

BOROUGH OF BARROW-IN-FURNESS
LICENSING REGULATORY COMMITTEE

Special Meeting, Tuesday 23rd February;
Wednesday 24th February, and
Wednesday 2nd March, 2016
at 9.30 a.m. (Drawing Room)

A G E N D A

PART ONE

1. To note any items which the Chairman considers to be of an urgent nature.
2. To receive notice from Members who may wish to move any delegated matter non-delegated and which will be decided by a majority of Members present and voting at the meeting.

3. Admission of Public and Press

To consider whether the public and press should be excluded from the meeting during consideration of any of the items on the agenda.

4. Declarations of Interest.

To receive declarations by Members and/or co-optees of interests in respect of items on this Agenda.

Members are reminded that, in accordance with the revised Code of Conduct, they are required to declare any disclosable pecuniary interests or other registrable interests which have not already been declared in the Council's Register of Interests. (It is a criminal offence not to declare a disclosable pecuniary interest either in the Register or at the meeting).

Members may however, also decide, in the interests of clarity and transparency, to declare at this point in the meeting, any such disclosable pecuniary interests which they have already declared in the Register, as well as any other registrable or other interests.

5. Apologies for Absence/Attendance of Substitute Members.

FOR DECISION

- (D) 6. Zoo Licensing Act 1981 (as amended) – Zoo Licence for South Lakes Safari Zoo Ltd – Non Compliance with Direction Order – Public Walkways and Platforms.
- (D) 7. David Stanley Gill, South Lakes Safari Zoo Ltd, Zoo Licensing Act 1981 (as amended) – Report on Periodical/Renewal Inspection.

PART TWO

- (D) 8. David Stanley Gill, South Lakes Safari Zoo Ltd, Zoo Licensing Act 1981 (as amended) – Compliance with Conditions 17 and 18 – Direction Order.

NOT FOR PUBLICATION BY VIRTUE OF PARAGRAPHS 2 AND 7 OF PART ONE OF SCHEDULE 12A OF THE LOCAL GOVERNMENT ACT 1972 AND ACCESS TO INFORMATION (VARIATION) ORDER 2006

NOTE (D) - Delegated
(R) - For Referral to Council

Membership of Committee

Callister (Chairman)
Seward (Vice Chairman)
Biggins
Cassells
Derbyshire
Heath
W. McClure
Maddox
Opie
Proffitt
Wall
One Vacancy

For queries regarding this agenda, please contact:

Keely Fisher
Democratic Services Officer
Tel: 01229 876313
Email: ksfisher@barrowbc.gov.uk

Published: 15th February, 2016

LICENSING REGULATORY COMMITTEE		(D) Agenda Item 6
Date of Meeting: 23 rd , 24 th February 2016 and 2 nd March 2016		
Reporting Officer: Principal Environmental Health Officer		
Title: Zoo Licensing Act 1981 (as amended) Zoo Licence for South Lakes Safari Zoo Ltd		
Non-Compliance with Direction Order Public Walkways and Platforms		
Summary & Purpose of the Report		
<p>Mr David Stanley Gill holds a zoo licence issued on 8th June 2010 to operate a zoo at premises known as South Lakes Safari Zoo Ltd, Crossgates, Dalton-in-Furness, Cumbria, LA15 8JR.</p> <p>On 17th December 2015 Members elevated a condition relating to public walkways and platforms to a Direction Order. On 4th February 2016 Members considered the Zoo's progress towards compliance with the Direction Order.</p> <p>On Wednesday 10th February 2016 information became available that suggested that the Zoo had given incorrect information to Council Officers regarding compliance with the Direction Order relating to the public wooden walkways and platforms.</p> <p>This report updates Members as to the current situation.</p>		

Background

Mr David Stanley Gill holds a zoo licence issued on 8th June 2010 to operate a zoo at premises known as South Lakes Safari Zoo Ltd, Crossgates, Dalton-in-Furness, Cumbria, LA15 8JR [the Zoo].

At a meeting of the Licensing Regulatory Committee on 17th December 2015 the Committee decided to elevate condition 21 "**Public wooden walkways and platforms**" to a Direction Order. A copy of the Direction Order is attached at Appendix A.

The Direction Order required that all walkways and platforms to be closed to the public until the Direction Order is revoked.

At the meeting of the Licensing Regulatory Committee on 4th February 2016 Members;

- accepted a report from the Zoo compiled by R.G.Parkins and Partners Ltd that considered 2 out of an identified 7 elevated walkways and platforms.
- accepted that 5 out of the identified 7 elevated walkways had been, or were to be demolished and either remodelled or replaced.
- required an addendum to the report that the Zoo had completed the works specified by Parkins to ensure the remaining walkways were strengthened as directed and that other wooden structures being remodelled were suitable for that purpose.
- extended the time limit for compliance to 31st May 2016
- granted the Environmental Health Manager the delegated authority to authorise the walkways to open as and when the Zoo produced suitable evidence of the strengthening works.

Officer's Comments

The walkways have been a cause of concern over the duration of the zoo licence and the issues are as yet unresolved. The previous history has been reported to past Committees but concerns were raised during Formal Inspections in 2009 and 2013 as well as Special Inspections in 2014 and most recently in November 2015

The SSSMZP states that:

- | | |
|----------------|---|
| paragraph 8.13 | Buildings and structures to which the public have access must be maintained in a safe condition. |
| paragraph 8.15 | Areas where visitors are encouraged to go should have surfaces to avoid the risk, as far as is reasonably practicable, of visitors falling or tripping. |
| paragraph 8.18 | Where a walkway passes over an animal enclosure it should be designed, constructed, and maintained to ensure that it is safe. |

Following the service of the Direction Order relating to the public wooden walkways and platforms the Zoo was inspected by Environmental Health Officers on 20th January 2016 to ensure that all the walkways were closed. During that inspection the Officers were accompanied by Ms Karen Brewer, the Zoo's Marketing and Development Manager. At the western end of the zoo, in the area known as the Worldwide Safari there a number of low level wooden walkways that serve to level the pathway and make wheelchair access easier. It was said by Ms Brewer that these platforms were less than 300mm high and therefore R.G. Parkins had said they did not need to be surveyed.

On 11th February 2016 a telephone conversation took place with Adam Roberts Associate Director of R G Parkins & Partners Ltd due to issues with the walkway around the Andean Bear enclosure and especially where the walkway was less than 300mm high. Mr Roberts stated that he had never said that a walkway less than 300mm should not be considered. This was later confirmed in an email exchange. A copy of the email chain is enclosed at **Appendix B**.

Recommendation

That the Committee instruct the Zoo to close every public wooden walkway/platform, regardless of it's height above the ground, until the full terms of the Direction Order have been met.

Reason for Recommendation

The Direction Order served on the Zoo covers all public wooden walkways and platforms including those less than 300mm high. R G Parkins have confirmed they did not exclude any public wooden walkway or platform due to its height.

Options

The options available to Members are:-

- **Accept** the Officer's recommendation and order the closure of all public wooden walkways/platforms with immediate effect until the terms of the Direction Order are met.
- **Reject** the officer recommendation and decide that any walkways under 300mm are not subject to the Direction Order.

Considerations

(i) Legal Implications

The Zoo requires a licence to be able to open to the public and the Zoo Licencing Act 1981 makes the local authority responsible for administering the Licence. Anyone running a Zoo without a licence is guilty of an offence.

The Local Authority's power to alter a licence is contained within Section 16 of the same Act

(1) At any time after the grant of a licence under this Act, it may be altered by the local authority if in their opinion it is necessary or desirable to do so for ensuring the proper conduct of the zoo during the period of the licence (whether their opinion arises from an inspectors' report or an alteration of standards specified under section 9 or otherwise).

(1A) Subsection (1B) applies where—

(a) the authority have made a direction under section 16A(2) in respect of a zoo;

(b) the period specified in that direction by virtue of section 16A(2)(c), including such a direction as varied under section 16A(4), has expired; and

(c) the authority are satisfied that a condition specified in that direction which requires any conservation measure referred to in section 1A to be implemented at the zoo is not met in relation to—

(i) if the zoo was specified under section 16A(2)(b)(i), any section of the zoo;

(ii) if a section of the zoo was specified under section 16A(2)(b)(ii), that section of the zoo or any smaller section of the zoo included in that section.

(1B) The authority shall make such alterations to the licence as they consider to be necessary or desirable to ensure that the section of the zoo in relation to which they are satisfied that the condition is not met is closed permanently to the public.

(2) Before exercising the power under subsection (1), the local authority shall give the holder of the licence an opportunity to make representations.

16A Enforcement of Licence Conditions

(1) Subsection (2) applies where the local authority, after giving the licence holder an opportunity to be heard, are not satisfied that a condition attached to a licence granted by them under this Act is met in relation to the zoo or a section of it.

(2) Unless subsection (3) applies, the authority shall make a direction specifying –

(a) The licence condition which they are not satisfied is met;

(b) Whether they are not satisfied that the condition is met in relation to –

- (i) the zoo; or
- (ii) a section of the zoo, and if so, which section;
- (c) steps to be taken by the licence holder to ensure that that condition is met in relation to the zoo ... within a period specified in the direction, which may not exceed two years from the date of the direction; and
- (d) whether the zoo or a section of it is required to be closed to the public during that period or any part of it specified in the direction

There is a right of appeal under Section 18 to the Magistrate's Court if the holder of the licence wishes to challenge the decisions of the Committee.

(1) *A person aggrieved by*

- (a) *the refusal to grant a licence;*
- (b) *any condition attached to a licence;*
- (c) *any variation or cancellation of a condition;*
- (d) *the refusal to approve the transfer of a licence;*
- (e) *a direction under section 13(8)(c) or 16A(2) or any variation of such a direction;*
- (f) *a zoo closure direction;*
- (g) *the refusal to approve a plan prepared under section 16E(2);*
- (h) *a direction under section 16E(6) or any variation of such a direction; or*
- (i) *any arrangements under section 16E(7) or (8),*

may appeal to a magistrates' court acting for the petty sessions area in which the zoo is situated.

(ii) Risk Assessment

Not Applicable

(iii) Financial Implications

The Council may be subject to an appeal against the Committee's decision in the Magistrates' Court under Section 18 of the Zoo Licensing Act 1981.

(iv) Key Priorities or Corporate Aims

None identified

Equality and Diversity

Not applicable

(v) Other Human Rights

All licence holders have a right to a fair hearing.

Any action taken by the Council must be taken having regard to the principle of proportionality. When determining what action is appropriate the Committee will balance the rights of the licence-holder with the rights of the public at large.

(vi) Health and Well-being Implications

One of the purposes of the Zoo Licensing Act 1981 is to protect the safety of the public visiting premises licensed under the Act.

Background Papers

Current Zoo Licence held by South Lakes Safari Zoo Limited

Table of Decision from Licensing Regulatory Committee 13th August 2015

Table of Decision from Licensing Regulatory Committee 17th December 2015

Licensing Regulatory Committee Report 4th February 2016

APPENDIX A



ZOO LICENSING ACT 1981 – SECTION 16(A)2

Direction to comply with a condition attached to a licence to operate a zoo.

To: Mr. David Stanley Gill

At: South Lakes Safari Zoo Ltd,
Broughton Road,
Dalton-in-Furness,
Cumbria LA15 8JR

Take notice that Barrow Borough Council having given you the opportunity to be heard is not satisfied that in relation to South Lakes Safari Zoo a condition attached to your licence dated 11th December 2015 which required you to:

Condition 21 In accordance with 8.13 and 8.18 of the SSSMZP, the public wooden walkways and platforms must be designed to meet BS 6399-1: 1996 and be able to cope with the heavy duty loading and maintained in safe condition. The effect of any walkway or platform stanchions being submerged in water for prolonged periods should be assessed in terms of deterioration and structural stability. A programme of inspection, maintenance and structural repairs needs to be documented.

A report must be produced for the Licensing Authority by 13th November, 2015 and presented to this Committee.

Is met.

The above licence condition is not met in relation to all timber walkways throughout the Zoo

Barrow Borough Council hereby requires you to take the following steps to ensure that the licence condition is met,

Directions

In accordance with 8.13 and 8.18 of the SSSMZP, the public wooden walkways and platforms must be designed to meet BS 6399-1: 1996 and be

able to cope with the heavy duty loading and maintained in safe condition. The effect of any walkway or platform stanchions being submerged in water for prolonged periods should be assessed in terms of deterioration and structural stability. A programme of inspection, maintenance and structural repairs needs to be documented.

A report must be produced for the Licensing Authority addressing the following six issues:-

- 1) The Zoo must produce design calculations that demonstrate that all timber walkways and platforms are designed to carry the loads specified in Clause 10 and Table 4 of BS 6399-1: 1996 with structures considered to be carrying 'heavy duty' loading;
- 2) Design calculations must be produced to confirm that 'stability critical' longitudinal and lateral sway stiffness of the structures is confirmed for at least 10% of the 5kNm-2 vertical loading in the appropriate combinations with lateral loading on the parapets and the timber post supports;
- 3) The Zoo must demonstrate through design and calculations that the design incorporates protection against any accidental (impact) loading on the timber posts;
- 4) The Zoo must demonstrate through design and calculations that the design incorporates a suitable assessment for any disproportionate collapse (i.e. structural integrity under failure of one or possibly more timber posts);
- 5) That the Zoo provides an independent Structural Engineer's report on the condition of the timber walkways and platforms within the Zoo and carry out any works that will meet the design standard and specifications above; and
- 6) That the Zoo implements a regular recorded assessment, inspection and maintenance regime

These steps completed by 19th January 2016.

The Zoo specified above must close all timber walkways to the public during the period specified for your compliance with this direction.

Failure to comply with the direction may (if appropriate) lead either to the closure of the zoo by a Zoo Closure Direction (under section 16B) or to alteration of your licence under section 16(1B) so as to require that a section of it is closed permanently to the public.

Your attention is drawn to the notes overleaf which include details about appeal against the direction. This direction shall not have effect during the period within which you are entitled to appeal against it nor, where you have appealed, during the subsequent period before the appeal is either determined or abandoned.

Therefore the effective date of this notice is 19th January 2016

Signed

Date 18th December 2015

Name and designation: Phil Huck, Executive Director

APPENDIX B

From: Adam Roberts
Sent: 10 February 2016 11:45
To: 'Richard Garnett'
Subject: RE: South Lakes Safari Zoo - Walkway

Thank you Richard,

Just to clarify, we have not informed South Lakes Safari Zoo that walkways under 300mm in height do not count as elevated.

Regards

Adam Roberts
Associate Director

R G Parkins & Partners Ltd
Meadowside | Shap Road | KENDAL | Cumbria | LA9 6NY

Tel:
Mob:
Fax:

www.rgparkins.com

From: Richard Garnett
Sent: 10 February 2016 11:06
To: 'Adam Roberts - R G Parkins Ltd'
Subject: RE: South Lakes Safari Zoo - Walkway

Dear Adam

Thank you for the email.

In confirmation of our discussion, when we visited the zoo on 20th January 2016 to look at the timber walkways we did look at a number of wooden section at the top [old] part of the zoo. These are there to level off the pathway and make wheelchair use easy. The zoo commented that you had informed them that anything under 300mm wasn't considered elevated. Therefore we have not looked at these sections.

In terms of the walkways that are being strengthened I cannot see a justification for the loading to change dependant on the height above the ground. Unless there is something with in the British Standard, the whole walkway must be built to cope with the same loading.

Richard Garnett
Principal Environmental Health Officer

From: Adam Roberts - R G Parkins Ltd
Sent: 10 February 2016 10:41

To: Richard Garnett

Subject: South Lakes Safari Zoo - Walkway

Hi Richard,

We have someone out on site looking at the remedial works the zoo have undertaken to the Bear walkway. This is a walkway that varies in height above ground up to a maximum of approximately 1m.

The zoo have mentioned to him that where the walkway is less than 300mm high, they do not need to do any strengthening works, as it is not classified as an elevated walkway – could you confirm if this is the case?

I've tried ringing to discuss but ended up sat on hold.

Regards

Adam

Adam Roberts

Associate Director

R G Parkins & Partners Ltd

Meadowside | Shap Road | KENDAL | Cumbria | LA9 6NY

Tel:

Mob:

Fax:

www.rgparkins.com

PART ONE

LICENSING REGULATORY COMMITTEE		(D) Agenda Item 7
Date of Meeting: 23rd, 24th February 2016 and 2nd March 2016		
Reporting Officer: Principal Environmental Health Officer		
Title: David Stanley Gill, South Lakes Safari Zoo Ltd Zoo Licensing Act 1981 (as amended) Report on Periodical/Renewal Inspection		
Summary:		
<p>Mr David Stanley Gill is the holder of a zoo licence issued on 8th June 2010 to operate a zoo at premises known as South Lakes Safari Zoo Ltd, Crossgates, Dalton-in-Furness, Cumbria, LA15 8JR.</p> <p>This report details the findings of a Periodical and Renewal Inspection undertaken at South Lakes Safari Zoo ("the Zoo") on 17th & 18th November 2015 carried out under the provisions of ss.6, 9A and 10 of the Zoo Licensing Act 1981 (as amended) ("the Act").</p> <p>In compliance with these statutory provisions, the assessment as to whether the appropriate levels of compliance are being satisfied by the zoo are delegated to a team of 25 DEFRA approved veterinary zoo inspectors who undertake routine inspections of the approximately 350 licensed zoo's in England & Wales. The inspection team provide a statutory report on their findings which are then implemented if necessary by the appropriate licensing authority.</p> <p>The inspection on 17th and 18th November 2015 was undertaken by 3 Secretary of State appointed zoo inspectors, which included the current head of the Zoo Expert Committee. An Officer from the Licensing Authority also attended</p> <p>At the time of the inspection the zoo licence held by Mr David Gill had 6 "statutory conditions", 5 "other conditions" and 18 "additional conditions" attached to its licence. In addition to 4 Direction Orders.</p> <p>A copy of the Inspection Report is attached at Appendix 1 ("the Report").</p> <p>The Report concludes that the current six year zoo licence which is due to expire on 6th June 2016 <u>should</u> not be renewed unless certain actions are implemented by the zoo prior to this date.</p> <p>Those actions are included in a list of 33 proposed additional conditions which have been recommended by the inspection team to lie alongside the existing 18 additional conditions. There are also 11 recommendations in the report.</p>		

Background

Under the Act Mr David Gill holds a zoo licence to operate the Zoo at Dalton issued on 6th June 2010. Zoo licences are renewable for a 6 year period. The current licence, in accordance with the Act, will expire on 6th June 2016. On 17th and 18th November 2015 a combined inspection was undertaken by 3 Secretary of State appointed inspectors. The Inspectors undertook a combined inspection comprising of a Periodical Inspection and Renewal Inspection.

The Inspectors produced their statutory report of their findings for the Barrow Borough Council as the Licensing Authority. A copy of this report is attached at **Appendix 1**. Because of the design of the form the Recommendations and Additional Conditions have been reformatted to make it easier to read, this document has been attached at **Appendix 2**.

The report was sent to the Zoo on 22nd January 2016 for comments. The Zoo provided their comments on 9th February 2016. A copy of the Zoo's response is attached at **Appendix 3** (Part I information) and **Appendix 5** and **Appendix 6** (Part II information).

Members should note that the inspection report details the findings of the Inspectors as at 17th and 18th November 2015. Under s.10(7) of the Act the zoo are given an opportunity to comment on the report, however these comments cannot change the content of the original report.

Today's hearing has been convened to consider the results of this November inspection and to consider:

- a) **Whether the zoo licence should be renewed; and**
- b) **What conditions if any should be attached to the existing licence following recommendations made in the report.**

Legislation & Guidance

The licensing regime for zoos is primarily governed by the terms of the Act. The Act is primarily focused on ensuring that certain conservation measures are achieved in zoos in accordance with s.1A of the Act. In order to achieve this, most licensing authorities impose up to 11 standard conditions on zoo licence holders (although the precise number varies between authorities). Where inspections reveal that zoos are failing to meet necessary standards or requirements, the Act allows for the setting of additional conditions on the licence. Should licence conditions fail to be met then the Act contains an enforcement mechanism of imposing Direction Orders. If a Direction Order is not complied with the Act permits partial or whole closure of the zoo.

Implementation of the provisions contained in the Act is supported by;

1. DEFRA's Guide to the Zoo Licensing Act (2012 edition)

The guidance is non-statutory guidance and is used in conjunction with the Act. It deals with the application for, and management of, the zoo licence, the setting and enforcement of conditions and the four types of inspections (licence, periodical, special and informal).

2. DEFRA - Secretary of State's Standards of Modern Zoo Practice ("SSSMZP");

These Standards are statutory Standards specified under s.9 of the Act by the Secretary of State. The Standards are with respect to the management of zoos and the animals in them.

The zoo must comply with the relevant Standards.

The Standards provide further information on the steps that Zoos must take in order to comply with both animal welfare and public safety concerns together with examples of how such compliance may be evidenced.

3. DEFRA's Zoo Expert Committee Handbook (2012 edition)

The Handbook' is a supplement to the guidance contained in the Secretary of State's Standards of Modern Zoo Practice and contains non-statutory guidance with recommendations and examples. The handbook is a living document which is reviewed, updated and added to on a regular basis.

Zoo Inspections

The regime for carrying out zoo inspections is contained within ss.9A to 12 of the Act. and s.15 in respect of fees and charges.

S.9A(3) of the Act allows the local authority to combine inspections required prior to the renewal of a licence. This inspection was a combined Periodical and Renewal Inspection.

Where an inspection is undertaken prior to the renewal of a licence s.9A(7) requires the inspectors to be nominated by the Secretary of State from her list of 25 approved inspectors. The Secretary of State nominated inspectors were:

Professor Anna Meredith; and *MA VetMB PhD CertLAS DZooMed DipECZM MRCVS*
Nick Jackson *MBE*, Director of the Welsh Mountain Zoo.

The Local Authority representatives were:

Matthew Brash; *B.Vet.Med Cert Zoo Med MRCVS* as the Council's advisor and Richard Garnett. *MCIEH*

Renewal Application

On 11th January 2016 the Council received an application to renew from Mr David Gill.

The Inspectors have recommended that the renewal of the licence be refused unless the "Additional Conditions" listed in their report are complied with, with greater emphasis placed on "Additional Condition" 32:

"32. In order to comply with section 10 of the Secretary of States Standards, a robust management and staffing structure must be in place to the satisfaction of the licensing authority, and in order to allow a new licence to be issued. This new structure must include a competent, suitably qualified and experienced full-time Director (or Senior Manager) with day to day responsibility for the running of the Zoo, the ability and authority to make decisions independent of the owner, and must be fully responsible to the licensing authority for the conduct of the Zoo, all its on-site activities and its compliance with the Secretary of State's Standards. [Please see recommendation/comment 2 regarding recommendation for refusal of a licence. Renewal of a licence is recommended to be dependent on the listed Additional Conditions being either complied with, or satisfactory progress towards compliance being made.] "

Recommendation/comment 2 referred to above reads :-

"The decision by the inspection team to recommend that a new licence for South Lakes Safari Zoo should not be granted at its due date, unless a Condition regarding the management structure has been complied with, is not taken lightly. It must be emphasised that the inspectors are keen to see the Zoo develop and thrive in line with modern zoo standards.

The inspectors commend Mr David Gill for his initial decision to step back from the running of the Zoo and to concentrate on its conservation role, but do not believe that at the time of the inspection, or subsequently, sufficient progress has been made in this respect, and note that this decision was subsequently reversed during the compilation of this final report.

This is no longer a small zoo and it now houses a large and diverse number of species. Suitable management processes must be in place before a new licence is issued to enable the Zoo to meet all its legal obligations, particularly in respect of Sections 3, 8, 9 and 10 of the SSSMZP.

These have been areas of concern and flagged as issues repeatedly over a number of years at previous zoo inspections. The inspection of November 2015 has highlighted 33 Conditions that the inspectors believe must be applied to the licence. This is a considerable number of

conditions for a zoo of this size and many of these result from the repeated failure to implement fully previous Conditions, thus aggravating the situation and determining the inspectors' position.

Of particular concern to the inspectors is the fact that as this zoo grows, it relies heavily on the owner's experience implementing out of date practices and refusing to implement modern zoo methods. In the inspectors' opinion this has resulted in animal welfare issues, a higher than expected mortality rate amongst the animals, higher than expected incidents (such as injuries to the public from animals), and places both staff and the public potentially in danger."

Benchmarking

The Council have felt it important to try and place the proposed number of licence conditions sought in this report in to some form of context. There are over 350 licensed zoos in the UK and we have accordingly obtained a snapshot of how many conditions other zoos presently have imposed upon them.

One of the key problems in doing so is that the practice of attaching conditions does vary between Licensing Authorities. The guide to the Act suggests in Annex F (page 51) a model zoo licence template which includes 6 "**statutory conditions**" dealing with conservation measures (required by s.5(2A)) and 5 "**other conditions**" which set certain standards arising from the SSSMZP. In addition there is capacity for any "**additional conditions**" which may be necessary and proportionate to deal with failings identified through the inspection regime.

For those authorities who have adopted the model format it would therefore be reasonable to expect zoos within their district to have up to 12 conditions on their licence which would comprise the "statutory" and "other" conditions. Some zoos have less due to their Licensing Authorities adopting a differing stance to that prescribed by the guidance whereby they have condensed the minimum requirements into a fewer number of conditions.

However, it would be fair to conclude that any zoo with more than 12 conditions attached to its licence has had failings identified during their inspection process which has resulted in their Licensing Authority imposing "additional conditions" by way of enforcement.

Out of 165 zoo licences reviewed a total of 47 (28%) had more than 12 conditions on their licence and can therefore be assumed to have had additional conditions imposed on their licences. Only 5% of zoos reviewed have over 20 conditions. The chart below sets out how many conditions were assigned to each of the 165 zoos that were reviewed. The recommendations of the inspection report, if accepted, would result in a total of 39 conditions to be placed on the Zoo's licence, 28 of which are"

additional conditions". From the benchmarking undertaken, this would constitute an unprecedented level of conditions being sought against a zoo licence holder.

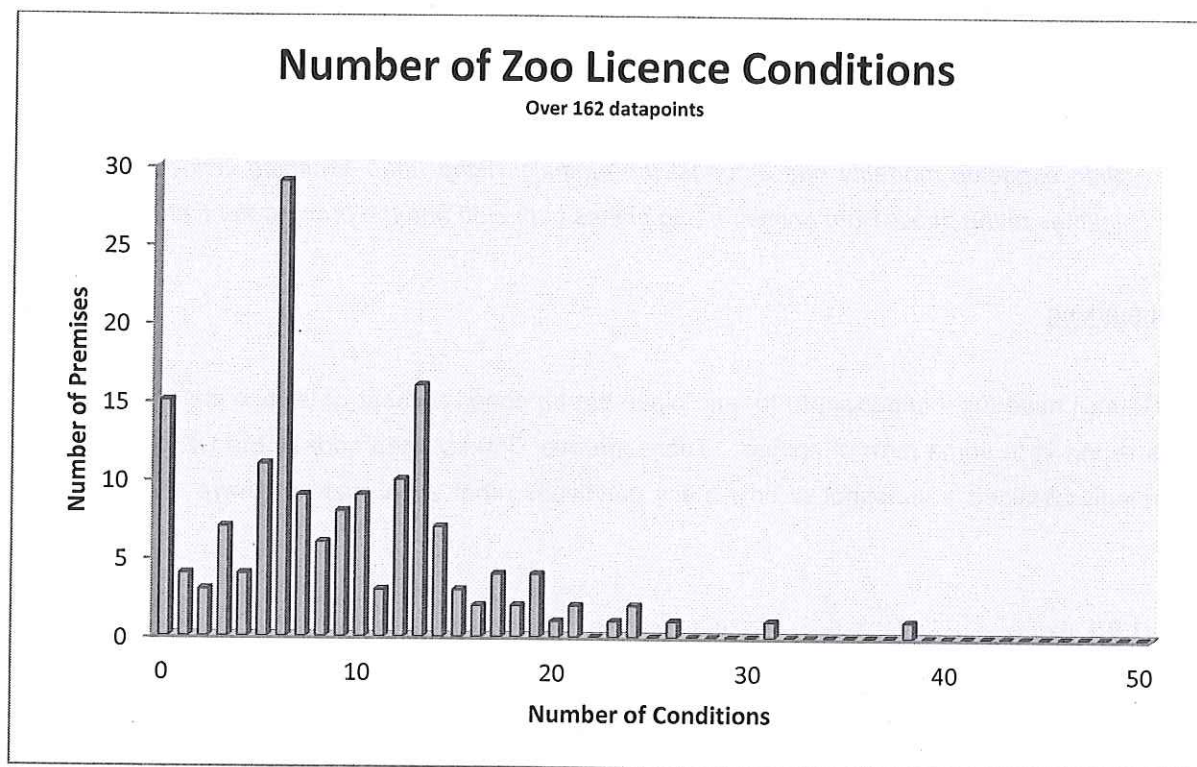


Chart 1

By way of working example these popular zoos currently have the following number of conditions:

Blackpool Zoo - 6 Conditions [all statutory]

Chester Zoo - 5 conditions [all statutory]

Flamingo Land - 13 conditions [7 statutory conditions + 6 additional]

Chessington – 17 [1 statutory + 16 additional]

Copies of these Zoo Licences are attached at **Appendix 4**.

Planning History

Members also need to be aware of the Planning History of the Zoo when considering the renewal of the licence. Under s.4(3) of the Act "*local authorities may refuse to grant a licence if they are not satisfied that the standards of accommodation, staffing or management are adequate for the proper care and well-being of the animals as a whole or for any of them, otherwise for the proper conduct of the zoo*" (5.4 DEFRA guidance)

The Development Services Manager (Planning) has made the following comments:

"The original "Wildlife Park" received consent in the mid 1990s (1993/499 refers). Since then the enterprise has been subject to a large number of planning applications as the site has developed, culminating in the relatively recent expansion eastwards towards Melton Terrace, (the Safari Zoo) This application (2010/0712) was initially refused by Members but approved by the Planning Inspectorate, subject to conditions on Appeal in 2012. Within its planning history there has been a mix of retrospective applications, principally related to animal houses as well as several refusals and subsequent Appeals including development within the Park boundaries and also relating to visitor car parks on Broughton Road.

Currently there are several issues still outstanding relating to the new extension. Firstly there remains a condition yet to be discharged relating to the Marshalling Plan. This is an agreed procedure that identifies how the Zoo will deal with large numbers of visitors that exceed the number of car parking spaces off Melton Road. The County Council are currently studying revised proposals relating to matters such as permanent signage and car park management.

A more pressing matter relating to the extension is the fact that the visitor reception building, the elephant house, and a storage building adjacent to the highway appear to have been built in the wrong positions. Also there is a building at the west end of the Africa Paddock that does not appear on the approved layout [for Members information this is the Andean Bear Enclosure and subject to an Additional Condition A5 which is addressed later on in this report].

Retrospective applications have been requested to amend the previous approval, and for the new building, but at the time of writing neither has been received. Such applications would be dealt with in the normal way. Members should note that it is not an offence to build without planning permission but it is an offence not to comply with an enforcement notice.

Ultimately however, this means that the entire extension, by virtue of non compliance with the approved plan, can be deemed unauthorised and potentially liable to enforcement proceedings. National Planning guidance states that enforcement is discretionary and only a last resort if negotiations fail or the development is so unacceptable that the Authority would not have granted planning permission."

The Zoo's Comment (Appendix 3, page 2, point 2)

"What lies within appears to be a somewhat sweeping unsubstantiated claims and false facts. The inspection team mislead the public and committee by stating that the decision for David Gill to step down as Director was in any way changed at any time. The facts of this situation are open and public. Mr Gill made an application to the LA to have the Zoo Licence transferred from his personal name to the company that operates the Zoo and the responsibility given to the two new directors at that time.

We received a very clear response in writing from the LA stating they would refuse any such transfer of Zoo Licence to the new Directors as they did not have the experience to run the Zoo and despite Mr Gills clear commitment and plan to retire they would prevent him retiring by forcing him to retain the licence. The implication in the report is that the Zoo or Mr Gill changed the position when in fact the LA changed the position and in effect forced Mr Gill to take up the Directorship again by their actions.

It is also a very valid point that by the date of the final signature the issues regarding the future operator of the Zoo was sent to the LA by e mail and acknowledged. The inspectors were FULLY aware of the plans to transfer the ZOO to a Charity and my intention to step down totally by e mail on 14th December 2015. The inspector's comments regarding future operator in this report are there for clearly intended to mislead the committee and the public as to the real situation and future plans that they simply choose to not report upon.

The zoo would like to point out although the report dated 5.1.16 highlights 32 conditions that the inspectors believe should be added to the licence many of these were in place and evidence of this in the hands of the inspectors with the detailed compliance sent to the council and Mr Brash, one of the inspectors attended the site again on 16th December 2015 many weeks before this report was completed with Mr Garnett from the LA and passed a number of these issues as fully complied with.

Inspectors claim many of the conditions were as a result of repeated failure? We would like inspectors and the LA to highlight which specific Conditions they are referring to instead of an invalid statement?

29 of the 33 conditions (not 32 as inspectors referred to) are brand new, with 2 including ethics and firearms being ongoing subject to annual reviews.

It is a fact therefore that the statement made "many of these result from the repeated failure to implement fully previous Conditions" is indeed factually incorrect and aimed to mislead. And

create a damaging image of the Zoos actual compliance. Indeed in particular the issues witnessed as fully complied with should not be on the conditions list as they are in fact now not relevant.

We would ask for the inspectors to quantify the claims made within this comment, What precise welfare issues do they refer to? And what level in the context of the whole zoo are they suggesting their comment applies. ? It is not professional to fail to qualify the comments rather than make opinion?"

Officer Recommendation

That the decision relating to the renewal application be deferred until June 2016.

This will provide the Zoo time to demonstrate compliance with the Conditions proposed by the Inspectors (which are to be considered by the Committee later in the report). The Licensing Authority believes the proposed timescale is reasonable and proportionate in light of the Zoo's stated intention to implement a new Management Team.

Reasons for the Recommendation.

Given the significance of the Inspectors recommendations concerning their unwillingness to recommend a licence renewal unless the management structure at the Zoo adequately changes, it is felt that the Zoo should be afforded as much opportunity prior to their licence expiring in June to implement the necessary changes. At this hearing, the Committee are to be asked to consider implementing a wide range of additional conditions which will need to be implemented prior to a realistic decision being made on whether the zoo licence should be renewed.

Accordingly, it is proposed that the decision to renew the licence should be deferred until June 2016 in order to provide the Zoo with the opportunity to demonstrate the implementation of real change.

The Zoo Inspectors believe that the Zoo should be inspected again in June with the same team of Inspectors as a Special Inspection. This will be scheduled for three days and it is hoped that the Zoo's Management, in whatever form it takes, uses the remaining time before that renewal hearing to demonstrate that it can operate to modern standards and in accordance with the Zoo Licensing Act 1981.

Options available to Members

- **Accept** the officer recommendation and defer the decision on the renewal application to an agreed date; or
- **Reject** the officer recommendation and make a decision today.

CONDITIONS TO BE ADDED TO THE LICENCE

MATTERS PERTAINING TO ESCAPES

A1 Perimeter Fence

Officer Comments

Escapes have been a long standing issue at this zoo with 7 incidents being reported between 2004 and 2014. During the inspection a number of issues related to escapes, or the potential of escapes came to the Inspectors' attention.

The Zoo is surrounded by a wire fence topped by electrical wires. Although a perimeter fence is meant to only deter entry or escapes, as large areas of the Zoo contain free roaming animals, such as lemurs, it is essential that the true perimeter fence remains small primate proof.

In certain areas considerable overgrowth of brush, such as brambles, is short circuiting the electric fence. In many areas trees are overhanging the fence. Either of these issues would be sufficient to easily allow primates to leave the premises as they would avoid any contact with the fence.

Inspectors noted in their report that:-

"1. In several areas the perimeter fence is overgrown with vegetation."

8.7 and 8.29 of the SSSMZP:

8.7 Barriers must be designed, constructed and maintained to contain animals within enclosures. Vegetation, climbing structures or other items should be maintained in such a way as to not aid escape.

8.29 The perimeter boundary, including access points, should be designed, constructed and maintained to discourage unauthorised entry and, so far as is reasonably practicable, as an aid to the confinement of all the animals within the zoo.

