

RECOMMENDED FWC POLICY CHANGES FOR SLOTHS IN FLORIDA

PREPARED BY THE SLOTH PROTECTION ALLIANCE

The Sloth Protection Alliance is a collaborative initiative formed by the [Sloth Conservation Foundation \(SloCo\)](#) and [The Sloth Institute \(TSI\)](#). Together, our organizations have spent decades studying, rescuing, rehabilitating, and protecting sloths in the wild. Since January 2026, we have worked alongside investigators, journalists, lawmakers, veterinarians, and policy experts to expose the realities of the commercial sloth trade and advocate for reform.

Under the current Florida Fish and Wildlife Conservation Commission (FWC) system, sloths are classified as Class III wildlife. This means that sloths can be possessed under a relatively limited framework of permitting and oversight.

At present:

- Current regulations do not require competency in sloth husbandry prior to acquisition.
- Pre-acquisition facility inspections are not required.
- Mortality reporting is not required.
- There is limited long-term welfare monitoring once sloths enter private ownership.
- There is limited traceability once animals enter the state.

The current regulatory framework places greater emphasis on public safety risks than on welfare vulnerabilities or husbandry complexity. While sloths pose little danger to public safety, they are highly sensitive, biologically specialized mammals with complex requirements that are difficult to meet in captivity. The high mortality rates among captive sloths demonstrate that the current system is failing to adequately protect their welfare.

EVIDENCE OF SYSTEMIC FAILURE

According to FWC records summarized by the Sloth Protection Alliance:

- A total of 76 wild-caught sloths were imported into Florida for Sloth World.
- 56 sloths are confirmed dead.
- Only 9 are confirmed alive at the Central Florida Zoo.
- 11 remain of unknown status.

The scale of mortality in this case clearly shows that the current system failed to detect serious welfare problems before large numbers of animals had already died.

Sloth World was not just the result of one poorly managed facility. It became a high-profile case because an unusually large number of animals died in a short period, and whistleblowers brought the situation to public attention. The broader concern is that the commercial trade in sloths remains active in Florida and continues to operate under a regulatory framework that offers limited oversight and accountability for welfare.

For example, Florida veterinarian Dr. Richard Miller has imported hundreds of wild-caught sloths into the United States over recent years. Animals that survive importation have subsequently been sold into the private exotic pet trade and supplied to commercial facilities throughout the country. Because Florida does not require mortality reporting for sloths, there is currently no way to know how many have died. According to the most recent FWC inspection records, Dr. Miller currently maintains 46 sloths at his facility. A review of import records is required to quantify the total number of sloths imported and distributed through this operation.

Similarly, Larry Wallach is currently seeking to establish a sloth encounter business in Margate, Florida, under the name Wildlife Adventures. Mr. Wallach previously operated a sloth encounter facility in New York that accumulated more than 60 documented animal-welfare violations before being shut down by court order and the suspension of its USDA license. He has since relocated to Florida and is now seeking to continue offering sloth encounter experiences under Florida's current regulatory framework.

These examples demonstrate that the issues exposed by the Sloth World case are not confined to a single facility or operator. Rather, they reflect broader systemic concerns surrounding the continued importation, sale, exhibition, and commercial use of sloths within Florida.





WHY SLOTHS REQUIRE SPECIALIZED REGULATION

Sloths are not well-suited to commercial handling, public encounters, or private ownership. They are highly specialized rainforest mammals with very specific biological and welfare needs that are difficult to meet in transport and in captivity.

SLOTHS OFTEN HIDE SIGNS OF SUFFERING:

Unlike many other exotic species, sloths are extremely sensitive to stress and often do not show obvious signs of struggle. They do not carry “fight or flight” reactions, and even when experiencing severe physiological stress or illness, they can appear calm and inactive, making problems difficult to detect or recognize.

HIGHLY SPECIALIZED DIET AND DIGESTION:

Sloths have evolved to survive on specific rainforest leaves and have a highly specialized digestive system, including a gut microbiome adapted to this natural diet. Sudden dietary changes, such as those that occur when sloths are removed from the wild and transported into the United States, lead to high mortality. Their extremely slow metabolism also means that illness and decline can take weeks to become visible, by which point the damage is often already irreversible.

