



Inspection Report

Date of inspection: Date report completed:

Name of applicant or current licence holder:

Name and address of zoo:

Tel no: Licence Number:

Date of last formal inspection: Type of last formal inspection:

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)
<input type="text" value=""/>	

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.

RZSS Edinburgh Zoo is well-established as the premier zoological collection in Scotland and one of Scotland's major visitor attractions. The current Royal Zoological Society of Scotland was founded in 1909 and bought part of the current 85 acre site which opened in July 1913. It was incorporated into Royal Charter in 1914 and permitted to use the Royal suffix in 1948, still the only zoo in the UK to do so. RZSS Edinburgh Zoo is a national leader in zoo based conservation, education, and research. The collection is diverse with many taxa represented.

The size and nature of the collection does not permit for a dispensation and the full licence is still considered appropriate. The zoo licence operates from 1st October 2018 until the 30th September 2024. This is a Section 10 periodical interim inspection. Due to the nature of the site and the time it took to complete the zoo inspection it is recommended that consideration is given to this being a 2.5 - 3 day zoo inspection next time at the formal inspection.

NOTE: this inspection report is written as per the instructions found in the current version of the 'Guidance for zoo inspectors 2019' which was released on the 21st January 2019 and clarifies that where there has been any, however small, failure of compliance that a question is marked 'no'. Where a box is marked 'no' the specific area of non-compliance is commented on even if other aspects of the zoo inspected with regard to each individual question were considered compliant unless otherwise stated. In addition, where there has been failure of full compliance and the area in question pertains to one of the Section 1A Conservation Measures or any other conditions on the current licence then the failure will result in the recommendation that the licensing authority issue a direction rather than a condition. Full details of this clarification were provided to the operator through the 'Notice to Zoo Inspectors, Zoo Operators and Local Authorities'. It is noted that the standard Section 1A Conservation Measures are listed on the zoo's current licence as well as Condition 1b which states 'The Zoo shall accommodate and keep the animals in a manner consistent with the SSSMZP', as such directions are issued based on the licensing authority's issued licence conditions as outlined above.

It is brought to the attention of both the licensing authority and the zoo licence holder that the current SSSMZP (2012) are undergoing review and at the next formal zoo inspection (March 2024) the zoo licence holder is expected to meet the new Standards as published. Alterations are to be made to the ZLA (1981) and its subsequent amendments to bring it in line with the new Standards and this is likely to be adopted by the devolved administrations. These changes are proposed for consultation in 2021-2022.

*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	However it was noted that there were inconsistencies across the site with regard to displaying and the format of diet sheets, see recommendations.
1.2. Is food and drink that is supplied appropriate for the species/individual?	Yes	
1.3. Are supplies of food and water: (a) kept hygienically?	No	(a) The fruit and veg walk in fridge and the meat walk in freezer were considerably dirty and required cleaning, see directions. (b) the chopping boards were life expired preventing adequate cleaning, see directions; multiple knives for food just wedged into gaps behind shelves or other wooden structures rather than a block, see recommendations; penguin fish defrosted at room temperature, see conditions; carnivore ABP waste kept in food preparation fridge in open bags, see condition.
(b) prepared hygienically?	Select	
(c) supplied to the animal hygienically?	Select	
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	Food forms part of the daily diet, verbally reported and appears well controlled.
(a) if 'yes', is it properly controlled?	Yes	
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?	No	Whilst many of the animal care areas were to a high standard there were two that stood out as not meeting the minimum standards: the reptile back room off show failed to provide for minimum environmental parameters and the koala exhibit had poor ventilation leading to mould issues (this is in the process of being managed). See directions and recommendations.
2.2. Are the following environmental parameters appropriate: (a) temperature?	No	(a) royal python in the back reptile room, see direction; (b) koala ventilation was insufficient and animal taken off show, see recommendation;
(b) ventilation?	No	(c) UVI concerns in the back reptile room with some excess of requirements and others approx 50% of what was expected, no UVI meter for the reptiles;
(c) lighting?	No	
(d) noise levels?	Yes	(e) high phosphate and pH in the penguin pool but plan in place to deal with in short and long term, with recent external review undertaken. Sand filters to be changed, see recommendations.
(e) any other environmental parameters?	No	