The Zoo's Comment, Appendix 3, page 27, point 1

Maintaining the integrity of the perimeter fencing is part of the daily keeper checks, the fence is tested and readings recorded daily. That fence is always fully operational; inspectors were doubtful of the working of the fence with shrubs etc. in near vicinity however after touching it

confirmed its efficiency. – Full records are in place and were available for inspection on the day.

A sample of December's daily fence check sheets – showing the perimeter fence reading is taken in 3 different places daily.

Date	Africa Field Fence	Bear fence	Perimeter	Faults
	kV	J	kV	J
1st	5.0	4.5	5.0	
2nd	5.0	4.5	5.0	
3rd	4.0	4.5	5.0	
4th	3.0	4.0	3.5	
5th	3.0	4.0	3.5	
6th	3.0	4.0	3.5	
7th	3.1	4.0	3.1	
8th	1.6	4.0	3.1	
9th	4.5	4.0	3.1	
10th	4.5	4.0	3.1	
11th	5.5	4.5	3.5	
12th	5.5	4.5	3.5	
13th	5.7	4.5	3.5	
14th	5.7	4.5	3.5	
15th	5.1	4.5	3.5	
16th	5.1	4.5	3.5	
17th	4.4	4.5	3.5	
18th	4.4	4.5	3.5	
19th	4.4	4.5	3.5	
20th	4.4	4.5	3.5	
21st	4.4	4.5	3.5	
22nd	4.4	4.5	3.5	
23rd	4.4	4.5	3.5	
24th	4.4	4.5	3.5	
25th	4.4	4.5	3.5	
26th	4.4	4.5	3.5	
27th	4.4	4.5	3.5	
28th	4.4	4.5	3.5	
29th	4.4	4.5	3.5	
30th	4.4	4.5	3.5	
31st	4.4	4.5	3.5	

Month: December Lemon - Fence and Temperature Recording

DATE		TIME	Temp (°C)	Max	kV	J	Integrity Check	Faults	Perimeter Fence	KEEPER
1st										CS
2nd										
3rd										
4th										
5th										
6th										
7th										
8th	8:00	17	18	6.4	3	✓		RAVINS PLANTING	0.8	CS
9th	8:00	17	18	6.2	3	✓			5.2	SA
10th	8:00	17	18	6.3	3	✓		vertical access gate	7.1	SA
11th	8:00	16	17	6.5	3	✓			6.8	JS
12th	8:00	16	17	6.1	3	✓			6.6	CS
13th	8:00	16	17	6.6	3	✓			5.9	CS
14th									5.3	JS
15th									6.7	SA
16th									7.7	SA
17th									7.4	SA
18th									7.1	SA
19th									6.6	JS
20th									6.1	JS
21st									5.9	JS
22nd									6.6	JS
23rd									6.9	JS
24th									6.9	JS
25th									6.9	CS
26th									6.0	CS
27th									7.7	CS
28th									7.3	SA
29th									6.7	SA
30th									7.4	CS
31st										

Recommendation

That the following condition be attached to the licence:-

In accordance with 8.7 and 8.29 of the SSSMZP all vegetation, shrubs, bushes and trees in proximity to the perimeter fence must be cut back and maintained to ensure they remain clear of the electric fencing. All shrubs, bushes and trees overhanging or near the perimeter fence must be kept cut back to prevent animals from escaping.

The time scale for compliance should be 3 months

Reason for Recommendation

The perimeter fence is being compromised in several areas which lead to a number of potential escape routes for the free roaming small primates that inhabit the park. This is contrary to "statutory" Condition 3 of the existing licence.

Options Available to Members

- **Accept** the officer recommendation and place the condition on the licence and specify a compliance period of 3 months; or
- **Accept** the officer recommendation but specify an alternative compliance period.; or
- **Reject** the officer recommendation and instruct Officers to continue to monitor the situation.

A29 Black Tailed Prairie Dogs Escape Assessment

Officer Comments

Along the western perimeter fence the Zoo have a colony of free roaming prairie dogs. In the wild these animals live in extensive burrows and warrens.

Condition 3 of the Zoo's Licence states that South Lakes Safari Zoo must:

"3. Prevent escapes and put in place measure to be undertaken in the event of any escape or unauthorised release of animals."

It is highly probable that, at some stage the prairie dogs' burrows may reach and cross the perimeter fence as, according to the Zoo's management, the fence is only set into the ground to a depth of 30cm in this area.

Inspectors have noted that: -

"29. There are a number of prairie dogs free living, in burrows, in the top walk through area where the perimeter fence is set into the ground only to a depth of 30cm."

8.10 and 8.29 SSSMZP state:-

"8.10 Animals that can climb or jump must be kept in enclosures secure enough to prevent them from escaping. The minimum recommended height of enclosures/barriers as stated in national or international industry standards (BIAZA, EAZA or AZA) such as those associations" Husbandry Guidelines should be taken into consideration. Digging or burrowing animals must be kept in enclosures so constructed as to avoid escape underneath barriers." "

"8.29 The perimeter boundary, including access points, should be designed, constructed and maintained to discourage unauthorised entry and, so far as is reasonably practicable, as an aid to the confinement of all the animals within the zoo."

If the Zoo wishes to maintain the animals roaming free in this area they must take steps to ensure that animals cannot burrow under the perimeter fence and escape.

The Zoo's Comments (Appendix 3, page 62, point 29)

Within the zoo development plan the Prairie marmots will be relocated over the next 24 months. The veterinary consultant Andrew Greenwood has expressed an opinion he is not qualified or able to write a risk assessment as requested.

Recommendation

That the following condition be attached to the licence :-

In accordance with 8.10 AND 8.29 of the SSSMZP a suitable and sufficient written risk assessment carried out by the veterinary consultant on the effectiveness of the perimeter fence must be undertaken. The steps taken by the zoo to ensure that there will not be any escapes must be implemented. Copies of these reports must be sent to the Local Authority.

The time scale for compliance should be 6 months.

Reason for Recommendation

According to Zoo Management the perimeter fence is shallow enough in this area for the prairie dogs to burrow underneath. This is contrary to Condition 3 of the Zoo's licence which is a Section 1A condition. s: *"Preventing the escape of animals and putting in place measures to be taken in the event of any escape or unauthorised release of animals"*.

Options Available to Members

- **Accept** the officer recommendation and place the condition on the licence and specify a compliance period of 6 months; or
- **Accept** the officer recommendation but specify an alternative compliance period.; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

ANIMAL ENCLOSURES AND WELFARE

A7 Hamadryas Baboon Indoor Accommodation

Officer Comments

The baboons housed at the zoo have access to a large outdoor enclosure that they currently share with the rhino and giraffe. However the indoor accommodation is not suitable. It is a bare box with a sloping floor meaning that it is higher at the front than at the back. There are no furnishings other than a single small screen, there is no climbing equipment, no enrichment items, no bedding or any other items to keep the baboons engaged or exercised.

The Inspectors' describe the current facility as "insufficient". Point 7. of the "Additional Conditions" states: -

"7. In accordance with 4.3 and 4.4 of the SSSMZP the indoor facilities for the group of baboons is insufficient and must be upgraded or replaced to provide increased space for the animals when they are indoors for prolonged periods, e.g. during the winter. The indoor quarters must also allow for a developed programme of enrichment, e.g. deep straw litter and scatter feeding. (1 Year)"

4.3 and 4.4 SSSMZP requires:-

"4.3 Accommodation must take account of the natural habitat of the species and seek to meet the physiological and psychological needs of the animal.

4.4. Enclosure must be equipped in accordance with the needs of the animals with bedding material, branch work, burrows, nesting boxes, pools, substrates and vegetation and other enrichment materials designed to aid and encourage normal behavior patterns and minimize any abnormal behavior. Facilities must take into account growth of animal and must be capable of satisfactorily providing for their needs at all stages of their growth and development."

In addition 2.2 SSSMZP states:-

"Animals in outdoor enclosures must be provided with sufficient shelter for their comfort and well-being. Refuge areas must be provided for nervous animals to escape the permanent gaze of the public. Enclosures must also be designed to allow for animals' normal defence reactions and appropriate "flight" or escape distances."

S.1A(c)(i) of ZLA requires "providing each animal with an environment well adapted to meet the physical, psychological and social needs of the species to which it belongs."

The Zoo's Comments (Appendix 3, page 35, point 7)

"Accepted and plans for this were made in 2012 and will be done as soon as the Rhinos are moved out."

Recommendation

That the following condition be attached to the licence: -

In accordance with 2.2, 4.3 and 4.4 of the SSSMZP. The indoor facilities for the baboons must be upgraded or replaced to meet the current recognised husbandry guidance. The indoor quarters must also allow for a developed programme of enrichment, e.g. deep straw litter and scatter feeding.

The timescale for compliance shall be 1 year

Reason for Recommendation

The indoor accommodation for the baboons is totally inadequate. The accommodation is small and offers no enrichment for the animals. This is contrary to Condition 2 of the zoo licence which is a s.1A condition. Section 1A(c)(i) ZLA states that accommodation must meet the physical, psychological, and social needs of the species.

The wording of Condition 2 on the licence is:

"2. Accommodate and keep the animals in a manner consistent with the standards set out in SSSMZP."

Options Available to Members

- **Accept** the officer recommendation and place the condition on the licence and specify a compliance period of 1 year; or
- **Accept** the officer recommendation but specify an alternative compliance period; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A14 Protection of Electrics from Animals

Officer Comments

Free roaming tamarin have access to the indoor area adjacent to the Tambopata Amazonia Aviary. Positioned on a high shelf within this area is electrical equipment, including a PA system. This equipment should be protected from the attention of primates by using a wire cage. However it has open access points at the back. During the inspection on 17th and 18th November the primates were observed sitting within the protective caging.

Primates are well known for chewing and exploring objects, and could injure themselves on the electrical equipment. Alternatively they could damage the equipment, such that it becomes a danger to a person, when they try to use the equipment.

It is important that all electrical equipment is kept safe from animals so that they are unable to injure themselves.

2.4 SSSMZP requires:

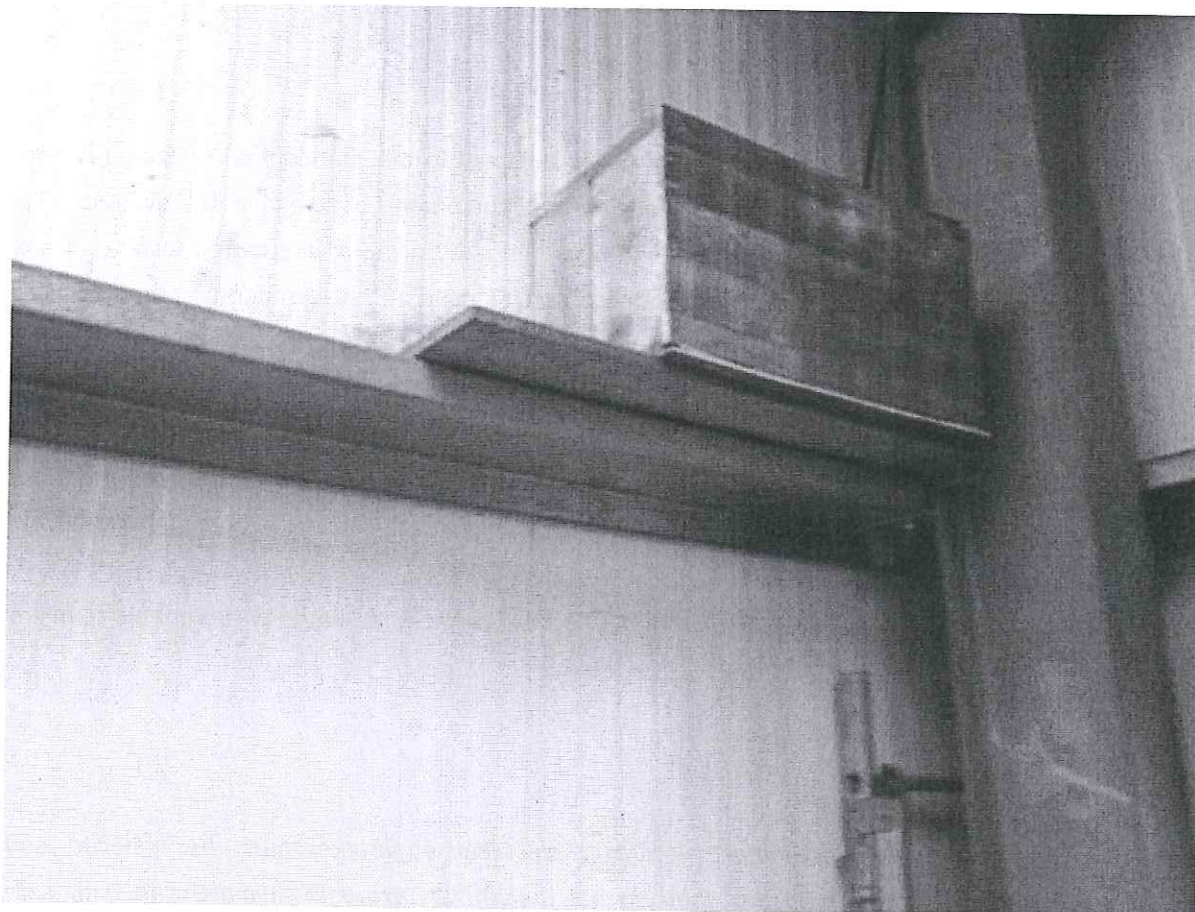
"All plant and fixed equipment, including electrical apparatus, must be installed and maintained in such a way that they do not present a hazard to animals, and their safe operation cannot be disrupted by them."

The Inspectors have noted in point 14 of the "Additional Conditions":-

"The mesh 'cage' preventing tamarin access to an electrical installation in the Amazon House was ineffective, and the electrical equipment may present a hazard."

The Zoo's Comments (Appendix 3, page 44, point 14

Within the Zoo response there is a picture of a large wooden box which covers one piece of the electrical equipment and they consider the matter completed.



Recommendation

As Council Officers have not verified during a visit that this issue has been fully complied with; it is still recommended that the following condition be attached to the licence:-

In accordance with 2.4 of the SSSMZP all plant and fixed equipment, including electrical apparatus, must be installed and maintained in such a way that they do not present a hazard to animals, and their safe operation cannot be disrupted by them.

The time scale for compliance shall be 3 months.

Reason for Recommendation

The electrical equipment, including the sockets, plugs, leads, and equipment should be placed out of reach of the free roaming animals in order to protect them and to preserve the safety of the equipment.

Options Available to Members

- **Accept** the officer recommendation and place the condition on the licence and specify a compliance period of 3 months; or
- **Accept** the officer recommendation but specify an alternative compliance period. ; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A17 Public Barrier at Top Lemur House –

Officer Comment

Adjacent to the northern exit from the Amazonia Aviary and adjacent to Mr Gill's house is the indoor accommodation for the some of the lemurs. Whilst this area is an off show area, comprising the accommodation for primates and a keepers corridor, once access has been gained, there is the potential for direct public access to the animals.

At the time of the inspection on 17th and 18th November 2015 the Inspectors noted that the doors were not locked, and there was no effective system in place to deter the public from gaining access to this area.

8.6 SSSMZP requires:

"8.6 All animals should be kept in enclosures so constructed as to avoid escape. Gates and doors to enclosures must be securely locked so as to prevent unauthorised opening. In general, there should be a double gate/door system in place to prevent escape from the secure area should one gate/door be breached."

The Zoo's Comments (Appendix C(1), page 45, point 17

"COMPLETED The effective barrier was and is indeed in place with a do not cross the barrier signage over 25 meters from the door in question. No member of the public has any access to this area. However the condition has been met in full and completed"

Recommendation

As Council Officers have not verified during a visit that this issue has been fully complied with; it is still recommended that the following condition be attached to the licence:-

The top lemur indoor accommodation has no effective public barrier preventing access to the house and its doors. In accordance with 8.6 of the SSSMZP the indoor accommodation must be kept locked at all times when no keeper is present.

The time scale for compliance is immediate.

Reason for Recommendation

The indoor accommodation for the small primates is not designed to be a public viewing area. Once inside the public would have direct access to animals risking bite injuries. The public could also be subjected to contact with urine and faeces and therefore present a risk of spreading zoonotic infections.

Options Available to Members

- **Accept** the officer recommendation and place the condition on the licence with a compliance period of immediate; or
- **Accept** the officer recommendation but specify an alternative compliance period; or
- **Reject** the officer recommendation and instruct Officers to continue to monitor the situation.

A19 Shelters in Africa Field

Officer Comments

The new Africa House and its adjacent Africa Field form the northern boundary to the zoo. When inspected on 23rd April 2015 these were relatively new developments. At that time the inspector was asked to look at the recent arrival of a single male Nyala. The new building was not ready to receive animals however the zoo had taken collection of this Nyala. On 13th August 2015 it was reported to this Committee that the Nyala arrived without the correct notification period being given. The Zoo argued that these animals were difficult to obtain.

Together with the Zebra already present, the Nyala had access to a shipping container that had been placed in the field to act as a shelter.

By the time of the inspection on 17th and 18th November 2015, the number of animals in the African Field had increased and included animals new to the collection namely two male Bactrian camels, and Wildebeest, as well as the incumbent Zebra, Donkeys and goats. The Zoo had also received 5 more Nyala.

At the time of the inspection the indoor housing within the Africa House was still incomplete and on the two days of the inspection the animals were unable to enter the main building due to the continuing building work. The container provided for the animals was far too small to provide shelter for all these animals, and Inspectors noted aggression between the camels and the zebra over feeding stations.

It should be noted that at the time of the inspection the weather was heavy rain.

By the end of the inspection it had been revealed that the 5 out of 6 Nyala that the Zoo had received earlier that year had died. This included two that had died the week of the inspection. The Zoo's management team explained to the Inspectors that these had probably died from exposure, as they had no access to the indoor housing whilst the building was being completed.

The Inspectors' have noted at point 9. and 10. of their "Comments and Recommendations": -

9. *The inspectors were dismayed and shocked to see bales and pallets held together with baler twine used as temporary holding for mixed exhibit of Bactrian camels, wildebeest, Nyala and zebra in the Africa House. Such inadequate and insecure holding arrangements should not be part of modern zoo practice.*
10. *From the information provided it would appear that the recent Nyala deaths were preventable and were the result of a poor decision-making process which the inspectors hope will no longer occur under a new management structure"*

Further at point 19 of their recommended "Additional Conditions" they state:-

"During the completion of the indoor accommodation of the Africa house the animals already present in the outside enclosure, occasionally, cannot or will not use the Africa House for shelter."

1.2 SSSMZP requires:

"Animals in outdoor enclosures must be provided with sufficient shelter for their comfort and well-being. Refuge areas must be provided for nervous animals to escape the permanent gaze of the public. Enclosures must also be designed to allow for animals' normal defence reactions and appropriate „flight“ or escape distances."

The Zoo's Comment (Appendix 3, page 48, point 19)

"ALREADY COMPLETED" Firstly, there was already at the inspection outside shelter in the field? We fail to see how the inspectors did not recognise this huge shelter?

The internal facility was always available for shelter 24/7 . See above all internal accommodation complete Photographs confirming the bales were removed and showing the animals moved to the finished pens (as below) were forwarded to the LA on 13.12.16 some 6 weeks before the report was delivered, this internal housing situation was also seen and inspected by Mr Brash, one of the inspectors and BBC EHO on 16.12.16

So why the condition when it is already clearly agreed and complied with ?"

Recommendation

That the following condition be added to the licence:-

In accordance with 2.2 of the SSSMZP additional shelter must be provided in the outside enclosure serving the Africa House to allow sufficient space for the accommodation of all the animals having access to that area.

That the timescale for compliance shall be 1 month.

Reason for Recommendation

All animals in the Zoo must have access to a suitable outdoor shelter to resort to that provides a temporary refuge from the weather. The accommodation must be of a size to comfortably accommodate the number of animals being housed.

Options Available to Members

- **Accept** the officer recommendation and attach the condition on the licence and specify a compliance period of 1 month; or
- **Accept** the officer recommendation but attach an alternative compliance period; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A20 Flooring in Caribbean Flamingo House

Officer Comments

The Flamingos have been relocated to a new enclosure adjacent to the Illescas aviary. They have a grassed outdoor area with a pool and indoor accommodation. The indoor area has a formed concrete base with a foot pool.

During the inspection on 17th and 18th November 2015 the Inspectors noted that a number of the flamingos appeared to be lame:

"A number of lame flamingos were observed, and the flooring of the new flamingo house is plain concrete." (Point 20. Additional Conditions).

In a document entitled Flamingo Husbandry Guidelines: A Joint Effort of the AZA and EAZA in Cooperation with WWT circa 2001 under the heading "Indoor Facilities" (page 37) it states: -

"Since most indoor holding facilities' floors can remain damp for long periods of time and are usually constructed of concrete it is essential that rubber, vinyl, or other easy-to-clean fast-drying matting material be used to separate the birds' feet from the caustic and abrasive properties of concrete. Long term exposure to damp concrete causes the birds' feet to become receptive to abrasions thus opening up the opportunities for infection and the debilitating condition known as bumblefoot."

AZA Association of Zoos and Aquariums

EAZA European Association of Zoos and Aquaria

WWT Wildfowl and Wetlands Trust

SSSMZP 4.3 and 4.4 requires:-

"4.3 Accommodation must take account of the natural habitat of the species and seek to meet the physiological and psychological needs of the animal.

4.4. Enclosure must be equipped in accordance with the needs of the animals with bedding material, branchwork, burrows, nesting boxes, pools, substrates and vegetation and other enrichment materials designed to aid and encourage normal behavior patterns and minimize any abnormal behavior. Facilities must take into account growth of animal and must be capable of satisfactorily providing for their needs at all stages of their growth and development."

In addition 2.2 SSSMZP states:-

"Animals in outdoor enclosures must be provided with sufficient shelter for their comfort and well-being. Refuge areas must be provided for nervous animals to escape the permanent gaze of the public. Enclosures must also be designed to allow for animals' normal defence reactions and appropriate „flight“ or escape distances."

The Zoo's Comments (Appendix 3, page 48, point 20)

"We totally refute this statement and question the judgement and professionalism of the comment as the admission was made it was from a passing walk on the way to other housing and not from a proper and professional view or assessment. Y one of the Inspectors claims to have witnessed this.

We have written confirmation that we have not had a lame flamingo at any time since the movement in April 2015 to the new facility. Both contracted Vets will confirm this and the records show no treatment or issues recorded of lameness in that time. We have indeed had the best foot/leg health in the flamingos since we used the new flooring in the history of keeping flamingos for the last 15 years. The flooring was sealed with a non slip specialist sealant and there is no contact between the birds feet and concrete due to this barrier. There are no plans to change the situation unless of course Veterinary advice from the Zoos own team show the need. We do not wish to change a perfectly healthy situation."

Recommendation

That the following condition be attached to the licence:-

In accordance with 2.2, 4.3 and 4.4 of the SSSMZP the floor in the Flamingo House must be the subject of review by the veterinary consultants and suitable flooring/substrate put in place to improve the health of the flamingos' feet.

The timescale for compliance shall be 6 months.

Reason for Recommendation

It is known that concrete flooring is detrimental to the soft feet of the flamingo, and predisposes them to developing foot lesions. This is contrary to Condition 2 of the zoo licence which is a s.1A condition and states:

"2. Accommodate and keep the animals in a manner consistent with the standards set out in SSSMZP."

A suitable substrate must be put down to protect their feet.

Options Available to Members

- **Accept** the officer recommendation and attach the condition on the licence and specify a compliance period of 6 months.; or

- **Accept** the officer recommendation but attach an alternative compliance period ; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A21 Review of Diets and Nutrition

Officer Comments

At the inspection on 17th and 18th November 2015, the Inspectors noted that diet sheets for the animals were kept on the wall in the kitchen/ food preparation area. The diets are made up from food that would otherwise have gone into a waste stream from a major supermarket, fresh supplies that are bought in, together with proprietary food from specialist suppliers. It was apparent that the diets had not been reviewed for some time and this was acknowledged by the Zoo's management.

The Inspectors noted their concerns in point 6 in the "Comments and Recommendations" section of their report: -

" 6. The inspectors were concerned that some animal diets e.g. psittacine birds, fennec fox and public feeding diets for macropods, capybara, mara, were nutritionally inadequate and do not reflect current knowledge and best practice. There should be a full documented dietary review for all species with veterinary input (including from Andrew Greenwood), to incorporate current nutritional guidelines for relevant species."

1.1, 1.12 and 1.13 of the SSSMZP require: -

"1.11 Uneaten food must be removed as appropriate to maintain hygiene.

1.12 Veterinary or other specialist advice in all aspects of nutrition must be obtained and followed.

1.13 A record of all diets and dietary changes must be maintained."

S.1A(c)(ii) of ZLA requires the provision of " a high standard of animal husbandry with a development programme of preventative and curative veterinary care and nutrition".

The Zoo's Comments (Appendix 3, page 21, point 21)

"Dietary review is something we as animal carers do on a regular basis with changes in groups, seasons, as knowledge changes. Accepted"

Recommendation

That the following condition be attached to the licence: -

In accordance with 1.1, 1.12 and 1.13 of the SSSMZP a full review of diets and nutrition across all species, in consultation with the veterinary consultants, must be carried out. Records of all diets and the changes made must be documented and kept.

The time limit for compliance should be 6 months.

Reason for Recommendation

There are a number of dietary issues such as feeding fruit to primates, and sunflower seeds to psittacine birds, where the Zoo appear to have fallen behind the current research. Whilst there is no criticism that the food being fed is of poor quality the Zoo needs to respond to changes in accepted good practice. The provision of a programme of nutrition, including food, water, and dietary supplements, is a Section 1A mandatory condition.

Options Available to Members

- **Accept** the officer recommendation and attach the condition on the licence and specify a compliance period of 6 months.; or
- **Accept** the officer recommendation but attach an alternative compliance period.; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A22 Andean Bear Enclosure – remove pinch point

Officer Comment

The Andean Bears have been given a new enclosure in the north western area of the park within the area known as the Worldwide Safari. In forming the boundary to the enclosure behind the bear house, the fencing tapers to a point. In the event of conflict between the bears, one could be trapped in this corner, potentially either leading to an escape, or the bear becoming injured. In designing animal enclosures, it is not good practice to have corners where an animal could be 'cornered'.

This pinch point should be removed by remodelling the boundary or rounding off the point with the electric fence.

2.3 SSSMZIP requires: -

"Enclosures and barriers to enclosures must be maintained in a condition which presents no likelihood of harm to animals. In particular:

a) any defect in barriers or appliances likely to cause harm to animals must be rectified at once. If this is not possible, the animals should be removed from the possibility of any contact with the source of the danger until rectified; a record should be kept of any action taken;

b) any vegetation capable of harming animals must be kept out of their reach;

c) water-filled and dry moats used for the confinement of animals must provide a means of escape back to the enclosure for animals falling into them;

d) any natural materials (e.g. plants and their products, such as seeds or fruit) or any introduced non-natural materials (e.g. paint, chemicals, treated substrates and treated water) should be assessed for toxicity to the species held before use."

The Zoo's Comment (Appendix 3, page 49, point 22)

"We have looked at this issue and cannot see where a conflict would occur and wonder whether the fencing has been assessed correctly as there is no taper in this fence as suggested. We invite an inspection if it is deemed necessary to show this?"

Recommendation

That the following condition be attached to the licence:-

In accordance with 2.3 of the SSSMZIP the corner of the Andean bear enclosure that tapers to a point (adjacent to the perimeter of the new rhino paddock) must be rounded off to prevent one bear being cornered by another in the event of conflict.

The time limit for compliance should be 3 months.

Reason for Recommendation

The animal enclosures should be designed so that the animals have space to move away from each other should they desire and that there shouldn't be areas where one animal can be trapped by other.

Options Available to Members

- **Accept** the officer recommendation and attached the condition on the licence and specify a compliance period of 3 months.; or
- **Accept** the officer recommendation but attach an alternative compliance period; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A25 Provision of a Wash hand Basin in Meat Preparation Area

Officer Comments

Raw meat for feeding to the Zoo's big cats and fish for feeding to the penguins is prepared in the meat kitchen which is adjacent to the lion house. These two processes were observed by the Inspectors on 17th and 18th November 2015. In this kitchen there was no wash hand basin available for staff use.

1.3 (d) SSSMZP requires that:-

"1.3 Supplies of food and drink must be kept and prepared under hygienic conditions, in particular:

d) staff should be instructed to observe strict standards of personal hygiene and should conform to good hygiene practice in the preparation of food, having due regard to the risk of cross contamination between equipment, utensils and surfaces;

The Zoo must provide a suitable wash hand basin which must be supplied with a source of hot and cold water, or warm water at a controlled temperature. It should be connected to a suitable foul water drainage system. It must be supplied with suitable soap and a method of hand drying.

The Zoo's Comment (Appendix 3, page 57, point 25)

"COMPLETED"



Recommendation

As Council Officers have not verified during a visit that this issue has been fully complied with; it is still recommended that the following condition be attached to the licence:-

In accordance with paragraphs 1.3d of the SSSMZIP a wash hand basin be installed in the area where the raw meat is handled. The wash hand basin should have a supply of hot and cold water, or water at a controlled temperature. The wash hand basin should have a supply of soap and a method of hand drying.

The time scale for compliance should be 6 months.

Reason for Recommendation

Cross contamination of the food for penguins with that for the lions can cause illness in the penguins and therefore should be avoided. The meat kitchen is large enough for such separation to be achieved.

Options Available to Members

- **Accept** the officer recommendation and attach the condition on the licence and specify a compliance period of 6 months; or
- **Accept** the officer recommendation but attach an alternative compliance period.; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A26 Avoidance of Cross Contamination in Meat Kitchen

Officer Comments

Raw meat for feeding to the Zoo's big cats and fish for feeding to the penguins is prepared in the meat kitchen which is adjacent to the lion house. These two processes were observed by the Inspectors on 17th and 18th November 2015 to be happening concurrently and therefore there is a risk that the penguin's fish could be contaminated with the meat being prepared for the cats.

Such cross contamination of feed is not desirable, the meat for the cats is unfit for human consumption and may introduce disease or ill health to which the penguins have no defence.

1.3 (d) SSSMZIP requires that:-

"1.3 Supplies of food and drink must be kept and prepared under hygienic conditions, in particular:

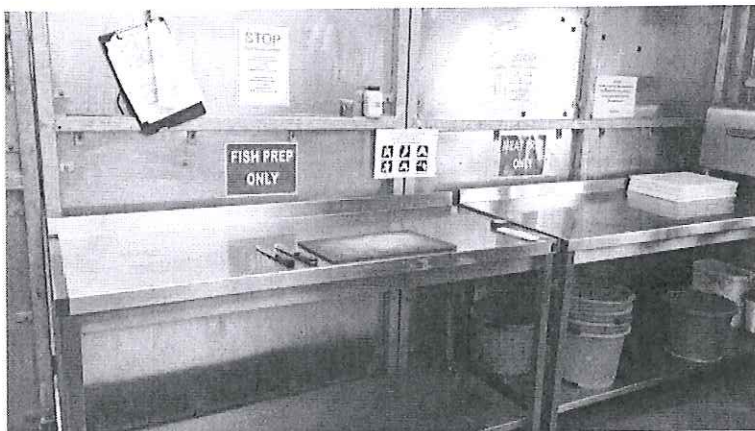
d) staff should be instructed to observe strict standards of personal hygiene and should conform to good hygiene practice in the preparation of food, having due regard to the risk of cross contamination between equipment, utensils and surfaces;

1.5 Feeding methods must be safe for animals and staff.

The Zoo must separate the meat kitchen to ensure that the same surfaces and equipment are not being used for preparing raw meat and raw fish as this creates a risk of cross contamination.

The Zoo's Comment (Appendix 3, page 58, point 26)

"COMPLETED: Completed designated separate areas, with colour coded boards utensils and table edging in in place."



Recommendation

As Council Officers have not verified during a visit that this issue has been fully complied with; it is still recommended that the following condition be attached to the licence:-

In accordance with paragraphs 1.3d and 1.5 of the SSSMZP the preparation of raw meat and raw fish must take place in designated separate areas with separate utensils to avoid cross-contamination particularly of fish for the penguins.

The time scale for compliance should be 1 month.

Reason for Recommendation

Cross contamination of the food for penguins with that for the lions can cause illness in the penguins and therefore should be avoided. The meat kitchen is large enough for such separation to be achieved.

Options Available to Members

- **Accept** the officer recommendation and attach the condition on the licence and specify a compliance period of 1 month; or
- **Accept** the officer recommendation but attach an alternative compliance period.; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A30 Future Design of Enclosures

Officer Comments

During the inspection on 17th and 18th November 2015 a keeper was observed by the Inspectors walking in with a white rhino, whilst moving the animal. During a subsequent Special Inspection which took place on 3rd February 2016 a member of staff was observed being in direct contact with 2 camels. Both these species are listed as Category 1 animals and non protected contact is deemed potentially high risk, as it puts the keepers at risk should something go wrong. For example if the rhino has a 'bad day' the keeper may find themselves in a very dangerous position. This type of animal management, although not banned, is to be discouraged.

Furthermore when the Zoo were questioned [by the Inspectors] regarding the plans for the new giraffe enclosures within the Africa House the Inspectors noted that to close the gates in the giraffe house the keepers must enter the enclosure with the giraffe to carry out this task.

At point 30 of the Inspectors "Additional Conditions" they have noted:-

"The practice of designing brand new facilities for Category 1 animals, such as the rhino and giraffe, whereby the keepers have no option but to be in direct contact with the animal, is not utilising up to date husbandry guidelines and can be a high risk to the keepers. In accordance with 1.5 and 5.1 and of the SSSMZP the design of the accommodation in the new Africa house must be such that keepers do not have to go into an enclosure with a Category 1 animal to be able to work gates, supply food or move them. It may be that with appropriate risk assessments and for certain specimens it may be possible to manage such Category 1 animals with contact, but a non-contact system must be available for new or proven aggressive animals or new staff."

As enclosures are redesigned the staff will require training regarding the new arrangements for animal husbandry, welfare, and any safe systems of work.

1.5 and 5.1 SSSMZP read as follows:-

"1.5 Feeding methods must be safe for animals and staff.";

"5.1 Animals must be handled and managed only by, or under the supervision of, appropriately qualified and experienced staff. Handling must be done with care, in order to protect the animals' well-being, and avoid unnecessary discomfort, stress or physical harm."

The Zoo's Comments (Appendix 3, page 62, point 30)

"The design process was agreed with all senior Animal Management staff as a suitable modern, safe and effective design to manage and control the animals safely. Whilst a number of gates are situated within internal pens, they are only occasional used gates. All the main regular use gates are remotely operated. This has all been reviewed in full since the inspection report and the Management team have not changed the design as it is not necessary but rather have created a working protocol for the area once it opened that gives clear non contact options as the first option to manage the internal gates etc.

There is a written process in place for the New facilities which involves across the board consultation from design to delivery. Revised protocols for Africa follow showing although animals can be managed with contact a non-contact system is available and the priority preferred method of operation.

Recommendation

That the following condition be attached to the licence:-

In accordance with 1.5 and 5.1 and of the SSSMZP the revised design of any new accommodation for Category 1 animals must be sanctioned by the Zoo's Veterinary Consultant and submitted to the Licensing Authority prior to the accommodation being built. A written document detailing the changes that will be made to the current animal management practice, including risk assessments, must be forwarded to the Licensing Authority.

The time limit for compliance should be 3 months.

Reason for Recommendation

There is a legacy within the Zoo that has failed to keep up with current thinking regarding keeper/animal contact. The designs for the new animal enclosures are often drawn up without keeper input and without the safeguards.

As the Zoo designs new enclosures it is essential that the Zoo's Veterinary Consultant approve these before the work starts so avoiding the issue of having to rebuild housing, such as has been done with the Andean Bear enclosure. In line with the new housing the Zoo will need to prove that changes in animal management are reflected in risk assessments and safe working practices.

Options Available to Members

- **Accept** the officer recommendation and attach the condition to the licence and specify a compliance period of 3 months; or

- **Accept** the officer recommendation but attach an alternative compliance period.; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A33 Yellow Anaconda Exhibit

Officer Comments

In the indoor area adjacent to the Tambopata Amazonia aviary there is a Yellow Anaconda that lives in an open exhibit consisting of a pool with surrounding vegetation. There is no barrier that would prevent a member of the public from touching either this reptile or the pond water within which it is housed, to photograph it, or disturb it in the hope of provoking some response. This could act as a danger to the public. Equally there is nothing to prevent the snake having free roam of the whole enclosure should it wish to do so. The building also contains a number of rodent baiting stations which places the snake in danger of ingesting a poisoned rodent.

