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My name is Adrienne Mock, and I am the current Legislative Vice President and Arkansas State Coordinator for the American Federation of Aviculture (www.afabirds.org). While my main focus is avian species I also take interest in regulations regarding possession of other exotic species in general and various species in particular as these can easily be changed to include my animals of interest.

Personally, and through online associations I am familiar with many individuals who keep exotic species including reptiles (non-venomous and venomous), hoofstock, various exotic mammals and more. They care about and love THEIR animals just as much as you and I love our dogs, cats and other domestic animals. In addition, they generally love teaching others about their animals. Education eliminates fear.

Bans such as this proposed ordinance (ORD. 2023-130) will harm animals, some of which are endangered in the wild, and people. I have been following and working on regulations and legislation pushed by animal rights organizations, which strongly oppose any and all human-animal interactions for any reason. They have stated on numerous occasions that they plan to work towards eliminating all human-animal interactions using legislative action and the ballot box if necessary. In past years, federal bills were proposed to ban all exotic species from human care. H.R 669 (2009) and HR 996 (2013) both failed and died. Animal rights organizations stated that they would then work at local and state levels to enact bans, and when they had enough of these in place, they would move for yet another all-encompassing federal ban. This proposed bill is more of the same- entirely emotion and fear based pushed by animal rights extremists, with little to no science (or reason) behind it.

It simply pushes exotic species closer to the stated goals of animal rights extremists – “until there are none”.

While I commend Richmond VA for their oversight and desire to keep the citizens of Richmond VA safe, this proposed regulation will NOT do that. There are some extreme issues with this regulation as proposed.

The exotic bans proposed appear to be following the trend of banning ALL non-native species. This is a solution in search of a problem. I did some broad research on animal injuries to humans within the Commonwealth of Virginia and the US for various years. The most common animal attacks resulting in injuries to humans in the entire US are domestic dogs. From this paper <https://rga.lis.virginia.gov/Published/2006/RD275/PDF> the following information on dog bites:

“Although the number of fatalities from canine attacks is relatively low, many more people are victims of dog bites each year. The Centers for Disease Control and Prevention (popularly known as the CDC) has estimated that there are 3.73 million nonmedically treated dog bites each year, with an additional 757,000 requiring medical treatment (a total of close to 4.5 million bites).⁶ Of the 757,000 bites requiring medical attention, around 334,000 bites are treated in emergency room visits.”

So HERE is an animal that lives in our homes, and causes great harm/ injuries and even deaths to humans, yet is not banned in Richmond VA!

Livestock (also not banned in Richmond) cause injuries and fatalities:

<https://www.intechopen.com/chapters/40418>

“In a survey of US farm operations 1993-1995, the National Institute for Occupational Safety and Health (NIOSH) found that livestock was the number two cause of nonfatal injuries (99,310 injuries), almost the same as machinery, which was the number one cause of injuries (99,402 injuries). The rate of nonfatal occupational injuries from 1993 to 1995 was 7 per 100 workers on livestock farms, and cattle/hog/sheep operations had the highest number of injuries by type of farm operation. Of the injuries, 37% were due to horses and 31% due to cattle (Myers, 2001). The major source of injuries on US farming operations were machinery excluding tractor (21.3%), livestock (20%), and slips, trips, and falls on working surfaces (8.5%). Beef, hog, or sheep operations were found to have the highest number of lost work-time injuries (84,736) and restricted workdays (1,869,561). When looking at activities in which workers were injured, 45.7% involved livestock handling. When looking at restricted workdays by source of injury, livestock were responsible for the largest percent (34.9%), followed by machinery. [Austin \(1998\)](#) studied nonvenomous animal related fatalities in the workplace 1992-1994. She found that about 40 deaths per year occur, and 27 of these occur in farmers. Of 144 deaths obtained using the US Department of Labor (US DOL) Census of Fatal Occupational Injuries (CFOI), there were 22 transportation fatalities involving animals. Of the 122 non-transportation deaths, 68 were due to cattle and 41 from horses, and 13 from other animals. Bulls caused 54% of the cattle related deaths. Of workers that were farmers, cattle caused 54 deaths and horses caused 27 deaths. Of the deaths from cattle, 40% were due to multiorgan trauma, 35% trauma to trunk and chest, and 18% from head trauma. Of the horse-related deaths, 46% were due to head trauma.”

And this:

“According to the Bureau of Labor Statistics, from 1992-1997, more than 75,000 workers received injuries and 375 workers were killed from animal-related injuries. Cattle are responsible for most injuries caused by farm animals. A 1997 study conducted by Oklahoma State University (OSU), Biosystems and Agricultural Engineering Department, found 150 cases of cattle handling-related injuries among 100 Oklahoma cow-calf operations. The study also showed that more than half of the injury cases resulted from human error ([Hubert et al., 2003](#)). In 2002 alone, 730 deaths and 150,000 disabling injuries occurred on U.S. farms. Each day, about 500 agricultural workers suffer lost-time injuries, 25 of which result in permanent impairment. Farm operators and their family members accounted for most of the injuries reported ([Myers, 2003](#)).

