

**GENERAL
INSPECTION
PROCEDURES**

Each inspector should develop a consistent method of conducting inspections of traveling exhibitors while in travel status that ensures that the inspection is thorough and accurate.

**Inspection
Procedures**

Inspections of exhibitors on the road are different from inspections at the home facility. However, all of the applicable AWA regulations and standards must be met.

Prior to the Inspection

Prior to conducting the inspection, review:

- several past inspections in LARIS to determine if there were noncompliances
- prior inventories, if listed on the inspection reports
- and follow “Protocol for Inspecting Traveling Exhibitors with Elephants” if applicable (see page 17.1.7)

Admission to the Venue

If the venue, e.g. theme park, State/county fair, Renaissance Festival, or craft show, where the traveling exhibitor is located has an admission gate:

- go to the admission gate
- identify yourself in a professional manner
- state the purpose of your visit
- pay the admission fee, if required

Note: Do not argue with the person at the admission gate (see below).

NOTE: If you want to enter the venue to observe the exhibitor without him/her knowing you are there, pay the entrance fee and you will be reimbursed.

At most venues, you will not be required to pay admission. However, the venue is not obligated to let you in without paying the admission fee. If an admission fee is required, you can:

- ask to speak to someone in management

- make prior arrangement for your admission if this is a venue that you inspect regularly
- pay the fee

If you are required to pay admission, you should:

- charge the admission fee on your Purchase Visa (preferable), or
- pay cash (you will be reimbursed)

Conducting the Inspection

Listed below are some suggested procedures for conducting a thorough inspection:

- if possible, observe a performance/act
- if possible, observe the handling of the animals before contacting the responsible person
- if you have concerns about the handling of the animals, ask about the qualifications and training of the animal handlers
- be alert and cautious around the animals. Remember that big cats spray, nonhuman primates throw feces, and animals may be able to get their arm or paws/feet through the bars.
- observe and check the health and well-being of all the animals, such as:
 - alertness and activity level
 - behavior
 - normal appearance
 - foot and hoof care
 - presence of wounds
 - signs of abuse
- check chained or tethered animals for restraints which are too tight
- if you have concerns about an animal, ask to see the animal up close, if possible and safe
- for animals housed outdoors, check for adequate shelter and shade
- ask about contingency plans for veterinary care if an animal becomes sick or is injured on the road
- inspect food preparation and storage areas

	<ul style="list-style-type: none">• if fresh meat is required, ask about:<ul style="list-style-type: none">➤ sources of the meat while on the road➤ storage➤ method(s) of thawing• ask about feeding schedules• Note: Food deprivation may not be used for training.• ask about the source and quality of the drinking water to make sure it is potable• observe and ask about security measures to protect the animals and the public, such as:<ul style="list-style-type: none">➤ barrier fences or electric fences➤ uniformed attendants➤ night security• determine if there is a sufficient number of employees to provide for the animals' care• check enclosures for adequate space during travel and at the temporary location• check on availability and use of exercise areas• if possible, observe the loading and/or unloading of animals• check records (See Section 17.4)• obtain an up-to-date copy of the exhibitor's itinerary and forward it to the Regional Office with a note to forward to the home inspector
<p>Species Specific</p>	<p>Elephants</p> <p>Prior to inspecting a traveling exhibitor with elephants, review and follow the procedures in "Protocol for Inspecting Traveling Exhibitors with Elephants" (page 17.1.7).</p> <p>The following are some suggestions, when inspecting elephants:</p> <ul style="list-style-type: none">• be alert and cautious when near the elephants• never trap yourself in an enclosed area with the elephants• have the owner/handler present at all times when near the animals• determine the routine for skin care, such as:<ul style="list-style-type: none">➤ routine bathing (every day or two)➤ wetting down➤ access to a pool or pond

- check the skin for proper care, such as, the absence of:
 - dryness
 - sores/abscesses
 - ingrown hairs
 - check animal for skin wounds from abusive handling or training
 - check ankles for chain sores or cuts
 - check all feet for proper foot care, such as:
 - proper foot trimming
 - the absence of cysts
 - management of toenail cracks
 - management of overgrown cuticles
 - check foot care logs, if available
 - if animals are chained, either on one or two legs, the chains must allow the elephants to:
 - lie down comfortably on either side
 - get up easily
 - turn and move about
 - observe the animal for any signs of conditions that require veterinary care. Note: If you note signs of disease, you should check for veterinary care and treatment records.
 - check for the appropriate treatment of animals with arthritis or any other medical conditions
 - inspect indoor enclosure and transport enclosures carefully for:
 - general condition/structural strength
 - adequate ventilation
 - required space
- NOTE:
Most trucks/trailers are only 8 feet wide with an interior width of 7-7.5 feet. Ask how animals are positioned in the truck/trailer.