This animal, being under 3m in length, is currently classed as a Category 2 animal [Appendix 12, SSSMZP - 2.1 *Contact between the public and animals in Category 2 may result in injury ... but is not likely to be life threatening.*]

The Notes to Appendix 12 state:-

"Note 5: Where Category 2 species are exhibited without non-touch barriers (e.g. in walk-through areas or areas with no stand-off barriers), the details of the practices being followed must be recorded in writing and be made available to the inspectors under the Act and the local authority, at the time of any subsequent inspection."

It should be noted that once the snake becomes 3m or more in length it will become an animal listed under Category 1 [Appendix 12, SSSMZP – 1.1 *"Contact between the public and animals in Category 1 is likely to cause serious injury or be a serious threat to life ... irrespective of the age and vulnerability of the visitor."*]

Appendix 12, SSSMZP – 1.2 states:-

"Animals in Category 1 must either be separated from the public by a barrier of suitable design in order to prevent physical contact between the animals and members of the public within their designated areas, or, with the prior approval of the local authority, be provided with adequate supervision to allow the public and the animals to be in the same area without hazard."

8.3 SSSMZP requires:-

"8.3 Risk assessments relating to public safety must be undertaken where appropriate and significant findings should be available for examination by the Inspector."

The Zoo's Comment (Appendix 3, page 67, point 32)

"ALREADY COMPLIED" Risk assessment was in place and supplied to inspectors and BBC EHO on during the inspection. A refresher session with keepers has been held since. The long term has been to remove this animal to a new site within 3 months ALL this information was available to the inspectors on the day so we do wonder once again why this condition is asked for."

A copy of the risk assessment is attached at the end of the Zoo's response

Recommendation

That the following condition be added to the licence: -

In accordance with 8.3 of the SSSMZP the Zoo must undertake a suitable and sufficient risk assessment of the yellow anaconda in terms of the public safety, the safety of other animals within in the vicinity, and with due consideration paid to the welfare of the snake itself. The Zoo must then implement any findings. The Zoo must provide a written report to the Licensing Authority including a copy of the risk assessment and details of any changes in the reptiles' care or its enclosure.

The time limit for compliance should be 1 month

Reason for the Recommendation

The Anaconda is a Category 2 animal as defined by the SSSMZP. The guidance states that the animals within that category would normally be separated from the public by a barrier. However, the responsibility for assessing the kind of barriers lies with the zoo operator.

There are other animals that have access to the enclosure and the presence of rodent baiting stations suggests that pests may also be present. The assessment of the enclosure must include the safety of the other animals and the welfare of the snake itself.

Options Available to Members

- **Accept** the officer recommendation and attach the condition to the licence and specify a compliance period of 1 month; or
- **Accept** the officer recommendation but attach an alternative compliance period; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

Pest Control

A11 Fly Killer in Vegetable Store/Kitchen

Officer Comments

In the old part of the zoo close to the old entrance the Zoo have a building that operates as a food store and a kitchen for many of the herbivores. Despite it being mid-November, the inspectors noted a larger than expected number of flies in the building. There was no evidence of an effective fly control system in place and working. Flies act as a pest, and will transmit disease.

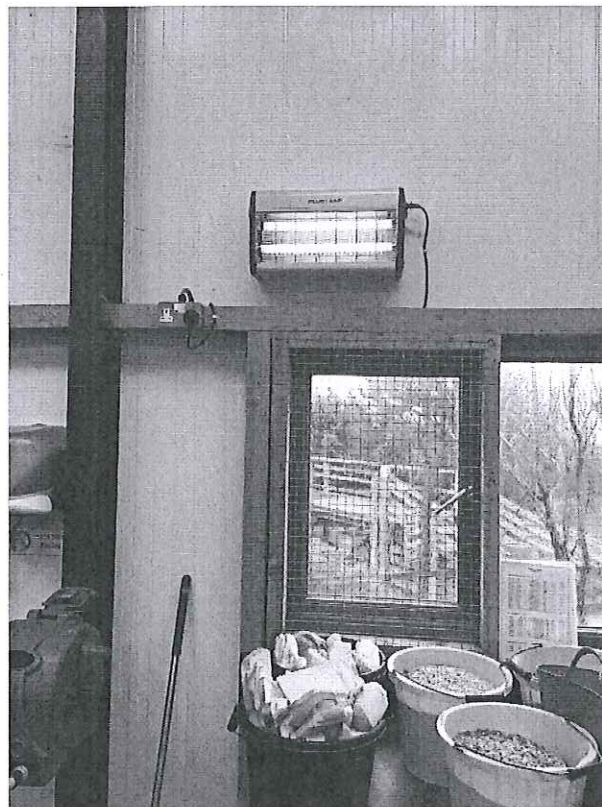
1.3a of the SSMZP requires:-

"Supplies of food and drink must be kept and prepared under hygienic conditions, in particular:

a) food and drink must be protected against dampness, deterioration, mould or from contamination by insects, birds, vermin or other pests."

The Zoo's Comments (Appendix 3, Page 39, point 11)

"COMPLIED. Completed in place"



Recommendation

As Council Officers have not verified during a visit that this issue has been fully complied with; it is still recommended that the following condition be attached to the licence:-

In accordance with 1.3a of the SSSMZP a functioning fly killer must be provided in the fruit/vegetable store/kitchen area.

The time scale for compliance shall be 3 months.

Reason for the Recommendation

The kitchen is providing an environment suitable for flying insect pests. They will be able to find food and shelter and therefore survive in the artificial environment long after they cease to be viable in the natural environment. As the flies carry a disease risk the Zoo must install appropriate control measures.

Options Available to Members

- **Accept** the officer recommendation and attached the condition on the licence and specify a compliance period of 3 months; or
- **Accept** the officer recommendation but attach an alternative compliance period; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

Reviews and Other Additional Conditions

A9 Removal of Photograph

Officer Comment

The new Zoo entrance is lined with a number of large format photographs that are designed to give the visitor a sense of the attractions and experiences within the zoo. One such photograph (approx. 2m long) is of a young girl feeding lemurs.

The young girl is not wearing gloves, and the lemur is clearly in direct contact with the child. This is in direct contradiction to the Zoo's own Zoonosis Policy, and the Inspectors were assured that the public were not allowed to touch the animals, just hand them the food.

The photograph at the main entrance clearly contradicts Zoo's own Zoonosis Policy for managing potential spread of disease or zoonosis. It implicitly encourages direct public/lemur contact.

Paragraph 6.14 of the SSSMZP deals with Walk-through exhibits

6.14 *In walk-through exhibits with exotic herbivores/primates, the following points should be noted:*

- *appropriate risk assessments, particularly regarding zoonotic diseases and direct or indirect contact with animals, should be undertaken and reviewed regularly by a suitably qualified person (this would usually be a veterinary surgeon). These will be dependent on animal species and exhibit design and should cover risks to both public and animal safety;*

The Zoo have undertaken an assessment and have chosen to ban the feeding of lemurs and other animals within the Worldwide Safari and the photograph contradicts the Zoo's own policy

The Zoo's Comments (Appendix 3, Page 37, point 9)

"COMPLIED Whilst we disagree with the "implicitly encouraging" comment.... the photograph has been removed We would like to see consistent application by DEFRA Inspectors of guidelines such as this one to other zoos. Other zoos openly promote by leaflet or web photo the touching or stroking of lemurs. We have a very strict policy not to allow this."

Recommendation

As Council Officers have not verified during a visit that this issue has been fully complied with; it is still recommended that the following condition be attached to the licence:-

In accordance with para 6.14 of SSSMZP the Zoo ensures that all photographs show behaviour that does not contradict the Zoo's own risk assessments. Therefore the photograph must be removed

The time limit for compliance should be Immediate

Reason for the Recommendation

The photograph is implying that contact with the animals is allowed which is contrary to the Zoo's own Zoonosis Policy and is discouraged by signs and notices throughout the park.

Options Available to Members

- **Accept** the officer recommendation and place the condition on the licence with immediate effect; or
- **Accept** the officer recommendation but attach a different compliance date to the condition; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A8 Review of Public Feeding

Officer Comment

The Zoo offers an immersive experience for visitors with the opportunity to feed animals in an unsupervised manner by purchasing bags of food on the day. There are also supervised feeding sessions through the purchase of wristbands. In addition the Zoo offer extra experiences such as the feeding the big cats. The inspectors were generally supportive of this; however, there was no evidence that the Zoo had undertaken any suitable risk assessments regarding the individual elements of the feeding experiences and in particular the risk to the public from zoonotic infections.

The feeding of the big cats is allowed under strict supervision as a "paid for experience". This includes the opportunity to prepare the meat to feed to the large carnivores. This is usually meat which is not fit for human consumption and therefore carries a high zoonotic risk. There is no advice that the public must wear gloves.

During the inspection on 17th and 18th November 2015 the Inspectors observed the keepers wearing gloves whilst preparing meat in the meat kitchen.

1.5 and 1.10 of the SSSMZP require:-

"1.5 Feeding methods must be safe for animals and staff."; and

1.10 Uncontrolled feeding of animals by visitors must not be permitted. Where controlled feeding occurs, it should be on a selective basis only, with suitable food sold, provided or approved by the operator. The quantity supplied per day must be managed to avoid over-feeding."

The Zoo's Comment (Appendix 3, page 36, point 8)

"COMPLIED Public feeding of penguins, giraffes, lemurs is one of the contributing factors to the overall success of the zoo, by that close personal unique encounter a visitor builds empathy with the animal, and then education issues of the "special attributes" of that animal and conservation issues of why and how this animal is in threat and what me as an individual can do about it become somewhat more easier to take on board.

Penguin feeding has been carried out without incident in the zoo since their arrival in 2006, we are committed to funding a conservation project, protecting the penguins, and all the other animals that live beside it, their natural habitat and reintroducing penguins back to the wild in Peru. In 2013 just 12 Humboldt's penguins were counted in the region, an area where they

used to occur in there hundreds, our contribution to this project in 2015 exceeded £30,000 and funds from penguin feeding is a vital source of income.

We have fully risk assessed the activity, the fish in use is human graded, and we felt a strong message to be delivered by the keeper as to the issues of contamination as well as having gloves available for those with immune deficiencies or if people wanted to purchase was an appropriate control. We will continue to monitor the situation. Hand wash with soap is available at the facility."

South Lakes Safari Zoo Risk Assessment – Hand Feed Penguins - Supervised			
LOCATION: Penguin Exhibit		Date: January 2016	
DOCS REF: ACSRA15,	Assessed By: Management Team	Expiry: January 2017	
Humboldt Penguin – Category 2 This feeding will be supervised by a fully trained keeper.		Review: June 2016	
HAZARDS	PERSONS AT RISK	CONTROLS TO MINIMISE THE RISK	ANY FURTHER NECESSARY ACTIONS
Direct Contact with the Penguins	Employees & Visitors	No barrier between 'person & animal' therefore the keeper supervising the feedings must be vigilant at all times. Ensuring that they make people aware of the risks and do not allow the area to become overcrowded. (See below). The correct signage is in place – knowledge of the risks are highlighted to visitors. Keepers demonstrate the correct way of hand feeding the penguins. Reducing the risk of animal bites, scratches.	
Handling the fish - Preparation	Employees	When preparing the fish within the kitchen the fish will be prepared on the 'fish counter' which is cleaned before and after use with the correct cleaning agent. Keepers will wear gloves at all times. The correct chopping boards are to be used (Blue) Keepers will use the appropriate equipment for the job as labelled. Strict, clear hygiene rules are in place which keepers must adhere to.	Clear signs are in place in the meat/fish prep area to separate the 2 areas avoiding cross contamination.
Handling the fish - Visitors	Employees and visitors	VISITORS ARE TOLD, PRIOR TO FEEDING THE PENGUINS THAT THEY ARE TO WASH THEIR HANDS AFTER HANDLING THE FISH AND FEEDING THE PENGUINS. Gates, barriers and signs are cleaned daily and are checked prior to the talk & feeding. All enclosure furniture that can be contacted must be clean of faeces and any dirt. During the talk the keeper must give a clear, forceful instruction to the visitors to wash their hands with soap and water immediately	Hand washing sink is located across from the penguin enclosure entrance gate.

Recommendation

That the following condition be attached to the licence:-

In accordance with paragraphs 1.5 and 1.10 any organised sessions of members of the public preparing or feeding animals that involves raw meat and fish must be the subject of a written risk assessment and protective gloves be provided as appropriate.

The time limit for compliance should be immediate.

Reason for the Recommendation

The public are encouraged to feed the animals, both unsupervised, feeding food bought at the main entrance, and supervised during close encounters. Whilst the documentation states that the public should not encourage direct contact between the animals and the person feeding, in the inspector's

opinion this is obviously going on. In fact the photograph at the front entrance encourages it. Whilst the inspectors would all agree that an immersive experience for people visiting zoos is generally a good idea, it is important that it is controlled, and that boundaries are not overstepped and that direct contact with the public must be restricted and controlled.

Options Available to Members

- **Accept** the officer recommendation and attach the condition to the licence and specify a compliance period of Immediate; or
- **Accept** the officer recommendation but attach an alternative compliance period. ; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A12 Written Protocol for Quarantine of "rescue" Animals

Officer Comments

Whilst the Zoo does not have an official policy on the acceptance of animals from the general public it does find itself having to deal with animals that the public may gift the Zoo or simply leave at the door.

There is no suggestion that the Zoo should not try and assist in these circumstances but the animals must be considered a potential high risk carrier of disease as they may not have undergone any levels of testing for infectious disease.

The Zoo also has animals coming in from other collections as part of its development which may or may not require quarantine periods.

As a result of observation during the inspection on 17th and 18th November 2015, Mr Brash noted :-

"a cockatoo, which had relatively recently arrived undergoing quarantine in a room where a number of other birds were sharing the same air space. "

The Inspectors' noted at point 12 of their recommended "Additional Conditions"

"The quarantining of, or housing of newly arrived, birds within the same air space as birds already within the collection is poor practice and must cease."

3.19 and 3.21 of the SSSMZP require:-

"3.19 Dedicated accommodation, off-show where necessary, should be available for the isolation and examination of newly arrived animals, and for the quarantine and care of unduly distressed, sick or injured animals.

3.21 Newly arrived animals should be kept isolated for as long as is necessary to ensure proper examination, acclimatisation and quarantine before introduction to other animals in the collection."

The Zoo's Comment (Appendix 3, page 40, point 12)

Condition 18 of the present licence relates to veterinary services. On 13th August 2015 BBC Licencing Committee accepted veterinary procedures and protocols were in place which included a quarantine procedure. That bird was placed in that unit in contravention to the quarantine procedures

in place, the animal manager who made this decision is undergoing retraining in the protocols and their implementation.

Recommendations

That the following condition be added to the licence:-

In accordance with 3.19, 3.21 of the SSSMZP written protocols must be produced, with advice from the veterinary consultants, for the housing and quarantine of any animals introduced to the collection or accepted as rescue animals. Staff must receive training on the protocols and their implementation and this should be documented.

The time limit for compliance should be 6 months.

Reason for the Recommendation

In accepting new animals to the collection whether as temporary "rescue" cases or part of a formal development plan the Zoo must be aware of the need to quarantine animals. There must be policies in place so that staff can house and care for the animals appropriately without risking the spread of disease throughout the current zoo population.

Options Available to Members

- **Accept** the officer recommendation and attach the condition on the licence and specify a compliance period of 6 months; or
- **Accept** the officer recommendation but attach an alternative compliance period; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A24 Review of Animal Bites

Officer Comment

The Zoo offers an immersive experience with the ability to walk through aviaries filled with free flying birds, feed certain animals in an unsupervised manner, and take part in supervised feeds. Such close contact can result in the animals biting or pecking visitors. During the inspection on 17th and 18th November 2015 the accident book for the Zoo was studied by the Inspectors. They noted that there had been a number of bites reported. One of the Zoo Inspectors, Matt Brash reported: -

"...that there had been 9 incidents within the last year where a member of the public has been bitten by an animal. Some of these have occurred in the new Aviary, however the majority of these have been bites caused by primates, mainly squirrel monkeys or lemurs.

Of particular concern is a bite wound where a child was bitten by a vulture on the ear. This injury could have been far more severe. This injury was caused by a Vulture that was already known to the zoo as a difficult bird. The directors of the zoo informed the inspectors that the bird had previously been removed from the aviary as it was imprinted, and thus not afraid of people. Despite this knowledge the bird had then been mixed back into the aviary when the public were present. At the time of the inspection, the bird was in the aviary, although a keeper was present to observe it."

During the inspection it was observed, in several areas, including the Illescas Aviary, which houses the Condor and Vulture species, that some animals were not afraid to approach humans. One Inspector had a Black Vulture perched on their wellington boot and was seen pecking at areas of mud.

It is not submitted that contact should be prohibited but there may be certain individual animals, or certain practices, that place the public at a greater risk of bites and possible infection. A review should be undertaken into the animal bites, and the animal contact opportunities, to ensure that sufficient safeguards have been introduced.

6.14 SSSMZIP requires: -

"6.14 In walk-through exhibits with exotic herbivores/primates, the following points should be noted:

- appropriate risk assessments, particularly regarding zoonotic diseases and direct or indirect contact with animals, should be undertaken and reviewed regularly by a suitably qualified person (this would usually be a veterinary surgeon). These will be dependent on animal species and exhibit design and should cover risks to both public and animal safety;*

- numbers of people allowed in the exhibit at any time, and allowable visitor behaviour and activities, should be consistent with the animals' welfare;
- appropriate staffing must be available, and protocols in place for staff to intervene in defence of either the visitor or animal if any conflict arises;
- staff and/or visitors should have a clearly indicated means of contacting assistance if required, including that of trained first-aiders;
- feeding of animals should only take place under supervision by staff"

The Zoo's Comment (Appendix 3, page 53, point 24)

Please note that none of these bites were serious but were recorded as part of our obligation under the Act.

Written review

In the calendar year 2015 there a total of eight reported incidents where a member of the public has been bitten by animals within the safari Zoo , none of them resulted in a serious injury that required other than minor first aid treatment. Below is the list of incidents :

Date	Location	Animal	Level of injury	Occurrence
18/02/15	Tropical House	Tamarin	slight scratch	child too close
13/05/15	Lemur feeding area	Lemur	drew blood from finger	
01/06/15	Lemur feeding area	Lemur	small cut	
10/08/15	Aviary threatened by camera	Condor	small puncture wound	Peck as bird
19/07/15	Bush area	Prairie Dog	Bite	animal
22/07/15	Bush area	Squirrel monkey	Bite	animal
24/08/15	Bush area duck being fed	Squirrel monkey	Bite	animal tried to steal food as
09/10/15	Aviary taken	King Vulture	Bite	Bird bit as photograph being taken

An examination of this data would suggest the areas where incidents have occurred can be broken down in to three areas namely , the lemur area , the bush area and the Illesces aviary and each area will be examined in turn with an action plan set accordingly in SMART (Specific ,Measurable, Achievable ,Relevant and within a Timescale) format.

LEMUR AREA

Both instances occurred when supervising keepers were present and occurred during the first half of the calendar year, with no reported re occurrence in the second half of the calendar year.

Bearing in mind the present time of the year as the season is about to start , the action plan will be set to reflect this calendar occurrence

S - To remind / retrain keepers of the need to raise awareness of the public during periods of contact that these animals can bite

M - By the number of reported bites and completion of required training reminder.

A - To complete a reminder training session with animal care team , with the aim of ensuring that keepers raise awareness of the potential of these animal biting during relevant 'health and safety' talks , this is reflected in the Animal Contact Situation – Risk Assessment

R - Two contacts have resulted in minor bites

T - A year, in order to compare calendar year with calendar year. Reminder training to be delivered within one month .

WORLDWIDE/BUSH AREA

The Bush or worldwide safari area has three reported bites and proximity to animals which should be under observation. As a result the action plan will concentrate on this issue

S – To raise awareness to the public that animals can bite and that food should only be given to certain animals within that area (namely Kangaroos , Wallabies , Emus , Ducks , Geese, Peacocks and swans).To ensure all staff deployed in this area be they animal care team or volunteers are trained accordingly.

M- By the reported number of bites

A- All animal food to be sold in bags which clearly state which animals can be fed (already happens) , signage to reinforce this message to be placed , ensure staff deliver ' health and safety' brief to customers purchasing this animal food (to be part of relevant staff induction packages) and ensure staff in relevant area challenge customers who breach this zoo rule.All relevant animal care team to have reminder training and relevant risk assessment to be raised in all volunteer induction.

R- Three contacts have resulted in minor bites

T- A year, in order to compare calendar year with calendar year. Reminder training for the animal care team to be delivered within one month.

ILLESCES AVIARY

In the aviary there have been two minor incidents in the calendar year and in both of these cases the person involved has been carrying camera equipment, as a result the action plan will concentrate on this issue

S- To raise awareness to the public who enter this area of the perceived threat that some animals may feel by some types of camera equipment

M-By the reported number of bites

A- Appropriate signage being displayed at entrance to aviary in question

R-Two contacts have resulted in minor injury

T-A year, in order to compare calendar year with calendar year.

The remaining issue was not a bite but a scratch as a member of the public entered an animal house and there has been no repeat of this issue , suggesting no pattern that can be actioned.

Recommendation

That the following condition be attached to the licence:-

In accordance with paragraph 6.14 of the SSSMZP a full written review of incidents of members of the public being bitten by animals must be carried out and an action plan adopted to reduce the number of bites. A copy of the report and the action plan must be forwarded to the Licensing Authority.

The time limit for compliance should be 3 months

Reason for the Recommendation

The Zoo must undertake a review into the animal bites that are occurring. Certain instances, such as the vulture, must clearly not be allowed to occur, but other instances may alert the Zoo to a need to change practices or move individual animals. It is not acceptable that visitors should be subject to a risk of bites that is unmanaged.

Options Available to Members

- **Accept** the officer recommendation and attach the condition to the licence and specify a compliance period of 3 months; or
- **Accept** the officer recommendation but attach an alternative compliance period ; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

**MATTERS RAISED AT THE INSPECTION THAT
ARE NOT BEING BROUGHT TO THE COMMITTEE**

Officer Comments

The Committee will note that the Inspectors recommended 33 "Additional Conditions" on the inspection form. Throughout the inspection Inspectors provided information and advice to the Zoo Management and this was summarised in a formal debrief session at the end of the second day (18th November 2015), therefore the Zoo have known about many of the items under discussion today since that time.

Licensing Officers have been in contact with the Zoo since the inspection and visited the Zoo on 16th December 2015. It has been confirmed with the Zoo that the following matters have been resolved. (In each case the resolution has been seen and approved by the Authority and Mr Brash, in his role as the Council's advisor):-

- A10 **Lifebelt and Sign**
- A15 **Enclosures maintained to Protect Animal Safety**
- A16 **Andean Bear Fencing**
- A18 **Temporary Enclosures in Africa House**

The following Additional Conditions are already being dealt with by the Council

- | | | |
|-----|----------------------------------|--|
| A2 | Walkways. | This matter is already being dealt with via a Direction Order and is subject to a separate report before Members today |
| A4 | Zoonotic Infection / PPE. | This matter is one that only affects Staff Health and Safety and is therefore being dealt with under the Health and Safety at Work etc. Act 1974 |
| A28 | Wire Mesh / Walkways. | This matter is the subject of an Improvement Notice served under the Health and Safety at Work etc. Act 1974 |

Recommendation

The Members note that Additional Conditions 10, 15, 16 and 18 of the Inspectors' Report have been complied with and that the completion has been approved by the Licensing Authority therefore they do not require inclusion on the zoo licence.

That Members note that Additional Conditions 2, 4, and 28 are currently being dealt with separately and therefore do not require further consideration in this report.

Reason for Recommendation

Conditions that have been complied with to the satisfaction of the Licensing Authority do not require inclusion on the Zoo's licence.

Additional Conditions 2, 4 and 28 are currently being dealt with separately outside of this report.

Options Available to Members

- **Accept** the officer recommendation; or
- **Reject** the officer recommendation and add the conditions to the zoo licence.

CONDITIONS THAT SHOULD BE REPLACED

A6 Redrafting of Existing Condition 14

Condition 14 Hazardous Animals

In the event of the licence holder adding new species of hazardous animals to those already in the exhibition/collection the licence holder must ensure that the staff managing such animals have achieved a satisfactory degree of competence. Such competence should be derived from a period of training, by those keepers who will be responsible for the care of animals, undertaken in another zoo or similar institution which has experience of and has at the time, examples of such animals in the collection. This period of training should be appropriate to the species acquired, agreed with the Licensing Authority and be followed by written endorsement by a responsible person from whom the training has been derived.

It is the opinion of the Zoo Inspectors that the condition currently on the licence could be simplified and the emphasis placed back on to the Zoo's management. As currently worded the existing condition only refers to staff managing the animals, as opposed to all the keepers involved in the animal's care. It also states that the training shall be agreed with the Licensing Authority which does not recognise that expertise may be held in-house by keepers with knowledge of similar animals.

The existing condition does not specify that the training endorsement should be received before the animals arrive.

5.1 and 10.1 SSSMZP require:

"5.1 Animals must be handled and managed only by, or under the supervision of, appropriately qualified and experienced staff. Handling must be done with care, in order to protect the animals' well-being, and avoid unnecessary discomfort, stress or physical harm."

The Zoo's Comment (Appendix 3, page 34, point 6)

"Accepted" and this condition was already in place over many years as ongoing – full records are in place and were available for inspection on the day. However clarification is sought as to whether previous experience of animals from the same family group counts as previous training. e.g. Tigers qualify as Lions etc.

10.1 Number of staff and their experience and training must be sufficient to ensure compliance with the Standards at all times, taking due allowance for holidays, sickness and other absences."

Recommendation

That existing Condition 14 of the Zoo's Licence be replaced with:-

In accordance with paragraph 5.1 and 10.1 of the SSSMZP all staff who work with newly arrived hazardous species [any animal listed in Category 1 of the Hazardous Animal categorisation (see Appendix 12 of the Secretary of State's Standards of Modern Zoo Practice)] not previously held in the collection (or not within other staff's past experience) must undergo a period of recorded training at a collection already holding the species. Evidence of this training must be forwarded to the Licensing Authority prior to the hazardous animal arriving on site. If staff have previous experience then that experience must be detailed including dates and establishments where the training was received and forwarded to the Licensing Authority 4 weeks prior to the animal arriving

The change in condition should have immediate effect.

Reason for the Recommendation

The zoo licence conditions must be relevant to the premises, understandable by both the Zoo and the Authority, and must be enforceable. It is felt that by widening the scope of the training to cover all keepers involved, and stating that the training must be completed before the animal arrives, the condition is both clear in its objectives and enforceable should the need arise.

Options Available to Members

- **Accept** the officer recommendation and change the wording of Condition 14 currently attached to the licence with immediate effect; or
- **Accept** the officer recommendation but attach an alternative compliance period; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor the situation.

A13 Re-drafting of Existing Condition 19

Condition 19

Safe and effective control of rodents

In accordance with 1.3a and 3.25 of the Secretary of State's Standard of Modern Zoo Practice (SSSMZP) a safe and effective programme for the control of rodent vermin must be implemented and maintained throughout the zoo. Food and forage must be protected from contamination by vermin.

[Timescale by 1st December 2015]

Officer Comments

During the special inspection on 28th/29th January 2014 the inspection team saw and photographed evidence of a rodent infestation problem. However during the special inspection on 11th November 2014, a limited inspection of mainly the Giraffe house did not reveal evidence of similar levels of rodent activity. An external company had been brought in to assist in developing a pest control plan. The control of pests is being maintained in house, by the keepers.

Whilst accepting that the problem of rodent pests is a perennial problem in all zoos, by nature of the zoos' activity, it is essential that a comprehensive and effective process of rodent control is maintained consistently. Rodents can transmit and spread a number of diseases that can both adversely affect the animal's health but also be potentially zoonotic.

During the inspection on 17th and 18th November 2015 the inspection team noted and photographed considerable evidence of rodent infestation throughout many areas of the zoo. Mr Brash has confirmed:

1. *There was evidence of rodent droppings in the keeper's kitchen and grain storage areas. There was also a bag of grain that had been chewed by rodents and was now leaking mixed cereals onto the floor. This area would be relatively easy to make rodent proof.*
2. *In many other areas of the park there was evidence of large numbers of rodents, evidenced by the presence of tracks both through and adjacent to exhibits and holes under buildings.*

Although the Inspectors recognise that some work has been undertaken by the zoo to control vermin, from the large scale evidence of the rodent problem, it is still a major concern and the current program run by the keepers is not effective.

The Inspectors recommended the following "Additional Condition":-

"13. There is evidence that the vermin control in the dry food storage area specifically, and more generally throughout the park is still inadequate. In accordance with 1.3a and 3.35 of the

Secretary of State's Standard of Modern Zoo Practice (SSSMZP) a report must be produced for the Licensing Authority by an independent professional pest control company on the safe and effective control of rodent vermin (within 3 months). The Zoo must then implement the recommendations of that report (within 6 months)

1.3 a) and 3.25 SSSMZP require:

"1.3 Supplies of food and drink must be kept and prepared under hygienic conditions, in particular:

a) food and drink must be protected against dampness, deterioration, mould or from contamination by insects, birds, vermin or other pests;

3.25 A safe and effective programme for the control or deterrence of pests and vermin and where necessary predators, must be established and maintained throughout the zoo."

The Zoo's Comment (Appendix 3, page 41, point 13)

"COMPLETED The zoo has already carried out this procedure – the documentation was available for inspectors on the day. On 20th August 2015 a pest control survey was conducted by Rentokil on the zoo premises, issues raised by this report in bullet point format for easy reference were:

- 1) There is a rodent issue on site
- 2) Reasons given for this include the ready availability of food, water and the relative safe nesting with protection from predators
- 3) A gelatine based bait would be more palatable to rats and thus more effective, replace current product and consider using glue boards.
- 4) Increase number of bait boxes
- 5) Targeted use of bait, in any form.

As a result of this survey, the zoo identified two champions from the animal care team to drive the issue forward, the rationale behind this being this was that with intelligence fed from the other members of the team, they could be proactive in bait placement.

Additional bait boxes were purchased as well as two new types of rat bait namely Romax rat cp Coumatetralya blocks and jade cluster bromadiolone packeted bait , the purchase and move to these bait types was a direct result of the Rentokil report.

The daily check sheet was amended, that allowed the easier recording and monitoring of the bait that was deployed and where, so allowing for hot spot identification , providing a visible

system that allows staff to see where that bait is being eaten and concentrate accordingly on those areas. These sheets are also submitted to the to the administration office, so they are able to verify sufficient attention is being paid to the issue.

Following a review of the action being taken in respect of this issue which took place on 12th January 2016 it was noted that whilst the champions were being proactive in their work , their core role responsibilities at times stopped them from being as totally pro active as management desired. Management made the decision in light of this review to increase the hours worked by a part time member of staff to full time, this has resulted in this member of staff being able to devote 20 hours a week to this issue exclusively. Any gap in this cover is maintained by the previous animal champions and as of 28th January 2016 this change in tactics has resulted in the destruction of most of the noted occurrence.

Since the review was carried out in August, additional bait boxes have been purchased and there are now 50 deployed around the park and additional bait has been bought and placed 9 orders for rat bait and has been placed. Since August 2016 Safari Zoo has spent £2,985 to combat this issue.

To ensure continued work in this area have adopted the following action plan in SMART (Specific , Measurable, Achievable , Relevant and specific Timescale)

- S To continue following the recommendations within the Rentokil report to combat the 'rat 'issue within The Safari Zoo
- M Number of destroyed rats, amount of rat bait used and the rate at which it is used.
- A By the employment of a member of staff specifically to combat this issue, not distracted by any other core role and the continued purchase of necessary equipment.
- R The issue Safari Zoo has with rats as per Rentokil report
- T A calendar year from 20th August 2015, as this action has been on going from the date of the Rentokil report.

Note: As seen from this report the achievable/methodology will be monitored as amended as deemed necessary."

Recommendation

There is an existing condition attached to the licence with regard to rodent control, Condition 19. It is therefore recommended that Condition 19 be amended to the following

In accordance with 1.3a and 3.25 of the SSSMZP:

- a report covering the safe and effective control of rodent vermin and including recommendations is produced and submitted to the Local Authority by an independent professional pest control company.

Compliance period within 3 months The Zoo implement the recommendations from that report.

Compliance period: within 6 months.

Reason for Recommendation

There is evidence that the pest control in the dry food storage area specifically, and more generally throughout the park is still inadequate. The Zoo's current pest proofing and baiting do not appear to be effective. It is required that an independent company inspect the zoo to report on the current level of pest infiltration and to report on the requirement for proofing and baiting.

It is not a requirement that an independent company undertake the proofing or baiting.

Options Available to Members

- **Accept** the officer recommendation and revise Condition 19 and specify a timescale of 3 months for the report to be produced and submitted to the Local Authority and 6 months for the implementation of the recommendations from that report; or
- **Accept** the officer recommendation but attach a different compliance date; or
- **Reject** the officer recommendation and instruct Officer to continue to monitor compliance with the existing Condition.

EXISTING DIRECTION ORDERS THAT HAVE BEEN COMPLIED WITH

Condition 20(a) Remove muck heap and relocate

In accordance with 8.5 and 8.10 of the SSSMZP the existing muck heap in the African Exhibit must be moved to the middle of the paddock so that waste does not fill the adjacent moat and aid escape of the Baboons (Category 1 animal);

Officer Comments

This matter was brought to Committee on 17th December 2015. Officers reported to the Committee that the Zoo had not complied with the license condition within the specified period. The Committee resolved to escalate the Condition to a Direction Order with a compliance time of 28 days. The Direction Order required the Zoo to undertake works they wouldn't normally have been required to and therefore the Effective Date of the Direction Order was 19th January 2016.

On the 14th January 2016 the Zoo emailed a photograph to the Officers that clearly showed a gap between the muck heap and the ditch wide enough to ensure that no material from the muck heap could end up in the ditch, and further could not aid the escape of the baboons.

During an inspection of the Zoo on 20th January 2016 Officers confirmed, from ground level, that the muck heap had been moved as required by the Order.

Recommendation

That the Committee record that the Direction Order is complied with and that Condition 20(a) be removed from the licence.

Reason for Recommendation

Through observation and discussion the Zoo has in place suitable arrangements to comply with the requirements of the Direction Order.

Options

The options available to Members are:-

- Accept the officer recommendation that the Direction Order is complied with and that the condition can be removed; or
- Reject the officer recommendation and instruct the Zoo to undertake such works as it believes are necessary to comply with the Order, and to consider such extension of time as the Committee see fit.

Condition 25 Clinical Waste Disposal Contract

In accordance with 3.24 of the SSSMZP, the zoo must have legally compliant clinical waste disposal contract in place with a licensed contractor or the Veterinary Consultant must demonstrate authorisation as a licensed transporter to transport clinical waste for disposal at their premises.

Officer Comments

This matter was brought to Committee on 13th August 2015. Officers reported that the Zoo had not complied with the licence condition within the specified compliance period. The Committee resolved to escalate Condition 25 to a Direction Order with a compliance date of 16th November 2015. The Direction Order did not require the Zoo to undertake works and therefore was effective immediately.

On the 17th September 2015 the Zoo emailed a Waste Transfer Document dated 16th September 2015 from Direct 365 to the Officers that showed a waste contract in place for the removal of clinical waste.

Recommendation

That the Committee record that the Direction Order is complied with and that Condition 25 be removed from the licence.

Reason for Recommendation

Through discussion the Zoo has in place suitable arrangements to comply with the requirements of the Direction Order.

Options

The options available to Members are:-

- Accept the officer recommendation that the Direction Order is complied with and that the condition can be removed; or
- Reject the officer recommendation and instruct the Zoo to undertake such works as it believes are necessary to comply with the Order, and to consider such extension of time as the Committee see fit.

Condition 29 Pygmy hippo pool

In accordance with 2.1, 4.4 of the SSSMZP and the EAZA Husbandry Guidelines, the Pygmy Hippos must be given access to an indoor heated pool in which they can fully submerge themselves.

Officer Comments

This matter was brought to Committee on 13th August 2015. Officers reported that the Zoo had not complied with the license condition in the specified compliance period. The Committee resolved to escalate Condition 29 to a Direction Order with a compliance date of 30th September 2015. The Direction Order did not require the Zoo to undertake works they wouldn't normally have been required to and therefore was effective immediately.

On 29th September 2015 the Zoo sent through a series of photographs that showed the hippo pool was complete and full of water.

