

American Ferret Association, Inc.

PMB 255, 626-C Admiral Drive, Annapolis, Maryland 21401
www.ferret.org • 1-888-FERRET-1



OUR REF: California Senate Bill 89

August 24, 2004

The Honorable Arnold Schwarzenegger
Governor of California
State Capitol Building
Sacramento, CA 95814

Dear Governor Schwarzenegger:

The American Ferret Association, Inc., is a nonprofit, 501(c)(3) educational organization. Our members include: ferret owners, breeders, health professionals (veterinarians and allied professions), commercial entities and others interested in the health and welfare of ferrets.

On behalf of our California members—and on behalf of our members who are moving to California, we urge you to sign SB 89, legalizing the ownership of ferrets in California.

Ferrets are the third most popular companion animal in the United States. We need not tell you that ferrets are loved by their owners to the same degree as dogs and cats. Of the 10 million ferrets living in the United States today, we estimate that 3 to 5% already reside in California. Legalization will allow these ferrets to receive proper husbandry and healthcare.

We would also like to address some of the State agencies' concerns about ferret legalization:

1) *Ferrets are no more "exotic" than the French poodle, dachshund, or housecat.*

The California Department of Fish and Game (DFG) has identified lists of animals that it considers as "troublesome" and "non-native species." DFG has raised concerns that ferrets are a "non-native species."¹ With the number of ferrets currently living in California, ferrets are distinctly absent from these lists.¹

The US federal government considers dogs and cats to be "non-native invasive species": "In a compilation of threats to U.S. national parks, non-native plants and animals were the most often reported threat, and were reported by the most areas; **feral cats (*Felis catus*)**, **feral dogs (*Canis familiaris*)**, and wild pigs (*Sus scrofa*) were the non-native animals cited most often"²⁻³

Except for the Husky or Alaskan Malamute dog breeds, no dogs or cats can claim to be "native species" to North America or California. ".... [D]ata suggest Native American dogs have not genetically contributed to modern dog breeds.... DNA sequences from hundreds of dogs from dozens of modern breeds from throughout the world do not show traces of American ancestry."⁴

2) *Ferrets are as domestic as dogs and cats and should be removed from the California Department of Fish and Game "Wild Animal" list, and from this agency's jurisdiction.*

All reputable modern scientific sources are in agreement that the pet ferret, ***Mustela putorius furo***, is a domesticated species. Ferrets were domesticated by humans several centuries before the

housecat.⁵⁻⁹ Domestic pet animals should NOT be under the jurisdiction of the state's Fish & Game department.

3) Compared to the Dog or Cat, the Ferret is a "safer" family pet.

Although the DFG has expressed concerns regarding pet ferrets and children, what they failed to address is the relative risk of ferrets as pets, in comparison to dogs and cats.

An estimated 4 to 5 Million dog bites to humans are reported each year to the CDC.¹⁰⁻¹¹ Dog bites are greatly under-reported: the incidence of dog bites was found to be "more than 36 times the rate reported to health authorities."¹² Children are often victims of dog bites.^{10, 13-17} Almost half of all children have been bitten by their own pet dog by the time they are 12 years old.¹⁵ On average, dog-bite related injuries are responsible for 20 human deaths each year.¹⁸⁻¹⁹

A bite from a ferret is newsworthy: ferrets bite significantly less often than do dogs.²⁰ Rarely does the bite from a 1 to 4 pound ferret require anything more than good cleansing and a Band-Aid®. However, bite wounds from a 10 pound cat or a 20 to 100 pound dog routinely require medical and even surgical intervention, including antibiotic prophylaxis against zoonotic infections.²¹⁻²⁴

Dog and cat bites are well known to cause infections in humans. Also, zoonotic transfer of infectious agents between pet dogs, cats and their owners is also well documented in the medical literature.²¹⁻³¹ (See **Table 1: "Documented Zoonotic Infections in Dogs, Cats, Ferrets"**).

4) Rabies is NOT an issue for ferrets—but it is for dogs and cats!! (see Table 2).

Although a deadly disease, the incidence of human rabies infection is extremely rare in the United States. On average around 2 people die of rabies annually in the US. Over the past 22 years, a total of only 20 ferrets have tested positive for rabies—in distinct contrast to the more than 200 cats and 140 dogs on average that test positive for rabies **each year**. (See **Table 2: "Annual CDC Rabies Surveillance"**)³² More importantly, **ferrets have never transmitted rabies** to a human or to another animal, which is not the case for dogs, cats, or even humans!³³

There is an approved rabies vaccine for ferrets.