Listed below are some conditions in elephants which may appear abnormal, but are actually normal:

- a dark, oily fluid draining from the temporal gland which is located between the eye and the ear canal
- an increase in temporal gland secretions in the male in “musth”
- female mammary glands are located between the front legs

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Other Animals

Listed below is some information to remember when inspecting other wild and exotic animals:

- **baboons and chimps** have sexual swellings that may resemble tumors
- **camels** -
 - when males become excited, they may blow up a sac-like extension of the soft palette into a red “balloon” which hangs out from the corner of their mouth
 - males in “musth/rut” may:
 - lose a significant amount of weight
 - drool, slobber, and froth at the mouth
 - make gurgling sounds
 - have rough/scaly hair coats
 - dribble urine
- **large cats** - females in heat:
 - roll around
 - become very vocal
- **pygmy hippos** -
 - secrete a clear, pink or brown viscous substance on the skin
 - skin should appear soft and flexible
 - skin should not be cracking or scaling
 - like to wallow in mud
 - should have a pond, or
 - be wetted down regularly

Inspection Reports

When entering an inspection report for a traveling exhibitor **not** at his/her home site, make sure that:

- you use the TRA site designation in LARIS:
 - if the licensee does not have a TRA site already in LARIS, follow the procedure on page 7.1.2
 - if the licensee has more than one TRA site, use the correct TRA site if it is in LARIS, such as the Blue Unit or the Red Unit

- in the narrative section, you put:
 - the location(s) of the inspection
 - the name of the Unit, if applicable
 - the names of the elephants inspected

After the inspection, you should send a copy of the inspection report to your Regional Office or SACS, according to your Region's administrative procedures.

If a reinspection is needed, inform your SACS, so the AC inspector at the next location where an inspection is needed can be informed.

PROTOCOL FOR INSPECTING TRAVELING EXHIBITORS WITH ELEPHANTS

The following guidelines have been developed because of the complexities involved in inspecting traveling exhibitors with elephants. These complexities include TB concerns, specific complaints calling for a focused inspection, ongoing investigations, pending legal action and an assortment of other confounding issues that make it very difficult for an inspector to perform a complete inspection. To ensure that these complexities do not interfere with our potential legal actions or investigations, it is important that inspectors take the following simple steps PRIOR to conducting inspections of these elephants.

If you are aware in advance (flyers, word of mouth, newspaper articles, etc.) of a traveling exhibitor with elephants (circus, renaissance fair, elephant rides, etc.) Coming through your area, please contact your SACS and Denise Sofranko (field specialist for elephants) with the information about the exhibition before conducting an inspection. The information should include:

(1) the name of the exhibition (i.e., “Monty Gator’s Flying Circus”); (2) dates; and (3) location (i.e., city, State). At this point, the SACS, with input from the Elephant Field Specialist and the home inspector, will determine what additional information needs to be obtained, or if an inspection would be contraindicated for one of the reasons listed above. There may even be circumstances where we would ask the inspector to observe the exhibition or performance, but not complete an inspection report.

If you didn’t know in advance that a traveling exhibitor had elephants and you find yourself in a situation where you might normally do an elephant inspection, please contact your SACS and/or Dr. Sofranko before proceeding for the reasons listed above.

If you cannot reach your SACS or Dr. Sofranko, try to contact the regional office or the home inspector so you can determine if an inspection has been done in the last 30 days and/or if there are other concerns. If you can’t reach anyone and/or can’t get into LARIS to determine the last inspection date, you should request the last inspection report from the licensee to make that determination. If an inspection has not been done in the last 30 days or there is an identifiable need (obvious non-compliances), go ahead and conduct an inspection.

Please always attempt to obtain the following information when inspecting an exhibitor with an elephant:

1. A current itinerary for traveling exhibitors (please encourage them to send future itineraries to the appropriate regional office)
2. Names of the elephants
3. Elephant owner’s name
4. Name of the licensee under whom the elephants are being exhibited

5. Employer of the elephant manager (e.g., if the manager is not also the owner, are they employed by the elephant owner or the circus owner?)

NOTE: Other than the names of the elephants, this information should not be in the narrative of the inspection report. A separate e-mail memo with this information should be sent to your SACS and Dr. Sofranko.