



American Ferret Association, Inc.

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Baby Ferrets Need Your Help Right Now!

- Do you get frustrated by seeing 5 week old ferret kits (babies) in the stores, some still with stitches or incision infections?
- How about the babies who have prolapsed rectums, because they aren't yet fully weaned and their bodies can't yet process the dry kibble they're being fed?
- Do you cry over the news of baby ferrets dying in transport?

Now you and I have a real opportunity to actually change these outcomes and improve conditions for ferret babies throughout the entire U.S.!

How? Simply by writing a letter to the U.S. Department of Agriculture (USDA), urging the department to adopt new protective regulations. Guidelines and pointers for such letters will follow.



5 week old kits - not yet weaned and are too young to be shipped.

First, we are pleased to announce that a major milestone has been reached in the effort to get the USDA and APHIS (Animal Plant Health Inspection Service) to adopt ferret-specific regulations under the Animal Welfare Act. For the first time, these agencies have accepted a petition to consider revisions in regulations affecting ferret breeding farms, dealers and research institutions under USDA control.

There have been two previous attempts to improve USDA/APHIS standards for ferrets. The first was initiated by volunteers of the Georgia Domestic Ferret Association; the second

by our own American Ferret Association, Inc. (AFA). Unfortunately, neither of these efforts was supported by enough public feedback to get USDA/APHIS to even accept a petition for considering regulatory changes. The organizers' hard work was wonderful, but the ferret community did not do its part. Now, a multi-group effort has cleared the first hurdle, but needs your help to clear the second.

Last year, people realized that improving conditions for ferret kits involved specific rules of procedure and a multi-step process. The first step was to petition the relevant agencies to consider ferret-specific regulations. This time large numbers of the ferret community WROTE IN AND WERE COUNTED. The result? For the very FIRST time, a successful petition set the stage for improving ferret standards nationally!

So, what next? We have only a few weeks to show the government that improving standards for ferrets has widespread public support. If enough of us write in to show that support, we can eliminate some of the worst conditions affecting the well-being of baby ferrets. In place of the sadness and frustration we now often feel at the plight of helpless kits, we could expect them to enjoy a healthy, happy start in life. On the other hand, if we don't do our part, the entire effort will fall back to square one.

We CAN get national regulations to forbid breeding farms, dealers and research institutions from selling or transporting ferrets younger than 8 weeks. Besides protecting the kits themselves, such changes would also help our overburdened shelter community through a dramatic drop in failure-to-thrive kits and in kits that purchasers can't deal with because they're too young to be easily maintained. Moreover, we can prevent entire shipments of ferrets from dying of heat stroke at airports. We can make sure they aren't crowded into tiny, unmonitored cages or exposed to other animals who can injure them. By taking just a single action to show our support now, we can help the pets we love in many ways!

Write a Letter Now!

In March, 2004, several ferret organizations sent a petition to the USDA requesting a revision in the requirements for ferret housing and transport that apply to breeding farms, dealers and research institutions under USDA control. The proposed changes would not apply to small breeders who sell privately; they would apply only to farms that breed ferrets for wholesale, to their distributors, and to the transport they use.

The USDA has accepted this petition, and has now requested public input. They ask three main questions (condensed here):

- 1. Should specific standards be implemented for the welfare of domestic ferrets? If yes, please explain what standards you believe are needed.**
- 2. What specific problems have dealers, exhibitors, or research facilities had with the current handling, care, treatment, and transportation standards and how would ferret-specific standards eliminate them?**
- 3. Should there be minimum age requirements for the transportation of domestic ferrets, and, if so, what factors should be considered in determining those requirements?**

The deadline for responding is **October 4, 2005**. You may respond by regular mail, by email, or on the USDA web site (via EDOCKET). We are told that sending a letter by mail is the most effective option, so even if you choose to respond via EDOCKET, please also mail your letter with three copies to the USDA address below. It is URGENT that the USDA get a strong response from the ferret community to move forward with the development of new regulations! For help on what items to include in your letter, please see the attached content suggestions. You can also view letters that have been sent by members of the IFC on their website and that are included, as well, in this packet. The full text of the request for input and how to respond is included in this packet, or go to www.aphis.usda.gov/ppd/rad/webrepor.html and click on All Recent Publications. Scroll down to Animal Welfare; Standards for Ferrets, Docket No. 04-088-1.

