

September 14, 2023

Roxanne Mullaney, D.V.M.  
Deputy Administrator  
USDA/APHIS/Animal Care

Via email: [REDACTED] [ac.complaints@usda.gov](mailto:ac.complaints@usda.gov)

Dear Dr. Mullaney,

I'm writing to follow-up on PETA's July 10, 2023 request for investigation of Bear Country U.S.A. (license no. 46-C-0005) for apparent Animal Welfare Act violations (complaint no. AC23-0772). According to an August 10, 2023 inspection report, Bear Country U.S.A. was cited for a handling violation for using fireworks to "get mother bears out and away from the dens and safely retrieve the cubs." Acknowledging that this method causes undue stress and trauma, the inspectors instructed Bear Country U.S.A. to ensure that it is no longer used. However, the report excuses the premature separation as purportedly necessary "for the safety of the cubs and to allow for early preventive veterinary care and treatment," and it omits the fact that a supervisor also admitted to using explosives to scare mother wolves from their dens to separate them from their newborn pups.

As described in PETA's July 10 correspondence (enclosed) and according to animal behavior experts, premature maternal separation itself causes trauma and stress. In the rare circumstance in which cubs are removed from their mothers for medical necessity, they should be returned as soon as possible. The fact that Bear Country U.S.A. claims the removal is for the cubs' own safety indicates a much larger welfare issue there. The grounds crew supervisor also admitted to PETA's investigator that the cubs and pups were bred each year because they "are nice out front for people to see. People enjoy the babies more than anything." Furthermore, as described in complaint no. AC23-0772, the cubs and pups demonstrated a reluctance to eat following the separation, indicating that they experienced stress and discomfort beyond the traumatic use of fireworks.

PETA respectfully asks that the USDA investigate Bear Country U.S.A.'s violation of 9 C.F.R. § 2.131(b)(1), and hold the licensee accountable for taking these vulnerable newborns away from their mothers and putting them in a state of unrelieved suffering—as evidenced by their refusal to eat in the days and weeks that followed the separation.

Thank you for your attention to this important matter.

Very truly yours,



Debbie Metzler, M.S.  
Director of Captive Animal Welfare  
[REDACTED]

PEOPLE FOR  
THE ETHICAL  
TREATMENT  
OF ANIMALS  
FOUNDATION

Washington  
1536 16th St. N.W.  
Washington, DC 20036  
202-483-PETA

Los Angeles  
2154 W. Sunset Blvd.  
Los Angeles, CA 90026  
323-644-PETA

Norfolk  
501 Front St.  
Norfolk, VA 23510  
757-622-PETA

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