A **rabies vaccine** (Imrab-3, manufactured by Merial, Athens, Georgia) has been licensed by the US Department of Agriculture since 1990. The vaccine has been clinically proven to be safe and effective for use in ferrets, and it is the same product also licensed for use in dogs, cats, horses, cattle, and sheep.³⁴

5. No feral colonies of ferrets exist anywhere in the United States.

Although the DFG raised concerns regarding feral colonies of ferrets, the **California Research Bureau concluded that: "It appears improbable that ferrets could establish feral colonies in California, given the risks of ferrets themselves being prey."**³⁵ Also, the DFG has confirmed that there is no evidence of feral ferrets in the United States today.¹

This is in stark contrast to the dog or cat. **Feral dog** and **feral cat** colonies post a major problem for national and state parks, as well as for suburban settings.^{2-3, 36-39,}

6. Ferrets do not pose a threat to wildlife—but cats and dogs do!!

The DFG states: "Domestic cat (*Felis catus*) predation is a significant cause of wildlife mortality in many parts of the world. Diseases of domestic cats pose serious threats to native species, as well."³⁸

"On Mount Diablo we have feral dogs and cats. Other feral animals which are damaging some areas of California are goats, burros, pigs and horses.... Many of the livestock kills blamed on coyotes are actually killed by dogs, then scavenged by coyotes."³⁹

Although the California DFG speculates that legalization of ferrets might create an environmental problem, the agency has no data to support a problem exists with ferrets in California or anywhere

else in the country. This is not surprising. Ferrets are kept indoors or caged. They do not wander like cats and dogs. Unlike cats, untrained escaped ferrets are extremely poor hunters, and usually succumb to starvation, predation, or exposure within days.

Ferrets are legally owned in every state EXCEPT California and Hawaii. Since the AFA formed in the early 1990's, the ***following jurisdictions have legalized or re-legalized ferret ownership:***

<u>STATES</u>	<u>CITIES/COUNTIES</u>
Alaska	Baltimore City & Baltimore County
Connecticut	Minneapolis
Massachusetts	Salt Lake City & Salt Lake County
Michigan	San Antonio City
New Hampshire	
South Carolina	
Utah	

A survey of the above jurisdictions – and the remaining states—will demonstrate that allowing ferret ownership will not and has not had an impact on the environment.

In summary, the American Ferret Association joins the California Veterinary Medical Association and the many other individuals, groups and organizations, to encourage you to sign Senate Bill 89-- a first step in decriminalizing ferret ownership in the State of California.

We thank you for your kind attention to this important matter.

Respectfully yours,

Gigi Shields
President, American Ferret Association

Freddie Ann Hoffman, MD
Co-Founder and Chair, AFA Health Affairs Committee

Attachments:

TABLE 1: Documented Zoonotic Infections in Dogs, Cats, Ferrets

TABLE 2: Annual Rabies Surveillance (Center for Disease Control and Prevention)

Rabies Vaccine Label (Imrab-3) for Ferrets

REFERENCES:

- 1) California Department of Fish and Game, Habitat Conservation Planning Branch: Domestic Ferret Issues in California.
http://www.dfg.ca.gov/hcpb/species/nuis_exo/ferret/ferret_issues_1.shtml#TAXO
- 2) Summary of National Parks and Conservation Association survey of feral animals in the national park system. National Parks and Conservation Magazine 51:16-20, 1977.
- 3) Drost, C.A. & Fellers, GM: Non-native Animals on Public Lands. (National Biological Service, US Department of the Interior) <http://biology.usgs.gov/s+t/noframe/x180.htm>
- 4) Vila, C, Savolainen, P, Maldonado, JE, et. al.: Multiple and Ancient Origins of the Domestic Dog. Science, Vol. 276 13 June 1997.
- 5) Davidson, A., J.D.S. Birks, H.I. Griffiths, A.C. Kitchener, D. Biggens, etc. Hybridization and the phylogenetic relationship between polecats and the domestic ferret in Britain.. Biological Conservation 87:155-161, 1999.
- 6) US Department of Agriculture – Animal Welfare Act: Preamble.
- 7) Smithsonian National Museum of Natural History: “*Mustela putorius*: Probable ancestor of domestic ferret, *furo* (Rempe, 1970ref; Volobuev, 1971ref).”
<http://www.nmnh.si.edu/cgi-bin/wdb/msw/comments/query/12276>
- 8) Volobuev, A. T. 1971. Karyological evidence concerning domestic ferret. Zoological Journal.
- 9) San Diego Zoo – Personal communication.
- 10) CDC. Nonfatal dog bite-related injuries treated in hospital emergency departments--United States, 2001. MMWR Morb Mortal Wkly Rep. 4;52(26):605-610, Jul 2003. (See also: www.cdc.gov)
- 11) Sacks JJ, Kresnow M, Houston B: Dog bites: how big a problem? Inj Prev.;2(1):52-54 Mar 1996 (from the Department of Health and Human Services, Centers for Disease Control and Prevention, Atlanta, Georgia 30341, USA)
- 12) Weiss HB, Friedman DI, Coben JH. Incidence of dog bite injuries treated in emergency departments. JAMA 7;279(1):51-53, Jan 1998.
- 13) Voelker R. Dog bites recognized as public health problem. JAMA 22-29;277(4):278; 280, Jan.1997.
- 14) Sinclair CL, Zhou C. Descriptive epidemiology of animal bites in Indiana, 1990-92--a rationale for intervention. Public Health Rep.;110(1):64-7. Jan-Feb 1995.
- 15) Beck AM, Jones BA. Unreported dog bites in children. Public Health Reports. 100(3):315-21, 1985.
- 16) Brogan TV, Bratton SL, Dowd MD, Hegenbarth MA. Severe dog bites in children. Pediatrics. 96(5 Pt 1):947-50,1995.
- 17) Kahn A, Bauche P, Lamoureux J; Dog Bites Research Team. Child victims of dog bites treated in emergency departments: a prospective survey. Eur J Pediatr. 162(4):254-258, 2003 (Epub Feb 6, 2003).
- 18) Sacks JJ, Lockwood R, Hornreich J, Sattin RW. Fatal dog attacks, 1989-1994. Pediatrics.97(6 Pt 1):891-895, 1996