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	Animal electric fences - recording values that were lower than stipulated in SSOW with no actions taken, inconsistent, no published expected values for each species, see direction.
2.4. Do animal enclosures have sufficient shelter and refuge areas?	No	Armadillo stereotyping and limited cover in enclosure, see directions.
2.5. Do animal enclosures provide sufficient space?	No	Several snakes in the reptile backroom unable to fully stretch out in their vivaria, see directions.
2.6. Are backup facilities for life support systems adequate?	No	No generator on site, see directions.
2.7. Is the cleaning of the accommodation satisfactory?	Yes	
2.8. Is the standard of maintenance adequate for: (a) the buildings?	No	Monkey house roof in poor condition and water leakage/damage, partula snail room (part of reptile back room area), see conditions and directions.
(b) the fences?	Yes	
2.9. Is all drainage effective and safe?	No	Multiple drains flooded and overflowing, rain forming small streams flowing into enclosures in some cases, see conditions.
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?	No	See 2.2 and 2.5, specifically the reptile back room, see directions.
3.2. Do animals on display to the public appear in good health?	Yes	
3.3. Are observations of condition and health made and recorded?	Yes	
3.4. Do animals receive prompt and appropriate attention when problems are noted?	Yes	
3.5. Are enclosures designed and operated in such a way that social interaction problems are avoided?	Yes	
On-site facilities 3.6. Are catch-up and restraint facilities adequate?	Yes	Recommendation made to plan operational programmes for the giraffe crush and induction box prior to actually requiring their use, see recommendations.
3.7. Is darting equipment satisfactory?	Yes	
3.8. Are on-site veterinary facilities adequate?	Yes	Noted as part of the master plan for new veterinary facility within the footprint of the current old monkey house.

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?	Yes	Commended on the veterinary curative and preventative health care programmes and subsequent audits.
3.10. Is there a system for the regular review of clinical and pathological records?	Yes	Comprehensive clinicopathological audits.
3.11. Are appropriate veterinary records kept?	Yes	
3.12. Are medicines kept and disposed of correctly?	No	Out of date drugs identified in animal house and ivermectin no broach date, however able to address due to records. Drug fridge freezer required defrosting, addressed at inspection. No concerns.
3.13. Are controlled drugs used and recorded satisfactorily?	Yes	
3.14. Are appropriate antidotes available?	Yes	See recommendations.
3.15. Are <i>post mortem</i> examination arrangements satisfactory?	Yes	
Isolation and containment 3.16. Is adequate reserve accommodation available for isolation of animals for:		
(a) assessment?	Yes	Noted balai inspection recently and all sufficient for the needs of that inspection.
(b) treatment?	Yes	
(c) recovery?	Yes	
(d) quarantine (where required)?	Yes	
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?	No	Foxes live within the zoo but are managed to prevent incursion by additional foxes; rodents are evident in almost all areas - both squirrel, rats and mice. See directions. Open animal waste and food skips considerable corvid related spillage noted across the site, see conditions.
3.18. Does it appear that general sanitation and pest control are effective?	No	Evidence of considerable vermin incursion present across the site and appears poorly managed, in addition cockroaches evident in multiple areas with traps full. Pest control programme needs review and environmental controls implemented across the site, see directions.