During the inspection of the Zoo on 17th and 18th November 2015 the Inspectors and Officers confirmed that the work had been completed in compliance with the Direction Order

Recommendation

That the Committee record that the Direction Order is complied with and that Condition 29 be removed from the licence.

Reason for Recommendation

Through observation and discussion the Zoo has undertaken all works necessary to comply with the requirements of the Direction Order.

Options

The options available to Members are:-

- Accept the officer recommendation that the Direction Order is complied with and that the condition can be removed; or
- Reject the officer recommendation and instruct the Zoo to undertake such works as it believes are necessary to comply with the Order and to consider such extension of time as the Committee see fit.

MATTERS FOR NOTING

A5 Rebuild of Andean Bear Enclosure

The indoor facilities for the Andean Bears are insufficient. In accordance with 4.3 and 4.4 of the SSSMZP the breeding/sleeping dens for the Andean bears must be redesigned and rebuilt to bring their specification in line with modern husbandry standards. The rebuilt house must include facilities for the separation and direct visual assessment of bears, adequate ventilation, access for veterinary management, double doors for security, and a level of separation that prevents nose to nose, or visual contact, with other species in the main house. (Compliance time - 6 Months)

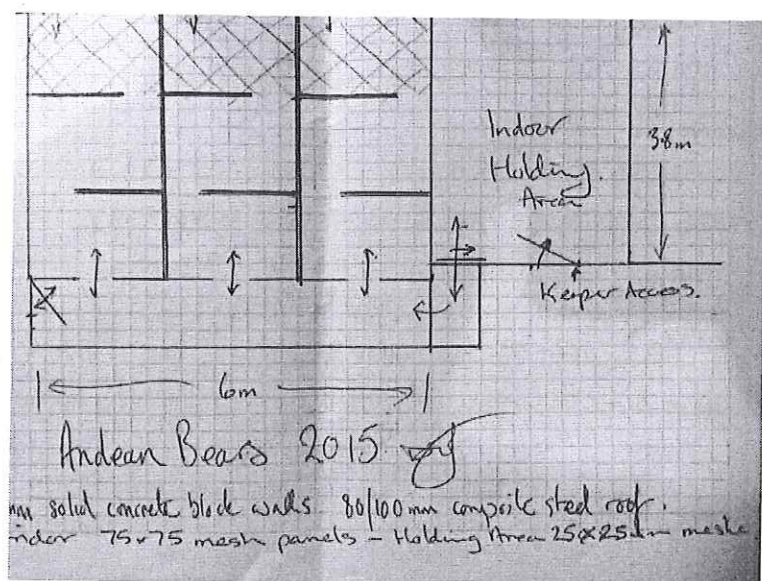
Officer Comment

The Andean bears were moved to a new enclosure, with a purpose built indoor house built for them, and an expanded outdoor area. The shed housing their new dens, is multi-functional and also acts as the indoor enclosure and viewing area for mixed species such as Kangaroos and capybara.

The bear accommodation is made up of three separate bear dens, each with its own entrance from the outside. There is a further access point from inside the house, into each den. The inside of dens is viewed using cameras. For keepers to gain access to the inside of the den, they must first check that there are no bears present in the den, then ensure all gates are fastened closed. They would then have to crawl in via the bear doors.

If however a bear was ill in the den then it would be difficult to manage as there is no practical way of treating the animals, without physically removing the roof. If the bear had to be anaesthetised, then this procedure would be complicated by the need for the keeper, or vet, to crawl into the den to ensure that the bear was asleep after being darted.

During the inspection plans were produced that showed an indoor passageway (2m by 6m) that would allow inspection of the animals, allow for treatment or darting for anaesthesia if required. A further indoor accommodation area was included in the plans, to be used when they might be unable to go outside. (See photo of plans below)



The bear accommodation was not however built to this specification, hampering the management of the animals, and thus potentially their welfare.

Planning matters

Members will be aware that a brief summary of the planning history was delivered earlier in this report. The current situation is that the Andean Bear enclosure does not benefit from planning permission.

The Zoo have been informed that they are required to apply for retrospective planning permission for consideration by the Council's Planning Committee.

Under Section 4(3) of the Act "local authorities may refuse to grant a licence if they are not satisfied that the standards of accommodation, staffing or management are adequate for the proper care and well-being of the animals as a whole or for any of them, otherwise for the proper conduct of the zoo" (5.4 DEFRA guidance)

The Zoo's Comments (Appendix 3, page 30, point 5)

"ALREADY COMPLIED: Photographs confirming the changes to the bear house were forwarded to the LA on 13.12.16 some 6 weeks before the report was delivered, this internal housing situation was also seen and inspected by Mr Brash, one of the inspectors and BBC EHO on 16.12.16 Procedures in place show in the changes. However it must be noted that the basic design of the Bear House was given to the Zoo by the Bear Taxon Advisory Group of EAZA. It is designed to give specific welfare benefits and security. The dens do not need a redesign as stated but needed to offer a visual assessment more than the existing cctv already in place. This was done by completing the design as was in place but not completed

when the inspectors first saw it. Full size access doors were fitted in place of low level doors and the ventilation modified. The separation in the catchment is done by procedural activity as can be read. Mr Brash the LA appointed Inspector agreed on 16th December 2015 that this condition was met, so we must again ask why it is on this list to be done within 6 months?? It is not relevant or necessary?"

Recommendation

Having brought this to the zoo's attention, modifications have been carried out which satisfy the requirements of this condition. Mr Brash and Mr Garnett confirmed this during a visit to the zoo on 16th December 2015.

That Members note this condition has been complied with therefore it does not need to be added to the zoo licence.

Members should note however, that currently the Andean Bear has been built without planning permission so a retrospective application is required.

Reason for Recommendation

The reliance on retrospective planning applications, especially when dealing with animal accommodation, will affect the other licences held for the proper operation of the Zoo and will raise the question of the wider zoo business being run in a fit and proper manner as required by the Act. The Committee will wish to be assured that the Zoo are taking the necessary steps to obtain the required planning permission for the building.

Options

The options available to Members are:-

- To note the matter only.

A3 Firearms

This duplicates an existing condition which states:

Condition 23

Firearms cover and Protocol regarding escapes

In accordance with 8.20 and 8.34 of the SSSMZP there must be an agreed and written protocol for liaison with the Cumbria Constabulary in response to the escape of an animal outside of the perimeter of the licensed premises and appropriate firearms cover for the premises. This must be reviewed on a yearly basis and be provided to the Licensing Authority upon review.

[Timescale by 1st December 2015 and then annually by 1st April]

Officer Comments

The Committee will be aware that the Zoo wishes to transfer the Zoo Licence to a charity at some point in the future. It is unclear at this time if those who hold the appropriate licences for the Zoo's firearms will remain employees.

The Zoo have committed to work with Cumbria Police and Inspector Paul Telford and therefore it will be incumbent of the existing Firearms Licence Holders to liaise fully with any new management and the Police, to ensure continuity of cover.

The Zoo's Comments (Appendix 5 and 6)

The comments provided have been exempted and are a Part II item.

Recommendation

That the Committee note this matter.

Reason for Recommendation

The Council is unaware of how the proposed transfer of the Zoo to a charitable status will affect the other licences held for the proper operation of the Zoo and the Committee will wish to be assured that the Zoo are considering such matters at the earliest opportunity.

Options

The options available to Members are:-

- To note the matter only.

A27 Ethics Committee

There is already an existing condition on the licence concerning the Ethics Committee which states:

Condition 16**Ethics Committee**

The Ethics Committee must meet regularly and minutes of the business of that Committee be kept on record.

Officer Comments

The inspectors were not shown minutes of the Ethics Committee during the inspection. There was no evidence that there had been any ethical input into the wider animal welfare issues.

Zoo Comments

The zoo accepted the inspectors' view on this.

Recommendation

That Members note this issue as there is already an existing condition on the licence relating to the Ethics Committee.

Reason for Recommendation

The zoo appreciate the need for an ethical review process and there is an existing condition on the licence relating to this.

Options

The options available to Members are:-

- To note the matter only.

(i) Legal Implications

The Zoo requires a licence to be able to open to the public and the Zoo Licencing Act 1981 (ZLA) makes the local authority responsible for administering the Licence. Anyone running a Zoo without a licence is guilty of an offence.

Section 10 of the ZLA states the following with regard to periodical inspections:

(1) The local authority shall carry out periodical inspections in accordance with this section of any zoo for which a licence granted by that authority is in force.

(2) Before any such inspection the local authority shall, after consultation with the operator of the zoo, give him at least twenty-eight days notice of the date upon which it is proposed to carry it out.

(3) Inspections under this section shall be made at the following times—

(a) in the case of an original licence, during the first year and not later than six months before the end of the fourth year of the period of the licence;

(b) in the case of a renewed licence or fresh licence granted to the holder of an existing licence, during the third year and not later than six months before the end of the sixth year of the period of that licence.

(4) The following provisions apply to any inspection to be carried out under this section:—

(a) the inspection shall be conducted by the following inspectors, namely—

(i) not more than three appointed by the local authority, being persons who appear to the authority to be competent for the purpose, at least one of whom shall be a veterinary surgeon or veterinary practitioner; and

(ii) two nominated after consultation with the local authority by the Secretary of State from the list, one from the first part of the list and one from the second; and the names of all persons inspecting shall be notified to the operator of the zoo;

(b) the operator may give notice to the local authority of objection to any one or more of the inspectors, and the local authority or the Secretary of State as appropriate may if they think fit give effect to any such objection;

(c) representatives of the operator not exceeding three in number may accompany the inspectors on the inspection; and the inspectors may require the attendance of any veterinary surgeon or veterinary practitioner employed in or retained by or for the purposes of the zoo;

(d) the inspection shall extend to all features of the zoo directly or indirectly relevant to the health, welfare and safety of the public and the animals, including measures for the prevention of the escape of animals;

(e) the inspectors shall require the production of all records kept by the operator in pursuance of conditions of the licence requiring the conservation measures referred to in section 1A(f) to be implemented at the zoo, and the operator shall produce the records.

(5) The inspectors shall send their report to the local authority, and the report may include advice on the keeping of records and recommendations for any practicable improvements designed to bring any features of the zoo up to the normal standards of modern zoo practice; and for this purpose the inspectors shall have regard to any standards known to them which have been specified by the Secretary of State under section 9.

(6) Any disagreement between the inspectors over recommendations to be made in their report relating to the welfare of the animals or any of them may be referred to the Secretary of State, who may, after consultation with such persons on the list as he thinks fit, give such guidance as he thinks proper in regard to the recommendations to be made.

(7) Within one month after receiving the report of the inspection the local authority shall send a copy to the operator of the zoo and give him an opportunity to comment on it.

The Local Authority's power to alter a licence is contained within Section 16 of the same Act:

- (1) *At any time after the grant of a licence under this Act, it may be altered by the local authority if in their opinion it is necessary or desirable to do so for ensuring the proper conduct of the zoo during the period of the licence (whether their opinion arises from an inspectors' report or an alteration of standards specified under section 9 or otherwise).*
- (1A) *Subsection (1B) applies where—*
- (a) the authority have made a direction under section 16A(2) in respect of a zoo;*
 - (b) the period specified in that direction by virtue of section 16A(2)(c), including such a direction as varied under section 16A(4), has expired; and*
 - (c) the authority are satisfied that a condition specified in that direction which requires any conservation measure referred to in section 1A to be implemented at the zoo is not met in relation to—*
 - (i) if the zoo was specified under section 16A(2)(b)(i), any section of the zoo;*
 - (ii) if a section of the zoo was specified under section 16A(2)(b)(ii), that section of the zoo or any smaller section of the zoo included in that section.*
- (1B) *The authority shall make such alterations to the licence as they consider to be necessary or desirable to ensure that the section of the zoo in relation to which they are satisfied that the condition is not met is closed permanently to the public.*
- (2) *Before exercising the power under subsection (1), the local authority shall give the holder of the licence an opportunity to make representations.*

The Local Authority powers to issue a direction order are contained in section 16A of the ZLA as follows:

- (1) *Subsection (2) applies where the local authority, after giving the licence holder an opportunity to be heard, are not satisfied that a condition attached to a licence granted by them under this Act is met in relation to the zoo or a section of it.*
- (2) *Unless subsection (3) applies, the authority shall make a direction specifying—*
- (a) the licence condition which they are not satisfied is met;*
 - (b) whether they are not satisfied that that condition is met in relation to—*
 - (i) the zoo; or*
 - (ii) a section of the zoo, and if so, which section;*
 - (c) steps to be taken by the licence holder to ensure that that condition is met in relation to the zoo (or, if a section of the zoo is specified under paragraph (b)(ii), in relation to that section) within a period specified in the direction, which may not exceed two years from the date of the direction; and*
 - (d) whether the zoo or a section of it is required to be closed to the public during that period or any part of it specified in the direction.*

There is a right of appeal under Section 18 to the Magistrate's Court if the holder of the licence wishes to challenge the decisions of the Committee.

- (1) *A person aggrieved by*
- (a) the refusal to grant a licence;*
 - (b) any condition attached to a licence;*
 - (c) any variation or cancellation of a condition;*
 - (d) the refusal to approve the transfer of a licence;*
 - (e) a direction under section 13(8)(c) or 16A(2) or any variation of such a direction;*

- (f) a zoo closure direction;
- (g) the refusal to approve a plan prepared under section 16E(2);
- (h) a direction under section 16E(6) or any variation of such a direction; or
- (i) any arrangements under section 16E(7) or (8),

may appeal to a magistrates' court acting for the petty sessions area in which the zoo is situated.

(ii) Risk Assessment

Not Applicable

(iii) Financial Implications

The Council may be subject to an appeal against the Committee's decision in the Magistrates' Court under Section 18 of the Zoo Licensing Act 1981.

(iv) Key Priorities or Corporate Aims

None identified

(v) Equality and Diversity

Not applicable

(vi) Other Human Rights

All licence holders have a right to a fair and public hearing

(vii) Health and Well-being Implications

The ZLA contains requirements to ensure the public who visit zoos can do so in a safely and to ensure that the wider public are not put at risk by the Zoo's operation.

Background Papers

Current Zoo Licence held by South Lakes Safari Zoo Limited.

Table of Decision from Licensing Regulatory Committee 23rd June 2014 and 1st July 2014.

Table of Decision from Licensing Regulatory Committee -13th August 2015.

Table of Decision from Licensing Regulatory Committee – 15th October 2015.

Table of Decision from Licensing Regulatory Committee – 17th December 2015.

Zoo Licensing Act 1981 (as amended) Sections 4, 9, 9A-S12, and 15

Zoo Licensing Act 1981

Appendix 11 Secretary of State's Standards of Modern Zoo Practice/
National Assembly for Wales Standards of Modern Zoo PracticeDepartment
for Environment
Food & Rural Affairs

Inspection Report

Date of inspection:

17th /18th November 2015

Date report completed:

28 December 2015

Name of applicant or current
licence holder:

Mr David Stanley Gill

Name and address of zoo:

South Lakes Safari Zoo Ltd.
Broughton Road
Dalton-in -Furness

Postcode: LA15 8JR

Tel no:

01229 466086

Licence Number:

Date of last formal inspection:

11th November 2014

Type of last formal inspection:

Special

Timing of next formal inspection:

Type of next formal inspection:

Type of inspection Statutory composition of inspection team

Please tick appropriate box

Section 10 Periodical: 2 Defra/Welsh Government nominees; 1 LA vet; option of up to 2 more from LA.. ☒Section 11 Special: Any number of competent LA authorised appointees ☐Section 14(1)(b) dispensation renewal under section 6(1A)(a) (where a direction has been made that
section 10 shall not apply):Defra/Welsh Government nominee/s..... ☐

Section 14(2) dispensation Periodical:

Defra/Welsh Government nominee/s..... ☐For a licence inspection (Section 4(1A)(b)) and a significant change inspection (Section 9A(8)) please
use the inspection form at Appendix 11A of the Standards.

Name and designation of inspector(s)	Name of zoo representative(s)
Anna Meredith MRCVS (Part 1)	Christina Fischer, Director (since resigned as Director)
Nick Jackson (Part 2)	Frieda Schreiber, Director
Matthew Brash MRCVS (LA appointed vet)	Andrew Greenwood FRCVS (consultant vet)
Richard Garnett, Principal Environmental Health Officer,	Karen Brewer Rick Browne, local vet (for part)
Barrow Borough Council.	John McIntosh David Gill, Owner (for part)

When this form has been completed and signed the original must be sent to the local authority.

If the zoo is owned by the local authority, the local authority must send a copy of the completed form
to Defra where the zoo is situated in England or to the Welsh Government, where the zoo is situated in
Wales.

Preamble to inspectors' report

Information and guidance about the Zoo Licensing Act 1981 (ZLA) is available at <https://www.gov.uk/government/policies/protecting-biodiversity-and-ecosystems-at-home-and-abroad/supporting-pages/species-protection> and <http://wales.gov.uk/topics/environmentcountryside/ahw/zoos/?lang=en>

Preamble to inspectors' report*, including any comments about the current dispensation status, if applicable.

South Lakes Wild Animal Park, recently rebranded as the Safari Zoo, opened in 1994 and has undergone major expansion in recent years, along with recent changes in management structure. The zoo offers a highly interactive experience where visitors can wander among a large variety of free-ranging species in mixed exhibits and in two walk-through aviaries, and is a significant visitor attraction in the area.

Until September 2015 the Director was David Gill, the owner, and at the time of the inspection the inspectors were informed that joint directorship had been recently transferred from Mr Gill to Christina Fischer and Frieda Schrieber (Chair), with David Gill remaining as Conservation Manager. The licence currently is held by David Gill, but a request was made to the LA to transfer it to the new Director.

However, since the dates of the inspection and during preparation of this report, the inspectors have subsequently been made aware via ongoing correspondence with the Local Authority that Christina Fischer has resigned her position as co-Director, but has stayed on the staff. Initially this left Frieda Schrieber as the sole Director, but the inspectors now understand that Mr Gill has reverted to being Director again. These changes have had a direct bearing on some of the recommendations and conditions made in this report.

The zoo has a historical and ongoing catalogue of a large number of licence conditions, directions of compliance and special inspections (most recently November 2014), details of which were supplied to the inspection team prior to the inspection.

*this might include general background about the zoo (type of collection, size etc) and any relevant information or comments from the pre-inspection audit

Findings at inspection

Guidance note: Where possible a Yes, No or Not Applicable (N/A) answer should be given. Where not all criteria are met for a particular question, comments and clarification should be made indicating where any deficits occur. If appropriate, means of correction or improvement should be included as Conditions or Recommendations under 'Additional conditions' or 'Additional space' towards the end of the form.

1. Provision of food and water	Marking Yes No N/A	Comments/clarification
Section 1A(c)(ii) ZLA 1981:		
1.1. Are animals provided with a high standard of nutrition?	Yes	But needs complete review with veterinary and specialist nutritional input (see Condition).
1.2. Is food and drink that is supplied appropriate for the species/individual?	Yes	But see above. Recommend revision of hand-fed diets as many are inappropriate, eg cereal mixes to mara and macropods.
1.3. Are supplies of food and water:		
(a) kept hygienically?	Yes	But evidence of rodent presence in fruit/veg prep area and food store.
(b) prepared hygienically?	Yes	Fresh fish and fresh meat should not be prepared in the same immediate area, particularly where the fish is for non-carnivores, e.g. penguins. (see Condition)
(c) supplied to the animal hygienically?	Yes	Designated hand-wash for staff in meat prep area required. (see condition)
1.4. Has natural feeding behaviour been adequately considered to ensure that all animals have access to food and drink?	Yes	
1.5. Are feeding methods safe for staff and animals?	Yes	
1.6. Is feeding by visitors permitted?	Yes	This was not observed directly. See notes re types of food given.
(a) if 'yes', is it properly controlled?	Yes	Total amounts fed are controlled. Feeding of lemurs, penguins and cats directly supervised, but not in walk-through areas.
2. Provision of suitable environment		
Section 1A(c)(i) ZLA 1981:		
2.1. Are the animals provided with an environment well adapted to meet the physical, psychological and social needs of the species to which they belong?	Yes	But baboon internal area is too small for the number of animals and no enrichment is provided. Animals are enclosed here for prolonged periods in winter with no enrichment or bedding material. Flamingo flooring inadequate. (see Condition)
2.2. Are the following environmental parameters appropriate:		
(a) temperature?	Yes	
(b) ventilation?	Yes	But new bear dens currently have no ventilation.
(c) lighting?	Yes	
(d) noise levels?	Yes	
(e) any other environmental parameters?	Yes	

2. Provision of suitable environment (contd.)	Marking Yes No N/A	Comments/clarification
2.3. Are there satisfactory measures in place to safely confine the animals?	No	Many enclosures are adequate but see notes and conditions.
2.4. Do animal enclosures have sufficient shelter and refuge areas?	Yes	Not outdoor Africa area (See Condition). 2 Nyala recently died in association with a period of extreme wet and cold weather.
2.5. Do animal enclosures provide sufficient space?	Yes	But not indoor baboon enclosure.
2.6. Are backup facilities for life support systems adequate?	Yes	2 diesel generators on site.
2.7. Is the cleaning of the accommodation satisfactory?	Yes	
2.8. Is the standard of maintenance adequate for: (a) the buildings?	Yes	Where insulation material is exposed in the roof of the bear dens peafowl were observed eating it.
(b) the fences?	Yes	Some areas of delapidation of fencing requiring routine maintenance e.g. bottom of giraffe paddock.
2.9. Is all drainage effective and safe?	Yes	NB The inspection took place on days with unusually severe rainfall leading to localised flooding.
3. Provision of animal health care		
Section 1A(c)(ii) ZLA 1981: 3.1. Are the animals provided with a high standard of animal husbandry?	Yes	See Condition 30 re keeper contact.
3.2. Do animals on display to the public appear in good health?	Yes	Except a few lame flamingos, lame crowned crane, thin capybara and mongoose with mange.
3.3. Are observations of condition and health made and recorded?	Yes	Daily diaries maintained in good detail, although some animals are not individually identified in them.
3.4. Do animals receive prompt and appropriate attention when problems are noted?	Yes	See veterinary notes.
3.5. Are enclosures designed and operated in such a way that social interaction problems are avoided?	Yes	But there is a narrow tapering corner in the bear enclosure where one animal could be cornered by another.
On-site facilities 3.6. Are catch-up and restraint facilities adequate?	Yes	But the new bear dens do not currently allow direct visual assessment or access for darting etc.
3.7. Is darting equipment satisfactory?	Yes	Blow pipe on site. Recently purchased dart gun had not arrived at the time of inspection.
3.8. Are on-site veterinary facilities adequate?	Yes	

3. Provision of animal health care (contd.)	Marking Yes No N/A	Comments/clarification
Veterinary care Section 1A(c)(ii) ZLA 1981: 3.9. Are the animals provided with a documented and maintained programme of preventative and curative veterinary care and nutrition?	No	We acknowledge that there is a written protocol document in place and the addition of Andrew Greenwood (IZVG) as a consultant vet has greatly improved the routine care, however the team had serious concerns over the level of control and oversight by Rick Browne, and the degree of apparent diagnosis and prescribing by the co-director, who is a qualified vet but not MRCVS. (See notes and Condition re veterinary programme).
3.10. Is there a system for the regular review of clinical and pathological records?	No	No structured system in place. See Condition re veterinary programme.
3.11. Are appropriate veterinary records kept?	No	See Condition re veterinary programme.
3.12. Are medicines kept and disposed of correctly?	Yes	
3.13. Are controlled drugs used and recorded satisfactorily?	N/A	
3.14. Are appropriate antidotes available?	N/A	
3.15. Are <i>post mortem</i> examination arrangements satisfactory?	No	See Condition re veterinary programme. Inspectors noted that the overall annual mortality level is high, at around 10%
Isolation and containment 3.16. Is adequate reserve accommodation available for isolation of animals for: (a) assessment?	Yes	But not for the Andean bears in the den area. Quarantine of psittacine birds must not be in same building/air space as existing psittacines.
(b) treatment?	Yes	
(c) recovery?	Yes	
(d) quarantine (where required)?	Select	
Sanitation and control of disease Section 1A(e) ZLA 1981: 3.17. Are satisfactory measures in place to prevent the intrusion of pests and vermin into the zoo premises?	Yes	
3.18. Does it appear that general sanitation and pest control are effective?	No	There are ongoing rodent problems despite an in-house vermin control programme, eg rodent droppings were seen in the food prep and foodstore areas.

4. Provision of an opportunity to express most normal behaviour	Marking Yes No N/A	Comments/clarification
4.1. Do the accommodation and management regimes encourage normal behaviour patterns and minimise any abnormal behaviour, taking into account current enrichment and husbandry guidelines?	Yes	
4.2. Are animals of social species normally maintained in compatible social groups?	Yes	
5. Provision of protection from fear and distress		
5.1. Are the animals handled only by or under the supervision of appropriately experienced staff?	Yes	
5.2. Is physical contact between animals and the public consistent with the animals' welfare?	Yes	
5.3. Are interactions between the animals such that they are not excessively stressful?	Yes	
6. Transportation and movement of live animals		
6.1. Can the zoo demonstrate a knowledge of, and compliance with, the regulations covering transportation of animals, and provide copies of certificates to show compliance when transportation has occurred?	Yes	Specialist commercial animal transport companies are used.
6.2. Can the zoo demonstrate that:	Yes	
i) transport and movement equipment is in good order?	Yes	
ii) facilities suitable for lifting, crating and transportation of all the types of animals kept within the zoo to destinations both inside and outside the zoo are readily available?	Yes	
iii) catching and transportation techniques take account of the animal's temperament and escape behaviour in order to minimise injury, damage and distress?	Yes	
iv) adequate provision is made for the animal's and the public's safety and well-being while the animal is being transported or kept away from the zoo?	Yes	

7. Conservation, education and research	Marking Yes No N/A	Comments/clarification
Section 1A(a) ZLA 1981: 7.1. Is the zoo participating in at least one of the following: (i) research from which conservation benefits accrue to species of wild animals?	Yes	The Zoo is involved in and raises funds for a commendable number of in situ projects. Interpretation and information throughout zoo re in situ projects. The development of new interpretative signs is linked to the in situ projects that the Zoo supports.
(ii) training in relevant conservation skills?	No	
(iii) the exchange of information relating to the conservation of species of wild animals?	Yes	
iv) where appropriate, breeding of wild animals in captivity?	Yes	
(v) where appropriate, the repopulation of an area with, or the reintroduction into the wild of, wild animals?	No	
Section 1A(b) ZLA 1981: 7.2. Is the zoo promoting public education and awareness in relation to the conservation of biodiversity, in particular by providing information about the species of wild animals kept in the zoo and their natural habitats?	Yes	A new education officer is in post and she is applying energy and enthusiasm to the development of a new education programme. Much of the signage and interpretation was absent or in transition at the time of the inspection, as it is undergoing a process of rebranding and updating. Sufficient new signage was seen, which is of high quality. The policy of mixing species from different continents and habitats in the same enclosure is counter to modern zoo education philosophy and practice.
7.3. Where appropriate are animals managed in a way consistent with the conservation needs of the species, (such as exchange between zoos, accommodation to encourage natural behaviour and breeding etc)?	Yes	
7.4. Are on-site education facilities adequate for the resources of the collection?	Yes	
7.5. Are the conservation efforts adequate for the resources of the collection?	Yes	
7.6. Are the research efforts adequate for the resources of the collection?	No	There are no highly developed research initiatives.
7.7. Is captive breeding properly managed?	Yes	But we note breed and cull policy for some species. Others, like the ring-tailed lemurs, are not subject to any genetic management.

8. Public safety	Marking Yes No N/A	Comments/clarification
Section 1A(d) ZLA 1981:		
8.1. Are there satisfactory measures in place to prevent the escape of animals?	Yes	But not in the new Africa House where the temporary hay bale enclosure is insecure and has resulted in escapes.
8.2. Are there satisfactory measures in place to be taken in the event of any escape or unauthorised release of animals?	Yes	There is a written protocol in place, but the document needs updating to clarify specifically the role of the vet in escape procedures, particularly when new dart gun arrives.
8.3. Are escape drills carried out four times a year, recorded and regularly reviewed (at least two drills should include the escape of a Category 1 animal where present)?	Yes	Only three (one category 1) this year by the time of the inspection - one more Category 1 will be needed by the end of the year.
8.4. Will the perimeter deter unauthorised entry and aid the confinement of zoo stock?	Yes	But in many areas vegetation is growing up and over the perimeter and must be removed (see Condition).
8.5. Do stand-off barriers appear adequate?	Yes	Except at bear enclosure, next to indoor kangaroo house access (see Condition), and electric fence warning sign needed here.
8.6. Are adequate warning signs provided?	Yes	
8.7. Are prohibited areas appropriately signed?	Yes	
8.8. Are exits clearly marked and accessible?	Yes	
8.9. Do public areas, walkways and buildings appear safe?	Yes	Except ongoing issue with engineer's report for walkways (see Condition).
8.10. Are trees regularly inspected and appropriate remedial action taken?	Yes	Done in house.
8.11. Have appropriate risk assessments for direct contact by the public with animals been carried out?	Yes	But a photograph at the main entrance depicts direct contact between a visitor and a lemur.
8.12. Are the special safety requirements for walk-through or drive-through exhibits adequately met?	Yes	But we note 9 bite injuries so far in 2015 recorded in accident book. A written review and action plan is required for feeding of animals by public (see Condition).

9. Records	Marking Yes No N/A	Comments/clarification
Section 1A(f) ZLA 1981:		
9.1. Are there up-to-date records of the zoo's collection, including records of:		ZIMS
(i) the numbers of different animals?	Yes	
(ii) acquisitions, births, deaths, disposals and escapes of animals?	Yes	However there is doubt over the accuracy of recording of escapes and discrepancies were noted between the daily diaries and verbal reports. Deaths are recorded, but causes of deaths are not always recorded and diagnosis of cause of death often made by non MRCVS vet. There is often no additional sampling/histopathology etc by IZVG (eg only 3 primates in the last year were sent to IZVG).
(iii) the causes of any such deaths?	Yes	
(iv) the health of the animals?	Select	
9.2. Are daily diaries maintained, and do they contain appropriate information?	Yes	Generally very good, detailed information recorded.
9.3. Are animal stock records clear and up-to-date?	Yes	
9.4. Are annual stock records completed in the correct format and submitted to the local authority?	Yes	
9.5. Are animal source and destination records kept?	Yes	ZIMS
9.6. Are archived records secure?	Yes	
10. Miscellaneous		
10.1. Do staff numbers and training of staff appear adequate?	Yes	See notes
10.2. Is the management structure and organisation of staff adequate to ensure compliance with the Standards at all times?	Yes	The new management structure was only implemented in November 2015, so it was difficult to make an accurate assessment at the time of the inspection. Subsequent further changes made between the inspection and finalising this report have raised additional serious concerns (see notes and condition).
10.3. Are effective risk assessments carried out where appropriate?	Yes	A simplified version of key points for day to day use by keepers would be helpful with detailed risk assessment as back up.
10.4. Has an ethical review process been established and implemented?	Yes	There are records of meetings for 2012 and September 2015 but no other minutes/records available. (see Condition)
10.5. Are public toilet facilities adequate and serviced?	Yes	
10.6. Are parking facilities adequate?	Yes	
10.7. Is a First Aid policy and accident reporting and recording system in place?	Yes	

11. Associated legislation	Marking Yes No N/A	Comments/clarification
11.1. Is electrical equipment routinely serviced?	Yes	
11.2. Have fire precautions been agreed and implemented?	Yes	To be checked by LA
11.3. Is refuse and clinical waste disposed of correctly?	Yes	
11.4. Are the required needs of disabled visitors met?	Yes	
12. Compliance check including licence conditions		
12.1. Is the current licence or a copy on public display at each public entrance?	Yes	
12.2. Is adequate Public Liability Insurance current?	Yes	
12.3. Have any Additional licence conditions been met?	Yes	However; The muck heap has not been moved away from the enclosure fence. A new report on the structural integrity of the walkways has not been received. No written report has been received from Inspector Telford regarding firearms. No evidence of staff CPD was provided.

Additional space

The following space is provided for:

- additional notes and comments on the answers to the earlier questions
- recommendations (other than in respect of grant or refusal of a licence and any specific conditions recommended for a licence) including those based on comments already made to earlier questions
- any general remarks which the inspecting team may wish to record

Comments and Recommendations:

1. The Inspectors note and commend the overall evident hard work and dedication of the keeping staff and administration team. At the time of the inspection the inspectors were pleased to see the recent change of structure of governance and senior management that would empower the new Director to lead and implement change. We sincerely hoped that this would enable the zoo to move forward in a progressive way that reflects current thinking and best practice in the national and international zoo community.
2. The decision by the inspection team to recommend that a new licence for South Lakes Safari Zoo should not be granted at its due date, unless a Condition regarding the management structure has been complied with, is not taken lightly. It must be emphasised that the inspectors are keen to see the Zoo develop and thrive in line with modern zoo standards. The inspectors commend Mr David Gill for his initial decision to step back from the running of the Zoo and to concentrate on its conservation role, but do not believe that at the time of the inspection, or subsequently, sufficient progress has been made in this respect, and note that this decision was subsequently reversed during the compilation of this final report. This is no longer a small zoo and it now houses a large and diverse number of species. Suitable management processes must be in place before a new licence is issued to enable the Zoo to meet all its legal obligations, particularly in respect of Sections 3, 8, 9 and 10 of the SSSMZP. These have been areas of concern and flagged as issues repeatedly over a number of years at previous zoo inspections. The inspection of November 2015 has highlighted 32 Conditions that the inspectors believe must be applied to the licence. This is a considerable number of Conditions for a zoo of this size, and many of these result from the repeated failure to implement fully previous Conditions, thus aggravating the situation and determining the inspectors' position. Of particular concern to the inspectors is the fact that as this zoo grows, it relies heavily on the owner's experience implementing out of date practices and refusing to implement modern zoo practices. In the inspectors' opinion this has resulted in animal welfare issues, a higher than expected mortality rate amongst the animals, higher than expected incidents (such as injuries to the public from animals), and places both staff and the public potentially in danger. The new management structure must include a competent, suitably qualified and experienced full-time Director (or Senior Manager). This individual will have day to day responsibility for the running of the Zoo, will be able to make decisions independent of the owner and will be fully responsible to the licensing authority for the conduct of the Zoo and all its on-site activities. This will be a full-time post and therefore cannot be someone who will spend large parts of the year absent from the site.
3. Whilst it is acknowledged that the zoo has demonstrated imaginative and sometimes innovative animal display techniques since its founding, it is believed by the inspectors that keeping species from different continents and habitats together in the same enclosure runs counter to modern zoo education practice and gives a distorted and unnatural view to the visiting public. There are also potential animal health and welfare issues such as parasite and other pathogen transmission, and behavioural conflict, even if these are not overtly apparent.
4. The inspectors spent some time assessing the issue of the free flying macaws and despite some difficulty getting a definitive view of the numbers and species we were eventually provided with a written statement of the situation by Mr David Gill. In the light of the information provided at the time (and without commenting on the relevance or otherwise of such legislation as the Wildlife and Countryside Act) the inspectors have concluded that the birds are not part of the South Lakes Safari Zoo animal inventory. They are therefore not protected by the Zoo Licensing Act and are not relevant to this inspection. This view is based on the fact that the birds are not trained to return to Zoo property (and therefore are unlikely to be seen as "kept" by the Zoo) and are not owned by the Zoo company. It is likely that these free-flying birds will visit the Zoo and we strongly recommend to the local authority that if there is any evidence that the birds are encouraged onto Zoo property, by for example deliberate feeding, then this might change an interpretation of the birds' status in terms of zoo licensing. The inspectors note that staff are currently monitoring and recording the behaviour of the macaws and their whereabouts in the Zoo grounds every two hours.
5. All animal keeping staff should have a structured development and training programme to include external CPD and formal qualifications such as the DMZAA at Sparsholt College.
6. The inspectors were concerned that some animal diets e.g. psittacine birds, fennec fox and public feeding diets for macropods, capybara, mara, were nutritionally inadequate and do not reflect current knowledge and best practice. There should be a full documented dietary review for all species with veterinary input (including from Andrew Greenwood), to incorporate current nutritional guidelines for relevant species.
7. There should be a properly developed collection plan covering all species which includes the rationale for keeping the species, plans for future, etc.
8. The inspectors were greatly concerned over an apparent lack of consultation and inclusion of input from staff and vets in enclosure design and an apparent failure to follow original design specifications, e.g. bear dens. We recommend all future animal accommodation plans should include staff and vet input as appropriate.
9. The inspectors were dismayed and shocked to see bales and pallets held together with baling twine used as temporary holding for mixed exhibit of Bactrian camels, wildebeest, nyala and zebra in the Africa House. Such inadequate and insecure holding arrangements should not be part of modern zoo practice.
10. From the information provided it would appear that the recent Nyala deaths were preventable and were the result of a poor decision-making process which the inspectors hope will no longer occur under a new management structure.
11. The involvement of Andrew Greenwood (ZVG) in the Zoo's veterinary cover is commended, however the overall veterinary programme in the Zoo is inadequate and needs to be radically revised to bring it into line with modern zoo veterinary practice. The current arrangement of two practices, a local vet and a visiting specialist vet, is suitable but the current levels of routine attendance are not adequate for a collection of this size and complexity. Whilst Frieda Schreiber is a qualified vet she is not an MRCVS and cannot practice in UK, but her skills and training can be invaluable to the development of the veterinary programme. If the current arrangement of two veterinary practices is to be continued then the levels of cover must be increased to the equivalent of one full day a week by a local vet with appropriate CPD and at least one full day a month by the specialist vet. These visits must be established as routine (i.e. not call-outs) and involve the UK qualified vets in a wide range of initiatives, including preventive protocols such as screening/worming and vaccination, post mortem protocols, enclosure design, nutrition, vet records, etc. The veterinary visits, and any telephone advice given, must be fully documented.

