

**Subject:** Space and Exercise Requirements for Traveling Exhibitors **Policy #6**

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**References:** AWA Section 13  
9 CFR, Part 3 Sections 3.6, 3.8, 3.28, 3.53, 3.80, 3.104, 3.128

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**History:** This replaces the June 6, 1984, memo entitled “Traveling Animal Acts-Cage Spaces for Dogs, Cats, and Nonhuman Primates.” It expands and clarifies enclosure space and exercise requirements for traveling exhibitors. The previous version of this policy released on March 5, 1998, has been modified to provide better clarification of the requirements regarding space for vertical posturing.

**Justification:** Some traveling exhibitors maintain animals long term in transport cages during “travel status.” This policy clarifies when the licensee is required to meet full primary enclosure space requirements and/or provide sufficient exercise space and time for animals in traveling exhibits.

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**Policy:** Animals exhibited in traveling shows may be kept in enclosures that meet the space requirements for transport enclosures as specified in Sections 3.14, 3.36, 3.61, 3.87, 3.113, and 3.137 **ONLY** during actual transport, i.e., movement in a conveyance between temporary locations. At all other times, they must be provided with space as described below.

- Dogs, cats, rabbits, guinea pigs, hamsters, nonhuman primates, and marine mammals must be housed in primary enclosures that meet the space requirements described in Sections 3.6, 3.28, 3.53, 3.80, and 3.104, respectively.
- Primary enclosures for all other animals must allow space for each animal to express all species-typical postures, social adjustments, behaviors, and movements. For example, animals must be able to lie down with limbs extended in a normal manner without obstruction from enclosure sides or having to extend feet through feeder doors or bars. Animals that normally engage in occasional vertical postures, such as bears and many felines, must have sufficient vertical space available to accommodate these postures. For example, bears often stand upright on their rear legs and must be allowed sufficient vertical space within their housing enclosure to do so. Many felines also stand on their rear legs, for example, when using scratching posts. However, if enclosures used while “on the road” (i.e., when away from permanent quarters but not actually in transit) do not provide adequate height for animals that occasionally exhibit vertical postures to

engage in such activities, this requirement can be satisfied through release of the affected animals into an exercise pen or equivalent. If a pen is used for this purpose, animals should be released at least once per day and allowed to remain for a reasonable length of time unless otherwise justified. These periods will be in addition to regular performance and practice time.

- When elephants are housed on chains while not in transport, chains must be of sufficient length and arrangement so as to permit each elephant to comfortably lie down, get up, self-groom, and move about within a reasonable range. If elephants are kept unchained in a truck or railway car, each elephant must have enough space to make these postural adjustments as well. These same requirements apply to tethered hoofstock.
- When more than one animal is kept in an enclosure at one time, all animals must simultaneously have sufficient space to accommodate the postures and movements as described above.
- Subpart F animals (for example, elephants, hoofstock, and exotic cats) are required to have “sufficient space to allow each animal to make normal postural and social adjustments with adequate freedom of movement.” Enclosures that allow only postural adjustments are inadequate to meet this requirement. “Adequate freedom of movement” includes the ability to exercise. Since it is sometimes difficult for a traveling exhibitor to provide a primary enclosure large enough to allow an animal sufficient exercise, an enclosure that allows only “normal postural and social adjustments” will be considered acceptable if the animal contained therein is released regularly from the primary enclosure (or tether) into a secure space, such as a ring or corral, that provides the opportunity for species-appropriate exercise. This release must occur at least once per day for an appropriate length of time unless otherwise justified. These periods will be in addition to regular performance and practice time. For some species, an area enclosed by an electrical fence is acceptable for this purpose if monitored at all times. Trained elephants and domestic hoofstock may be walked by a qualified handler for this purpose. These provisions apply only to the need for additional space for exercise. Other than to satisfy the vertical posturing needs of animals that occasionally exhibit such movement, the requirement for “sufficient space to allow each animal to make normal postural and social adjustments” cannot be met by periodic release into a larger enclosure. When a traveling exhibitor is not actually in transit (i.e., when he/she is set up for a show or in a holding location), animals must be kept in enclosures which allow them to express postural adjustments typical of their species.