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?	No	See 2.4 and 2.5.
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	
6.2. Can the zoo demonstrate that: i) transport and movement equipment is in good order?	Yes	Wide range of crates maintained on site in the hay barn.
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	(i) Commended on the wide range of conservation research carried out by RZSS Edinburgh Zoo, including veterinary and wildlife genetics in the dedicated on site laboratory.
(ii) training in relevant conservation skills?	Yes	(ii) Wide range of training programmes both in and exsitu. Commended.
(iii) the exchange of information relating to the conservation of species of wild animals?	Yes	iii) ZIMS, peer reviewed publications, presentations and the wide scope of the new Conservation Strategy to name but a few ways in which the RZSS Edinburgh Zoo promotes exchange of information.
iv) where appropriate, breeding of wild animals in captivity?	Yes	(iv) Number of CR, EN or VU species bred at the RZSS Edinburgh Zoo including native species for reintroduction e.g. pond mud snail.
(v) where appropriate, the repopulation of an area with, or the reintroduction into the wild of, wild animals?	Yes	(v) part of the partula snail reintroduction programme, as well as supporting native species reintroduction programmes delivered by sister zoo HWP including the Scottish wild cat and the pine hover fly.
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	Excellent education programme which has a much wider scope and vision than many other zoos. Delivers to a high standard even during covid lock down through the use of digital online teaching which has been expanded post lockdown to support students in need and unable to attend school. Commended.
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	Active not only in supporting international breeding programmes but also lead in native and international breeding programmes, many of which are managed by Edinburgh Zoo staff.
7.4. Are on-site education facilities adequate for the resources of the collection?	Yes	Commended on the diversity of the education programmes and the wide range of audiences catered for.
7.5. Are the conservation efforts adequate for the resources of the collection?	Yes	Commended on the diversity of the conservation programmes delivered by RZSS Edinburgh Zoo, especially considering the size of the organisation.
7.6. Are the research efforts adequate for the resources of the collection?	Yes	Commended on the wide range of research, both peer reviewed and not, delivered by RZSS Edinburgh Zoo.
7.7. Is captive breeding properly managed?	Yes	

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?	No	Inconsistency with regard to the management of electric fences and lesser concern when non-cat 1 hazardous animals escape e.g. ibis, pelicans, etc which can have conservation impacts when released, see directions .
8.2. Are there satisfactory measures in place to be taken in the event of any escape or unauthorised release of animals?	Yes	Basic over view document, more detailed supporting documentation has been in production since Feb 2019 and needs updating to reflect current practice, weapons selection includes species not held for 20 years or so e.g. lowland gorilla, see conditions.
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)?	No	For period of 2018 to 2021 (total of 14 possible escape drills) only undertook 6 escape drills, see directions.
8.4. Will the perimeter deter unauthorised entry and aid the confinement of zoo stock?	Yes	
8.5. Do stand-off barriers appear adequate?	No	Able to make direct contact with the pygmy hippo, especially close to the indoor house area, see conditions.
8.6. Are adequate warning signs provided?	Yes	
8.7. Are prohibited areas appropriately signed?	Yes	But gate to off show track behind Animal Antics left open and unsecured during opening hours, see recommendations.
8.8. Are exits clearly marked and accessible?	Yes	
8.9. Do public areas, walkways and buildings appear safe?	No	Wooden walkway to north of Budongo Trail in poor condition with broken sections and lights fallen in to create trip hazards, see conditions.
8.10. Are trees regularly inspected and appropriate remedial action taken?	Yes	
8.11. Have appropriate risk assessments for direct contact by the public with animals been carried out?	N/A	Not presented for inspection. Advised any new animal experiences or reintroduced ones should have relevant risk assessments submitted for review by the licensing authority prior to them starting in the future.
8.12. Are the special safety requirements for walk-through or drive-through exhibits adequately met?	Yes	Amber risk assessments carried out for staff for grey kangaroo present in the Kangaroo and Wallaby walkthrough.