Additional Conditions continued from next page:

21. In accordance with 1.1, 1.12 and 1.13 of the SSSMZP a full review of diets and nutrition across all species, in consultation with the veterinary consultants, must be carried out. Records of all diets and the changes made must be documented and kept. (6 months)
22. In accordance with 2.3 of the SSSMZP the corner of the Andean bear enclosure that tapers to a point (adjacent to the perimeter of the new rhino paddock) must be rounded off with the electric fencing to prevent one bear being cornered by another in the event of conflict. (3 months)
23. The overall veterinary programme in the Zoo is inadequate and must be radically revised to bring it into line with modern zoo veterinary practice. In accordance with 3.7, 3.8, 3.9 of the SSSMZP a written outline of this revised programme must be produced and submitted to the licensing authority, (3 months) and implemented. (See explanatory notes above).
24. The inspection team noted that there had been a number of bites reported. In accordance with paragraph 6.14 of the SSSMZP a full written review of incidents of members of the public being bitten by animals must be carried out and an action plan adopted to reduce the number of bites. A copy of the report and the action plan must be forwarded to the LA. (3 months)
25. In accordance with 1.3d of the SSSMZP dedicated staff hand-washing facilities must be provided where raw meat is handled i.e. in the meat preparation area. (6 months)
26. In accordance with 1.3d and 1.5 of the SSSMZP if the preparation of raw meat and raw fish is to continue in the same room it must take place in designated separate areas with separate utensils to avoid cross-contamination particularly of fish for the penguins. (1 month)
27. The details of the ethical review process must be recorded and must be made available to the zoo licensing process. (3 years)
28. Although a wire mesh has been nailed onto large areas of the wooden walkways, in many areas this is already coming loose, and will be a trip hazard. In other areas no non slip surface has been provided. In accordance with 8.15 SSSMZP all walkways that are constructed of wood must have a surface that will prevent, as far as is reasonably practical visitors falling or tripping. (6 months).
29. There are a number of prairie dogs free living, in burrows, in the top walkthrough area where the perimeter fence is set into the ground only to a depth of 30cm. In accordance with 8.10 of the SSSMZP if prairie dogs are to continue to be kept in this area then a written risk assessment carried out by the veterinary consultant on the effectiveness of the perimeter fence must be undertaken. The steps taken by the zoo to ensure that there will not be any escapes must be documented. Copies of these reports must be forwarded to the Local Authority. (6 months)
30. The practice of designing facilities for Category 1 animals, such as the rhino and giraffe, whereby the keepers have no option but to be in direct contact with the animal is not utilising up to date husbandry guidelines and can be a high risk to the keepers. In accordance with 1.6 and 5.1 of the SSSMZP the design of the accommodation in the new Africa house must be such that keepers do not have to go into an enclosure with a Category 1 animal to be able to work gates, supply food or move them. It may be that with appropriate risk assessments and for certain specimens it may be possible to manage such Category 1 animals with contact, but a non-contact system must be available for new or proven aggressive animals or new staff. Revised designs must be forwarded to the LA for approval prior to the accommodation being built. A written document detailing the changes that will be made to the current animal management practice, including risk assessments, must be forwarded to the local Authority (3 months).
31. The Muck heap in the Rhino and Giraffe paddock must be moved sufficiently far from the perimeter fence to eliminate its potential use as an escape aid. (1 month)
32. In order to comply with section 10 of the Secretary of State's Standards, a robust management and staffing structure must be in place to the satisfaction of the licensing authority, and in order to allow a new licence to be issued. This new structure must include a competent, suitably qualified and experienced full-time Director (or Senior Manager) with day to day responsibility for the running of the Zoo, the ability and authority to make decisions independent of the owner, and must be fully responsible to the licensing authority for the conduct of the Zoo, all its on-site activities and its compliance with the Secretary of State's Standards.
33. There must be a suitable and sufficient written risk assessment for the anaconda in the walk-through area and a copy must be forwarded to the LA (1 month) (NB it will become a Category 1 hazardous animal when it attains 3m when it must be housed in such a way that access with the public is prevented).

Inspecting team's recommendation to the local authority

Having inspected (name of zoo)

South Lakes Safari Zoo

on: 17th and 18th November 2015

the inspecting team make the following recommendation:

Please tick appropriate box

- it is recommended that a licence be refused ☒
- it is recommended that the above collection be licensed in accordance with the ZLA 1981 subject to the conservation measures in section 1A ☐
- it is recommended that the above collection be licensed in accordance with the ZLA 1981 subject to the conservation measures in section 1A and the following Additional Conditions (N.B Additional Conditions must be clearly worded so as to be enforceable and a timescale applied for compliance) ☐
- it is recommended that the following alterations be made to the above collection's licence conditions ☐

Additional Conditions (if appropriate)

Please see note 2 regarding recommendation for refusal of a licence. Renewal of a licence is recommended to be dependent on the listed additional Conditions below being either complied with, or satisfactory progress towards compliance being made.

1. In several areas the perimeter fence is overgrown with vegetation. In accordance with 8.7 and 8.29 of the SSSMZP all vegetation and trees in proximity to the perimeter fence must be cut back and maintained at no closer than 0.5m from the electric fencing. All high shrubs, bushes and trees overhanging or near the perimeter fence must be kept cut back to prevent animals from escaping. (3 months)

2. Some of the wooden support posts on the walkways are visibly rotten. In accordance with 8.13 and 8.18 of the SSSMZP, the public wooden walkways and platforms must be designed to meet BS 6399-1: 1996 and be able to cope with the heavy duty loading and maintained in safe condition. The effect of any walkway or platform stanchions being submerged in water for prolonged periods should be assessed in terms of deterioration and structural stability. A programme of inspection, maintenance and structural repairs needs to be documented. (1 year)

3. In accordance with 8.20 and 8.34 of the SSSMZP there must be an agreed and written protocol for liaison with the Cumbria Constabulary in response to the escape of an animal outside of the perimeter of the licensed premises and appropriate firearms cover for the premises. This must be reviewed on a yearly basis and be provided to the Licensing Authority upon review. (1 year)

4. In accordance with 3.26 of the SSSMZP all staff involved in power washing surfaces used by animals must wear appropriate PPE to prevent zoonotic infection, e.g. facemasks, goggles etc. Clear written instructions to staff must be enforced. (Immediate)

5. The indoor facilities for the Andean Bears is insufficient. In accordance with 4.3 and 4.4 of the SSSMZP the breeding/sleeping dens for the Andean bears must be redesigned and rebuilt to bring their specification in line with modern husbandry standards. The rebuilt house must include facilities for the separation and direct visual assessment of bears, adequate ventilation, access for veterinary management, double doors for security, and a level of separation that prevents nose to nose, or visual contact, with other species in the main house. (6 Months)

6. In accordance with paragraph 5.1 and 10.1 of the SSSMZP all staff who work with newly arrived hazardous species (any animal listed in Category 1 of the Hazardous Animal categorisation (see Appendix 12 of the Secretary of State's Standards of Modern Zoo Practice)) not previously held in the collection (or not within other staff's past experience) must undergo a period of recorded training at a collection already holding the species. Evidence of this training must be forwarded to the Licensing Authority prior to the hazardous animal arriving on site. (Immediate effect). If staff have previous experience then that experience must be detailed including dates and establishments where the training was received and forwarded to the Licensing Authority 4 weeks prior to the animal arriving (Immediate effect)

7. In accordance with 4.3 and 4.4 of the SSSMZP the indoor facilities for the group of baboons is insufficient and must be upgraded or replaced to provide increased space for the animals when they are indoors for prolonged periods, e.g. during the winter. The indoor quarters must also allow for a developed programme of enrichment, e.g. deep straw litter and scatter feeding. (1 Year)

8. Any organised sessions of public feeding of animals involving raw meat and fish must be the subject of a written risk assessment and protective gloves provided as appropriate. (Immediate)

9. Although there are signs in the park prohibiting direct public contact with the leopards there is a large photograph at the entrance showing (and implicitly encouraging) direct public/leopard contact. This sign must be removed or replaced. (Immediate)

10. A Meibell and a sign with emergency instructions must be provided at the top pond walkthrough. (3 months)

11. In accordance with 1.3a of the SSSMZP a functioning fly killer must be provided in the fruit/veg kitchen store area. (3 months)

12. The quarantining of, or housing of newly arrived, birds within the same air space as birds already within the collection is poor practice and must cease. In accordance with 3.19, 3.21 of the SSSMZP written protocols must be produced, with advice from the veterinary consultants, for the housing and quarantine of any animals introduced to the collection or accepted as rescue animals. Staff must receive training on the protocols and their implementation and this should be documented. (6 months)

13. There is evidence that the vermin control in the dry food storage area specifically, and more generally throughout the park is still inadequate. In accordance with 1.3a and 3.35 of the Secretary of State's Standards of Modern Zoo Practice (SSSMZP) a report must be produced for the Licensing Authority by an independent professional pest control company on the safe and effective control of rodent vermin (within 3 months). The Zoo must then implement the recommendations of that report (within 6 months)

14. The mesh 'cage' preventing tamarin access to an electrical installation in the Amazon House was ineffective, and the electrical equipment may present a hazard. In accordance with 2.4 of the SSSMZP all plant and fixed equipment, including electrical apparatus, must be installed and maintained in such a way that they do not present a hazard to animals, and their safe operation cannot be disrupted by them. (3 months)

15. The insulation in the roof of the Andean bear dens must be protected to prevent the peafowl from eating the insulation material. In accordance with paragraph 2.3 of the SSSMZP Enclosures must be maintained in a condition which presents no likelihood of harm to animals. (1 month)

16. In accordance with 8.24 and 8.9 of the SSSMZP effective non-touch barriers, e.g. a stand-off barrier, for the public must be provided at the area of Andean bear fencing in proximity to their access to the dens. (3 months)

17. In accordance with 8.6 of the SSSMZP the top lemur house has no effective public barrier preventing access to the house and its doors. The house and enclosures must be kept locked at all times when no keeper is present. (Immediate)

18. The temporary enclosure made of hay bales, pallets and bale twine in the Africa House is completely inadequate and has resulted in escapes into the house. In accordance with 2.3, 8.6, 8.7 of the SSSMZP this must be made secure to modern zoo standards to prevent further escapes. (1 Month)

19. During the completion of the indoor accommodation of the Africa house the animals already present in the outside enclosure, occasionally, cannot or will not use the Africa House for shelter. In accordance with 2.2 of the SSSMZP additional shelter must be provided in the outside enclosure to accommodate all species. (1 Month)

20. A number of lame flamingos were observed, and the flooring of the new flamingo house is plain concrete. In accordance with 2.2, 4.3 and 4.4 of the SSSMZP the floor in the Flamingo House must be the subject of review by the veterinary consultants and suitable flooring/substrate put in place to improve the health of the flamingos' feet. (6 months)

Continued on previous page.

Date signed

5-1-2016

5th Jan 2016

05/01/2016

The Data Protection Act 1998 – Fair Processing Notice

The purpose of this Fair Processing Notice is to inform you of the use that will be made of your personal data, as required by the Data Protection Act 1998.

The local authority in England (or in Wales as the case may be) is the data controller in respect of any personal data that you provide when you complete this zoo inspection form. The information that you provide may be used by the local authority in its consideration of issuing or amending a zoo licence in accordance with the Zoo Licensing Act 1981 (ZLA). The local authority may be required to release information, including personal data and commercial information, on request under the Environmental Information Regulations 2004 (EIRs) or the Freedom of Information Act 2000 (FOIA). However, local authorities will not permit any unwarranted breach of confidentiality nor act in contravention of their obligations under the Data Protection Act 1998 (DPA).

Where the zoo, to which this inspection report applies, is owned by the local authority, the local authority must send a copy of the completed form to Defra (in accordance with section 13(2) of the ZLA) where the zoo is situated in England, or to the Welsh Government where the zoo is situated in Wales. Defra or the Welsh Government (as the case may be) may use the information contained in the form to ensure that local authorities are carrying out their duties correctly in accordance with the ZLA.

Defra and the Welsh Government are also subject to the EIRs and the FOIA and so may be required to release information, including personal data and commercial information, on request. However, as above, Defra and the Welsh Government will not permit any unwarranted breach of confidentiality nor act in contravention of their obligations under the DPA.

Periodical [Renewal] InspectionSouth Lakes Safari Zoo Ltd

This document must not be read in isolation. It is an extract of the Inspectors Report on the Zoo undertaken on 17th and 18th November 2015

Due to the design of the official form, as more information is inserted into the text boxes on pages 11 and 12, the text becomes smaller and harder to read. As the electronic version is a PDF document and not editable, the information below is the Comments, Recommendations, and Additional Conditions simply reformatted to make it easier to read.

Comments and Recommendations:

1. The inspectors note and commend the overall evident hard work and dedication of the keeping staff and administration team. At the time of the inspection the inspectors were pleased to see the recent change of structure of governance and senior management that would empower the new Director to lead and implement change. We sincerely hoped that this would enable the zoo to move forward in a progressive way that reflects current thinking and best practice in the national and international zoo community.
2. The decision by the inspection team to recommend that a new licence for South Lakes Safari Zoo should not be granted at its due date, unless a Condition regarding the management structure has been complied with, is not taken lightly. It must be emphasised that the inspectors are keen to see the Zoo develop and thrive in line with modern zoo standards. The inspectors commend Mr David Gill for his initial decision to step back from the running of the Zoo and to concentrate on its conservation role, but do not believe that at the time of the inspection, or subsequently, sufficient progress has been made in this respect, and note that this decision was subsequently reversed during the compilation of this final report. This is no longer a small zoo and it now houses a large and diverse number of species. Suitable management processes must be in place before a new licence is issued to enable the Zoo to meet all its legal obligations, particularly in respect of Sections 3, 8, 9 and 10 of the SSSMZP. These have been areas of concern and flagged as issues repeatedly over a number of years at previous zoo inspections. The inspection of November 2015 has highlighted 32 Conditions that the inspectors believe must be applied to the licence. This is a considerable number of Conditions for a zoo of this size, and many of these result from the repeated failure to implement fully previous Conditions, thus aggravating the situation and determining the inspectors' position. Of particular concern to the inspectors is the fact that as this zoo grows, it relies heavily on the owner's experience implementing out of date practices and refusing to implement modern zoo practices. In the inspectors' opinion this has resulted in animal welfare issues, a higher than expected mortality rate amongst the animals, higher than expected incidents (such as injuries to the public from animals), and places both staff and the public potentially in danger. The new management structure must include a competent, suitably qualified and experienced full-time Director (or Senior Manager). This individual will have day to day responsibility for the running of the Zoo, will be able to make decisions independent of the owner and will be fully responsible to the licensing authority for the conduct of the Zoo and all its on-site activities. This will be a full-time post and therefore cannot be someone who will spend large parts of the year absent from the site.
3. Whilst it is acknowledged that the zoo has demonstrated imaginative and sometimes innovative animal display techniques since its founding, it is believed by the inspectors that keeping species from different continents and habitats together in the same enclosure runs counter to modern zoo education practice and gives a distorted and unnatural view to the visiting public. There are also potential animal health and welfare issues such as parasite and other pathogen transmission, and behavioural conflict, even if these are not overtly apparent.
4. The inspectors spent some time assessing the issue of the free flying macaws and despite some difficulty getting a definitive view of the numbers and species we were eventually provided with a written statement of the situation by Mr David Gill. In the light of the information provided at the time (and without commenting on the relevance or otherwise of such legislation as the Wildlife and Countryside Act) the inspectors have concluded that the birds are not part of the South Lakes Safari Zoo animal inventory. They are therefore not protected by the Zoo Licensing Act and are not relevant to this inspection. This view is based on the fact that the birds are not trained to return to Zoo property (and therefore are unlikely to be

seen as "kept" by the Zoo) and are not owned by the Zoo company. It is likely that these free-flying birds will 'visit' the Zoo and we strongly recommend to the local authority that if there is any evidence that the birds are encouraged onto Zoo property, by for example deliberate feeding, then this might change an interpretation of the birds' status in terms of zoo licensing. The inspectors note that staff are currently monitoring and recording the behaviour of the macaws and their whereabouts in the Zoo grounds every two hours.

5. All animal keeping staff should have a structured development and training programme to include external CPD and formal qualifications such as the DMZAA at Sparsholt College.
6. The inspectors were concerned that some animal diets e.g. psittacine birds, fennec fox and public feeding diets for macropods, capybara, mara, were nutritionally inadequate and do not reflect current knowledge and best practice. There should be a full documented dietary review for all species with veterinary input (including from Andrew Greenwood), to incorporate current nutritional guidelines for relevant species.
7. There should be a properly developed collection plan covering all species which includes the rationale for keeping the species, plans for future, etc.
8. The inspectors were greatly concerned over an apparent lack of consultation and inclusion of input from staff and vets in enclosure design and an apparent failure to follow original design specifications, e.g. bear dens. We recommend all future animal accommodation plans should include staff and vet input as appropriate.
9. The inspectors were dismayed and shocked to see bales and pallets held together with baler twine used as temporary holding for mixed exhibit of Bactrian camels, wildebeest, nyala and zebra in the Africa House. Such inadequate and insecure holding arrangements should not be part of modern zoo practice.
10. From the information provided it would appear that the recent Nyala deaths were preventable and were the result of a poor decision-making process which the inspectors hope will no longer occur under a new management structure.
11. The involvement of Andrew Greenwood (IZVG) in the Zoo's veterinary cover is commended; however the overall veterinary programme in the Zoo is inadequate and needs to be radically revised to bring it into line with modern zoo veterinary practice. The current arrangement of two practices, a local vet and a visiting specialist vet, is suitable but the current levels of routine attendance are not adequate for a collection of this size and complexity. Whilst Frieda Schreiber is a qualified vet she is not an MRCVS and cannot practice in UK, but her skills and training can be invaluable to the development of the veterinary programme. If the current arrangement of two veterinary practices is to be continued then the levels of cover must be increased to the equivalent of one full day a week by a local vet with appropriate CPD and at least one full day a month by the specialist vet. These visits must be established as routine (i.e. not call-outs) and involve the UK qualified vets in a wide range of initiatives, including preventive protocols such as screening/worming and vaccination, post mortem protocols, enclosure design, nutrition, vet records, etc. The veterinary visits, and any telephone advice given, must be fully documented.

Additional Conditions:

1. In several areas the perimeter fence is overgrown with vegetation. In accordance with 8.7 and 8.29 of the SSSMZP all vegetation and trees in proximity to the perimeter fence must be cut back and maintained at no closer than 0.5m from the electric fencing. All high shrubs, bushes and trees overhanging or near the perimeter fence must be kept cut back to prevent animals from escaping. (3 months)
2. Some of the wooden support posts on the walkways are visibly rotten. In accordance with 8.13 and 8.18 of the SSSMZP, the public wooden walkways and platforms must be designed to meet BS 6399-1: 1996 and be able to cope with the heavy duty loading and maintained in safe condition. The effect of any walkway or platform stanchions being submerged in water for prolonged periods should be assessed in terms of deterioration and structural stability. A programme of inspection, maintenance and structural repairs needs to be documented. (1 year)
3. In accordance with 8.20 and 8.34 of the SSSMZP there must be an agreed and written protocol for liaison with the Cumbria Constabulary in response to the escape of an animal outside of the perimeter of the licensed premises and appropriate firearms cover for the premises. This must be reviewed on a yearly basis and be provided to the Licensing Authority upon review. (1 year)

4. In accordance with 3.26 of the SSSMZP all staff involved in power washing surfaces used by animals must wear appropriate PPE to prevent zoonotic infection, e.g. facemasks, goggles etc. Clear written instructions to staff must be enforced. (Immediate)
5. The indoor facilities for the Andean Bears are insufficient. In accordance with 4.3 and 4.4 of the SSSMZP the breeding/sleeping dens for the Andean bears must be redesigned and rebuilt to bring their specification in line with modern husbandry standards. The rebuilt house must include facilities for the separation and direct visual assessment of bears, adequate ventilation, access for veterinary management, double doors for security, and a level of separation that prevents nose to nose, or visual contact, with other species in the main house. (6 Months)
6. In accordance with paragraph 5.1 and 10.1 of the SSSMZP all staff who work with newly arrived hazardous species [any animal listed in Category 1 of the Hazardous Animal categorisation (see Appendix 12 of the Secretary of State's Standards of Modern Zoo Practice)] not previously held in the collection (or not within other staff's past experience) must undergo a period of recorded training at a collection already holding the species. Evidence of this training must be forwarded to the Licensing Authority prior to the hazardous animal arriving on site. (Immediate effect). If staff have previous experience then that experience must be detailed including dates and establishments where the training was received and forwarded to the Licensing Authority 4 weeks prior to the animal arriving (Immediate effect)
7. In accordance with 4.3 and 4.4 of the SSSMZP the indoor facilities for the group of baboons is insufficient and must be upgraded or replaced to provide increased space for the animals when they are indoors for prolonged periods, e.g. during the winter. The indoor quarters must also allow for a developed programme of enrichment, e.g. deep straw litter and scatter feeding. (1 Year)
8. Any organised sessions of public feeding of animals involving raw meat and fish must be the subject of a written risk assessment and protective gloves provided as appropriate. (Immediate)
9. Although there are signs in the park prohibiting direct public contact with the lemurs there is a large photograph at the entrance showing (and implicitly encouraging) direct public/lemur contact. This sign must be removed or replaced. (Immediate)
10. A lifebelt and a sign with emergency instructions must be provided at the top pond/ walkthrough. (3 months)
11. In accordance with 1.3a of the SSSMZP a functioning fly killer must be provided in the fruit/veg kitchen store area. (3 months)
12. The quarantining of , or housing of newly arrived, birds within the same air space as birds already within the collection is poor practice and must cease. In accordance with 3.19, 3.21 of the SSSMZP written protocols must be produced, with advice from the veterinary consultants, for the housing and quarantine of any animals introduced to the collection or accepted as rescue animals. Staff must receive training on the protocols and their implementation and this should be documented. (6 months)
13. There is evidence that the vermin control in the dry food storage area specifically, and more generally throughout the park is still inadequate. In accordance with 1.3a and 3.35 of the Secretary of State's Standard of Modern Zoo Practice (SSSMZP) a report must be produced for the Licensing Authority by an independent professional pest control company on the safe and effective control of rodent vermin (within 3 months). The Zoo must then implement the recommendations of that report (within 6 months)
14. The mesh 'cage' preventing tamarin access to an electrical installation in the Amazon House was ineffective, and the electrical equipment may present a hazard. In accordance with 2.4 of the SSSMZP all plant and fixed equipment, including electrical apparatus, must be installed and maintained in such a way that they do not present a hazard to animals, and their safe operation cannot be disrupted by them. (3 months).
15. The insulation in the roof of the Andean bear dens must be protected to prevent the peafowl from eating the insulation material. In accordance with paragraph 2.3 of the SSSMZP Enclosures must be maintained in a condition which presents no likelihood of harm to animals.(1 month)
16. In accordance with 8.24 and 8.9 of the SSSMZP effective non-touch barriers, e.g. a stand-off barrier, for the public must be provided at the area of Andean bear fencing in proximity to their access to the dens. (3 months)

17. In accordance with 8.6 of the SSSMZP the top lemur house has no effective public barrier preventing access to the house and its doors. The house and enclosures must be kept locked at all times when no keeper is present. (Immediate)
18. The temporary enclosure made of hay bales, pallets and bale twine in the Africa House is completely inadequate and has resulted in escapes into the house. In accordance with 2.3, 8.6, 8.7 of the SSSMZP this must be made secure to modern zoo standards to prevent further escapes. (1 Month)
19. During the completion of the indoor accommodation of the Africa house the animals already present in the outside enclosure, occasionally, cannot or will not use the Africa House for shelter. In accordance with 2.2 of the SSSMZP additional shelter must be provided in the outside enclosure to accommodate all species. (1 Month)
20. A number of lame flamingos were observed, and the flooring of the new flamingo house is plain concrete. In accordance with 2.2, 4.3 and 4.4 of the SSSMZP the floor in the Flamingo House must be the subject of review by the veterinary consultants and suitable flooring/substrate put in place to improve the health of the flamingos' feet. (6 months)
21. In accordance with 1.1, 1.12 and 1.13 of the SSSMZP a full review of diets and nutrition across all species, in consultation with the veterinary consultants, must be carried out. Records of all diets and the changes made must be documented and kept. (6 months)
22. In accordance with 2.3 of the SSSMZP the corner of the Andean bear enclosure that tapers to a point (adjacent to the perimeter of the new rhino paddock) must be rounded off with the electric fencing to prevent one bear being cornered by another in the event of conflict. (3 months)
23. The overall veterinary programme in the Zoo is inadequate and must be radically revised to bring it into line with modern zoo veterinary practice. In accordance with 3.7, 3.8, 3.9 of the SSSMZP a written outline of this revised programme must be produced and submitted to the licensing authority, (3 months) and implemented. (See explanatory notes above).
24. The Inspection team noted that there had been a number of bites reported. In accordance with paragraph 6.14 of the SSSMZP a full written review of incidents of members of the public being bitten by animals must be carried out and an action plan adopted to reduce the number of bites. A copy of the report and the action plan must be forwarded to the LA. (3 months)
25. In accordance with 1.3d of the SSSMZP dedicated staff hand-washing facilities must be provided where raw meat is handled i.e. in the meat preparation area. (6 months)
26. In accordance with 1.3d and 1.5 of the SSSMZP if the preparation of raw meat and raw fish is to continue in the same room it must take place in designated separate areas with separate utensils to avoid cross-contamination particularly of fish for the penguins. (1 month)
27. The details of the ethical review process must be recorded and must be made available to the zoo licensing process. (3 years)
28. Although a wire mesh has been nailed onto large areas of the wooden walkways, in many areas this is already coming loose, and will be a trip hazard. In other areas no non slip surface has been provided. In accordance with 8.15 SSSMZP all walkways that are constructed of wood must have a surface that will prevent, as far as is reasonably practical visitors falling or tripping. (6 months).
29. There are a number of prairie dogs free living, in burrows, in the top walkthrough area where the perimeter fence is set into the ground only to a depth of 30cm. In accordance with 8.10 of the SSSMZP if Prairie dogs are to continue to be kept in this area then a written risk assessment carried out by the veterinary consultant on the effectiveness of the perimeter fence must be undertaken. The steps taken by the zoo to ensure that there will not be any escapes must be documented. Copies of these reports must be forwarded to the Local Authority. (6 months)
30. The practice of designing facilities for Category 1 animals, such as the rhino and giraffe, whereby the keepers have no option but to be in direct contact with the animal is not utilising up to date husbandry guidelines and can be a high risk to the keepers. In accordance with 1.5 and 5.1 and of the SSSMZP the design of the accommodation in the new Africa house must be such that keepers do not have to go into an enclosure with a Category 1 animal to be able to work gates, supply food or move them. It may be that with appropriate risk assessments and for certain specimens it may be possible to manage such Category 1 animals with contact, but a non-contact system must be available for new or proven aggressive animals or new staff. Revised designs must be forwarded to the LA for approval prior to the accommodation being

built. A written document detailing the changes that will be made to the current animal management practice, including risk assessments, must be forwarded to the local Authority (3 months).

31. The Muck heap in the Rhino and Giraffe paddock must be moved sufficiently far from the perimeter fence to eliminate its potential use as an escape aid. (1 month)
32. In order to comply with section 10 of the Secretary of States Standards, a robust management and staffing structure must be in place to the satisfaction of the licensing authority, and in order to allow a new licence to be issued. This new structure must include a competent, suitably qualified and experienced full-time Director (or Senior Manager) with day to day responsibility for the running of the Zoo, the ability and authority to make decisions independent of the owner, and must be fully responsible to the licensing authority for the conduct of the Zoo, all its on-site activities and its compliance with the Secretary of State's Standards. [Please see recommendation/comment 2 regarding recommendation for refusal of a licence. Renewal of a licence is recommended to be dependent on the listed Additional Conditions being either complied with, or satisfactory progress towards compliance being made.]
33. There must be a suitable and sufficient written risk assessment for the anaconda in the walk-through area and a copy must be forwarded to the LA (1 month) (NB it will become a Category 1 hazardous animal when it attains 3m when it must be housed in such a way that access with the public is prevented).

Responding to each point in turn:

1. The inspectors note and commend the overall evident hard work and dedication of the keeping staff and administration team. At the time of the inspection the inspectors were pleased to see the recent change of structure of governance and senior management that would empower the new Director to lead and implement change. We sincerely hoped that this would enable the zoo to move forward in a progressive way that reflects current thinking and best practice in the national and international zoo community.

This first comment has our management team bemused as to where the comment was derived? We certainly have to question why any new Director needed to change the future plan and development from the plan we are working to at this time. We find the comments of the inspectors to be a failure to comprehend our strategy and commitment to the ideals of modern Zoo practice and developing a zoo that the visitors and animal see as of high standard and with a high satisfaction rating. What possible change would the 2 new Directors, not 1, make that could improve our success and our visitor satisfaction. The management team is fully empowered to fulfil ALL its obligations under the ZLA and H and S. under the leadership of the past 22 years. We are fully aware and supportive of the plans and clear direction for compliance sought by the director in the past. The implication drawn from this comment is that under present management the zoo will not move forward or improve? It is our unanimous opinion that it is the present management with the ideas and enthusiasm that has created the extremely successful style and approach and we have to ask how any 2 day inspection can conclude these sweeping statements of misleading information.

We have no doubts at all that we always have always from the day of opening moved forward in a progressive way that reflects current thinking and best practice in the national and international zoo community. The proof of this is the interest from other Zoos in our style and enclosure design and the acknowledgement via Taxon Advisory Groups 's in EAZA of the high quality experience many of our animals experience via the unique ways we have pioneered. After being inspected by our peers in the recent past where we received very positive comments about many exhibits and our mission and work we find the comments insulting to our management team that has worked tirelessly to provide unique experiences for our animals and visitors that are of the highest standard and at the forefront of "modern" zoo thinking and very much the public's expectation of standards and experience.

2. The decision by the inspection team to recommend that a new licence for South Lakes Safari Zoo should not be granted at its due date, unless a Condition regarding the management structure has been complied with, is not taken lightly. It must be emphasised that the inspectors are keen to see the Zoo develop and thrive in line with modern zoo standards. The inspectors commend Mr David Gill for his initial decision to step back from the running of the Zoo and to concentrate on its conservation role, but do not believe that at the time of the inspection, or subsequently, sufficient progress has been made in this respect, and note that this decision was subsequently reversed during the compilation of this final report. This is no longer a small zoo and it now houses a large and diverse number of species. Suitable management processes must be in place before a new licence is issued to enable the Zoo to meet all its legal obligations, particularly in respect of Sections 3, 8, 9 and 10 of the SSSMZP. These have been areas of concern and flagged as issues repeatedly over a number of years at previous zoo inspections.

The inspection of November 2015 has highlighted 32 Conditions that the inspectors believe must be applied to the licence. This is a considerable number of Conditions for a zoo of this size, and many of these result from the repeated failure to implement fully previous Conditions, thus aggravating the situation and determining the inspectors' position. Of particular concern to the inspectors is the fact that as this zoo grows, it relies heavily on the owner's experience implementing out of date practices and refusing to implement modern zoo practices. In the inspectors' opinion this has resulted in animal welfare issues, a higher than expected mortality rate amongst the animals, higher than expected incidents (such as injuries to the public from animals), and places both staff and the public potentially in danger. The new management structure must include a competent, suitably qualified and experienced full-time Director (or Senior Manager). This individual will have day to day responsibility for the running of the Zoo, will be able to make decisions independent of the owner and will be fully responsible to the licensing authority for the conduct of the Zoo and all its on-site activities. This will be a full-time post and therefore cannot be someone who will spend large parts of the year absent from the site.

What lies within appears to be a somewhat sweeping unsubstantiated claims and false facts. The inspection team misled the public and committee by stating that the decision for David Gill to step down as Director was in any way changed at any time. The facts of this situation are open and public. Mr Gill made an application to the LA to have the Zoo Licence transferred from his personal name to the company that operates the Zoo and the responsibility given to the two new directors at that time.

We received a very clear response in writing from the LA stating they would refuse any such transfer of Zoo Licence to the new Directors as they did not have the experience to run the Zoo and despite Mr Gills clear commitment and plan to retire they would prevent him retiring by forcing him to retain the licence. The implication in the report is that the Zoo or Mr Gill changed the position when in fact the LA changed the position and in effect forced Mr Gill to take up the Directorship again by their actions.

It is also a very valid point that by the date of the final signature the issues regarding the future operator of the Zoo was sent to the LA by e mail and acknowledged. The inspectors were FULLY aware of the plans to transfer the ZOO to a Charity and my intention to step down totally by e mail on 14th December 2015. The inspector's comments regarding future operator in this report are there for clearly intended to mislead the committee and the public as to the real situation and future plans that they simply choose to not report upon.

The zoo would like to point out although the report dated 5.1.16 highlights 32 conditions that the inspectors believe should be added to the licence many of these were in place and evidence of this in the

hands of the inspectors with the detailed compliance sent to the council and Mr Brash, one of the inspectors attended the site again on 16th December 2015 many weeks before this report was completed with Mr Garnett from the LA and passed a number of these issues as fully complied with.

Inspectors claim many of the conditions were as a result of repeated failure? We would like inspectors and the LA to highlight which specific Conditions they are referring to instead of an invalid statement?

29 of the 33 conditions (not 32 as inspectors referred to) are brand new, with 2 including ethics and firearms being ongoing subject to annual reviews.

It is a fact therefore that the statement made "many of these result from the repeated failure to implement fully previous Conditions" is indeed factually incorrect and aimed to mislead. And create a damaging image of the Zoos actual compliance. Indeed in particular the issues witnessed as fully complied with should not be on the conditions list as they are in fact now not relevant.

We would ask for the inspectors to quantify the claims made within this comment, What precise welfare issues do they refer to? And what level in the context of the whole zoo are they suggesting their comment applies. ? It is not professional to fail to qualify the comments rather than make opinion?

Mortality rates: The zoo would seek for clarification as to what standard the inspectors are basing their accusations upon. We have investigated this issue further and taken advice of a DEFRA Inspector who has analysed the annual stocklists of other medium to large zoos which resulted in an average range on between 8.8 to 11.8%, with just one lower one at 5.3% - a new zoo with the smallest collection, no reptiles, and few birds.

We question the inspectors comprehension of the records and why the inspectors did not seek to find explanations as nearly one third of animals were Rodrigues fruit bats that joined the collection many years ago had reached their maximum life span, died of old age (15 to 17 years old) and Baboons that were culled by the vet for safety and welfare reasons under the zoos ethical review process and EAZA guidelines. If we exclude those 2 specific circumstances from the totals the average mortality for Safari zoo is 7.82% - under the average rates, well within good zoo practice and certainly cannot attract professional criticism in any way ?

3. Whilst it is acknowledged that the zoo has demonstrated imaginative and sometimes innovative animal display techniques since its founding, it is believed by the inspectors that keeping species from different continents and habitats together in the same enclosure runs counter to modern zoo education practice and gives a distorted and unnatural view to the visiting public. There are also potential animal health and welfare issues such as parasite and other pathogen transmission, and behavioural conflict, even if these are not overtly apparent.

