



IN DEFENSE OF ANIMALS

May 19, 2009

Elizabeth Goldentyer, DVM
Regional Director
USDA-APHIS Animal Care
920 Main Campus Drive, Ste. 200
Raleigh, NC 27606

VIA FAX: 919/855-7123

Dear Dr. Goldentyer:

Please consider this letter an official complaint regarding the May 15, 2009 death of Affie, a 39-year-old African elephant at the Brookfield Zoo in Illinois.

We ask that you investigate the circumstances surrounding Affie's death and, specifically, zoo conditions that may have been causal factors. There is a high probability that this middle-aged elephant suffered from foot disease and/or arthritis, excruciating and often-fatal ailments caused by inadequate zoo conditions, including lack of space for movement and hard, unyielding surfaces that damage elephants' feet and joints. These conditions are found at the Brookfield Zoo.

Facts supporting this contention include:

- Brookfield Zoo installed specialized flooring several months ago and provided a sand pile for Affie to lean on, strongly suggesting she was suffering from serious foot disease and/or arthritis. Sand piles, which help ailing elephants to lie down and alleviate pressure on painful feet and joints, and softer substrates are often prescribed for individuals suffering from these conditions.
- A keeper checked on Affie at 4 a.m., a time when keepers are not normally working. This suggests the elephant may have been closely monitored and that her health was of serious concern to the zoo. Ailing elephants often collapse overnight and are unable to rise, only to be found in the morning when keepers arrive. Some have been discovered dead, while others died shortly after being found down in their pens. Many suffered foot disease and/or arthritis, which precluded them from being able to right themselves.
- Elephants at the Brookfield Zoo are held in a small enclosure of about a quarter acre. However, during the region's notoriously long winters, freezing weather forces them indoors, where they spend the majority of their time in tiny cages. (Mean temperature from December through February is 30 degrees or below, and does not rise above 40 degrees until April.) Restricted movement and hard surfaces (specialized flooring was only recently installed) are key factors for foot and joint disease.
- At least two elephants at Brookfield Zoo died from severe arthritis.

If in fact Affie did succumb to a disease caused by zoo conditions, the Brookfield Zoo should be found in violation of the Animal Welfare Act, which requires exhibitors to maintain animals under conditions that are conducive to their health and well-being and also to practice preventive measures to avoid injury and death, according to the following sections of the Animal Welfare Act:

Section 2.40(b)(2) which requires the use of appropriate methods to prevent diseases and injuries;

Section 3.128, which states that enclosures shall provide "sufficient space to allow each animal to make normal postural and social adjustments with adequate freedom of movement. Inadequate space may be indicated by evidence of malnutrition, poor condition, debility, stress, or abnormal behavior patterns."

The Brookfield Zoo's suggestion that Affie was a geriatric elephant is without merit, and should not be accepted as an excuse for any serious health problem caused by captive conditions. A recent study published in the journal *Science* (Dec. 2008) reports that the median life span for female elephants undergoing natural mortality at Kenya's Amboseli National Park is 56 years. Yet, despite receiving regular daily and veterinary care and being provided a nutritious diet, Affie died almost 20 years earlier than the age expected for her wild counterparts. Seven elephants have died at the Brookfield Zoo since 1975; more than half did not live to age 40 (four Africans, three Asians).

Elephants are highly intelligent and physically vigorous animals that hail from warm climates. In the wild, they range seven to fourteen miles or more per day, and are active for 20 out of 24 hours, as they forage, explore, socialize and raise their young. Brookfield Zoo's cramped elephant exhibit just does not provide the space, natural conditions, or climate elephants need to live long and healthy lives. This is being proven with the death of each additional elephant.

IDA urges the USDA to fully investigate the conditions surrounding Affie's death at the Brookfield Zoo, including all medical records and necropsy reports, and to take timely and appropriate action to strictly enforce the Animal Welfare Act.

Sincerely,



Elliot M. Katz
President