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:		
(i) the numbers of different animals?	Yes	
(ii) acquisitions, births, deaths, disposals and escapes of animals?	Yes	
(iii) the causes of any such deaths?	Yes	
(iv) the health of the animals?	Yes	
9.2. Are daily diaries maintained, and do they contain appropriate information?	Yes	Minimal daily diaries present with little information generally as transition to all entry direct into ZIMS.
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	
9.6. Are archived records secure?	Yes	
10. Miscellaneous		
10.1. Do staff numbers and training of staff appear adequate?	No	Reasonable records but poor training e.g. processes & outcomes as seen with electric fences. Also no pest control training for staff
10.2. Is the management structure and organisation of staff adequate to ensure compliance with the Standards at all times?	Yes	
10.3. Are effective risk assessments carried out where appropriate?	Yes	But inconsistent and poorly considered, see recommendations.
10.4. Has an ethical review process been established and implemented?	Yes	
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	However, outstanding jobs pose potential electrical risk e.g. Budongo Trail actioned job to replace waterproof electrical sockets 20th August not complete on day of inspection, see conditions.
11.2. Have fire precautions been agreed and implemented?	No	Number of fire extinguishers out of service date e.g. rhinos and Living Links.
11.3. Is refuse and clinical waste disposed of correctly?	No	Yellow skips open access, corvid access to contents and noted to be spread out around bins, see conditions.
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?	N/A	No licence conditions on the current zoo licence.

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

The zoo inspectors would like to thank the team at RZSS Edinburgh Zoo for their hospitality, transparency and honesty during the zoo inspection. The zoo has undergone a major and significant audit over the last twelve months in part due to the impact of covid but also with the arrival of the new CEO [REDACTED]. There has been a strategic review of the whole operation which is in the early days of implementation and all departments and operational practices are being assessed and developed in line with the new vision. Edinburgh Zoo and their sister zoo, the Highland Wildlife Park, have pioneered the role of the modern zoo establishing themselves as pre-eminent in their field. The new vision builds on the foundations of the original RZSS but has been redefined for this post-covid era: with RZSS pledging to save wild species, deliver wild connections and enable wilder communities. This is a national institution but also a global player in the international zoo community. The inspection team looks forward to seeing how the Society develops over the next three years as they journey to their strategic milestone of 2030.

The zoo licensing and inspection process creates a baseline of minimum standards to which RZSS Edinburgh Zoo more often than not exceeds that required for compliance. The conservation, research and education programmes were world class and there were no concerns, only lavished praise to be provided. The animal collection was well considered and the animal collection plan was being reviewed alongside the new strategic vision. However, there were three areas that raised some concerns for the inspection team, these being (i) escape management documentation and related safe systems of work; (ii) pest control management across the whole site; and (iii) what appeared to be legacy issues with regard to processes, procedures and their implementation.

1. ESCAPE MANAGEMENT DOCUMENTATION

There were two primary elements of concern with regard to escape management documentation. The first was the consistency and variable nature of the varied elements of the escape management programme deployed at Edinburgh Zoo. This is not to say that there were any concerns with regard to what staff would do in an emergency, as they are all very capable, but more an issue of a lack of robust and consistent written documents outlining those steps to be taken. For example, the generic overview escape document lacks little deployment information or evidence of dynamic risk assessment and is more a general document for non-primary responders. A supporting document was being produced but was still in a draft form having been started in February 2019. The main escape management document being a power point which was reasonably well considered but was inconsistent with other elements of the escape programme found in keeper areas, there being documents that whilst still usable were out of date e.g. the firearms calibre selection which still referred to lowland gorillas which left the zoo some 20 years ago. The second aspect of this was the escape prevention documentation. None of the safe systems of work reviewed referred to the actual voltages expected on the electric fences except for the chimpanzee protocol. Voltages were recorded and when staff were asked what the actual voltage should be the response was typically an approximation of what had most recently been read. In the case of the chimpanzees the voltage documented was actually often less than the minimum required and raised significant concerns with the inspection team. The risk of escape is considered low and the staff are competent in their response, this is simply a situation where the written documentation does not demonstrate the actual activities on the ground and as such this system requires an intensive and timely review.