- 19) CDC. Dog-bite-related fatalities--United States, 1995-1996. MMWR Morb Mortal Wkly Rep. 46(21):463-467, 1997.
- 20) Hoffman, F. Ferrets – Pet of the Nineties. FDA Veterinarian Sept/Oct 6(5):5-6, 1991.
- 21) Steele JH and Mathewson JJ: The zoonoses and some other diseases of animal and man. Healthy People 2000 (The University of Texas-Houston, School of Public Health)
- 22) Shukla SK, Paustian DL, Stockwell PJ, et al.: Isolation of fastidious *Bergeyella* species associated with cellulitis after a cat bite and phylogenetic comparison with *B. zoohelcum* strains. Journal of Clinical Microbiology 42(1):290-293, 2004.
- 23) Guardabassi L, Schwarz S, Lloyd DH: Pet animals as reservoirs of antimicrobial-resistant bacteria. Journal of Antimicrobial Chemotherapy 54(2):321-332, 2004 (Epub Jul 14, 2004).
- 24) Tan JS: Human zoonotic infections transmitted by dogs and cats. Archives of Internal Medicine Sep 22;157(17):1933-43, 1997.
- 25) Kravetz JD; Federman DG.: Cat-Associated Zoonoses. Arch Internal Medicine 162:1945-1952, 2002.
- 26) Bradshaw SE Endocarditis due to *Staphylococcus aureus* after minor dog bite. South Med J. 96(4):407-409, Apr 2003.
- 27) Guptill L. Bartonellosis. Vet Clin North Am Small Anim Pract.;33(4):809-825 Jul 2003.
- 28) Perrin I, Blanc P, Karam T, Carbajal R. [Meningitis and osteitis caused by *Pasteurella multocida* in a three-month-old infant] Arch Pediatr. 2003 May;10(5):439-441, May 2003. [Infant's infection caused by licking from family dog.]
- 29) Hvilsom GB, Himmelstrup B. [Non-characteristic course of disease after dog bite] Ugeskr Laeger 31;165(14):1460-1461, Mar 2003.
- 30) Hara H, Ochiai T, Morishima T, Arashima Y, Kumasaka K, Kawano KY. *Pasteurella canis* osteomyelitis and cutaneous abscess after a domestic dog bite. J Am Acad Dermatol. 46(5 Suppl):S151-2., May 2002.
- 31) Talan DA, Citron DM, Abrahamian FM, Moran GJ, Goldstein EJ. Bacteriologic analysis of infected dog and cat bites. Emergency Medicine Animal Bite Infection Study Group. N Engl J Med. 340(2):85-92, 1999
- 32) Center for Disease Control and Prevention: Annual Rabies Surveillance data (see: www.cdc.gov)
- 33) Baer, G.: The Natural History of Rabies, 2nd edition. CRC Press, 1991.
- 34) Rupprecht, C, Gilbert, J, Pitts, R, et al.: Evaluation of an inactivated rabies vaccine in domestic ferrets. JAVMA 196(10):1614-1616, 1990.
- 35) Umbach KW: Ferrets: a selective overview of issues and options. California Research Bureau, California State Library. CBR Note 4(3) May 30, 1997. (on DFG Website).
- 36) Brochure: San Bernadino County, California <http://www.co.san-bernardino.ca.us/brochures/docs/49.pdf> page 1 of 2.

