



**United States Department of Agriculture**

Office of the Secretary  
Washington, D.C. 20250

**JAN 23 2020**

The Honorable Richard Blumenthal  
United States Senate  
706 Hart Senate Office Building  
Washington, D.C. 20510

Dear Senator Blumenthal:

Thank you for your letter of December 18, 2019, regarding the welfare of animals at Commerford Zoo and requesting information about the recent deaths of two elephants at that facility.

U.S. Department of Agriculture takes very seriously its responsibility to protect animals covered by the "Animal Welfare Act," (AWA) and appreciates your concerns. Our Animal and Plant Health Inspection Service (APHIS) enforces the AWA and is dedicated to ensuring the welfare of covered animals.

I have asked APHIS to provide responses to your numbered questions. Please find that information enclosed.

If you have any further questions, please have a member of your staff contact USDA's Office of Congressional Relations at (202) 720-7095.

Sincerely,

A handwritten signature in blue ink that reads "Sonny Perdue".

Sonny Perdue  
Secretary

Enclosures

**U.S. Department of Agriculture  
Response to Senator Blumenthal  
Animal Welfare Act (AWA) Regulation of Commerford Zoo**

**1. What were the initial and final causes of death for elephants Karen and Beulah?**

Karen's cause of death was kidney disease. Beulah died of septicemia from pyometra (uterine infection).

**2. Could those deaths have been prevented?**

USDA believes that appropriate veterinary care and intervention was administered to Karen and Beulah. Commerford's attending veterinarian was directly involved with the medical care and assessment of Karen and Beulah for both routine preventative veterinary care as well as medical issues and concerns relayed by the licensee. The attending veterinarian routinely consulted with several veterinarians experienced in the care of elephants to develop treatment plans for both Karen's renal disease and Beulah's urogenital disorder. Facility personnel followed the attending veterinarian's instructions for both elephants and had frequent communication with him to update him on the elephants' conditions. Some of the diagnostic testing and treatment performed on the elephants included physical examination, blood testing, diet modification, increase in fluid intake both orally and per rectum (in order to help the impaired kidneys flush out waste products), and prescribing medications as indicated based on clinical signs.

**3. What is USDA's role after unexpected exotic animal deaths?**

In such situations, USDA evaluates the circumstances of the death and determines if noncompliance with the AWA caused the death. If an AWA noncompliance resulted in an animal's death, the noncompliance would be cited on an inspection report, and if appropriate, enforcement action would be considered.

**4. How does USDA ensure that the veterinarian performing the necropsy is qualified and renders an independent opinion?**

Necropsies involve both gross necropsy and the submission of tissues and samples for histopathology and other types of laboratory tests. During a records review, APHIS inspectors can verify that the necropsy report includes notes on all body systems and that samples were collected and submitted to an appropriate laboratory for diagnosis. In the Commerford case, the necropsy report noted the necropsy was performed by three veterinarians—the attending veterinarian and two other veterinarians from different veterinary practices. The samples were submitted to Cornell University Diagnostic Lab for histopathology.

**5. Why did Commerford Zoo continue to pass USDA inspections under the AWA despite the premature deaths of two elephants?**

Licensees are required to be in compliance with the AWA in providing appropriate veterinary care for their animals. The Commerford Zoo provided documentation that Karen and Beulah were under veterinary care at the time of their deaths and that the care provided was appropriate. Our discussions with the attending veterinarian confirmed that appropriate care was rendered.

**6. Please provide Commerford Zoo inspection reports dating back to 2010.**

We are enclosing the requested inspection reports for your review.