If you use EDOCKET (which is said to be anonymous so that those in California can use it), your comments will take 24 to 72 hours to appear. The link is: www.epa.gov/fedocket.

If you use the snail mail option, remember to send the original and three copies of your letter to:

Docket No. 04-088-1
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

The American Ferret Association and the International Ferret Congress will be hosting information on their web sites:

American Ferret Association, Inc.
www.ferret.org

The International Ferret Congress
www.ferretcongress.org

IFC will include: the Notice of Petition and Request for Comments; sample letters to the USDA; and the transcript of Dr. Sandra Kudrak's presentation at the 2005 International Ferret Symposium in St. Louis this spring. Dr. Kudrak's talk provides an excellent overview of the very complex multi-year process of creating new regulations, of where we are in the process, and what is yet to be done.

Please prepare what YOU will write in your letter to the USDA, and plan to communicate this urgent need to the vets in your area and to the other ferret groups you are a part of. Input is needed from both individuals and organizations. Keep in mind that we've got as far as we have thus far only through the dedicated efforts of members of the ferret community who last year urged the USDA to take action. It's up to us now to keep up the good work!

Remember, October 4, 2005 is the deadline to submit your letters! Those of us who are interested in the welfare of ferrets are the only ones who can make good things happen for them. Please write your letter today!

Pointers on Letter Content and Style

On the need for regulations:

- kits (babies) are now shipped too young to eat solid food, resulting in failure to thrive, prolapsed rectum, and other issues
- ferrets' need for frequent meals
- ferrets' sensitivity to temperature extremes, especially high temperatures
- ferrets are intelligent, complex animals; to make good pets, they should remain a part of family/social groups as long as possible

Suggested regulations:

- minimum age of shipping should be 8 weeks, as verified by the eruption of all four adult canine teeth, which are needed to handle kibbled food
- spaying/neutering/descending incisions should be healed before shipping
- cage size should meet minimum standards for exercise and social interaction
- regular access to food and water
- minimum and maximum temperatures, especially if animal is not acclimated
- use only priority shipment methods specific for transporting animals
- 500-gram minimum weight prior to shipping

Other suggestions:

- be polite and professional
- don't badmouth any breeders or stores
- if you have any sad personal stories relating to any of these issues, be sure to use them!

Sample Letters – No. 1

Dear APHIS Animal Care Experts:

I am so very grateful that the USDA is now seeking input on some of the ways that current regulations fail to protect ferrets, Docket 04-088-1.

There is barely a month on any major ferret electronic list when someone does not seek help with a kit who was transported and sold too young. This was not always the case. Before ferrets became so popular, typical pet store ferrets were at least 8 weeks of age, a safe age for transportation and sale of healthy kits. This is not just personal recollection. I have heard it from others, including those at one of the major farms

who told me that competition forced them to lower their shipping ages from 8 weeks to 6 weeks.

Eight weeks also is an easy age to check, because when a kit is 8 weeks of age the conical adult canine teeth are replacing the needlelike kit canines, so all one has to do is to look for adult shape canine teeth. (At 50 and 53 days, approximately, they also erupt first molars, both mandibular and maxillary, meaning that they can deal dentally with the sort of diet a pet store will provide.)

Just as it is financially feasible for the ferret farms to sell kits at no younger than 8 weeks of age, it is also not an economic burden upon pet stores. Petsmart has been selling ferrets at no younger than 12 weeks of age since last year.

I wind up reading of too many situations in which kits were so undeveloped and unready for weaning that they could not properly eat kibble, or they wound up with painful rectal prolapses.