2. PEST CONTROL MANAGEMENT

In the majority of areas visually assessed there was considerable evidence of cockroaches, rats and mice. In addition, grey squirrels and corvids were apparent, the former being linked to escaped birds from aviaries and the latter linked to the throwing around and distribution of skip waste further exacerbating the vermin problem. The primary area of concern was the pest control problem combined with the lack of evidence of environmental management and general good house-keeping in off-show areas with spilt food not uncommon and areas not particularly well cleaned. There was evidence of 'keeper hoarding' and areas which would benefit from a general clean-up of materials to minimise habitat and food for rodents and cockroaches. A pro-active review and implementation of both environmental and physical control methods are needed as the current situation is untenable and is both a potential welfare and a staff/visitor health risk.

Additional space

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3. PROCESSES, PROCEDURES AND THEIR IMPLEMENTATION

There were a number of areas where processes were either not fit for purpose or were failing to achieve the intended aim. It is not the role of the zoo inspectors to list all of these here, but the inspectors felt this was a particular area of weakness that was having an impact on the effectiveness of the delivery of the Standards in some cases and as such the zoo licence holder needs to review the processes and their individual roles in the operation of the zoo. Examples include: (a) the maintenance request system where potential welfare or staff safety systems are not addressed in a timely fashion e.g. broken water proof sockets in the chimp house are not repaired in an area which is regularly hosed down almost 8 weeks after the request was made (and this did not appear to have been followed up by keepers despite the same issue occurring on the last zoo inspection report); (b) Team leaders and senior keepers being unaware of the expectation in electric fence management despite having written the policies themselves e.g. chimpanzee electric fence; (c) statements regarding population management or firearms control in the current policies not being adhered to or staff even being aware of what was expected; and (d) standard operating procedures that lacked robust implementation and prioritisation of critical safety pathways despite these being the primary training tool for staff. This is not to say that in most cases that there were concerns with regard to welfare nor staff or public safety, simply that in the event of a significant incident the documentation and systems would fail to support the staff and wider business in their current format and the manner in which they are implemented. In the examples cited above it is not for the inspectors to dictate the normal operational parameters for the zoo, simply it is our responsibility to flag where the operational practices do not match the written expectation of the safe systems of work and the related policies and procedures where it leads to real or potential non-compliance.

Other than these three areas, which are mainly procedural in manner, Edinburgh Zoo was found to be a well operated zoo that is a genuine leader in its field. It was a genuine honour to inspect the zoo and we look forward to seeing how the collection develops under the new leadership and their new robust strategy.

RECOMMENDATIONS (OPTIONAL)

1. It is recommended that the zoo licence holder is consistent as to whether diet sheets are or are not displayed in the animal feed kitchens and that a consistent diet sheet template is utilised. Note that it is possible the new Standards may require diet sheets to be displayed.
2. It is recommended that animal food preparation knives and other catering type instruments are stored on a magnetic knife block or similar rather than tucked into the frame of wooden brackets or old plastic food tubs to ensure hygiene is maintained.
3. It is recommended that the case of the koala 'Goonaroo' is reviewed to identify improvements in communication between departments and any learning objectives that can be obtained by this individual's management with regard to the unforeseen circumstances of changing the ventilation due to the failed heating system and timely interventions with regard to environmental management.
4. The zoo licence holder is recommended to produce a written service schedule for the constituent parts of the penguin filtration system so that elements such as the sand filters are replaced in a timely fashion to assure water quality parameters are maintained.
5. It is recommended that the veterinary department working with the animal department produce a written protocol for the use of the giraffe crush and the giraffe induction box prior to them needing to be used in an emergency, the former should include a plan on how to manage a giraffe if it were to go down in the crush itself.
6. It is recommended that consideration is given to the use of intranasal naloxone as a first response in the event of significant etorphine exposure, following advice from the Society's occupational health or other medical advice.
7. It is recommended that all operational documents are dated and the author identified to allow rapid assessment as to whether the document is current or requires review.
8. It is recommended that the licence holder review staff training across departments as to site security and safety with regard to the closure and securing of off-show areas and gates.