SLOTHS REQUIRE VERY SPECIFIC ENVIRONMENTAL CONDITIONS:

Sloths are poikilothermic, meaning they cannot effectively regulate their internal body temperature and instead rely on very narrow temperature and humidity ranges to survive. Maintaining these environmental conditions consistently is difficult in captivity and nearly impossible during international transport.

CAPTIVE SLOTHS OFTEN HAVE REDUCED LIFESPANS:

Even under the best captive conditions, sloths have significantly shorter lifespans than they do in the wild. Sloths are estimated to live 50+ years in the wild, but even the best-accredited facilities report average captive lifespans of only 13–20 years, depending on species and sex. This raises concerns about whether their complex welfare needs can realistically be met within commercial exhibition and private ownership settings.

These characteristics make sloths fundamentally different from many other Class III species and support the need for more specialized regulation and oversight.

FIVE ACTION ITEMS: RECOMMENDED POLICY CHANGES

BAN THE IMPORTATION OF WILD-CAUGHT SLOTHS INTO FLORIDA

FWC should implement a permanent ban on the importation of sloths. Any permitted imports should:

- Involve only facilities accredited by the Association of Zoos and Aquariums (AZA) or equivalent internationally accredited institutions,
- Happens with the approval of the Sloth Species Survival Plan (SSP),
- And not include any sloth that was wild-caught after the date these regulations came into effect

CREATE A SPECIALIZED REGULATORY CATEGORY FOR SLOTHS

FWC should establish either:

- A new category for highly specialized, welfare-sensitive species, or
- At minimum, uplist sloths from Class III to a more regulated classification with new requirements.

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REQUIREMENTS SHOULD INCLUDE:

- Permit holders must demonstrate prior experience and competency in sloth husbandry, handling, and welfare, and must have no history of animal welfare violations, permit revocations, license suspensions, or other regulatory non-compliance involving captive wildlife.
- Mandatory facility inspections prior to the acquisition of any sloth and at least annual inspections throughout the duration of ownership.
- Inspections should be conducted by FWC personnel and/or qualified contractors with training and experience in sloth husbandry and welfare assessment. The Sloth Protection Alliance is willing to provide guidance and training materials to assist FWC in developing species-specific inspection protocols and welfare assessment standards.
- A written veterinary care plan developed in consultation with a veterinarian experienced in sloth medicine, husbandry, and preventative healthcare, including protocols for routine health monitoring, emergency care, quarantine procedures, and disease management.
- Minimum environmental standards based on current best practices for sloth care, including appropriate diet plans, enclosure design, climbing opportunities, temperature and humidity requirements. At a minimum, temperatures should be maintained between approximately 23–32°C (73.4–89.6°F) for Choloepus sloths and 26–30°C (78.8–86°F) for Bradypus sloths, with humidity levels consistently maintained between 75–85%.
- Comprehensive record-keeping requirements for all sloths held in captivity, including acquisition records, origin documentation, transfers, sales, births, deaths, veterinary treatment history, necropsy findings, and final disposition of animals.
- Permanent individual identification and traceability requirements for all sloths, ensuring that animals can be tracked throughout their lives and preventing individuals from disappearing from regulatory oversight following transfers or sales.

MANDATORY MORTALITY AND TRANSFER REPORTING

All sloth deaths, transfers, sales, and births should be reported to FWC immediately. Without mortality reporting, regulators cannot accurately assess welfare outcomes or detect systemic problems.

PROHIBIT DIRECT-CONTACT “SLOTH ENCOUNTER” EXPERIENCES

Direct-contact sloth encounters should be prohibited. This includes holding and petting. These interactions create chronic stress and incentivize continued commercial demand for imported sloths. Educational viewing and feeding without physical contact should remain permissible.

CLOSE THE “CAPTIVE-BRED” LOOPHOLE

Sloths born to females imported while pregnant should not automatically qualify as captive-bred animals. This loophole currently enables the commercial sale of offspring derived directly from wild-caught sloths while obscuring the true origin of the trade. FWC should establish clear definitions and traceability requirements surrounding captive breeding claims.

