



The American Ferret Association, Inc.

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August 5, 2006

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

Dear Dr. Gipson:

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 express deep concern upon learning that the USDA has proposed sidestepping the urgent need for ferret-specific regulations to govern the handling, care, treatment, and transport of domestic ferrets.

On September 23, 2005, the AFA presented to APHIS/USDA a formal response stating very specific reasons why such regulations must be separate from those governing other animals in these areas and proposed the adoption of the following ferret-specific regulations:

- 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.

The ferret community is the 'consumers' of the ferret pet trade and they have loudly expressed their support for the above-mentioned ferret-specific regulations. By simply lumping domestic ferrets into the regulations governing warm blooded animals and adding an 8-week shipping rule, adequate protection as listed above will not be provided, 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.

Ferret kits are routinely seen in pet stores for sale at less than 8 weeks of age as evidenced by the lack of full eruption of all four adult canine teeth. Dental eruption requirements is the only way to verify the age of ferret kits to guarantee they are not being shipped before 8 weeks of age. Including ferret kits in with regulations governing all warm blooded animals in no way provides for this.

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Again, on behalf of the hundreds of thousands of ferret owners across the United States, we implore you to adequately provide for the well being of these unique animals by adopting ferret-specific regulations to govern the handling, care, treatment, and transport of domestic ferrets.

Sincerely,

Penny M. Hendrix
President
American Ferret Association, Inc.

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