Additional space

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9. It is recommended that the zoo licence holder prioritise the standardisation of animal record keeping and outlines the data information management tools deployed across the Animal Department as there was considerable variation in the use of daily diaries, written records, ZIMS and non-ZIMS electronic data which made data assessment by the inspectors, and staff being requested to demonstrate information, challenging. As part of this, clarity on the processes and actions to be taken is highly recommended, especially where the information being recorded is not consistent with parameters expected.

10. It is recommended that the Safe Systems of Work and associated risk assessments with regard to the Animal Department undergo revision by a competent person to ensure that they are reflective of the work being carried out, outline the expectation of the work being carried out and that the content is robust and provides business security in the event of a significant incident.

11. It is recommended that the fire extinguishers are re-reviewed by the appropriate person as several were out of date and had been missed in the last inspection (or the ticket not updated).

12. It is recommended that if the Waldrapp ibis enclosure to the southwest of the zoo is retained, a double door is installed for keeper entry.

13. It is recommended that the zoo licence holder review the considerable growth of plant material putting additional stress on the netting for some of the enclosures across the site, especially the flamingo facility. Where required this material should be trimmed back to protect the security of any roof netting.

14. It is recommended that the frayed ends of ropes are either re-spliced or removed in the great ape and primate exhibits to prevent digit or limb ligation or other injuries.

15. It is recommended that cockroach traps are dated on the day of deployment to allow accurate tracking of efficacy and pest population as part of the management programme, see directions.

END RECOMMENDATIONS

RECOMMENDATIONS TO THE LICENSING AUTHORITY

The following are recommendations made to the licensing authority but are outwith the scope of the ZLA (1981) but are covered by the HSAWA 1976 and other legislation:

1. It is highly recommended that the practice of power washing the inside chimp dens without water proofs, goggles and other relevant PPE protecting them against aerosolization of faecal and other primate matter is stopped until a new formal policy is put in place. See also Section 3.26 of the SSSMZP (but also Section 8.1).

2. It is recommended that the gibbon enclosure lifting system for the public shelter at the east end of the exhibit and the new giraffe winch systems for browse are confirmed to have been assessed under LOLER 1998 and PUWER 1998 as may be required for these systems.

3. It is recommended that there is an electrical safety and management review carried out across the site as there were a number of areas of concern e.g.: the open front of the House 3 Consumer Unit (African Aviary): the use of multiple extensions plugged into extensions; failure to repair water-proof plug sockets utilised in areas frequently hosed down e.g. chimp corridor; the wide open Consumer Unit in the chimp house due to the frequent tripping of the system; and the location of electric fence mains powered energisers located at ground level in areas which are also frequently hosed down.

4. A large number of toughened glass panes were stacked up against the wall in the maintenance yard at the base of the stairs to the veterinary hospital, these were tied back by a piece of nylon rope which itself was not tied to the wall but was tied to another free standing unsecured object. Whilst they had been there for some time (plants were growing between the panes), they were unsecured and did present a potential hazard if they were to be disturbed and fall outwards. It is recommended these are reviewed and secured in a more permanent manner.

Additional space

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NOTE 01:

Please note that following review of the current zoo licence the mandatory conditions as per the ZLA (1981) and the typical additional conditions that are outlined by the licensing authority have been slightly updated and altered to bring them in line with current recommendations. As these are changes to the zoo licence they are open to review and appeal by the zoo licence holder if they feel this is appropriate, as per Section 18 of the ZLA (1981). They are included in this report in the following pages as per Section 5 and 16 of the ZLA (1981): see Schedule One and Schedule Two below. The remaining additional conditions arising from the zoo inspection are found in Schedule Three.