Whilst we acknowledge there is a purist line of thinking amongst some zoos, there are many examples throughout the zoo world of fabulous mixed exhibit displays – Chester Zoo latest "islands of Adventure", which display island animals regardless of where the species come from, Our World Wide Safari – is exactly that a celebration of the diversity of animals that occur around our planet. – kangaroos, deer, many bird species, emu, vicuna , lemurs, monkeys and many more. There is so much a visitor can learn and we concentrate on - the messages of biodiversity...

Our approach to “modern” animal welfare in zoos is to get away from cages and restrictions caused by purist sometimes blinkered views of animal experience. All species are adapted to live in their specific environments... we simply look at an environment and wish to use each aspect of it effectively. We have in fact been well known in the Zoo community for this breakthrough in thinking, so much that many zoos now come to SAFARI ZOO to understand the dynamics of the facilities and interactions of species.

So to have monkeys in the trees, capybara on the ground and birds using trees, ground and water etc is a replication of a wild environment and exclusion of diversity is in fact working against wild natural stimulus. Traditional Zoos promote the continental grouping or species specific exhibits and that is their choice and this in itself promotes challenges. We have had our “bush” now “world wide Safari for 22 years. In that time it has provided a contact with animals and an experience that has changed people and their perception of wildlife and animals, we have not had any specific issues and indeed the policy of mixed exhibits in the view of most animal managers is a huge benefit to animals specifically as a stimulus to their lives.

Until this very personalised negative comment ALL previous inspections have indeed commended the use of mixed exhibits and our world safari facility as innovative and stimulating to both animals and public alike. We use this concept to illustrate the variety of animals from differing habitats around the globe with success and we are proud of this aspect of our zoo. The most vital mission we have is to give our animals great environments, good security and health and use them effectively to illustrate and educate about conservation issues facing animals across the globe.

The role of a zoo in our eyes is to stimulate and educate our visitors and giving them a unique hands on encounter with “the animals of the world” and this is just one of the ways we empower them to join in and support the conservation of the planet as we know it. We are a very forward looking zoo and certainly do not use out of date practice or ideals.

4. The inspectors spent some time assessing the issue of the free flying macaws and despite some difficulty getting a definitive view of the numbers and species we were eventually provided with a written statement of the situation by Mr David Gill. In the light of the information provided at the time (and without commenting on the relevance or otherwise of such legislation as the Wildlife and Countryside Act) the inspectors have concluded that the birds are not part of the South Lakes Safari Zoo animal inventory. They are therefore not protected by the Zoo Licensing Act and are not relevant to this inspection. This view is based on the fact that the birds are not trained to return to Zoo property (and therefore are unlikely to be seen as “kept” by the Zoo) and are not owned by the Zoo company. It is likely that these free-flying birds will ‘visit’ the Zoo and we strongly recommend to the local authority that if there is any evidence that the birds are encouraged onto Zoo property, by for example deliberate feeding, then this might change an interpretation of the birds’ status in terms of zoo licensing. The inspectors note that staff are currently monitoring and recording the behaviour of the macaws and their whereabouts in the Zoo grounds every two hours.

5. All animal keeping staff should have a structured development and training programme to include external CPD and formal qualifications such as the DMZAA at Sparsholt College.

In ADVANCE of the inspection pre-inspection audit paperwork has to be submitted to LA which includes a list of staff including qualifications. It was supplied to the LA with all the other documentation on 17/9/16 (as below 6th document along). Inspectors during the inspection suggested that paperwork had not been supplied to them but EHO assured it had been made available. Up-to-date individual CPD plans are kept on all the keeping staff and were available to the inspectors on the day. The supplied information shows there is a development programme in place which includes external CPD and our keepers have external formal animal qualifications:

As per SSSMZP section 9 the zoo also holds regular continuous in house training and development – a full years programme delivered including topics - animal husbandry, animal welfare, emergency escape procedures, basic hygiene, management of species in animal contact areas, in-situ and ex-situ conservation, education, health monitoring, zoonosis, electrical fences.

Animal Department Manager	HND Animal Welfare & Management, 11 years experience working at Flamingo Land and previously with us at South Lakes Wild Animal Park
Registrar	HND Animal Welfare & Management, FAWW Certificate, CIEH Health & Safety in the Workplace Certificate. 15 years experience
Senior Keeper	Diploma in Herpetology, EAWT Advanced Herpetology Course, OATA Award.
Senior Keeper	BSc (Hons) Equine Science & Management. FAWW Certificate
Keeper	BSc Animal Biology Degree
Keeper	BSc Animal Behaviour and welfare,
Keeper	Working towards an extended diploma in Animal Management Level 2
Keeper	BSc Animal Behaviour Science Degree
Keeper	Btec Public Service Course LV3
Keeper	BSC Zoology 2:1
Keeper	Bsc (Hons) Zoology
Keeper	
Keeper	Btec Diploma in Animal Care Level 2
Keeper	Working towards 2nd year in DIMZAA
Keeper	GSCE's, 10 years experience as animal manager at Ducky Park Farm
Keeper	A level Biology, Geography & Sports Science

pre inspection audit 1 of 2

Karen Brewer 
to Richard, Christina, David

17/09/2015

Hi Richard

As discussed I am on holiday for 2 weeks but here's the pre inspection audit together with all the relevant attachments. I am sending 2/3 mails due to size restrictions of our server, but you should have everything. I know you are away today but if you notice anything missing Christina will organise and anna can be on hand for copies of RA etc.

Karen Brewer

Marketing & Development Manager
SAFARI ZOO

South Lakes Safari Zoo Ltd
Mellon Terrace
Lindal in Furness
Cumbria, LA12 0LU
Company Registered in England No: 3581682
VAT no: 621 3114 58

www.safarizoo.co.uk
Tel: 01229 485588 ext 0

WE DON'T JUST TALK ABOUT WILDLIFE CONSERVATION WE ARE DOING IT EVERYDAY.....

10 Attachments



6. The inspectors were concerned that some animal diets e.g. psittacine birds, fennec fox and public feeding diets for macropods, capybara, mara, were nutritionally inadequate and do not reflect current knowledge and best practice. There should be a full documented dietary review for all species with veterinary input (including from Andrew Greenwood), to incorporate current nutritional guidelines for relevant species.

The zoo's independent consultant looks at diets, certainly if they appear to be causing issues. Andrew Greenwood has confirmed there is nothing wrong with the Fennec Fox diet in place and we have no idea as to why this comment has been made as on the day it was not mentioned? A full structured review is underway but initial results are so far revealing no change to written diets. It must be noted that diets vary day to day with availability of fruits and veg and what the inspectors witnessed with parrot like is a lack of vegetables and these are fed outside in the aviary and were simply just not seen by the inspectors.

We noted the disagreement on this matter of diets between the inspectors on the day of inspection. The success we have had with most species suggests that the majority of diets are correct and fulfilling need. Re Psittacine birds we acknowledge that there are other options of pellets available but a reliance on them can lead to death if the birds do not eat them and that our winter diets for parrot like birds does contain higher levels of sunflower and peanuts than usual. However we have successfully used these in wet /cold times in winter as a supplementary fat source to try to replace natural fats and oils found in the natural diet during the specific challenge period.

Re Macropod and Capybara public diets, we can only say that over 22 years the diet has proven to be successful, the breeding success of Capybara and Kangaroo at the top of the range.

PAGES 7 to 17 REMOVED

PART II INFORMATION

EXEMPT BY VIRTUE OF

Paragraph 3, Part 1, Schedule 12A Local

Government Act 1972:

Information relating to the financial or business
affairs of any particular person

(See Appendix No. 5 - Agenda Item 8).

8. The inspectors were greatly concerned over an apparent lack of consultation and inclusion of input from staff and vets in enclosure design and an apparent failure to follow original design specifications, e.g. bear dens. We recommend all future animal accommodation plans should include staff and vet input as appropriate.

Will the inspectors please elaborate on what their concerns actually were? Staff were and are ALWAYS involved in the practical aspects of the facilities, as a specific instance the Animal Manager Christina Fischer was totally inclusively involved with consultation on the internal design and final arrangements of the gates, slides and accommodation in the New African House. Her comments were fully integrated into the final layout and working design. The animal manager's role is to consult the staff on opinion and pass that opinion on in their deliberations. Re Bear Dens this comment is unfounded and the inspectors were made fully aware of the temporary aspect of the layout of the catchment cage facility at the inspection. We have to ask inspectors why change to original plans is unacceptable to them when clearly practical issues can arise in construction and working practice that are not seen on drawings. The need always arises where change has to be made. This is good practice and responds to need.

All plans are done in house and the whole staff are and were, included in the process. For instance for the expansion programme the WHOLE STAFF were given a guided tour of the un-developed site and asked for ideas and suggestions, at regular intervals of development the same guided tour was undertaken and all staff given chance to contribute. To suggest otherwise is wrong and intended to mislead the committee and public as to real events.

9. The inspectors were dismayed and shocked to see bales and pallets held together with baler twine used as temporary holding for mixed exhibit of Bactrian camels, wildebeest, nyala and zebra in the Africa House. Such inadequate and insecure holding arrangements should not be part of modern zoo practice.

This temporary shelter accommodation was approved by Mr Brash, one of the inspectors during a special inspection on 23.4.15. Photographs confirming the bales were removed and showing the animals moved to the finished pens (as below) were forwarded to the LA on 13.12.16 some 6 weeks before the report was delivered, this internal housing situation was also seen and inspected by one of the inspectors and BBC EHO on 16.12.16 . Full compliance.

Although bales did form temporary shelter accommodation, the animals actually spent 95% of their time out in the huge enclosure and were never locked in the inside area in question.

Background: The delay that caused this temporary undercover accommodation was caused by one issue out of our control. The fabricator contracted to make the new Antelope housing inside the same building as the bales was supposed spend the Summer period making them in time for the autumn so the animals had professional internal housing. The bales were certainly adequate for purpose as we did not "fasten or hold" the animals behind them and they were inside a secure animal housing with no chance of an escape to outside the designated housing.

It was to our dismay to find out that the fabricator actually let us down and simply did not turn up to make the housing because **Barrow Borough Council offered him far more money per hour** than we did to work for them. So our predicament and now criticism has arisen simply because the Barrow Borough LA "lured"

the fabricator with high rates of pay to complete work on LA projects we understand . We did not get any explanation as to why our facility was not completed until after completion of the LA work .

As you can see it now is fully complete and all animals content. (Internal housing situation was seen and inspected by one of the inspectors and BBC EHO on 16.12.16 . Full compliance.)



Inspection of the Zoo

Inbox x



Richard Garnett <[redacted]>

14/12/2015



to David, SAFARI, Karen

Dear Mr Gill

There were a number of items that the Zoo Inspectors wanted dealt with as a matter of urgency, The Africa House and the Stand Off Barrier at the Kangaroo House. I have received pictures from Karen that suggest this work has been completed and would like to visit with Mr Brash on Wednesday at 2pm to review the works done and ensure that it is suitable.

At the same time I would like to discuss the hot water provision for customers as at the November inspection it was discussed that hot water boilers were due to be fitted.

Richard Garnett
Principal Environmental Health Officer

Agenda 7 item response.



Karen Brewer <[redacted]>

13/12/2015



to Richard, David, SAFARI

Dear Richard

Please find response to Agenda Item 7 to be distributed to members prior to Thursdays meeting. The straw bales have all been removed and there are images of the animals in there internal stabling in the African house to follow.

I also inform you the insulation of the roof within the bear house, has been covered and changed, and the "stand off safety barrier" outside at the bears is in place. (Images to follow also)

--

Karen Brewer

>

> Marketing & Development Manager

> SAFARI ZOO

>

> South Lakes Safari Zoo Ltd

> Melton Terrace

> Lindal in Furness

> [redacted]

The end of the housing where the bales were



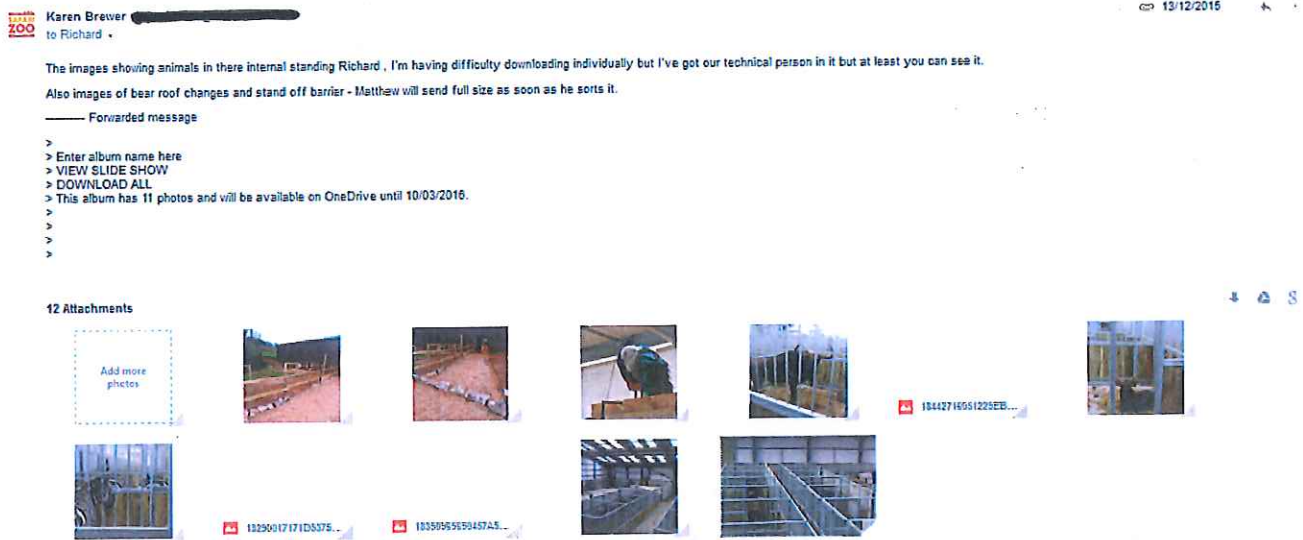
Karen Brewer <[redacted]>

13/12/2015



to Richard





10. From the information provided it would appear that the recent Nyala deaths were preventable and were the result of a poor decision-making process which the inspectors hope will no longer occur under a new management structure.

These sad and we agree preventable deaths came about from a combination of significant events.

We were "forced" to take the animals from a European Zoo despite the delay on our internal housing. The supplying zoo we are told was redeveloping and had contractors in to demolish the previous housing so ALL animals had to leave by a specific date.

The Veterinary team were not made aware of the group composition or age of the animals before arrival.

On arrival the animals were unloaded as normal, they were placed inside the temporary housing for assesment by the Vets, the animals went into shock, one died of a huge heart attack (pm recorded) to try to prevent further serious stress it was decided by the TEAM to let the remaining animals out into the huge external field as the weather was good and it was felt the correct decision at that time.

The weather turned to wet and windy and clear instructions were given to Animal Management to get the animals inside the building for shelter.

The animal manager and keeping staff refused to go into the field to move the animals despite the severe risk to animal welfare. They based their arguments of the written procedure and risk assessments provided to them with regard to the species in that field. The animals subsequently died of stress induced issues and wet weather. (pm reports) It was only at PM that it was discovered that the animals were very old and at the end of their lifespan with one young animal.

A full investigation was undertaken at the time and the risk assessments and procedures have now been reviewed to include the ability to take actions in emergencies and special needs . However the management as a whole was extremely disappointed in the lack of communication, adaptability and understanding of the situation that occurred. Changes in responsibility occurred at that time as a result of the investigations.

Every member of staff here are passionate about their animals, it's why they are here and doing the job they do, the death of any animal is always severely regrettable and cuts deep throughout the whole of the zoo. As much as processes and experience minimises incidents they cannot remove them. A full analysis surrounding incidents always takes place to ensure future risks are minimised in every possible way and any lessons learnt are applied. It is of note without minimising the importance that this was a couple of animals in the whole context of the huge number of animals in our care.

11. The involvement of Andrew Greenwood (IZVG) in the Zoo's veterinary cover is commended; however the overall veterinary programme in the Zoo is inadequate and needs to be radically revised to bring it into line with modern zoo veterinary practice. The current arrangement of two practices, a local vet and a visiting specialist vet, is suitable but the current levels of routine attendance are not adequate for a collection of this size and complexity. Whilst Frieda Schreiber is a qualified vet she is not an MRCVS and cannot practice in UK, but her skills and training can be invaluable to the development of the veterinary programme. If the current arrangement of two veterinary practices is to be continued then the levels of cover must be increased to the equivalent of one full day a week by a local vet with appropriate CPD and at least one full day a month by the specialist vet. These visits must be established as routine (i.e. not callouts) and involve the UK qualified vets in a wide range of initiatives, including preventive protocols such as screening/worming and vaccination, post mortem protocols, enclosure design, nutrition, vet records, etc. The veterinary visits, and any telephone advice given, must be fully documented.

Condition 18 of the present licence relates to veterinary services. Following an inspection on 28-29 January 2014 the zoo were issued with a directive order pertaining to the veterinary services outlines the shortcomings and necessary procedures/ protocols to be put in place. On 13th August 2015 BBC Licensing Committee were advised by Mr Brash one of the inspectors and EHO the veterinary directive order had been complied with "the Zoo now has in place suitable arrangements which comply with the requirements of the Direction Order"

How now just 3 months later is that programme "inadequate and needs to be radically revised to bring it into line with modern zoo veterinary practice." ? This statement is contradictory, inconsistent and causes deep concern to the Zoos management in that it seems "goal posts" are being moved by inspectors to create a false image of the Zoos professional application to such a serious and important aspect of our operations.

Zoo vet Rick Browne is contracted to visit the zoo weekly if necessary, during the year period (10 months) up to the November inspection, he visited the zoo on 47 separate occasions. This equates to the attendance required? Why then the comment?

A vet co-ordinator is on site daily and is responsible for Preventative protocols, vaccinations, PM protocols Vet visits, telephone advice given is all fully documented. All this documentation is then disseminated to the MRCVS locally and to our International ZOO Veterinary specialist monthly for their input, comments and suggestions – full records are in place and were available for inspection on the day. Andrew Greenwood, of IZG, who is also an active DEFRA Zoo Inspector is contracted to oversee the vet programme, he visits monthly and is on 24/7 contact availability, therefore he refutes any programme shortcomings.

APPENDIX No. 2

ZOO LICENSING ACT 1981 – SECTION 16(A)2

Direction to comply with a condition attached to a licence to operate a zoo.

To: Mr. David Gill

At: South Lakes Wild Animal Park,
Broughton Road,
Dalton-in-Furness,
Cumbria LA15 8JR

Take notice that Barrow Borough Council having given you the opportunity to be heard, is not satisfied that in relation to South Lakes Wild Animal Park a condition attached to your licence dated 8th June 2010 which required you to

Condition Number 25. Delivery of Veterinary Services

The delivery of veterinary services to and in the zoo, is still unclear and in some areas appears uncoordinated.

The operator must, in conjunction with the Zoo's veterinary advisor and/or other such professional advice as deemed necessary, develop to the modern standards of good zoo practice and implement, an improved and clearly defined programme, for the delivery of veterinary services to the collection. (This must include the additional and extended collection). This programme must detail: the frequency of routine visits, duties expected of the Vet, routine prophylaxis (vaccination etc), agreed surveillance policy – to include screening, post mortem protocols, transmission & recording of p.m. records & pathological results. All relevant information must be integrated into the animal records system, such that, information on any individual animal is quickly and easily retrieved. Agreed protocols for relevant veterinary cover when the principal vet is unavailable, must be clear. A written copy of the final procedures must be lodged with the licensing authority within 3 months & clear evidence of implementation provided within 6 months.

is met.

The above licence condition is not met in relation to the whole zoo.

Barrow Borough Council hereby requires you to take the following steps to ensure that the licence condition is met,

Directions

- A Biosecurity Programme must be put in place in accordance with 2.9 and 3.9f of SSSMZP (Secretary of State's Standards of Modern Zoo Practice) to include actions to minimize potential disease transmission around the site, including staff uniform and protective clothing management, protection of collection animals from diseases carried from wild animals, actions to be put in place when animals are suffering from infectious diseases and actions in response to disease outbreaks in the local area surrounding the zoo.
- A Health Monitoring Programme in accordance with 3.9c, 3.9d and Appendix 5.1 of SSSMZP to include routine health monitoring of the collection with particular focus on screening of EC Directive 92/65 Appendix A listed diseases and zoonotic diseases including, but not limited to Chlamydiosis, E.Coli, Salmonella, Tuberculosis sp., Brucellosis sp.
- An Imported/Added Animals Protocol in accordance with 3.21 of SSSMZP including routine disease screening to contribute to the Health Monitoring Programme described above. This protocol must describe which diseases are of concern to the collection and what action should be taken if an animal intended to be imported, or on arrival to the collection is found to be carrying such a disease.
- In accordance with 3.12 of the SSSMZP, the complete veterinary programme should be formally reviewed by the zoos veterinary staff and animal management team on a six monthly basis to identify trends and disease patterns, cases of concern, areas for further development, issues for further investigation and veterinary issues which may be influenced by animal management, husbandry or nutrition. Minutes must be provided and an action plan produced following each meeting.
- In accordance with 3.3 and 3.11 of the SSSMZP accurate, detailed and comprehensive veterinary records for clinical cases, post mortem examinations, laboratory reports, preventative medicine, disease surveillance and health monitoring must be kept on the zoo site with immediate access to inspectors. They must be recorded on ZIMS and be updated to be correct within 72 hours of the activity.
- In accordance with 3.9g, 3.17 of the SSSMZP, all dead animals must have a gross post-mortem examination completed within 48 hours of death by a veterinarian. This does not need to compromise compliance with Appendix 5.19, as methods to preserve suitability of specimens for research purposes are available. Compliance with Appendix 5.19 is NOT a suitable alternative to this requirement. In compliance with 3.17 samples for diagnosis or health monitoring should be taken. In accordance with 3.18 a reference collection of formalin stored tissues from animals which die should be established. A decision tree, which explains which animals will undergo further histological or other advanced diagnostics should be produced.
- In accordance with Appendix 5.13 of the SSSMZP the zoo must be compliant with veterinary medicines legislation. All out of date drugs must be identified and removed on a monthly basis. A full drug inventory in line with current

Veterinary Medicines Directorate legislation must be kept. Breach dates must be recorded on the drug. The Veterinary Medicines Directorate should undertake an inspection and advise if the zoo requires separate authorization or if the veterinary facilities, should be listed as a 'holding location' under the consultant veterinarians licenses.

- In accordance with the Zoos Expert Committee Handbook Chapter 5 Appendix 1 any veterinarians associated with the park in any capacity for more than 3 days per 12 month period, must demonstrate, through a formal interview process, understanding of current veterinary legislation relevant to the operation of the licensed premises with particular reference but not limited to, the requirements and their duties under the Zoo Licensing Act 1981, the 'Bala' Directive EC 92/65 and the Veterinary Medicines Regulations 2006.
- In accordance with the Zoos Expert Committee Handbook Chapter 5 2.1 all veterinarians working at the zoo for more than 3 days per 12 month period must demonstrate CPD participation according to Royal College of Veterinary Surgeons requirements by providing the inspectors a completed official RCVS CPD card on request.

These steps completed within three months from the date of this direction.

The Zoo specified above need not be closed to the public during the period specified for your compliance with this direction.

Failure to comply with the direction may (if appropriate) lead either to the closure of the zoo by a Zoo Closure Direction (under section 16B) or to alteration of your licence under section 16(1B) so as to require that a section of it is closed permanently to the public.

Your attention is drawn to the notes overleaf which include details about appeal against the direction. This direction shall not have effect during the period within which you are entitled to appeal against it nor, where you have appealed, during the subsequent period before the appeal is either determined or abandoned.

Signed

Date

Name and designation:.....

Barrow Borough Council,
Environmental Health Department,
Town Hall, Duke Street,
Barrow-in-Furness,
Cumbria LA14 2LD

Tel: (01229) 876543 Fax: (01229) 876411 email: commercial@barrowbc.gov.uk

Barrow Borough Council

Licensing Regulatory Committee

Date of Meeting: 13th August 2015

Agenda Item: 6

Record of Decisions

iii) Veterinary Services (Condition 18)

Condition	Findings of Fact	Decision	Reasons
1. Compliance with Direction Order relating to Condition No. 13 – Delivery of Veterinary Services	<p>Following a Special Inspection undertaken in January 2014, the Inspectors had recommended that a Direction Order be served for non-compliance of condition a condition originally placed on the licence in 2009.</p> <p>A Direction Order was served on 1st July 2014 making a number of demands of the Zoo. The Committee noted the following:</p> <p>A review had been undertaken by the Council, with advice from Public Health England, which concluded that the Biosecurity Programme was suitable.</p> <p>The Zoo now has in place, suitable controls and procedures for monitoring the health of its animals.</p> <p>There is a program of phased introduction of new animals to their new enclosures and the Zoo is aware of quarantine requirements with the import of live animals.</p> <p>An Inspection in November 2014 and subsequent check in February 2015, demonstrated that the veterinary programme was in place and working satisfactorily.</p> <p>The process of ensuring that all animals could be traced through the veterinary care process from diagnosis to treatment and then, when necessary to gross post mortem and laboratory testing had been demonstrated to work satisfactorily.</p> <p>The process of gross post mortems had been established and carried out by the Zoo.</p> <p>Leading vet Andrew Greenwood has worked with the Zoo to ensure that they are compliant with veterinary medicines legislation.</p> <p>During the Inspection in November, 2014 and the subsequent visit in February, 2015 the Zoo were able to demonstrate that they have in place a stable Veterinary Team.</p> <p>The Zoo has policies in place to determine the veterinary care that is given to the animals both as routine practice and in emerging situations.</p>	The Direction Order has been complied with.	<p>The Zoo now has in place suitable arrangements which comply with the requirements of the Direction Order.</p> <p>Whilst the full wording of the Condition has not been met, it was acknowledged that the experience and qualifications of the Veterinary Team was suitable.</p> <p>Matt Brash, the Council's retained Veterinary expert expressed his support for Andrew Greenwood, the Zoo's retained Consultant as a zoo expert and DEFRA Zoo Inspector, informing members he was "at the top of his game".</p>

ADDITIONAL
- All patients are
- Given appropriate
- If possible, the patient

2. Some of the wooden support posts on the walkways are visibly rotten. In accordance with 8.13 and 8.18 of the SSSMZP, the public wooden walkways and platforms must be designed to meet BS 6399-1: 1996 and be able to cope with the heavy duty loading and maintained in safe condition. The effect of any walkway or platform stanchions being submerged in water for prolonged periods should be assessed in terms of deterioration and structural stability. A programme of inspection, maintenance and structural repairs needs to be documented. (1 year)

Condition 21 of the present licence relates to Timber Walkways. On 17th December committee voted to escalate this condition to a directive order, that order requested as above to be submitted to council on or before 19.1.26 Action immediately taken to respond and reports submitted and committee met 4th February the issue has been dealt with.

SECTION 3 REMOVED

PART II INFORMATION

EXEMPT BY VIRTUE OF

Paragraph 2, Part 1, Schedule 12A Local
Government Act 1972:

Information relating to an action taken or to be
taken in connection with the prevention,
investigation or prosecution of crime.

(see Appendix No. 6 - Agenda Item 8)

~~keep one per~~
Johns

Keeper Training & Development Meeting

Date: 20/11/15.	Keeper: [REDACTED]
Agenda: Use of PPE during power washing to prevent. Zoonoses related diseases.	
Attending: [REDACTED]	
<p>Description of meeting (areas covered, queries from keepers, feedback etc):</p> <p>S correct usage of PPE during activities</p> <p>M spot checks and verbal discussion to show an understanding of correct usage.</p> <p>A true understanding of the activity.</p> <p>R part of the staff health programme and risk assessment.</p> <p>T one month.</p> <p>This is a developmental/training issue. Not disciplinary; raised due to not being trained sufficiently in this area.</p>	

Keeper's Signature	Date: 20/11/15.
Animal Manager Si	Date: 20/11/15.

complete

RPE Development Training
Meeting Held: 2nd December 2015

Name	Date	Signature
Christina Fischer	2.12.15	
Mark Conway	2/12/15	
Annabeth Robson	2/12/15	
Tracy Gillard	11.12.15	
Sammi Sherwood	3/12/15	
Yaz Walker	2/12/15	
Jenn Gant	2-12-15	
Jo Scholefield	11-12-15	
Gavin Barber	15/12/15	
Sarah Austin	2.12.15	
Adelise Brewer		
Leanne Crabtree	3/12/15	
Brad Tones		
Charlotte Drummond	3/12/15	
Andy Flanagan	4/12/15	
Cerys Holmes	3/12/15	
Candice Sadouk		
Kim Banks	2/12/15	
Helen Pearson	3/12/15	
John McIntosh	2/12/15	
Anna Gillard	2/12/15	

5. The indoor facilities for the Andean Bears are insufficient. In accordance with 4.3 and 4.4 of the SSSMZP the breeding/sleeping dens for the Andean bears must be redesigned and rebuilt to bring their specification in line with modern husbandry standards. The rebuilt house must include facilities for the separation and direct visual assessment of bears, adequate ventilation, access for veterinary management, double doors for security, and a level of separation that prevents nose to nose, or visual contact, with other species in the main house. (6 Months)

ALREADY COMPLIED: Photographs confirming the changes to the bear house were forwarded to the LA on 13.12.16 some 6 weeks before the report was delivered, this internal housing situation was also seen and inspected by Mr Brash, one of the inspectors and BBC EHO on 16.12.16 Procedures in place show in the changes. However it must be noted that the basic design of the Bear House was given to the Zoo by the Bear Taxon Advisory Group of EAZA. It is designed to give specific welfare benefits and security. The dens do not need a redesign as stated but needed to offer a visual assessment more than the existing cctv already in place. This was done by completing the design as was in place but not completed when the inspectors first saw it. Full size access doors were fitted in place of low level doors and the ventilation modified. The separation in the catchment is done by procedural activity as can be read. Mr Brash the LA appointed Inspector agreed on 16th December 2015 that this condition was met, so we must again ask why it is on this list to be done within 6 months?? It is not relevant or necessary?



Safe Working Procedure

Section: **Bear & Howler Monkey Exhibit**

Species: Bear & Howler Monkey Exhibit	Date: November 2015 Amendments made: Dec 2015 Review: January 2015
Area/Task: Working safely within internal & external areas.	Approved By: Christina Fischer
You MUST have read the relevant Risk Assessment(s) along with this document before authorisation.	

Please be aware that you are working with DEFRA Category species 1 – however animals are assessed by behaviour monitoring – please consult your manager and refer to the risk assessment.

Before entering any building/enclosure you must inform all untrained person(s) of the risks within and what to be aware of when inside, outlining all the dangers of the animal.

If you are not certain that the person(s) will follow the rules and instructions then you must not allow them access into the building.

Howler Monkey Procedure

Under NO circumstances should a person enter a primate enclosure with a primate present without approval from a manager and without a manager or her delegate attending. **(Refer to Bear alongside this)**

- Before allowing the animals access onto the field, the enclosure must be checked to ensure it is safe to do so. This includes;
 - The electric fence - readings are to be taken; checking they are correct, if they are not then this must be reported to management immediately and recorded accordingly
 - All litter and objects to be found which should not be there should be removed.
- Before allowing complete access you must check ALL animals are accounted for.
- You may then allow the animal's access outside once it is safe to do so.
- You must ensure the padlocks and all working mechanisms are locked and secure preventing any public interference.
- Once the animals have full access to the field doors should always be shut and bolted (where appropriate) which can then allow you to carry out work in the internal areas.

Any problems which may occur must be reported to animal management immediately.

Working within internal dens – You **MUST** carry a radio at all times.

Keepers will need access to the internal den AM & PM every day. This will be for cleaning/supplying food or other duties. The strict procedure must be followed to ensure safe working practices.

When working within the den you must be vigilant at all times, if you are not fully confident about any locks/slides or the whereabouts of the animal you must not proceed with the task and leave the building, closing and locking everything behind you. If you feel that you are not in the right frame of mind/concentration level then it is important that you report it to your manager and that you do not work in these areas until you feel fit to do so.

- Before entering any of the three internal dens you must check that all internal doors are closed and secure and the animal is excluded. You will do this by using the CCTV system – you will check one den at a time.
- Once the animal is excluded you must close and secure the external slides – this will allow you to enter safely. Double check the animals are excluded by visually checking if they are within the outdoor enclosure. You must see each bear before continuing.
If at any time you are unsure/uncomfortable with the working mechanisms you are operating you **MUST** call for a manager.
- Once it is safe to enter you must use the keeper access door only

4. You must unlock the padlock and enter the corridor using the door at the end, closing the door behind you.
5. The entrance MUST be kept clear at all times.
6. Once the access slide is locked in the safety position you must display your 'Keeper in enclosure' signs clearly to ensure other members of staff know you are working in that area. *You must have access to these signs at all times and if they need replacing they must be replaced immediately.*
7. On entering you must give a radio call to make your section member(s) and manager aware that you are entering the den. **(All dens are numbered to allow the keeper to state where he/she is within the building when making the radio call) 'Tiger __ Entering Bear Den 1'**
8. This radio call must be answered by either your manager, or your fully trained section team member. You must not enter the den until you have received a reply. **Your whereabouts is vital at all times.**
9. When working within the internal enclosure you must be wearing the correct footwear and PPE where necessary.
10. When hosing or power washing in the den you must wear the correct PPE.
11. Once you have carried out routine tasks within the den, you will remove all equipment from the den leaving the area safe for the animal.
12. When leaving the den you must lock and secure the access slide behind you, double checking it is full locked.
13. Remove all signs that are in place and store them out of sight.
14. It will then be safe to give the animal access back inside.
15. Before doing so you must Radio call that you are leaving the den and all doors/locks are secure and that you are giving the animal access back inside. Await reply.

You must follow this procedure when entering any den. If you are moving from one den to another during your routine tasks, you must follow the procedure above to ensure a safe working operation. Always carry a radio with sufficient power levels and keep your section members and managers aware of your whereabouts throughout.

Breach of protocols and procedures are severely disciplined. Gross misconduct is a sackable offence.

Working in the outdoor enclosure

1. Before entering the outdoor enclosure you must first check that the animals are locked inside the house. **If you are not certain the animal is indoors you must check again. (This will also include Howler Monkeys)**
You must only enter the outdoor enclosure when you have secured and locked down all animals within the internal dens.

DO NOT UNDER ANY CIRCUMSTANCES ENTER THE OUTDOOR ENCLOSURE UNTIL ALL ANIMALS ARE ACCOUNTED FOR INSIDE AND ALL SLIDES ARE LOCKED AND SECURE.

2. Only fully trained keepers are to operate these slides/doors into the enclosure. Remember to always use door/slide handles and hold them in the correct manner to avoid any fingers/limbs becoming trapped.
3. Once secure you must display your 'keeper working in enclosure' signs to notify other staff that someone is working in the enclosure. These are removed as soon as work is finished and stored away out of sight.
4. All checks are complete and the animal is secure inside the house – you can then enter the outdoor enclosure. Please check your Howler Monkey procedure.
5. Before entering you must issue a radio call, making your section member, manager & all staff aware that you are entering the outdoor enclosure.
6. You must await a reply from your trained colleague/manager before you enter the enclosure, closing all gates/doors behind you.
7. Double check all your signs are in place to make personnel aware you are working in the enclosure.
8. When working in the enclosure, avoid any contact with the electric fence. If working in close proximity turn it off to minimise the risk. When turning off any electric fence you must radio call that you are doing so, stating which fence you are turning off, you must also do the same when turning the fence back on. Remember to turn it back on when you have finished.
9. Be aware of the terrain and position of enclosure furnishings; overhanging trees/branches, especially when working near the pond.
10. When using tools/equipment within the enclosure you must follow the safe working procedure for those tools and be aware of the risks.
 Ensure that when working at heights you must check the ladder is safe to use following the daily checklist. Monthly and Bi-Annual checks will also be carried out.
11. On completion of work in the enclosure you must close and lock all doors/gates behind you. Securing the

area.

12. You must take away all the signs that have been put in place when working in the enclosure and store them away out of sight.
13. Radio call that you are leaving the outdoor enclosure and that you will be giving the animal access back outside.
Before giving the animal outdoor access you must check all locks again to ensure everything is safe and secure.
14. When given a reply to the radio call, this then authorises you to give the animal the access to their outdoor enclosure.