As for invasive species and the potential for zoonotic disease, look no further than your furry domestic housecat (*Felis catus*). This species is an introduced non-native, invasive species that is responsible for the destruction of hundreds of species of native wildlife annually. Then there is the spread of disease (toxoplasmosis), rabies, “cat scratch fever” caused by the bacterium *Bartonella henselae*, among other things. Yet we do not ban them – indeed they live in our homes, sleep in our beds with us and sit on our laps!

Much more information is available online. In short, the animals that are ALLOWED can cause severe injuries and deaths; few to no issues come from the proposed banned species.

I also looked further for information on harm/injuries from exotic species. As I have many contacts including those in the zoological industries, it turns out that nearly all injuries are to the people who keep and work closely with these animals, not to the public at large. Again, a solution searching for a problem.

Venomous reptiles are always on the "hit list" (because most people are afraid of snakes in general) yet nearly ALL bites (usually from snakes) are from NATIVE venomous reptiles, and occur when humans try to kill them, handle a snake they THINK they have killed, stepped on one or stuck hands into places they shouldn't.

As far as captive venomous reptiles, very, very few incidents occur NATIONWIDE.

From a reptile expert: **"The statistics for death from captive venomous snakes and captive large constrictor snakes is about the same. Less than 1 every two years or less than .5 annually. Always to a person inside the facility or owner and never to a member of the general public."**

So, WHO are we protecting??

I compare regulations like this to the laws regarding driving a motor vehicle while under the influence. This is ILLEGAL in EVERY state, yet individuals are commonly caught doing just that! Often with multiple violations, and continue to drive even after losing their license- and can end up injuring or even killing someone else. Yet, we do not BAN vehicles!

The issue that started all of this in other counties was an individual who was keeping species of reptiles that are ALREADY ILLEGAL TO OWN without permits from the Commonwealth of Virginia. A regulation/ban would have made no difference. If people are doing something that is ALREADY illegal, new regulations will not change anything. This will simply harm responsible animal owners and their animals.

The Commonwealth already has regulations in place for ownership / permits to keep various species of exotic animals. So why is Richmond using taxpayer dollars to "reinvent the wheel"? May I suggest that instead of BANNING species, the County simply add "Richmond regulations for non-native exotic species will follow the regulations set forth by the Commonwealth of Virginia". Permits to keep venomous reptiles, various exotic mammals and other animals will provide the needed oversight. This will allow people to keep their pets, and allow tracking.

Simple, short, to the point. And no one is hurt by having to get rid of their animals. In my opinion, the grandfathering rule that was added is simply cruel to animal owners – "death by a thousand cuts", waiting for their animals to die with no means of replacing them. I wonder if we changed the context – a family pet (dog, cat). Who wants to be the first to tell little Billy or Suzy that they have to wait for their pet to die, and never EVER have another dog or cat? Hmmm- that hits home, doesn't it?

There are measures that can (and should) be in place to notify first responders regarding the presence of potentially dangerous exotic species include appropriate signage, permits with information readily available to first responders, and strict requirements to immediately report any accidental escapes. These measures currently are successfully used by public institutions including zoos and educational facilities, as well as private owners.

Provide information for those who keep certain species to obtain necessary permits (to help keep first responders safe if needed) plus signage on doors leading to enclosures housing potentially dangerous

species. Have requirements for secure housing as well. Inspections by State Department of Agriculture or
- USDA and/ or State Veterinarian.

Look at this proposal in the light of the **harm** it will cause.

-Current owners will not be allowed to replace the animals they love once the animals pass on, or add to their collections. This is an **extinction proposal**. Where will animals go as these bills, originally proposed by animal rights extremists, spread ever more widely?

- Many venomous snake owners work with organizations that collect and utilize venom for research and the production of antivenom- something that SAVES both human and animal lives! Eliminating these captive owned animals will greatly impact the availability of these products. Who wants to be the first to tell their family members that one of them will not have access to antivenin because there are not individuals helping to produce this product?

-Some people may be forced to choose between keeping their animals (that, remember, THEY love) and possibly sending them away or euthanizing them! This is a choice NO animal owner should have to make!

-Stores and small, usually family-owned businesses catering to owners of exotic animals to provide, food, enclosures, enrichment, and animal sales will lose their businesses and leave the county and/or state. This is a lose/lose for everyone. We want to ENCOURAGE small businesses to stay open and viable.

In short, this bill should be **tabled and rewritten**, following the regulations set by the Commonwealth of Virginia to protect the citizens of this fine state. No need to “reinvent the wheel” at taxpayer expense.

Commonwealth Of Virginia regulations on ownership/ possession of non native (exotic) animals (1993)

https://law.lis.virginia.gov/admincode/title4/agency15/chapter30/section40/?fbclid=IwAR3REsGk_Doe1H6CtwVHMyGJerXic4pOnLAefkDmiuCKEtDTEdNyHxaQDes

Allow people to continue to keep their pets and companion animals with proper licenses, proper housing and appropriate containment.

Contact USARK (United States Association of Reptile Keepers www.usark.org) for information on proper housing for venomous and non-venomous species of reptiles.

Keep our animals IN our homes – BEFORE there are none

Thank you for your time.

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