

THE HUMANE SOCIETY OF THE UNITED STATES

November 27, 2007

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Noel Holcomb
Commissioner
Georgia Department of Natural Resources
2 Martin Luther King, Jr. Dr., SE
Suite 1252 East
Atlanta, GA 30334

Dear Commissioner Holcomb:

On behalf of our nearly 170,000 constituents in Georgia, The Humane Society of the United States requests that the Department of Natural Resources pass regulations banning the practice of penning wildlife for dog training.

Recent investigations by many state wildlife agencies, including Indiana, Alabama and Virginia, have highlighted the cruelty inherent in this form of wildlife penned fighting, as well as the rampant live market perpetuated by these facilities of shipping wildlife across states lines.

The HSUS understands that the current DNR regulations permit pens to stock fenced-in areas with wildlife, including foxes and coyotes, and operators to charge a fee for individuals to chase the animals continually for dog training and sport (Ga. Code Ann. §27-2-22.1). Georgia DNR currently permits close to 60 pens, but countless others may exist, as the DNR does not require pens operating without an admission fee for dog training to obtain a license.

The HSUS asks that penning be banned for the following reasons:

Animal Welfare

Keeping wild, live animals for purposes of dog training within an enclosure is inherently inhumane, and should be banned on this premise alone. Exposure to repeated, prolonged and unavoidable pursuit results in chronic physiological stress and death even with the presence of escape shelters. In addition to continual pursuit, animals kept for penning may be kept in inhumane conditions without access to water or food.

Most animals inevitably meet a cruel end when torn apart by the dog pack. No dog handler can guarantee a dog pack chasing its quarry can be prevented from attacking the pursued animal. The parallels between these grisly penning operations, and other animal fighting operations, such as hog-dogging and dogfighting, are glaring.

Celebrating Animals, Confronting Cruelty

As the recent investigations uncovered, trapped animals sold into the live market are frequently sold illegally across state lines, and endure inhumane cramped, long distance transport before arriving at a pen.

Disease Transmission

Trapped, live coyotes are trafficked to many states, including some where penning is illegal, creating an immense disease threat. Studies have found that transporting live, wild animals for penning purposes has directly led to the spread of rabies, and other devastating diseases dangerous to wildlife, pets and even people. Georgia regulations only vaguely require that foxes and coyotes be vaccinated against “canine disease,” a definition that has only traditionally included canine distemper (Ga. Code Ann. § 27-2-22.1-c-5).

A study published in the *Journal of Wildlife Diseases* examining the disease presence found in captive wildlife kept for dog training enclosures concluded that the common practice of wild canid translocation for penning is “biologically hazardous.”¹

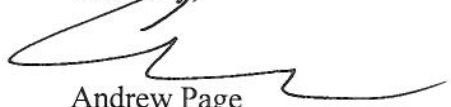
Many organizations have adopted a resolution in favor of increased restrictions or prohibitions on transporting wildlife for penning purposes including the American Veterinary Medical Association, International Association of Fish and Wildlife Agencies and the Southeastern Section of the Wildlife Society.²

Law Enforcement

Federal and state authorities made arrests in a multi-state sting operation of fox pens earlier this month. In Virginia, there are 41 fox pens; 36 were out of compliance. In Alabama, 18 individuals were arrested for activities related to penning and the live market. Authorities brought charges against fox pen operators and trappers in half a dozen other states. Enforcing the loose regulations currently governing these pens is a costly endeavor. Banning them outright would save much needed resources.

Please contact me at your earliest convenience at 301-721-6417. I look forward to working with you on this important matter.

Sincerely,



Andrew Page
Director, Hunting Campaign
The Humane Society of the United States

¹ Davidson, W.R. et al. 1992. Diseases and parasites of red foxes, gray foxes, and coyotes from commercial sources selling to fox-chasing enclosures. *Journal of Wildlife Diseases* 28(4): 581-589.

² Baker, O.E. 1998. Status of Fox and Coyote Hunting Enclosures in the Southeastern United States. *Proceedings of the fifty-second annual conference of the Southeastern Association of Fish and Wildlife Agencies* 52: 367-376.