



**THE ELEPHANT MANAGERS ASSOCIATION**  
300 Parkside Avenue, Buffalo NY 14214-1999

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March 2, 2009

To the Honorable Edward Meyer, Co-Chair, the Honorable Richard Roy, Co-Chair, and members of the Environment Committee:

The Elephant Managers Association (EMA) respectfully submits this comment in regards to proposed state legislation HB 6555 "An Act Concerning the Humane Treatment of Elephants".

The EMA is an international nonprofit organization of professional elephant handlers, administrators, veterinarians, researchers and elephant enthusiasts. The Association is dedicated to the welfare of the world's elephants through improved communication, husbandry, research, education and conservation.

The EMA is proud of its constructive efforts with state and federal regulatory agencies on matters relating to elephant care and management. Our members, who are comprised of elephant managers in a variety of organizations, adhere to a code of professional ethics. The EMA and its members are committed to providing elephant care at the highest professional level.

The EMA recognizes the value in and supports the responsible public display of elephants (and other animals) as a vitally important means of increasing public awareness of, and ultimately concern for these animals, in the care of humans, and significantly, in the wild. Indeed, such education and resulting conservation-related efforts are necessary to ensure the future survival of elephants in the wild where the critical issues of habitat degradation and destruction, along with human-elephant conflict and poaching for ivory, threaten the continued existence of wild elephant populations. Furthermore, animal exhibition is often the reason that people are interested in, and retain the conservation message that those of us working with these magnificent animals are committed to promoting.

With respect to proposed state legislation concerning captive elephant management, please note the following serious concerns:

- There are existing, and widely accepted, professional industry standards such as the EMA Guidelines for Elephant Care and Management and the EMA supported Elephant Husbandry Manual;

- Furthermore there are existing federal regulations under the Animal Welfare Act which are overseen by the Animal and Plant Health Inspection Service of the U. S. Department of Agriculture
- Elephants, horses, dogs, like all animal species are trained using "operant conditioning". This is a type of learning in which the probability of a behavior recurring is increased or decreased by the consequences that follow. This teaching process includes positive reinforcement, negative reinforcement and punishment. Different animal species require specialized tools and equipment to properly maintain and care for them. Elephant care staff should always be fully versed in appropriate use of any training and safety tool, or restraint method. With respect to techniques or tools to be used in the management of elephants, tools such as chains, ankuses or elephant guides, and commercially available livestock prods are safe and effective and may be used in elephant training.

The EMA feels that new regulations on a local or state level are not necessary and contribute little to the welfare of elephants or to the conservation of the species.

Thank you for your time and consideration. We would be glad to have a representative from our organization come speak to your Committee about captive elephant management issues. Please contact us if you require additional information on this or other important matters of concern to the elephant care community.

Yours very truly,



Chris Dulong  
President

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