37) California Feral Cat Organizations:

Feral Cat Foundation "serving Alameda and Contra Costa Counties"
<http://www.feralcatfoundation.org/>

Feral Cat Coalition, San Diego <http://www.feralcat.com/>

Town Cats serving Santa Clara County <http://www.towncats.org/feral/feralcats1.html>

Hopedance.org (*Feral Cat organization of San Luis Obispo County and the Central Coast of California*) http://www.hopedance.org/archive/issue10/a-feral_.htm

Forgotten Felines of Sonoma County (Santa Rosa, California) <http://www.forgottenfelines.com/>

Stanford Cat Network <http://www.stanford.edu/group/CATNET/>

Save Our Strays (Napa County, California) <http://saveourstrays.com/home/>

Alley Cat Organization (national) <http://www.alleycat.org/>

38) Jurek, R. M. 1994. A bibliography of feral, stray, and free-ranging domestic cats in relation to wildlife conservation. California Department of Fish and Game, Nongame Bird and mammal Program Rep. 94-99, 1994.

39) Pelonio, J.: Mammals of Mount Diablo State Park <http://www.mdia.org/mammals.htm>

TABLE 1: Documented Zoonotic Infections in Dogs, Cats, Ferrets

Infectious Disease	Dogs	Cats	Ferrets
Rabies	✓	✓	
Borreliosis (Lyme Disease)	✓		
Brucellosis	✓		
Campylobacter enteritis	✓	✓	
Cat Scratch Fever	✓	✓	
Plague	✓	✓	
Salmonella enteritis	✓	✓	
Group A Streptococcus (e.g. 'Strep throat')	✓	✓	
E. coli enteritis	✓	✓	
Tuberculosis	✓	✓	
Tularemia	✓	✓	
Boutonneuse fever	✓		
<i>Bergeyella zoohelcum</i>	✓	✓	
Pasturellosis	✓	✓	
Q Fever		✓	
Rocky Mountain Spotted fever	✓		
Ehrlichiosis	✓		
Actinomycosis	✓	✓	
Coccidioidomycosis	✓		
Nocardiosis	✓		
Blastomycosis	✓	✓	
Rhinosporidiosis	✓		
Ringworm	✓	✓	
Sporotrichosis	✓	✓	
Giardiasis	✓		
Pneumocystitis	✓	✓	
Leishmaniasis	✓		
Toxoplasmosis		✓	
Trypanosomiasis (African Sleeping sickness)	✓		
Chagas Disease	✓	✓	
Clonorchiasis	✓	✓	

Infectious Disease	Dogs	Cats	Ferrets
Echinostomiasis	✓	✓	
Fasciolopsiasis	✓		
Heterophyiasis	✓	✓	
Metagonimiasis	✓	✓	
Opisthorchiasis	✓	✓	
Paragonimiasis (Liver flukes)	✓	✓	
Schistosomiasis	✓	✓	
Coenuriasis	✓		
Heart worm (Dirofilaria)	✓		
Dog tape worm	✓	✓	
Dog hook worm	✓		
Fish tape worm	✓		
Hydatidosis	✓	✓	
Sparganosis		✓	
Capillariasis	✓	✓	
Dracunculiasis	✓	✓	
Filarisais	✓	✓	
Giant kidney worm	✓		
Gnathostomiasis	✓	✓	
Larva migrans, cutaneous & visceral	✓	✓	
Strongyloidiasis	✓		
Theleziasis	✓	✓	
Hirudiniasis	✓		
Ascariasis (round worm)	✓	✓	
Tunga infections	✓		
Pentatomid infections	✓		
Cowpox		✓	
Influenza	✓		✓
Lymphocytic Choriomeningitis	✓		
Sarcoptes (Scabies)	✓		
Fleas	✓	✓	?

References: See 21-31

TABLE 2: Annual Rabies Surveillance Data 1980 - 2001
(from the Centers for Disease Control and Prevention)

YEAR	Cat	Dog	Livestock	Rodent/ Rabbit	Human	Ferret
2001	270	89	138	56	1	0
2000	249	114	145	52	5	0
1999	278	111	212	45	0	0
1998	282	113	207	68	1	1
1997	300	126	183	65	4	0
1996	266	111	193	47	4	3
1995	288	146	193	54	4	2
1994	267	153	180	61	6	1
1993	291	130	183	64	3	1
1992	290	182	258	57	1	2
1991	189	155	308	63	3	0
1990	176	148	229	28	1	0
1989	212	160	211	21	1	0
1988	192	128	230	25	0	0
1987	166	170	223	12	1	2
1986	166	95	255	15	0	3
1985	130	113	260	23	1	2
1984	140	97	216	29	3	0
1983	168	132	284	21	2	1
1982	209	153	381	17	0	1
1981	285	216	581	10	2	1
1980	214	247	499	6	0	0
Totals:	5028	3089	5569	839	44	20
Average per Year:	229	140	253	38	2	<1
2001 Populations:	60 Million	57 Million			225 Million	10 Million

Imrab[®]

1 Rabies
Vaccine
for **6**
Good
Reasons