We ourselves have cared for such kits. One, aged by later dental eruption, fit in the palm of my hand, and I have tiny hands for a woman. By dental age obtained later, we determined that she was barely 5 weeks old when she joined our family. Our vet had to help us with a milk replacer we gave her as well as food slurry. She would keep entering my clothing not only for comfort but to try to suckle from me -- a very unusual behavior but one which emphasizes that she was among those who were sold too young. Thankfully, she was not among those who develop serious health problems from being sold so young, but she did require special care.

Another well known problem is that of poor temperature control during transport. Ferret kits are highly vulnerable not only to rapidly induced hunger and dehydration, but to temperature extremes, especially high temperatures. In fact, ferrets of any age have difficulty with high temperatures. Several times already there have been news stories, or internet rescue conversations about unacclimated ferrets who were exposed to temperatures of over 80 F for too long. They often died or suffered brain damage at airports or elsewhere in transit, sometimes acquiring kidney damage as well when dehydration also occurred. This could be so

easily avoided if people simply understood the conditions ferrets need to survive.

With the large increase in ferret popularity, far too many people have tried to cash in without knowing what they were doing. This has led to a number of products which are inappropriate to ferrets (and out of your control), as well as many people breeding without any idea what they are doing in terms of ferret health and longevity. This includes some ferret farms -- sellers who are controlled by USDA regulations. Reports from people I trust reveal that one such farm, now no longer in business, used cages that had wire flooring with openings too large for safety. But that wasn't the worst of it. They chose that size of wiring because they had pigs walk below the cages and eat dropped feces and food as a way to reduce their labor. I don't have to tell you what sort of zoonotic problems can arise when three species prone to influenza (humans, ferrets, and pigs) live in that sort of close contact. Just as with those in charge of transport knowing too little about ferret health needs, so, too, do some farms know too little, or care too little.

I would like to see a group of new ferret-specific regulations which take into account the ways that ferrets differ from dogs and cats, and I strongly think that the best regulations would be designed by ferret veterinarians.

Thank you so very much again for all of your hard work! The problems which exist are not at all caused by only one farm, one transporter, or one distributor. They are encountered across the board. In some cases, as with the mid-sized farms which first began selling ferrets at young ages, the choice was their own and ferret health was ignored. In the case of other farms, including one large one, competitive pressures created by the first group then caused them to also reduce their ages of sale. Many other times the harm to ferrets comes just from ignorance on the part of farms, distributors, or transporters. These are only three of the risks that exist currently, or recently existed. Ferret-specific regulations would go a huge way toward correcting such difficulties.

With gratitude,
Sukie Davis Crandall
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Ferret Health List co-moderator -
<http://www.smartgroups.com/groups/ferrethealth>
International Ferret Congress advisor -
<http://www.ferretcongress.org>

Sample Letters – No. 2

I am writing in support of the petition to create ferret-specific regulations to govern the handling, care, treatment and transportation of domestic ferrets. Such regulations are greatly needed and long overdue.

Ferrets have become increasingly popular pets over the last couple of decades. As a result, there is increasing demand at pet stores for ferret kits, increasing pressures on ferret farms to ship more kits early and quickly. Unfortunately, this is to the detriment of the animals. They are often taken from their mother and littermates at too young an age, spayed and neutered, and then shipped before surgical incisions are healed or they have the dentition to handle the kibbled food they are now forced to eat.

The key provision that should be part of any new ferret regulations is a minimum age of transport. A simple way to determine this age is by dentition – since, by 8 weeks of age, the easily identified canines have erupted along with the molars necessary to eat kibble.

Other provisions should protect ferrets from extremes in temperatures, provide for frequent access to food and fresh water, allow for adequate space for exercise, and provide social interaction. Ferrets are intelligent, curious animals, and being stuck in a small cage all day with no opportunities to exercise, play and interact is like jail to them.

Social interaction is especially important so that the animals will be well adjusted and make good pets. Too often ferrets end up in shelters because they have not learned how to interact with humans.