NOTE 02:

Each of the Schedule three conditions has a timeline that stipulates the time required to complete the condition. The timeline starts on the issuing of the updated zoo licence, the earliest being after the 28 days for appeal period or, if appealed, once the appeal has been addressed. Schedule one and two are permanent, open-ended conditions that apply at all times for the duration of the zoo licence.

Inspecting team's recommendation to the local authority

Having inspected (name of zoo)

RZSS Edinburgh Zoo

on:

4th and 5th October 2021

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)

SCHEDULE ONE: MANDATORY CONDITIONS FOR ALL ZOOS & AQUARIA

The zoo must, as required by the Zoo Licensing Act (1981) and its subsequent amendments:

1. Participate in at least one of the following:

- i. research from which conservation benefits accrue to the species of wild animals;
- ii. training in relevant conservation skills;
- iii. the exchange of information relating to the conservation of species of wild animals;
- iv. where appropriate, breeding of wild animals in captivity;
- v. where appropriate, the repopulation of an area with, or the reintroduction into the wild of, wild animals.

2. 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.





3. Accommodate the zoo's animals under conditions which aim to satisfy the biological and conservation requirements of the individual species to which they belong, including:

- i. providing each animal with an environment well adapted to meet the physical, psychological and social needs of the species to which it belongs; and
- ii. providing a high standard of animal husbandry with a developed programme of preventative and curative veterinary care and nutrition.

(Conditions continue over the page)

Inspector(s) signature(s)

Date signed

Inspecting team's recommendation to the local authority

Additional Conditions (if appropriate)

4. Prevent the escape of animals and put in place measures to be taken in the event of any escape or unauthorised release of animals.
5. Introduce practical measures designed to prevent the intrusion of pests and vermin into the premises of the zoo.
6. Keep up-to-date records of the zoo's collection appropriate to the species, including records of the numbers of different animals, acquisitions, births, deaths, disposals and escapes, causes of death and the health of the animals.
7. Keep information to show how it has complied with these conditions and supply said information to the local authority upon request.

SCHEDULE TWO: ADDITIONAL STANDARD CONDITIONS

Additional conditions to ensure the proper conduct of the zoo in all other respects, during the period of the licence:

Secretary of States Standards for Modern Zoo Practice (SSSMZP)

8. The zoo licence holder must ensure that the standards outlined in the current SSSMZP are complied with at all times.

Insurance

9. The zoo licence holder must have insurance cover which covers them and every other person under a contract of service or acting on their behalf, against liability for any damage or injury which may be caused by any of the animals or by other factors, whether inside or outside the zoo, including during transportation to other premises. Any upper limit on the sum insured must be set at an adequate but realistic level. Within one month of the date of renewal, where applicable, a copy of the zoo's current public liability insurance policy must be sent to the licensing authority.

Hazardous Animals

10. The licensing authority is to be notified in writing, at least one month in advance, of the proposed addition of any new species not currently held and listed in category one of the Hazardous Animal Categorisation (see relevant Appendix of the current Secretary of State's Standards of Modern Zoo Practice).
11. The zoo license holder shall notify the licensing authority before the temporary removal from the zoo (other than for veterinary attention or internal zoo movements) of any mammal listed in category one of the Hazardous Animal Categorisation.
 - a. Notification will be given as early as possible and, in any case, no later than 12 hours before the removal
 - b. When giving notification, details of the destination, method of transportation of the animal(s) and of the arrangements for its well-being, as well as for the safety of the public whilst it is away from the zoo, shall be provided
 - c. The period specified within 11(b) relating to notification period may be a shorter period if mutually agreed by both the licensing authority and zoo operator