Only authorised and trained staff are permitted to enter this exhibit – persons training or taking part in keeper for the day experiences are able to enter under the constant supervision of a trained and competent member of staff. Staff are trained from this working procedure and must follow it at all times when entering the enclosure to ensure that the keeper is working in a safe and efficient manner.

Indoor Catchment/Cage

Catchment – Treatment or Observations

Using the camera system and slide mechanisms the bears can be brought into the catchment area for treatment/observations. At no time should the bears be left within the catchment area unsupervised.

When it is necessary for the bear(s) to have access to the indoor cage facility all animals within the house must be excluded to avoid any 'nose to nose' contact or distress**

****Emergency situations may over rule. In these specific circumstances a divider can be used in order to avoid all visual and physical contact between animals.**

Greasing/Oiling

The mechanisms within the house should not need regular greasing. However a 6 month check is in place checking the cleanliness of the mechanisms ensuring they are in full working order and they are safe. If issues occur and they become consistent then the checks will become more regular.

Oiling the wheel mechanisms- sufficient oiling should take place at the same time as the 6 month checks to ensure the equipment is well oiled and in full working order.

Padlocks – the padlocks within the house should be checked everyday. When checking you should ensure they are in full working order; locking and opening efficiently. Oiling where necessary. This should then be recorded on your house check sheet.

NOTES

Documents Referenced:

SOPCARNIVORE1(layout and brief), BPArchived, PrProcedure

Consultation Reference:

Review of procedure according to Condition 5 Inspection Report Jan 2016

DA/CF – meeting 28.01.16

I _____ (insert name) have read and understood the above instructions and agree that I have had all instructions explained thoroughly to enable me to carry out my work in a safe and trained manner. I have also received a copy of the risk assessment

_____ (Trainee signature)

I _____ (insert name) have ensured that all the above information has been given to the trainee and (s)he has understood all the instructions and information given. I also believe that this person is competent and is safe to work within the stated area following these direct instructions.

your ref slszltd/201115



Karen Brewer <[REDACTED]>
to Richard, David, SAFARI

18/12/2015

Hi Richard

I am just confirming in writing the 2 matters you highlighted on your schedule dated 23.11.15, for completion within a month, namely the Tiger walkway, and New bear accommodation have been completed as shown to both yourself and Matt Brash on your visit on Wednesday 16.12.15. I trust on that visit you collated all the information you needed but should you need any further information please do not hesitate to come back to me.

Have a good weekend.

—
Karen Brewer

Marketing & Development Manager
SAFARI ZOO

South Lakes Safari Zoo Ltd
Melton Terrace
Lindal in Furness

6. In accordance with paragraph 5.1 and 10.1 of the SSSMZP all staff who work with newly arrived hazardous species [any animal listed in Category 1 of the Hazardous Animal categorisation (see Appendix 12 of the Secretary of State's Standards of Modern Zoo Practice)] not previously held in the collection (or not within other staff's past experience) must undergo a period of recorded training at a collection already holding the species. Evidence of this training must be forwarded to the Licensing Authority prior to the hazardous animal arriving on site. (Immediate effect). If staff have previous experience then that experience must be detailed including dates and establishments where the training was received and forwarded to the Licensing Authority 4 weeks prior to the animal arriving (Immediate effect)

Accepted and this condition was already in place over many years as ongoing – full records are in place and were available for inspection on the day. However clarification is sought as to whether previous experience of animals from the same family group counts as previous training. Eg: Tigers qualifies for Lions etc.

New Arrivals Information Sheet

Category:		Date of Arrival:	
Species & Latin:			
Quantity:	Gender(s): 1.	Age:	Name:
<i>If more than 4 please use continuation sheet.</i>	Gender(s): 2.	Age:	Name:
	Gender(s): 3.	Age:	Name:
	Gender(s): 4.	Age:	Name:
Imported from:		Time needed in Quarantine:	
		Care of which section?	
		Section Keepers:	
Risks of the animal	SID Serious Injury or Death		Other:
	BSSI Biting, Scratching or serious Injury		
	KR Kicking Risk		
	SS Strangulation or suffocation		
	NV No venomous snakes on site		
	CKR Carry special kicking risk		
Dietary Information:			
Habitat Information			
Husbandry Information			

7. In accordance with 4.3 and 4.4 of the SSSMZP the indoor facilities for the group of baboons is insufficient and must be upgraded or replaced to provide increased space for the animals when they are indoors for prolonged periods, e.g. during the winter. The indoor quarters must also allow for a developed programme of enrichment, e.g. deep straw litter and scatter feeding. (1 Year)

Accepted and plans for this were made in 2012 and will be done as soon as the Rhinos are moved out.

8. Any organised sessions of public feeding of animals involving raw meat and fish must be the subject of a written risk assessment and protective gloves provided as appropriate. (Immediate)

COMPLIED Public feeding of penguins, giraffes, lemurs is one of the contributing factors to the overall success of the zoo, by that close personal unique encounter a visitor builds empathy with the animal, and then education issues of the "special attributes" of that animal and conservation issues of why and how this animal is in threat and what me as an individual can do about it become somewhat more easier to take on board.

Penguin feeding has been carried out without incident in the zoo since their arrival in 2006, we are committed to funding a conservation project, protecting the penguins, and all the other animals that live beside it, their natural habitat and reintroducing penguins back to the wild in Peru. In 2013 just 12 Humboldt's penguins were counted in the region, an area where they used to occur in there hundreds, our contribution to this project in 2015 exceeded £30,000 and funds from penguin feeding is a vital source of income.

We have fully risk assessed the activity, the fish in use is human graded, and we felt a strong message to be delivered by the keeper as to the issues of contamination as well as having gloves available for those with immune deficiencies or if people wanted to purchase was an appropriate control. We will continue to monitor the situation. Hand wash with soap is available at the facility.

South Lakes Safari Zoo Risk Assessment – Hand Feed Penguins - Supervised			
LOCATION: Penguin Exhibit		Date: January 2016	
DOCS REF: ACSRA15,	Assessed By: Management Team		Expiry: January 2017
			Review: June 2016
Humboldt Penguin – Category 2 This feeding will be supervised by a fully trained keeper.			
HAZARDS	PERSONS AT RISK	CONTROLS TO MINIMISE THE RISK	ANY FURTHER NECESSARY ACTIONS
Direct Contact with the Penguins	Employees & Visitors	No barrier between 'person & animal' therefore the keeper supervising the feedings must be vigilant at all times. Ensuring that they make people aware of the risks and do not allow the area to become overcrowded. (See below). The correct signage is in place – knowledge of the risks are highlighted to visitors. Keepers demonstrate the correct way of hand feeding the penguins. Reducing the risk of animal bites, scratches.	
Handling the fish - Preparation	Employees	When preparing the fish within the kitchen the fish will be prepared on the 'fish counter' which is cleaned before and after use with the correct cleaning agent. Keepers will wear gloves at all times. The correct chopping boards are to be used (Blue) Keepers will use the appropriate equipment for the job as labelled. Strict, clear hygiene rules are in place which keepers must adhere to.	Clear signs are in place in the meat/fish prep area to separate the 2 areas avoiding cross contamination.
Handling the fish - Visitors	Employees and visitors	VISITORS ARE TOLD, PRIOR TO FEEDING THE PENGUINS THAT THEY ARE TO WASH THEIR HANDS AFTER HANDLING THE FISH AND FEEDING THE PENGUINS. Gates, barriers and signs are cleaned daily and are checked prior to the talk & feeding. All enclosure furniture that can be contacted must be clean of faeces and any dirt. During the talk the keeper must give a clear, forceful instruction to the visitors to wash their hands with soap and water immediately	Hand washing sink is located across from the penguin enclosure entrance gate.

		after taking part in the hand feeding. Gloves are also offered to visitors before they take part in the hand feeding once they have been given specific guidance from the keeper supervising the feeding – this is aimed at person(s) who are most vulnerable to infection e.g pregnant women, young children, elderly.	
Contact with the penguin pool content	Employees, visitors	Only authorised people are to cross the barriers in place. The correct procedures are in place within training for this to take place in a safe manner. Penguin pool water is tested regularly by a fully trained keeper. There is a standoff barrier within the exhibit with clear signs which separates visitors from the pool, ¼ of the area is divided with a concrete barrier.	Warning signs are in place.
Slips, trips within the visitor area.	Employees, visitors	The visitor area of the enclosure must be kept free of obstructions, dirt, faeces and any trip, slip hazards. Fully trained keepers must ensure the area is checked before open to the public and it is safe for them to enter. Any areas which become 'too wet' should be swept clear immediately.	
Overcrowding	Employees, visitors	The area must not become overcrowded. The number of people entering the area must be kept under control by the supervising keeper. Assistance must be called for as soon as it becomes necessary.	
Assisting the animal carer	Employees, volunteers, authorised visitors, keeper for the day	During busy periods there may be a time when a volunteer or another keeper is asked to assist the keeper when carrying out penguin feeding. The keeper assisting will have relevant training for this task.	
SHP14 is given to employees at the start of their employment and reviewed throughout ensuring they have a full understanding of the risks.			

9. Although there are signs in the park prohibiting direct public contact with the lemurs there is a large photograph at the entrance showing (and implicitly encouraging) direct public/lemur contact. This sign must be removed or replaced. (Immediate)

COMPLIED Whilst we disagree with the “implicitly encouraging” comment.... the photograph has been removed We would like to see consistent application by DEFRA Inspectors of guidelines such as this one to other zoos. Other zoos openly promote by leaflet or web photo the touching or stroking of lemurs. We have a very strict policy not to allow this.

10. A lifebelt and a sign with emergency instructions must be provided at the top pond/ walkthrough. (3 months)

ALREADY COMPLIED This was in place seen and inspected by one of the inspectors and BBC EHO on 16.12.16 so why is included with a 3 month timescale when already done? This could have been left off?



11. In accordance with 1.3a of the SSSMZP a functioning fly killer must be provided in the fruit/veg kitchen store area. (3 months)

COMPLIED Completed in place.



12. The quarantining of, or housing of newly arrived, birds within the same air space as birds already within the collection is poor practice and must cease. In accordance with 3.19, 3.21 of the SSSMZP written protocols must be produced, with advice from the veterinary consultants, for the housing and quarantine of any animals introduced to the collection or accepted as rescue animals. Staff must receive training on the protocols and their implementation and this should be documented. (6 months)

Condition 18 of the present licence relates to veterinary services. On 13th August 2015 BBC Licencing Committee accepted veterinary procedures and protocols were in place which included a quarantine procedure. That bird was placed in that unit in contravention to the quarantine procedures in place, the animal manager who made this decision is undergoing retraining in the protocols and their implementation.



Quarantine Procedures

- All staff must pay particular attention to personal hygiene practices at all times.
- Quarantine rules require all external clothing to remain within the quarantine zone, including footwear and gloves etc.
- All staff entering the quarantine area must wear designated overalls provided. These must stay within this area and not be removed until the animal is out of quarantine.
- Gloves must be worn when handling animals and also when direct or indirect contact to faeces and urine is likely.
- Footwear must be washed and disinfected every time the area is left, the foot dip must be used on the footwear kept in the quarantine area and on the keepers footwear before leaving this area. This must be reported to management when running low.
- Equipment used in one area is designated to be used only in the area. Once finished with it must be sterilized and taken to the admin office for storage.
- Hands must be washed and disinfected before handling the animals or food for own consumption
- Any injuries received which involved skin penetration must be washed and disinfected immediately. This is especially important for bites and scratches from the animals.
- Animals must remain isolated from all other animals not undergoing quarantine conditions.
- Doors must remain closed at all times, it is not permitted to prop open the doors at any point. Every quarantine area has a safety catchment area therefore the animal would not come into contact with any outside area until out of the time period.
- Animals are not to be relocated or moved without the vet being contacted or until quarantine has been signed off.
- All waste must be kept separate in a designated area to be disposed of under normal circumstances at the end of quarantine.
- Management will authorize designated staff which are permitted to enter the quarantine area.

13. There is evidence that the vermin control in the dry food storage area specifically, and more generally throughout the park is still inadequate. In accordance with 1.3a and 3.35 of the Secretary of State's Standard of Modern Zoo Practice (SSSMZP) a report must be produced for the Licensing Authority by an independent professional pest control company on the safe and effective control of rodent vermin (within 3 months). The Zoo must then implement the recommendations of that report (within 6 months)

COMPLETED The zoo has already carried out this procedure – the documentation was available for inspectors on the day. On 20th August 2015 a pest control survey was conducted by Rentokil on the zoo premises, issues raised by this report in bullet point format for easy reference were:

- 1) There is a rodent issue on site
- 2) Reasons given for this include the ready availability of food, water and the relative safe nesting with protection from predators
- 3) A gelatine based bait would be more palatable to rats and thus more effective, replace current product and consider using glue boards.
- 4) Increase number of bait boxes
- 5) Targeted use of bait, in any form.

As a result of this survey, the zoo identified two champions from the animal care team to drive the issue forward, the rationale behind this being this was that with intelligence fed from the other members of the team, they could be proactive in bait placement.

Additional bait boxes were purchased as well as two new types of rat bait namely Romax rat cp Coumatetralya blocks and jade cluster bromadiolone packeted bait, the purchase and move to these bait types was a direct result of the Rentokil report.

The daily check sheet was amended, that allowed the easier recording and monitoring of the bait that was deployed and where, so allowing for hot spot identification, providing a visible system that allows staff to see where that bait is being eaten and concentrate accordingly on those areas. These sheets are also submitted to the to the administration office, so they are able to verify sufficient attention is being paid to the issue.

Following a review of the action being taken in respect of this issue which took place on 12th January 2016 it was noted that whilst the champions were being proactive in their work, their core role responsibilities at times stopped them from being as totally pro active as management desired. Management made the decision in light of this review to increase the hours worked by a part time member of staff to full time, this has resulted in this member of staff being able to devote 20 hours a week to this issue exclusively. Any gaps in this cover is maintained by the previous animal champions and as of 28th January 2016 this change in tactics has resulted in the destruction of most of the noted occurrence.

Since the review was carried out in August, additional bait boxes have been purchased and there are now 50 deployed around the park and additional bait has been bought and placed 9 orders for rat bait and has been placed. Since August 2016 Safari Zoo has spent £2,985 to combat this issue.

To ensure continued work in this area have adopted the following action plan in SMART (Specific, Measurable, Achievable, Relevant and specific Timescale)

S- To continue following the recommendations within the Rentokil report to combat the 'rat' issue within The Safari Zoo

M-Number of destroyed rats, amount of rat bait used and the rate at which it is used.

A- By the employment of a member of staff specifically to combat this issue, not distracted by any other core role and the continued purchase of necessary equipment.

R- The issue Safari Zoo has with rats as per Rentokil report

T- A calendar year from 20th August 2015, as this action has been on going from the date of the Rentokil report.

Note: As seen from this report the achievable/methodology will be monitored as amended as deemed necessary.

Survey Findings

Whilst carrying out the survey, pest activities and / or pest risks were found to be present on the premises. These are listed below and give you the detail of any infestation or potential risk, the type of evidence that was found, the level and location of the activity or risk and any site specific notes.

Rentokil Pest Control operate using an 'ERDM' framework. This model allows us to assess a complete solution and the corresponding benefits to the customer in the following ways:

EXCLUSION = We work with the customer to ensure that the pests in question are kept outside of the area of concern to prevent further ingress.

RESTRICTION = We can provide advice to the customer to help significantly reduce the risk of pest infestations.

DESTRUCTION = We will make recommendations for methods to actually control the pest issue.

MONITORING = We will monitor on-going control of potential or current pest issues to avoid continued concern for the customer.

Rodents

Pest Detail:	Evidence:	Activity Level:	Location:
Brown rat			

Notes:

The survey is as follows: There as you are aware a very large rodent issue on site. During the survey live rats where seen in large numbers in all areas. There are multiple reasons for this the first being that food and water is very available. Also due to the nature of the business being a zoo there are lots of harbourages for the rodents to nests without fear of predators well some

During the visit I was stood with visitors who I actively heard commenting on seeing the rats who were running out feeding with the zoo's birds.

I reviewed the pest control on site and its clear why things are failing. The baiting is not being carried out in an effective way and due to the amount of food for the zoo animals this needs to be increased more than you would usually do as we have to compete with the available food sources and also in a safe way.

My personal feeling is the bait used for the rats is not ideal it's dry and not very palatable we use gelatine based block bait which is more suitable for rats.

We need to increase the amount of perimeter bait boxes I was informed you had fifteen approximately this need increasing to another fifty and possibly more. This is to reduce any non-target species coming into contact with the Pesticide but also the public as I found three external bait stating I could pick up two of which were in a dining area.

If a child picks it up the rodenticide can potentially fall out and be eaten by non-target species but also it is a risk of being handled by the public.

These should be fitted in key locations as little visible as possible but also fixed down and as close to the target species as possible.

To treat this site is very difficult and we need to work together in helping to deal with this issue. I believe you would receive many recommendations from our technicians on the site to help in control.

It was identified there are many internal areas the rats are using and baiting here should be very effective but also we could carry out some glue board treatment such as the animal kitchen. There are stick guide lines in carrying out this procedure as it's a live catch so they be must put down and lifted each day dispatching any rodent caught and they must be inspected every 12 hours.

One final point to make and to be aware of is. If you are seeing rats during the day is a key indicator the numbers are very large as they are nocturnal by nature as they have very poor eyesight and the only reason a rat comes put during the day are for two reasons. Firstly there may be a shortage of food and water; this is certainly not the case at the zoo as there is an abundance of both.

The second is the harbourage is full and there is no room to fit in so the rats go out. This is the most obvious issue and not good for the site.

However with the right partnership I believe we can deal with this issue and get it to manageable levels.

You are at risk from: House mouse

Customer recommendations:

(Destruction) To control the current Rat activity being experienced and to monitor for future infestation an external baiting program is recommended using plastic bait boxes installed around the premises and secured to the building. Once control has been achieved toxic baits will be changed for non-toxic blocks to monitor for future activity and re-introduce toxic baits when rats are present to help prevent infestation becoming established in and around the building. Placing a number of plastic bait boxes around the premises containing chronic rodenticide which Rats sporadically feed from. These are checked and replenished as necessary by trained technicians and the toxic bait removed or replaced with non-toxic/environmentally safe monitors when rat activity has ceased.

(Destruction) Given the high levels of rodents present an intensive sticky board treatment is recommended to reduce the problem quickly. Glue boards will be placed throughout the premises where rats are running. The rats get stuck on the glue board and are dispatched by the technician who is required to visit every 12 hours the glue boards are on site. All details have to be recorded and logged to comply with BPCA regulations

(Monitoring) To control the rodent activity you are currently experiencing and to monitor for future infestation an internal and external baiting program designed to fit the environment and levels of infestation is recommended. Placing a number of tamper resistant bait boxes internally throughout the premises containing chronic rodenticide which rodents will feed from. Externally metal bait boxes around the premises will be filled with chronic poisons for rats to feed on when there is an infestation present and with monitors when no infestation is present. These are checked and replenished as necessary by trained technicians at suitable intervals to comply with your pest site risk assessment for example 12 monthly visits per annum.

14. The mesh 'cage' preventing tamarin access to an electrical installation in the Amazon House was ineffective, and the electrical equipment may present a hazard. In accordance with 2.4 of the SSSMZP all plant and fixed equipment, including electrical apparatus, must be installed and maintained in such a way that they do not present a hazard to animals, and their safe operation cannot be disrupted by them. (3 months).

COMPLETED



15. The insulation in the roof of the Andean bear dens must be protected to prevent the peafowl from eating the insulation material. In accordance with paragraph 2.3 of the SSSMZP Enclosures must be maintained in a condition which presents no likelihood of harm to animals.(1 month)

COMPLETED Photographs confirming the changes to the roof in the bear house were forwarded to the LA on 13.12.16 some 6 weeks before the report was delivered, this was also seen and inspected by Mr Brash one of the inspectors and BBC EHO on 16.12.16



Karen Brewer <[redacted]>
to Richard

13/12/2015

Images as promised

14 Attachments



16. In accordance with 8.24 and 8.9 of the SSSMZP effective non-touch barriers, e.g. a stand-off barrier, for the public must be provided at the area of Andean bear fencing in proximity to their access to the dens. (3 months)

COMPLETED As above Photographs confirming the changes to the safety fence were forwarded to the LA on 13.12.16 some 6 weeks before the report was delivered, this was also seen and inspected by Mr Brash one of the inspectors and BBC EHO on 16.12.16 Therefore why the condition on here? Or time scale for completion?

17. In accordance with 8.6 of the SSSMZP the top lemur house has no effective public barrier preventing access to the house and its doors. The house and enclosures must be kept locked at all times when no keeper is present. (Immediate) .

COMPLETED The effective barrier was and is indeed in place with a do not cross the barrier signage over 25meters from the door in question. No member of the public has any access to this area. However the condition has been met in full and completed

—

18. The temporary enclosure made of hay bales, pallets and bale twine in the Africa House is completely inadequate and has resulted in escapes into the house. In accordance with 2.3, 8.6, 8.7 of the SSSMZP this must be made secure to modern zoo standards to prevent further escapes. (1 Month)

ALREADY COMPLETED Although bales did form temporary accommodation, that accommodation was fully approved as suitable by Mr Brash, one of the inspectors during a special inspection on 23.4.15. Photographs confirming the bales were removed and showing the animals moved to the finished pens (as below) were forwarded to the LA on 13.12.16 some 6 weeks before the report was delivered, this internal housing situation was also seen and inspected by Mr Brash of the inspectors and BBC EHO on 16.12.16

So once again why the condition when it was fully complied with and inspected as such?





Inspection of the Zoo

Inbox x



Richard Garnett

to David, SAFARI, Karen

14/12/2015

Dear Mr Gill

There were a number of items that the Zoo Inspectors wanted dealt with as a matter of urgency, The Africa House and the Stand Off Barrier at the Kangaroo House. I have received pictures from Karen that suggest this work has been completed and would like to visit with Mr Brash on Wednesday at 2pm to review the works done and ensure that it is suitable.

At the same time I would like to discuss the hot water provision for customers as at the November inspection it was discussed that hot water boilers were due to be fitted.

Richard Garnett
Principal Environmental Health Officer

Agenda 7 item response.



Karen Brewer

to Richard, David, SAFARI

13/12/2015



Dear Richard

Please find response to Agenda Item 7 to be distributed to members prior to Thursdays meeting. The straw bales have all been removed and there are images of the animals in there internal stabling in the African house to follow.

I also inform you the insulation of the roof within the bear house, has been covered and changed, and the "stand off safety barrier" outside at the bears is in place. (Images to follow also)

--

Karen Brewer

>
> Marketing & Development Manager
> SAFARI ZOO
>
> South Lakes Safari Zoo Ltd
> Melton Terrace
> Lindal in Furness
> Cumbria, LA12 0LU
> Company Registered in England No: 3561692
> VAT no: 621 3114 96
>
> www.safarizoo.co.uk
> Tel: 01229 466086 ext 0
>
> WE DON'T JUST TALK ABOUT WILDLIFE CONSERVATION WE ARE DOING IT EVERYDAY.....

The end of the housing where the bales were



Karen Brewer

to Richard

13/12/2015



19. During the completion of the indoor accommodation of the Africa house the animals already present in the outside enclosure, occasionally, cannot or will not use the Africa House for shelter. In accordance with 2.2 of the SSSMZP additional shelter must be provided in the outside enclosure to accommodate all species. (1 Month)

ALREADY COMPLETED Firstly, there was already at the inspection outside shelter in the field? We fail to see how the inspectors did not recognise this huge shelter? The internal facility was always available for shelter 24/7. See above all internal accommodation complete Photographs confirming the bales were removed and showing the animals moved to the finished pens (as below) were forwarded to the LA on 13.12.16 some 6 weeks before the report was delivered, this internal housing situation was also seen and inspected by Mr Brash, one of the inspectors and BBC EHO on 16.12.16

So why the condition when it is already clearly agreed and complied with ?

20. A number of lame flamingos were observed, and the flooring of the new flamingo house is plain concrete. In accordance with 2.2, 4.3 and 4.4 of the SSSMZP the floor in the Flamingo House must be the subject of review by the veterinary consultants and suitable flooring/substrate put in place to improve the health of the flamingos' feet. (6 months)

We totally refute this statement and question the judgement and professionalism of the comment as the admission was made it was from a passing walk on the way to other housing and not from a proper and professional view or assessment. Y one of the Inspectors claims to have witnessed this.

We have written confirmation that we have not had a lame flamingo at any time since the movement in April 2015 to the new facility. Both contracted Vets will confirm this and the records show no treatment or issues recorded of lameness in that time. We have indeed had the best foot/leg health in the flamingos since we used the new flooring in the history of keeping flamingos for the last 15 years. The flooring was sealed with a non slip specialist sealant and there is no contact between the birds feet and concrete due to this barrier. There are no plans to change the situation unless of course Veterinary advice from the Zoos own team show the need. We do not wish to change a perfectly healthy situation .

21. In accordance with 1.1, 1.12 and 1.13 of the SSSMZP a full review of diets and nutrition across all species, in consultation with the veterinary consultants, must be carried out. Records of all diets and the changes made must be documented and kept. (6 months)

Dietary review is something we as animal carers do on a regular basis with changes in groups, seasons, as knowledge changes. Accepted

22. In accordance with 2.3 of the SSSMZP the corner of the Andean bear enclosure that tapers to a point (adjacent to the perimeter of the new rhino paddock) must be rounded off with the electric fencing to prevent one bear being cornered by another in the event of conflict. (3 months)

We have looked at this issue and cannot see where a conflict would occur and wonder whether the fencing has been assessed correctly as there is no taper in this fence as suggested. We invite a re inspection if it is deemed necessary to show this?

23. The overall veterinary programme in the Zoo is inadequate and must be radically revised to bring it into line with modern zoo veterinary practice. In accordance with 3.7, 3.8, 3.9 of the SSSMZP a written outline of this revised programme must be produced and submitted to the licensing authority, (3 months) and implemented. (See explanatory notes above).

Condition 18 of the present licence relates to veterinary services. Following an inspection on 28-29 January 2014 the zoo were issued with a directive order pertaining to the veterinary services outlines the shortcomings and necessary procedures/ protocols to be put in place. On 13th August 2015 BBC Licensing Committee were advised by Mr Brash one of the inspectors and EHO the veterinary directive order had been complied with "the Zoo now has in place suitable arrangements which comply with the requirements of the Direction Order"

How now just 3 months later is that programme "inadequate and needs to be radically revised to bring it into line with modern zoo veterinary practice." ? this statement is contradictory , inconsistent and causes deep concern to the Zoos management in that it seems "goal posts" are being moved by inspectors to create a false image of the Zoos professional application to such a serious and important aspect of our operations.

Zoo vet Rick Browne is contracted to visit the zoo weekly if necessary, during the year period (10 months) up to the November inspection, he visited the zoo on 47 separate occasions. This equates to the attendance required? Why then the comment ?

A vet co-ordinator is on site daily and is responsible for Preventative protocols, vaccinations, PM protocols Vet visits, telephone advice given is all fully documented. All this documentation is then disseminated to the MRCVS locally and to our International ZOO Veterinary specialist monthly for their input, comments and suggestions – full records are in place and were available for inspection on the day. Andrew Greenwood, of IZG, who is also an active DEFRA Zoo Inspector is contracted to oversee the vet programme , he visits monthly and is on 24/7 contact availability, therefore he refutes any programme shortcomings.

ZOO LICENSING ACT 1981 – SECTION 16(A)2

Direction to comply with a condition attached to a licence to operate a zoo.

To: Mr. David Gill

At: South Lakes Wild Animal Park,
Broughton Road,
Dalton-in-Furness,
Cumbria LA15 8JR

Take notice that Barrow Borough Council having given you the opportunity to be heard, is not satisfied that in relation to South Lakes Wild Animal Park a condition attached to your licence dated 8th June 2010 which required you to

Condition Number 25. Delivery of Veterinary Services

The delivery of veterinary services to and in the zoo, is still unclear and in some areas appears uncoordinated.

The operator must, in conjunction with the Zoo's veterinary advisor and/or other such professional advice as deemed necessary, develop to the modern standards of good zoo practice and implement, an improved and clearly defined programme, for the delivery of veterinary services to the collection. (This must include the additional and extended collection). This programme must detail: the frequency of routine visits, duties expected of the Vet, routine prophylaxis (vaccination etc), agreed surveillance policy – to include screening, post mortem protocols, transmission & recording of p.m. records & pathological results. All relevant information must be integrated into the animal records system, such that, information on any individual animal is quickly and easily retrieved. Agreed protocols for relevant veterinary cover when the principal vet is unavailable, must be clear. A written copy of the final procedures must be lodged with the licensing authority within 3 months & clear evidence of implementation provided within 6 months.

is met.

The above licence condition is not met in relation to the whole zoo.

Barrow Borough Council hereby requires you to take the following steps to ensure that the licence condition is met,

Directions

- A Biosecurity Programme must be put in place in accordance with 2.9 and 3.9f of SSSMZP (Secretary of State's Standards of Modern Zoo Practice) to include actions to minimize potential disease transmission around the site, including staff uniform and protective clothing management, protection of collection animals from diseases carried from wild animals, actions to be put in place when animals are suffering from infectious diseases and actions in response to disease outbreaks in the local area surrounding the zoo.
- A Health Monitoring Programme in accordance with 3.9c, 3.9d and Appendix 5.1 of SSSMZP to include routine health monitoring of the collection with particular focus on screening of EC Directive 92/65 Appendix A listed diseases and zoonotic diseases including, but not limited to Chlamydiosis, E.Coli, Salmonella, Tuberculosis sp., Brucellosis sp.
- An Imported/Added Animals Protocol in accordance with 3.21 of SSSMZP including routine disease screening to contribute to the Health Monitoring Programme described above. This protocol must describe which diseases are of concern to the collection and what action should be taken if an animal intended to be imported, or on arrival to the collection is found to be carrying such a disease.
- In accordance with 3.12 of the SSSMZP, the complete veterinary programme should be formally reviewed by the zoos veterinary staff and animal management team on a six monthly basis to identify trends and disease patterns, cases of concern, areas for further development, issues for further investigation and veterinary issues which may be influenced by animal management, husbandry or nutrition. Minutes must be provided and an action plan produced following each meeting.
- In accordance with 3.3 and 3.11 of the SSSMZP accurate, detailed and comprehensive veterinary records for clinical cases, post mortem examinations, laboratory reports, preventative medicine, disease surveillance and health monitoring must be kept on the zoo site with immediate access to inspectors. They must be recorded on ZIMS and be updated to be correct within 72 hours of the activity.
- In accordance with 3.9g, 3.17 of the SSSMZP, all dead animals must have a gross post-mortem examination completed within 48 hours of death by a veterinarian. This does not need to compromise compliance with Appendix 5.19, as methods to preserve suitability of specimens for research purposes are available. Compliance with Appendix 5.19 is NOT a suitable alternative to this requirement. In compliance with 3.17 samples for diagnosis or health monitoring should be taken. In accordance with 3.18 a reference collection of formalin stored tissues from animals which die should be established. A decision tree, which explains which animals will undergo further histological or other advanced diagnostics should be produced.
- In accordance with Appendix 5.13 of the SSSMZP the zoo must be compliant with veterinary medicines legislation. All out of date drugs must be identified and removed on a monthly basis. A full drug inventory in line with current

Veterinary Medicines Directorate legislation must be kept. Breach dates must be recorded on the drug. The Veterinary Medicines Directorate should under take an inspection and advise if the zoo requires separate authorization or if the veterinary facilities, should be listed as a 'holding location' under the consultant veterinarians licenses.

- In accordance with the Zoos Expert Committee Handbook Chapter 5 Appendix 1 any veterinarians associated with the park in any capacity for more than 3 days per 12 month period, must demonstrate, through a formal interview process, understanding of current veterinary legislation relevant to the operation of the licensed premises with particular reference but not limited to, the requirements and their duties under the Zoo Licensing Act 1981, the 'Balai' Directive EC 92/65 and the Veterinary Medicines Regulations 2006.
- In accordance with the Zoos Expert Committee Handbook Chapter 5 2.1 all veterinarians working at the zoo for more than 3 days per 12 month period must demonstrate CPD participation according to Royal College of Veterinary Surgeons requirements by providing the inspectors a completed official RCVS CPD card on request.

These steps completed within three months from the date of this direction.

The Zoo specified above need not be closed to the public during the period specified for your compliance with this direction.

Failure to comply with the direction may (if appropriate) lead either to the closure of the zoo by a Zoo Closure Direction (under section 16B) or to alteration of your licence under section 16(1B) so as to require that a section of it is closed permanently to the public.

Your attention is drawn to the notes overleaf which include details about appeal against the direction. This direction shall not have effect during the period within which you are entitled to appeal against it nor, where you have appealed, during the subsequent period before the appeal is either determined or abandoned.

Signed

Date

Name and designation:.....

Barrow Borough Council,
Environmental Health Department,
Town Hall, Duke Street,
Barrow-in-Furness,
Cumbria LA14 2LD

Tel: (01229) 876543 Fax : (01229) 876411 email: commercial@barrowbc.gov.uk

iii) Veterinary Services (Condition 18)

Condition	Findings of Fact	Decision	Reasons
1. Compliance with Direction Order relating to Condition No. 18 – Delivery of Veterinary Services	<p>Following a Special Inspection undertaken in January 2014, the Inspectors had recommended that a Direction Order be served for non-compliance of condition a condition originally placed on the licence in 2009.</p> <p>A Direction Order was served on 1st July 2014 making a number of demands of the Zoo. The Committee noted the following:</p> <p>A review had been undertaken by the Council, with advice from Public Health England, which concluded that the Biosecurity Programme was suitable.</p> <p>The Zoo now has in place, suitable controls and procedures for monitoring the health of its animals.</p> <p>There is a program of phased introduction of new animals to their new enclosures and the Zoo is aware of quarantine requirements with the import of live animals.</p> <p>An Inspection in November 2014 and subsequent check in February 2015, demonstrated that the veterinary programme was in place and working satisfactorily.</p> <p>The process of ensuring that all animals could be traced through the veterinary care process from diagnosis to treatment and then, when necessary to gross post mortem and laboratory testing had been demonstrated to work satisfactorily.</p> <p>The process of gross post mortems had been established and carried out by the Zoo.</p> <p>Leading vet Andrew Greenwood has worked with the Zoo to ensure that they are compliant with veterinary medicines legislation.</p> <p>During the Inspection in November, 2014 and the subsequent visit in February, 2015 the Zoo were able to demonstrate that they have in place a stable Veterinary Team.</p> <p>The Zoo has policies in place to determine the veterinary care that is given to the animals both as routine practice and in emerging situations.</p>	The Direction Order has been complied with.	<p>The Zoo now has in place suitable arrangements which comply with the requirements of the Direction Order.</p> <p>Whilst the full wording of the Condition has not been met, it was acknowledged that the experience and qualifications of the Veterinary Team was suitable.</p> <p>Matt Brash, the Council's retained Veterinary expert expressed his support for Andrew Greenwood, the Zoo's retained Consultant as a zoo expert and DEFRA Zoo Inspector, informing members he was "at the top of his game".</p>

24. The Inspection team noted that there had been a number of bites reported. In accordance with paragraph 6.14 of the SSSMZP a full written review of incidents of members of the public being bitten by animals must be carried out and an action plan adopted to reduce the number of bites. A copy of the report and the action plan must be forwarded to the LA. (3 months)

Please note that none of these bites were serious but were recorded as part of our obligation under the Act.

Written review

In the calendar year 2015 there a total of eight reported incidents where a member of the public has been bitten by animals within the safari Zoo , none of them resulted in a serious injury that required other than minor first aid treatment. Below is the list of incidents :

Date	Location	Animal	Level of injury	Occurrence
18/02/15	Tropical House	Tamarin	slight scratch	child too close
13/05/15	Lemur feeding area	Lemur	drew blood from finger	
01/06/15	Lemur feeding area	Lemur	small cut	
10/08/15	Aviary threatened by camera	Condor	small puncture wound	Peck as bird
19/07/15	Bush area	Prairie Dog	Bite	animal
22/07/15	Bush area	Squirrel monkey	Bite	animal
24/08/15	Bush area duck being fed	Squirrel monkey	Bite	animal tried to steal food as
09/10/15	Aviary	King Vulture	Bite	Bird bit as photograph being taken

An examination of this data would suggest the areas where incidents have occurred can be broken down in to three areas namely , the lemur area , the bush area and the Illesces aviary and each area will be examined in turn with an action plan set accordingly in SMART (Specific ,Measurable, Achievable ,Relevant and within a Timescale) format.

