



The American Ferret Association, Inc.

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September 23, 2005

**APHIS/USDA
Regulatory Analysis and Development
PPD/APHIS, Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238**

**Re: Agency Docket #04-088-1
9 CFR Part 3
Animal Welfare; Standards for Ferrets**

To Whom It May Concern:

The American Ferret Association, Inc. (AFA) represents ferret owners, veterinarians, ferret shelters, and breeders across the United States. On their behalf, the AFA would like to thank the USDA for considering possible amendments to the Animal Welfare Act that would provide specifically for the protection of domestic ferrets.

Ferret-specific regulations to govern the handling, care, treatment, and transport of domestic ferrets are urgently needed and long overdue. Such regulations must be separate from those governing other animals in these areas, as ferrets have unique biological, physiological, and social needs. These needs are especially critical as they relate to early shipment of ferret babies, called "kits," from breeding farms.

The Need for New Safeguards

The domestic ferret is believed to be the third most popular companion animal in the U.S. The growing popularity of these pets has resulted in an increased demand for ferret kits at pet stores, inducing ferret breeding farms, under intense competitive pressures, to ship kits to retailers at younger and younger ages. This practice impacts adversely on the kits by removing them from their mother and littermates and subjecting them to spaying or neutering, and to descenting, at a much earlier stage of development than that at which they would be naturally weaned. In addition, the kits arrive at pet stores without their adult canine teeth, which prevents them from eating the hard kibble supplied to them as their primary diet.

Problems caused by early weaning and desexing as well as by the common practice of mass shipping include prolapsed rectums, unhealed and infected surgical incisions, pneumonia, upper respiratory infections, severe diarrhea, dehydration, and starvation or emaciation. The kits also suffer severe emotional trauma in being removed from their mother and littermates at an age when they should be nurtured and socialized by them. Ferret consumers and transient pet store personnel do not have the training or experience to properly care for kits that are supplied prematurely.

AFA continually receives phone calls and emails from concerned people in the ferret community complaining of problems with ferret kits in pet stores. Typically, such complaints include seeing or purchasing kits with the following conditions:

- No adult canine teeth, which indicates that the kit is less than 8 weeks old, and incapable of eating the hard kibble supplied as its primary diet
- Suckling behavior, resulting from premature weaning
- Unhealed and infected incisions from spaying or neutering or from other causes
- Prolapsed rectum
- Upper respiratory infection
- Severe diarrhea
- Dehydration, starvation, or emaciation
- Early death at the pet store or soon after purchase due to the adverse conditions afflicting ferret kits arriving from breeding farms or the inability of pet store employees or consumers to provide proper remedial care

Sadly, as these conditions indicate, the Animal Welfare Act does not afford ferret kits the protection they so badly need to survive and thrive. In order to provide urgently needed safeguards, the American Ferret Association proposes adoption of the following ferret-specific regulations to govern the handling, care, treatment, and transport of domestic ferret kits:

- Kits may not be shipped earlier than 8 weeks of age.
- Kits may not be shipped until all four **adult** canine teeth have fully erupted through the gum and are at least as long as the kit canine teeth. In addition, **adult** molars, both mandibular and maxillary, must be fully in place.
- No ferret kits may be shipped with a body weight of less than 500 grams.
- In the case of kits 8 to 9 weeks of age who are to be shipped, CDV vaccine that is USDA-licensed for use in ferrets is to be administered within 4 days prior to shipment.
- In all ferret kits, any incisions, including spay/neuter incisions, must be healed and with no signs of infection prior to shipment.
- No cargo shipping of ferret kits to be allowed: ONLY Priority Shipping.
- Ferret kits should not be in transit for more than 24 hours.
- In transport, ferret kits need to be checked often to make sure they have access to clean drinking water and food.

In addition, the following general protections should apply to the care of all domestic ferrets, including kits:

- Through the use of air conditioning and artificial heating where necessary, ferrets must be protected from ambient temperatures that exceed 80 degrees and from extreme cold. They must also be kept away from drafts, and from rain, snow, and other elements of the weather.
- Ferret housing must be well-designed and incorporate the following characteristics: 1) all elements in good repair, with no pieces that ferrets can chew through or ingest; 2) no sharp edges on which ferrets can be cut; 3) if flooring is mesh, openings must be small enough so that ferrets' feet and legs are protected; 4) cages must be large enough to allow normal and comfortable walking, sleeping, etc.

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- Other animals must be kept away from ferret housing.
- Ferret food should be stored away from anything toxic and protected to prevent spoilage.
- Ferret bedding should be clean and dry.

The American Ferret Association believes strongly that adoption of these proposed regulations to protect ferret kits can create a win-win situation for ferrets consumers, for pet stores, and, most importantly, for the domestic ferrets themselves.

Sincerely,

Penny M. Hendrix
President
The American Ferret Association, Inc.

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