tone reflects the same suspicion about zoos that was evident in Mrs. Stevens' testimony before the Senate subcommittee in 1974. In expressing her belief about the extent of neglect in zoos, she said it was "incredible, much more serious than. . . we know," and charged that zoo directors "cover up whenever anything is wrong." Although she did declare that "we endorse entirely the idea of the educational importance of zoos, but they are not as educational as they should be by a long, long shot." She cited the AAZPA's opposition to the USDI's model state bill in 1969, and charged AAZPA with playing "a leading role in keeping The Animal Welfare Act regulations as minimal as they are while humane societies are trying to raise them" (U.S. Congress, 1974, p.63). She stated that AAZPA's majority influence on the proposed federal zoo board would "lead to a proliferation of mediocrity at a time when the public expects genuine changes in the whole zoo concept" (p.64).

In spite of this essentially negative view of zoos and tendency to see instances of apparent neglect as the "tip of the iceberg" rather than as isolated and generally unintentional (which is the way The HSUS, more often than not, has seen them), Mrs. Stevens has been included in the "Zoological/Environmental" conferences initiated by ZOOACT.

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Defenders of Wildlife

In 1974, after a decade of drawing public attention to the plight of animals in roadside zoos, Defenders of Wildlife reduced its emphasis on the issue and phased out the position that Cecile O'Marr had held since 1969. The change in emphasis was due, according to John Grandy, Defenders' Executive Vice President, to an "increased level of activity" on other issues. Toby Cooper, Defenders' Programs Director, says the organization could not justify continuing to support one full-time staff person on that issue alone. Although Mrs. O'Marr contends that her program was always self-supporting.

In recent years roadside zoos have continued to be investigated and exposed by Defenders' regional representatives, although Defenders has never made it a point to "watchdog" USDA's enforcement of the Animal Welfare Act. The regional representatives have followed Defenders traditional approach of photographing roadside zoos, attempting to embarrass the owners, and making bad conditions known to citizens and legislators in areas where the zoos are found. Grandy believes the regional representatives have brought about a number of positive changes in some zoos with this approach and have even managed to close approximately twenty of them.

Before she left the organization, Cecile O'Marr had begun to express in her column in the magazine what amounted to opposition to all zoos, but Toby Cooper maintains that Defenders is not opposed to zoos in principle. John Grandy says Defenders does not have a written policy on zoos, but that its unwritten policy is very similar to that of The HSUS. Defenders is unalterably opposed to roadside

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zoos, but feels the relative merits of other zoos must be considered on a "case by case basis." Grandy indicates he personally does not like to see wild animals in captivity, but says his organization supports the efforts of zoos to breed animals in captivity as a means of reducing the drain on wild populations.

Even though they were unable to cite specific figures, both Grandy and Cooper declare that the organization continues to receive a number of letters from people expressing their opposition to conditions in roadside zoos. Articles in the magazine always result in a volume of mail, they contend. Cooper adds that Defenders has never received any mail from its constituents indicating the organization's concern for roadside zoos is misplaced.

Both Cooper and Grandy believe a campaign against roadside zoos would galvanize considerable public sentiment against these zoos, and could "get Congress moving" to pass legislation to close them. They have no plans to undertake such a campaign, however, and Grandy believes it would cost as much as \$400,000.00 and would take a three-year multi-media campaign to produce the desired result. He further believes there would be considerable opposition to a move to legislate roadside zoos out of existence from roadside zoo owners, AAZPA, and ZOOACT.

A recent article in Defenders Magazine concerning the Central Park Zoo quotes Sue Pressman and describes The HSUS system for rating zoos. Additionally, Sue has been consulted by Defenders' New England Regional Representative Teresa Nelson concerning proposed minimum standards for roadside zoos which Nelson is preparing for the legislature in Maine.