LEMUR AREA

Both instances occurred when supervising keepers were present and occurred during the first half of the calendar year, with no reported re occurrence in the second half of the calendar year.

Bearing in mind the present time of the year as the season is about to start , the action plan will be set to reflect this calendar occurrence

S - To remind / retrain keepers of the need to raise awareness of the public during periods of contact that these animals can bite

M - By the number of reported bites and completion of required training reminder.

A - To complete a reminder training session with animal care team , with the aim of ensuring that keepers raise awareness of the potential of these animal biting during relevant 'health and safety' talks , this is reflected in the Animal Contact Situation – Risk Assessment

R - Two contacts have resulted in minor bites

T - A year, in order to compare calendar year with calendar year. Reminder training to be delivered within one month .

WORLDWIDE/BUSH AREA

The Bush or worldwide safari area has three reported bites and proximity to animals which should be under observation. As a result the action plan will concentrate on this issue

S – To raise awareness to the public that animals can bite and that food should **only** be given to certain animals within that area (namely Kangaroos , Wallabies , Emus , Ducks , Geese, Peacocks and swans).To ensure all staff deployed in this area be they animal care team or volunteers are trained accordingly.

M- By the reported number of bites

A- All animal food to be sold in bags which clearly state which animals can be fed (already happens) , signage to reinforce this message to be placed , ensure staff deliver ' health and safety' brief to customers purchasing this animal food (to be part of relevant staff induction packages) and ensure staff in relevant area challenge customers who breach this zoo rule.All relevant animal care team to have reminder training and relevant risk assessment to be raised in all volunteer induction.

R- Three contacts have resulted in minor bites

T- A year, in order to compare calendar year with calendar year. Reminder training for the animal care team to be delivered within one month.

ILLESCES AVIARY

In the aviary there have been two minor incidents in the calendar year and in both of these cases the person involved has been carrying camera equipment, as a result the action plan will concentrate on this issue

S- To raise awareness to the public who enter this area of the perceived threat that some animals may feel by some types of camera equipment

M-By the reported number of bites

A- Appropriate signage being displayed at entrance to aviary in question

R-Two contacts have resulted in minor injury

T-A year, in order to compare calendar year with calendar year.

The remaining issue was not a bite but a scratch as a member of the public entered an animal house and there has been no repeat of this issue , suggesting no pattern that can be actioned.

25. In accordance with 1.3d of the SSSMZP dedicated staff hand-washing facilities must be provided where raw meat is handled i.e. in the meat preparation area. (6 months)

COMPLETED



26. In accordance with 1.3d and 1.5 of the SSSMZP if the preparation of raw meat and raw fish is to continue in the same room it must take place in designated separate areas with separate utensils to avoid cross contamination particularly of fish for the penguins. (1 month)

COMPLETED: Completed designated separate areas, with colour coded boards utensils and table edging in place.







27. The details of the ethical review process must be recorded and must be made available to the zoo licensing process. (3 years)

ACCEPTED

28. Although a wire mesh has been nailed onto large areas of the wooden walkways, in many areas this is already coming loose, and will be a trip hazard. In other areas no non slip surface has been provided. In accordance with 8.15 SSSMZP all walkways that are constructed of wood must have a surface that will prevent, as far as is reasonably practical visitors falling or tripping. (6 months).

ALREADY COMPLETED An assessment regarding the suitability of surface was carried out together with a study of best practice in other establishments. Many outdoor attractions including Martin Mere – WWT, utilise the same materials. A copy of that assessment together with routine maintenance procedures and checks in place were forwarded to LA on 20.1.16 a week before the report was delivered.

Improvement Notice - WALKWAYS



Risk Assessment attached for walkways in accordance to improvement notice. We...

20 Jan (9 days ago)



Karen Brewer to Richard -

20 Jan (9 days ago)

As promised Richard

We have taken the time to also look at daily checklists - which form part of section training, and to introduce a weekly one which is physically carried out and recorded by a member of staff and includes far more than walkways but areas we feel we want that check (almost a management control). Full training of all has been delivered to both keepers and maintenance and those responsible including how to report issues and timescales for resolution - immediately, and I have included yesterdays weekly check for an example.

If you or Peter need anything further please do not hesitate to come back to me as always.

Karen Brewer

Marketing & Development Manager
SAFARI ZOO

South Lakes Safari Zoo Ltd
Melton Terrace
Lindal in Furness
Cumbria, LA12 0LU
Company Registered in England No: 3561692
VAT no: 621 3114 96

www.safarizoo.co.uk
Tel: 01229 460080 ext 0

WE DONT JUST TALK ABOUT WILDLIFE CONSERVATION WE ARE DOING IT EVERYDAY.....

4 Attachments



comments / opinions

Tomorrow 10am

29. There are a number of prairie dogs free living, in burrows, in the top walkthrough area where the perimeter fence is set into the ground only to a depth of 30cm. In accordance with 8.10 of the SSSMZP if Prairie dogs are to continue to be kept in this area then a written risk assessment carried out by the veterinary consultant on the effectiveness of the perimeter fence must be undertaken. The steps taken by the zoo to ensure that there will not be any escapes must be documented. Copies of these reports must be forwarded to the Local Authority. (6 months)

Within the zoo development plan the Prairie marmots will be relocated over the next 24 months. The veterinary consultant Andrew Greenwood has expressed an opinion he is not qualified or able to write a risk assessment as requested.

30. The practice of designing facilities for Category 1 animals, such as the rhino and giraffe, whereby the keepers have no option but to be in direct contact with the animal is not utilising up to date husbandry guidelines and can be a high risk to the keepers. In accordance with 1.5 and 5.1 and of the SSSMZP the design of the accommodation in the new Africa house must be such that keepers do not have to go into an enclosure with a Category 1 animal to be able to work gates, supply food or move them. It may be that with appropriate risk assessments and for certain specimens it may be possible to manage such Category 1 animals with contact, but a non-contact system must be available for new or proven aggressive animals or new staff. Revised designs must be forwarded to the LA for approval prior to the accommodation being built. A written document detailing the changes that will be made to the current animal management practice, including risk assessments, must be forwarded to the local Authority (3 months).

The design process was agreed with all senior Animal Management staff as a suitable modern, safe and effective design to manage and control the animals safely. Whilst a number of gates are situated within internal pens, they are only occasionally used gates. All the main regular use gates are remotely operated. This has all been reviewed in full since the inspection report and the Management team have not changed the design as it is not necessary but rather have created a working protocol for the area once it opened that gives clear non contact options as the first option to manage the internal gates etc.

There is a written process in place for the New facilities which involves across the board consultation from design to delivery. Revised protocols for Africa follow showing although animals can be managed with contact a non-contact system is available and the priority preferred method of operation.



Document Reference: SWPA15

Safe Working Procedure

Section: **African Field – New Exhibit 2015**

Species: Nyala, Wildebeest, Camel, Zebra,	Issue Date: August 2015 Amendments: December 2015 Addition: January 2016
Area/Task: Working safely within a stated area	
<i>You MUST have read the relevant Risk Assessment(s) along with this document before authorisation.</i>	
<p><i>Please be aware that you are working with DEFRA Category species 1 – however animals are assessed individually by behaviour monitoring – please consult your manager and refer to the species risk assessment.</i></p> <p><i>Before entering any building/enclosure you must inform all untrained person(s) of the risks within and what to be aware of when inside, outlining all the dangers of the animal.</i></p> <p><i>If you are not certain that the person(s) will follow the rules and instructions then you must not allow them access into the building.</i></p> <p><i>You must carry a radio at all times.</i></p>	
Entering the African House	
<ol style="list-style-type: none"> 1. Enter the African House via main personnel door. This door is in the staff only safety zone. 2. Once inside you must visually assess the area – checking that there are no animals out of their enclosures. Check all locks/bolts are in the correct position. If you have any concerns at all you must ascertain the issues and exit the building closing the door behind you and immediately radio call for a manager. 3. Once inside you MUST shut the door behind you. 4. Be vigilant at all times. <p>Any problems you must report to your manager immediately.</p>	
Allowing the animals access to the yards outside	
<ol style="list-style-type: none"> 1. Before entering the relevant staff corridor you must check the corridor is clear, all bolts/working mechanisms are in the correct position and animals are secure in the internal pens. If you are unsure that all the animals are within their internal pen- do not enter the staff corridor. Radio for a manager immediately. 2. Once safe to do so you can enter the staff corridor. 3. Close the gate behind you. 4. At the end of the corridor exit the staff corridor shutting the gate behind you 5. Open the roller door using the pulling mechanism The door must be opened 1 metre higher than the tallest animal. Minimising the risk of an accident. 6. Once the door is open at the correct height you must re-enter the staff corridor closing your gate securely behind you. 7. You may then allow the animals access outside – unlocking the safety bolts allows you to operate the internal pen slides. You will open each slide one at a time starting nearest the door allowing each animal to exit one in turn. <p>You would do this for each species using each corridor to give them access outside.</p> <p>This is the preferred procedure however a close visual assessment of the area, animal and the task at hand at the time may over rule this procedure with given authorisation from a manager.</p>	

Document Reference: SWPA15

Working within internal pens

1. Once the animals are outside/locked down you must close the roller door and secure.
2. Once the door is locked and secure you can then enter the internal pens one at a time.
3. On leaving the internal pen you must lock all gates behind you using the safety bolt, taking all your equipment with you, leaving it safe for the animal.

Under the special circumstance where you have no alternative but to enter the corridors or enclosure when the animal is present you must not restrict the animal.

Assess the animals behaviour, ensuring it is safe to enter.

Stay as close to the gate/doors as possible ensuring all exit routes are clear.

On leaving the enclosure /corridor you must close and secure the gate.

You must NOT carry out tasks which take long periods of time when the animal is present in the internal pen – It is most important that the animals are excluded from a work zone at all times whenever possible

You can use other internal pens to exclude the animal from the one in which you wish to work.

Allowing the animals access from yard to internal housing.

1. Enter the Africa House as instructed within the procedure above.
 2. Once you have safely entered the staff corridor you must then exit at the rear or the corridor.
 3. Close the gate behind you
 4. Ensure all END and middle internal pen gates are open.
 5. Open the roller door using the pull mechanism. (radio controller when in use)
The door must be opened 1 metre higher than the tallest animal. Minimising the risk of an accident.
- Once the door is open at the correct height you must re-enter the staff corridor closing your gate securely behind you.
6. Once the door is open the animals will then have access to the internal enclosures.
It is advised to use the safety of the staff corridor gates on doing so. You can close the gate stopping all contact between you and the animal(s).
 7. You must then allow the animals to enter their internal pens one by one.
 8. Once the first animal has entered the rear pen you must then secure each pen one by one allowing each animal to be enclosed within their individual pens – securing the doors with the safety bolt.
 9. When all the animals are locked inside close the roller door – lock and secure.
 10. Leave the area via the staff corridor locking all gates behind you.

SAFETY BOLTS – the safety bolts which secure your internal den doors must be secure in an upright position allowing the nut to be fastened at the bottom.

This is so that if the nut was to come loose and fall off the bolt is still in place.

Entering the field – Authorisation ONLY

The field may be entered under certain circumstances.

Before entering the field you must radio for authorisation from your manager.

If you do not receive a reply radio again.

If no reply is given you must not enter the field.

A safe distance from the animal must be kept at all times – never restrict.

Keepers must carry a broom/stick with them at all times if animals are present.

Use of Dumper within the building

The dumper must enter/exit the building via roller doors.

It is vital that all round vigilance for persons or animals is constant throughout the operations and no movement of the dumper can take place until the positions of all persons in the African House are accounted for and safe.

When entering an area through a gate it must be closed securely behind you before proceeding.

NOTES

Document Reference: SWPA15

Documents Referenced:

Consultation Reference:

CF put together procedure; back and forth email consultation with DG, KB.

Changes made 14 December 2015 – DG confirmed verbally routine for new internal pens.

Additional item added in accordance to Condition 30 January 2016

I _____ (insert name) have read and understood the above instructions and agree that I have had all instructions explained thoroughly to enable me to carry out my work in a safe and trained manner. I have also received a copy of the risk assessment

(Trainee signature)

I _____ (insert name) have ensured that all the above information has been given to the trainee and (s)he has understood all the instructions and information given. I also believe that this person is competent and is safe to work within the stated area following these direct instructions.

(Trainer signature)

31. The Muck heap in the Rhino and Giraffe paddock must be moved sufficiently far from the perimeter fence to eliminate its potential use as an escape aid. (1 month)

ALREADY COMPLETED As above Photographs confirming the positioning of the muck pile were forwarded to the LA on 14.01.16 some 1 week before the report was delivered, showing the muck free from the ditch and roughly 4m away preventing any possible spillage into, this was also seen and inspected by BBC EHO on 15.01.16. However the zoo would like place on record the inconsistency of inspectors with regards different fencing criteria being applied to different sides of the enclosure. It still remains the view of the Management that there never was any risk of escape from the pile at any time and facts confirm this.



Richard Garnett
Karen Our email has been down since Monday. I have a blocked email from you y...

Safari Zoo Karen Brewer
to Richard

I sent over an image of the moved muck heap Richard have reattached shows the gap between pile and ditch.

Karen

Karen Brewer
Marketing & Development Manager
SAFARI ZOO
South Lakes Safari Zoo Ltd
Mellon Terrace
Lindal in Furness
Cumbria, LA12 0LU
Company Registered in England No: 3661052
VAT no: 621 3114 56
www.safarizoo.co.uk
Tel: 01229 450050 ext 0
WE DONT JUST TALK ABOUT WILDLIFE CONSERVATION WE ARE DOING IT EVERYDAY....

14 Jan

14 Jan



32. In order to comply with section 10 of the Secretary of States Standards, a robust management and staffing structure must be in place to the satisfaction of the licensing authority, and in order to allow a new licence to be issued. This new structure must include a competent, suitably qualified and experienced full-time Director (or Senior Manager) with day to day responsibility for the running of the Zoo, the ability and authority to make decisions independent of the owner, and must be fully responsible to the licensing authority for the conduct of the Zoo, all its on-site activities and its compliance with the Secretary of State's Standards. [Please see recommendation/comment 2 regarding recommendation for refusal of a licence. Renewal of a licence is recommended to be dependent on the listed Additional Conditions being either complied with, or satisfactory progress towards compliance being made.

Clearly up to date we have that structure in place that is and has been fully approved at every inspection. The only reason for change is due to the Owner of the Zoo spending less time working at the zoo now around 24 weeks per year and more critically by retiring from being Licence holder on or before June 2016 and the need for a change of structure to accommodate this the Owner has been strengthening the management team over the past 12 months in preparation. The appointment of David Armitage to replace the animal management experience void that David leaves gives the Zoo that high level of experience it needs to carry on with the success of the last 22 years. We are seeking to appoint a further experienced animal manager to continue the development of the administrative burden that becomes more each year. A further appointment of a HR/Training and Compliance manager further show the resolve to grow with our popularity. David Gill will remain as a non employed consultant to the management for at least 12 months or until the management feels it necessary to fully ensure continuity and knowledge base of the whole facility and operations is transferred. The details of the new operator and management structure will be forwarded as soon as the legality of the transfer of interests is completed. The Trustees of the new operator/Licence holder will have to appoint the new CEO who be the representative (not licence holder) of the Board of Trustees to the Management and to the Licencing Authority.

33. There must be a suitable and sufficient written risk assessment for the anaconda in the walk-through area and a copy must be forwarded to the LA (1 month) (NB it will become a Category 1 hazardous animal when it attains 3m when it must be housed in such a way that access with the public is prevented).

ALREADY COMPLIED Risk assessment was in place and supplied to inspectors and BBC EHO on during the inspection. A refresher session with keepers has been held since. The long term has been to remove this animal to a new site within 3 months ALL this information was available to the inspectors on the day so we do wonder once again why this condition is asked for.

South Lakes Safari Zoo Species Specific Risk Assessment

Species: Snakes

Category: 1 (If over 3feet) and 2 (Under 3feet)

Risk: **HIGH**

Likelihood: **LOW**

Severity: **HIGH**

Step Number	Where the risk is	Identify the hazards and hazard source with significant risks	Identify the people who could be affected by the hazards
1	Animal contact	Snakes are capable of biting, strangulation and suffocation.	Staff entering the enclosure
2	Zoonoses	Animal Contact during talk time	Staff, visitors, work experience, volunteers and keeper for the day
3	Escape	Animal Escape from enclosure	Staff, visitors, work experience, volunteers and Keeper for the day
	Hazard identified with significant risks	Existing written instructions/control measures in place at the time of assessment.	Details of additional measures required to reduce to an acceptable level.
1	Snakes are capable of biting, strangulation and suffocation.	The vivarium is strictly out of bounds to the public. An and-conda is in the rock pool in the Aviary, however the heaters are placed away from the public so the snake stays away from the path as it is free roaming. Staff are given inductions and training whilst working with these animals. Only authorised, trained personnel are able to work with these animals. Any trainee's or keepers for the day are permitted under the direct and continuous supervision of trained staff.	Has Risk been reduced? (Y/N)
			Y Trained keepers enter the building throughout the day at which time they will carry out a visual check to see that the And-conda is in the pond/garden.
2	Animal Contact during talk time (talk revised below 8/12)	When keepers are taking part in the Snake talk they are to inform the visitors of washing their hands after touching and stroking the	Y (Zoonoses risk assessment and Zoonotic infection – preventing and controlling ill health is in place)

		snake, the talk is situated close to the main public toilets. Animal carers are present during the talk and give direct pre and post contact instructions; contact is on condition that hand washing will take place afterwards. Prior to any contact, emphasis and stress is made to ensure hand washing takes place after contact with animals		
3	Animal Escape from enclosure	Staff are trained to keep doors shut, monitor conditions of vivarium throughout each day. Any defects are reported to management. In the event of an escape the emergency escape procedure will immediately come into action.	Y	
Additional Notes:				
The snake handling activity has now changed in line with advice contained within the Industry code of practice (version 1 June 2012 ref eating areas) ;				
<p>The talk takes place on the steps at the end of the raised decking (same position) adjacent to the picnic area.</p> <p>A fixed barrier is now in place separating that, to prevent members of the public touching the snake.</p> <p>During the talk Staff are to continue to emphasise the importance of hand washing and additional signs have been introduced, highly visible informing public of bacterial diseases which can be caught from not washing hands.</p> <p>At the end of the talk the keeper informs visitors and moves for the handling activity.</p> <p>The handling activity has now been moved to a contact area where an orderly queue is formed; the positioning of the queue ensures visitors, following contact, have to pass by washing facilities to return to the "park" or eating areas. Washing facilities contain cold and warm water available along with hand dryers.</p> <p>Veterinary treatment.</p> <p>Handling drugged, partially drugged or recovering animals – only under the direct supervision of approved senior staff</p> <p>With all control measures in place it is highly unlikely an accident will occur.</p> <p>No further action needed at this present time.</p>				



BLACKPOOL COUNCIL

ZOO LICENSING ACT 1981 (AS AMENDED)

LICENCE TO OPERATE A ZOO

Name and address of operator: Grant Leisure Group Ltd
Westward House
155 / 157 Staines Road
Hounslow
Middlesex
TW3 3JB

Name and situation of the zoo: Blackpool Zoo
East Park Drive
Blackpool
FY3 8PP

THE BLACKPOOL BOROUGH COUNCIL HAS GRANTED TO THE OPERATOR DESCRIBED ABOVE, A LICENCE UNDER THE ZOO LICENSING ACT 1981 (AS AMENDED), TO OPERATE THE ABOVE NAMED ZOO SUBJECT TO THE STANDARD CONDITIONS ATTACHED.

Date of Issue: 23rd May 2013

Service Manager
(Public Protection)

Notes:

1. The licence granted on the 28th May 1995 has been extended for a period of 6 years, expiring on the 27th May 2019.
2. The issue of this licence is without prejudice to the application of the Health and Safety at Work etc Act 1974 or other relevant legislation.

Mandatory Conditions

Blackpool Zoo Park must:

1. Promote public education and awareness about biodiversity conservation. In particular, provide information about the species of wild animals kept in the zoo and their natural habitats.
2. Accommodate and keep the animals in a manner consistent with the standards set out in the Secretary of State's Standards of Modern Zoo Practice.
3. Prevent escapes and put in place measures to be taken in the event of any escape or unauthorised release of animals.
4. Introduce practical measures designed to prevent the intrusion of pests and vermin into the premises of the zoo.
5. Keep up-to-date records of the animals, including numbers of different animals, acquisitions, births, death, disposals and escapes, causes of deaths and the health of the animals.
6. Participate in at least one of the following:
 - ☐ Research which benefits the conservation of wild animals
 - ☐ Training in relevant conservation skills
 - ☐ Exchanging information about the conservation of wild animals
 - ☐ Breeding of wild animals in captivity
 - ☐ Repopulating an area with wild animals, or re-introducing wild animals

Blackpool Zoo Park must keep information to show how it has complied with this condition and supply it to the local authority upon request.



Cheshire West
and Chester

Place Operations
Regulatory Services
Wyvern House
The Drummer
Winsford
Cheshire
CW7 1AH

Zoo Licensing Act 1981 (as amended)

Licence to operate a Zoo

Name and address of the operator:

The North of England Zoological Society

Name and address of the zoo:

**Chester Zoo – Including Phase 1 and Phase 2A of the Islands Extension
Caughall Road
Caughall, Chester
Cheshire
CH2 1LH**

Cheshire West and Chester Borough Council hereby grants the above applicant a Zoo Licence under the Zoo Licensing Act 1981 (as amended) to operate the above named Zoo.

The Licence is granted for a period not exceeding six years and expires on:

31 March 2019

The licence is granted subject to the attached conditions

Regulatory Services Manager
Compliance and Commercial Support

The issue of this licence is without prejudice to the application of other relevant legislation

Conditions of Zoo Licence

Conservation Measures

1. The Licensee must:

- Promote public education and awareness about biodiversity conservation. In particular, provide information about the species of wild animals kept in the zoo and their natural habitats.
- Accommodate and keep the animals in a manner consistent with the standards set out in the Secretary of State's Standards of Modern Zoo Practice.
- Prevent escapes and put into place measures to be taken in the event of any escape or unauthorised release of animals.
- Introduce practical measures designed to prevent the intrusion of pests and vermin into the premises of the zoo.
- Keep up-to-date records of the animals, including numbers of different animals, acquisitions, births, death, disposals and escapes, causes of deaths and the health of animals.
- Participate in at least one of the following:
 - Research which benefits the conservation of wild animals
 - Training in relevant conservation skills
 - Exchanging information about the conservation of wild animals
 - Breeding of wild animals in captivity
 - Repopulating an area with wild animals, or re-introducing wild animals
- The licensee must keep information to show how it has complied with this condition and supply it to the local authority upon request.

Insurance

2. Within one month of the date of the licence and one month of the date of renewal of the policy, where applicable, a copy of the zoo's current public liability insurance policy, and of subsequent renewals thereof, to be sent to the licensing authority.

Hazardous Animals

3. The licensing authority to be notified in writing, at least one month in advance, of the proposed addition of any animal listed in category 1 of the Hazardous Animal Categorisation (see Appendix 12 of the Secretary of State's Standards of Modern Zoo Practice), which is from a taxonomic family of which Category 1 species have not previously been kept in the zoo.

Temporary Removal of Animals from the Zoo

4. The licensee/s to notify the licensing authority before the temporary removal from the zoo (other than for veterinary attention or inter-zoo movements) of any animal listed in category 1 of the Hazardous Animal Categorisation of Secretary of State's Standards of Modern Zoo Practice. Such notification to be given as early as possible and, in any case, no later than 12 hours before the removal, unless the zoo operator and licensing authority mutually agree a shorter period. When giving notification, details of the destination and method of transportation of the animal and of the arrangements for its well-being, as well as for the safety of the public whilst it is away from the zoo, to be provided.

Escapes

5. In the event of any non-domestic animal escaping from the confines of the zoo, notification shall be made to the licensing authority as soon as possible, and, in any case, not later than 24 hours following the escape.

Note 1. These conditions are attached to the licence without prejudice to the application, where relevant, of the Secretary of State's Standards of Modern Zoo Practice specified in accordance powers conferred under section 9 of the Zoo Licensing Act 1981 (as amended).

Note 2. The grant of this licence does not imply that the requirements of any other legislation have been met.



LICENCE TO OPERATE A ZOO

Name and address of operator

*The Company Secretary
Flamingo Land Limited
The Cross
Uddington
Glasgow
G71 7ES*

Situation of the Zoo

*Flamingo Land Theme Park and Zoo
Kirby Misperton
Malton
North Yorkshire
YO17 6UX*

The Ryedale District Council, Ryedale House, Malton, North Yorkshire, YO17 7HH hereby grant Flamingo Land Limited, The Cross, Uddington, Glasgow, G71 7ES a licence to operate the above named zoo under the Zoo Licensing Act 1981 (as amended) for a period of six years beginning on 5th June 2013 and expiring on 4th June 2019.

Signed: Robert Robinson
(Principal Environmental Health Officer)

Date: 5th June 2013

(on behalf of Ryedale District Council, Ryedale House, Malton, North Yorkshire, YO17 7HH)

This licence is granted subject to the attached 2 pages of conditions.

Part 2: Licence Conditions (required by section 1A of the Act)

1. Promote public education and awareness in relation to the conservation of biodiversity, in particular by providing information about the species of wild animals kept in the zoo and their natural habitats.
2. Accommodate and keep animals in a manner consistent with the standards set out in the Secretary of State's Standards of Modern Zoo Practice currently in force under conditions which aim to satisfy the biological and conservation requirements of the species to which it belongs, including:
 - (a) provide each animal with an environment well adapted to meet the physical, psychological and social needs of the species to which it belongs, and
 - (b) provide a high standard of animal husbandry with a developed programme of preventative and curative veterinary care and nutrition.
3. Prevent escapes and put in place measures to be taken in the event of any escape or unauthorised release of animals.
4. Introduce practical measures designed to prevent the intrusion of pests and vermin into the zoo premises.
5. Keep up to date records of the zoo's collection, including records of:
 - (a) the numbers of different animals;
 - (b) acquisitions, births, deaths, disposals and escapes of animals;
 - (c) the causes of such deaths; and
 - (d) the health of the animals.
6. Participate in at least one of the following:
 - (a) research from which conservation benefits accrue to species of wild animals;
 - (b) training in relevant conservation skills;
 - (c) the exchange of information relating to the conservation of species of wild animals;
 - (d) where appropriate, breeding of wild animals in captivity.
7. The zoo must keep information to demonstrate compliance with the above conditions and make it available to Ryedale District Council should it be requested.

Part 3: Licence Conditions (other)

8. The current zoo licence or a copy of it, including the conditions, must be displayed at the public entrance of the zoo.
9. Within one month of the date of the licence and one month of the date of renewal of the policy, where applicable, a copy of the zoo's current public liability insurance policy and of subsequent renewals thereof, to be sent to Ryedale District Council.
10. Ryedale District Council to be notified in writing, at least one month in advance, of the proposed addition of any animals listed in category 1 of the Hazardous Animal Categorisation (Appendix 12 of the Secretary of State's Standards of Modern Zoo Practice), which is from a taxonomic family of which category 1 species have not been previously kept in the zoo.
11. The licensee to notify Ryedale District Council before the temporary removal from the zoo (other than for veterinary attention or inter-zoo movements) of any animal listed in category 1 of the Hazardous Animal Categorisation of the Secretary of State's Standards of Modern Zoo Practice. Such notification should be given as early as possible and, in any case, no later than 12 hours before the removal. The notification should include details of the destination, the method of transportation of the animal, the arrangements for its well-being and the arrangements for the safety of the public whilst it is away from the zoo.
12. In the event of any non-domestic animal escaping from the confines of the Zoo, notification shall be made to the Ryedale District Council as soon as possible, and, in any case, not later than 24 hours following the escape.
13. A copy of the zoo's annual stocklist, as defined in the Secretary of State's Standards of Modern Zoo Practice, to be forwarded to Ryedale District Council by 1 April of the year following that to which it relates. The stocklist should be a multi-column format similar, for example, to Section 9.5 of the Secretary of State's Standards of Modern Zoo Practice, or to those that are produced by ZIMS or ARKS.

Note 1 These conditions are attached to the licence without prejudice to the application, where relevant, of the Secretary of State's Standards of Modern Zoo Practice specified in accordance powers conferred under section 9 of the Zoo Licensing Act 1981 (as amended).

Note 2 The issue of this licence is without prejudice to other relevant legislation.

ZOO LICENSING ACT 1981 (as amended)
ZOO LICENCE

Licence Number

ZLA/13

LICENSING AUTHORITY

Licensing Team
Environmental Health & Trading Standards
Guildhall 2
High Street
Kingston Upon Thames
KT1 1EU



PART 1 – LICENCE DETAILS

PREMISES TO WHICH THIS LICENCE APPLIES

CHESSINGTON WORLD OF ADVENTURES

Leatherhead Road, Chessington, Surrey KT9 2NE

LICENCE HOLDER / ZOO OPERATOR

CHESSINGTON WORLD OF ADVENTURES OPERATIONS LIMITED

3 Market Close, Poole, Dorset BH15 1NQ

LICENCE PERIOD

This licence is issued in accordance with the Zoo Licensing Act 1981 (as amended) for a period of **six** years and shall remain in force from **8th August 2013** until **7th August 2019**.

CONDITIONS

This licence is issued subject to conditions set out in:

Part 2 – Conditions derived from European Council Directive 1999/22/EC ('the Zoos Directive')

Part 3 – Conditions necessary or desirable for ensuring the proper conduct of the zoo during the period of the licence [section 5(3) of the Zoo Licensing Act 1981]

SIGNED ON BEHALF OF THE LICENSING AUTHORITY

David Kingstone MCIEH MIOL
Environmental Health Manager (Licensing & Pollution Control)

PART 2 – CONDITIONS DERIVED FROM THE ‘ZOO DIRECTIVE’

The operator of the Zoo must:

- promote public education and awareness in relation to the conservation of biodiversity, in particular by providing information about the species of wild animals kept in the Zoo and their natural habitats.
- Accommodate and keep the animals in a manner which meets the standards set out in the Secretary of State's Standards of Modern Zoo Practice.
- prevent the escape of animals and put in place measures to be taken in the event of any escape or unauthorised release of animals.
- prevent the intrusion of pests and vermin into the premises of the Zoo.
- keep up-to-date records of the Zoo's collection of animals, including records of the numbers of different animals; acquisitions, births, deaths, disposals and escapes of animals; the causes of any such deaths; and the health of the animals.
- participate in at least one of the following:
 - research from which conservation benefits accrue to species of wild animals;
 - training in relevant conservation skills;
 - the exchange of information relating to the conservation of species of wild animals;
 - where appropriate, breeding of wild animals in captivity;
 - where appropriate, the repopulation of an area with, or the reintroduction into the wild of, wild animals.

ZOO LICENSING ACT 1981 (as amended)

ZOO LICENCE

Licence Number

ZLA/13

PART 3 – CONDITIONS NECESSARY OR DESIRABLE FOR ENSURING THE PROPER CONDUCT OF THE ZOO DURING THE PERIOD OF THE LICENCE

1. The Zoo Licensing Authority must be kept fully informed of all major proposals affecting the premises including the installation of new exhibits or entertainment areas and the Authority must be fully consulted on proposals for any relocation of any of the animals or changes in the design of existing animal enclosures.
2. Within one month of the date of the licence, and one month of the date of the renewal of the policy, where applicable, a copy of the zoo's current public liability insurance policy and subsequent renewals thereof, must be sent to the Licensing Authority.
3. A copy of the zoo's annual stock list, as defined in the Secretary of State's standards of modern zoo practice, must be forwarded to the Licensing Authority by 1st April of the year following that to which it relates.
4. The Licensing Authority shall be notified in writing at least one month in advance of the proposed addition of any animal listed in category 1 of the Hazardous Animal Categorisation (Appendix 12 of the Secretary of State's Standards of Modern Zoo Practice) which is from a taxonomic family of which category 1 species have not previously been kept at the zoo.
5. The Licence Holder shall notify the Licensing Authority before the temporary removal from the zoo [other than for veterinary attention or inner-zoo movements] of any animal listed in category 1 of the Hazardous Animal Categorisation (Appendix 12 of the Secretary of State's Standards of Modern Zoo Practice). Such notification to be given as early as possible and, in any case, no later than 12 hours before the removal, unless the zoo operator and licensing authority mutually agree a shorter period. When giving notification, details of the destination and method of transportation of the animal and of the arrangements for its wellbeing, as well as for the safety of the public whilst it is away from the zoo, to be provided.
6. Any amendments to the written procedures in respect of animal escapes shall be sent to the licensing authority within one month of the changes being made.
7. In the event of any non-domestic animal escaping from the confines of the zoo, notification shall be made to the licensing authority as soon as possible and, in any case, not later than 24 hours following the escape.

Conditions applied following the Periodical Renewal Inspection (June 2013)

8. A keeper door in the rhino house opens directly onto the paddock. From this door keepers can walk into the paddock to operate the holding yard gates. Secondary protection should be provided to provide a safe pedestrian route to the yard gates, and a viewing window should be added to the keepers door within 12 months of the date of grant of this licence.
9. The following facility maintenance must be undertaken:
 - a) Lion house walls must be made non-porous to aide cleaning within 3 months of the date of grant of this licence

ZOO LICENSING ACT 1981 (as amended)

ZOO LICENCE

Licence Number

ZLA/13

- b) Spider monkey house floors and walls must be non-porous and water repellent within 3 months of the date of grant of this licence
 - c) Reptile house preparation room requires considerable refurbishment with work surfaces, heating, ventilation, refrigeration, sink units to make it suitable for food preparation. To be provided within 3 months of the date of grant of this licence.
 - d) Off show area for Sealions is in an extremely poor condition. Current wooden and wire enclosures are rotten and dangerous to the animals and should be replaced. The food storage / preparation area must be provided with running hot water; adequate sink and work service facilities and improved drainage. To be undertaken within 12 months of the date of grant of this licence.
 - e) Dorcas gazelle house needs extensive maintenance or replacement within 3 years of the date of grant of this licence.
 - f) Tiger access tunnel has a damaged panel which must be repaired or replaced within 3 months of the date of grant of this licence.
 - g) Capybara enclosure perimeter wire is patched and bent which could cause injury to be repaired within 6 months of the date of grant of this licence.
 - h) The Leopard / Binturong house suffers from subsidence and is in a poor state of repair, ongoing remedial action is required and should be provided. Significant action is required to demolish or repair this building before the end of this license period (6 years).
10. A comprehensive preventative medicine programme for the terrestrial collection has been provided but a similar document for the Aquarium should be provided within 3 months of the date of grant of this licence.
11. Due to the death and relocation of her companions it is planned that an elderly female gorilla will be maintained on her own, outside of a social group. Although the inspectors feel that this is probably the most appropriate action for the specific needs of this individual, this should be kept under constant review. This animal's welfare must be assessed by zoo management and keeper, and a specific review note made on the animals individual record every 3 months which is to be made available for inspection. This animals welfare should also be reviewed at the Ethics Review meeting every time this panel meets and minutes be available for inspection.
12. A full risk assessment including zoonotic disease risks must be completed for the reptile and invertebrate handling sessions (Wild Factor). Full hand washing facilities with hot running water and soap must be provided in the same location as the presentation. Comprehensive signage informing the public of the potential risks and that hand washing is essential must be installed. All to be in place within 1 month of the date of grant of this licence.
13. A full risk assessment including zoonotic disease risks must be completed for the Lorikeet walk-through aviary. Full hand washing facilities with hot running water and soap must be provided in the same location as the presentation. Comprehensive signage informing the public of the potential risks and that hand washing is essential must be installed. All to be in place within 1 month of the date of grant of this licence.

ZOO LICENSING ACT 1981 (as amended)
ZOO LICENCE

Licence Number

ZLA/13

14. Comprehensive signage informing the public of the potential risks and that hand washing is essential must be installed at the Children's Zoo within 1 month of the date of grant of this licence.
15. A full and detailed revised risk assessment must be undertaken for the 'Keeper for the day' experience with large carnivores. There should always be a one keeper to one participant supervision ratio. The wire mesh panel from the lion enclosure to the keeper pathway should be made solid. Within 3 months of the date of grant of this licence.
16. Copies of the continuing professional development records for John Lewis, Steve Phelps and Sue Thornton (Veterinary Team) should be provided within 3 months of the date of grant of this licence.