Linda Iroff
Co-Director, International Ferret Congress
Director, Ohio Ferret Coalition
former ferret shelter director

Sandra Kudrak, DVM, response letter

I am greatly relieved to see the USDA considering possible amendments to the Animal Welfare Act to provide protection for ferrets.

Currently, domestic ferrets are thought by many to be the third most popular domestic house pet, behind the cat and the dog. Sadly, the protection afforded to them by the Animal Welfare Act does not take into account the specific biological, physiological, and social needs of this animal in a manner consistent with other household pets. As a result, ferrets are commonly being shipped to pet stores - already spayed/neutered, descented, and vaccinated - at an age even younger than that at which they would be naturally weaned.

I examined nearly 100 ferrets upon arrival over a several-month period at several pet stores near Bangor, Maine. In the course of my physical exam, I found approximately 30% of the ferrets to be ill enough to be classified as "unfit for sale." I witnessed animals that were estimated to be as young as 5 weeks of age at the time of arrival for sale. The conditions that I noted included prolapsed rectums, unhealed and infected surgical incisions, congenital malformations, pneumonia, upper respiratory infections, severe diarrhea, and starvation/emaciation. In addition, the toll of behavior changes associated with inappropriately early weaning and shipping prior to the emergence of adult dentition include nipping, biting, and hyperactivity. This combination of health and behavior problems results in the relinquishment of animals to already overburdened shelters. Many of these problems could be corrected with an older age at weaning and shipping, and standardized requirements for basic care.

One of my personal ferrets, now famous for his "testimony" before the State of Maine during the hearings for the "8-week Rule" adopted there, nearly died during shipment/resale. I was shopping at the local pet store for supplies, and a conscientious store clerk pulled me aside to let me know that a very sick ferret, slated to be "snake food" that evening, would be in the back seat of my car when I left. Would I please take care of him and euthanize him if he was suffering? I went outside to find an unconscious, barely-breathing tiny white ferret in my car. He was approximately 5 weeks old and only had baby teeth. I rushed him to my hospital, where my staff slowly warmed his

body temperature and began to nourish him. Within 12 hours, he had regained consciousness - and within 2 weeks, was a normal kit again. Fortunately, someone cared enough about him to bring him through. How many ferrets need to suffer and die before standards are set for their protection?

The Animal Welfare Act MUST be amended to protect not only the ferrets, but also the consumers. People buy these ferrets, assuming that they are getting a healthy, fully weaned animal. Instead, they are taking home kits that have baby teeth, need softened food, and are so biologically stressed from their early weaning and surgeries that they have often fallen prey to multiple illnesses. Pet stores, unfortunately, also suffer because they need to deal with these unhappy customers and these sick animals. Shelters wind up taking in the animals needing medical and behavioral care when the consumers are no longer willing or able to work with the ferrets. And, of course, the ferrets are the ultimate losers in this equation.

What would I like to see done to protect these popular pets?

-Allow no animal to be shipped from the breeder prior to 8 weeks of age, as evidenced by the emergence of adult dentition.

-Set humane shipping standards, maintaining animals within a natural thermoneutral zone (air temperature, not cooled with gel packs as is currently the norm). Ensure that they are provided adequate non-spillable food, water, and bedding to last the duration of their trip, with an added allowance for travel delays.

-Require that a health certificate be issued for each and every animal to be shipped, not a litter certificate.

-Require that surgical incisions be healed and that the animal be free of all apparent disease prior to transport.

-Provide for minimal care standards for all animals maintained on a ferretary.

These requests are minimal, basic requests which fall under the existing scope of the Animal Welfare Act. Not providing species-specific requirements covering ferrets is contrary to both the language and Congressional intent of the

Animal Welfare Act.

I would be happy to discuss this matter further. It is a petition that is too long in the coming. Every day that we delay, more animals die of neglect and ignorance. Protecting the ferrets provides a win-win situation - for the consumer, the pet stores, and, of course, the ferrets.

Sincerely,
Sandra C. Kudrak, DVM, DABVP