Escapes

12. 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.
13. The zoo licence holder must ensure that all members of staff are familiar with emergency procedures when animals escape. In particular, emergency animal escape drills must be carried out at least four times a year, recorded and regularly reviewed, this must include at least two drills involving the escape of a category one species (where present) as stipulated in the relevant Appendix of the current Secretary of State's Standards of Modern Zoo Practice. (Conditions continue over the page)

Inspecting team's recommendation to the local authority

Additional Conditions (if appropriate)

Stock Records

14. An annual stocklist of all animals must be kept and a copy must be forwarded to the local authority before the 1st April of the year following that to which it relates. This must be in, or similar to, the format stipulated in Section 9.6 of the current Secretary of State's Standards of Modern Zoo Practice and cover the period from the 1st January until the 31st December.

Display of the licence

15. The zoo licence holder is required to display publicly the current Zoo licence and Conditions or a copy of it at each public entrance to the zoo.

SCHEDULE THREE: ADDITIONAL CONDITIONS FOLLOWING ZOO LICENCE INSPECTION

1. In order to comply with Section 1.3(d) of the SSSMZP (2012), the zoo licence holder must ensure that a written meat and fish management policy demonstrating the principles of HACCP have been considered and steps implemented with regard to the management and preparation of raw meat and raw fish within the zoo to minimise any risks of cross contamination between equipment, utensils and surfaces. This must include consideration of best practice in source, storage of frozen meat (both meat and fish), stock rotation, appropriate defrosting of frozen meat products, handling of meat and appropriate PPE, risk of contamination of utensils, hand wash and door handles in the meat room areas and adjacent buildings, and defrosting and cleaning protocols and frequency for meat freezers. The zoo licence holder must ensure this change has been completed within three months from the date on which this condition takes effect.

2. In order to comply with Section 1.3 of the SSSMZP (2012), the zoo licence holder must ensure that the ABP waste from the carnivore enclosures is not stored in the carnivore walk-in fridge, in the same space as food intended for feeding to the carnivores. The zoo licence holder must ensure this change has been completed within one week from the date on which this condition takes effect.

3. In order to comply with Sections 4, 5 and 8 of the SSSMZP (2012), the zoo licence holder must ensure that a comprehensive written review of the existing animal houses and other animal containing facilities is undertaken that reviews each facility against the suitability for the species contained within, taking into account the welfare needs for said species; the longevity of the construction of the building and related internal infrastructure, including any maintenance needs required to ensure the welfare of the animal within (where required); and the long term plan for each building. This must include a summary of prioritisation which outlines the order in which the master plan and organisational strategy will attempt to address any issues identified and the timeline within which it is hoped to be achieved within. The zoo licence holder must ensure this change has been completed within eighteen months from the date on which this condition takes effect.

4. In order to comply with Section 2.10, 3.4 and 8.13 of the SSSMZP (2012), the zoo licence holder must ensure that a comprehensive written review of the existing drainage and related utilities across Edinburgh Zoo is undertaken to clearly identify the existing drainage infrastructure; the current issues with the drainage across the site; disease risk assessments with regard to waste water run-off from enclosures, midden or similar areas: especially with regard to water run-off into public areas; and the long term plan with regard to site master planning to address any issues noted from the review. The zoo licence holder must ensure this change has been completed within eighteen months from the date on which this condition takes effect.

5. In order to comply with Section 2 of the SSSMZP (2012), the zoo licence holder must ensure that the partula snail room is assessed to its integrity and any fire risks associated with the close proximity of the back reptile room, where concerns are noted these must be addressed OR the partula room moved to an alternative location. The zoo licence holder must ensure this change has been completed within twelve months from the date on which this condition takes effect.

(Conditions continue over the page)

Inspecting team's recommendation to the local authority

Additional Conditions (if appropriate)

6. In order to comply with Sections 8.30, 8.31, 8.33, 8.34, 8.36, 8.37, 8.38, and 8.39 of the SSSMZP (2012), the zoo licence holder must ensure that the written escape procedures and all associated documentation are up-to-date and reflect the current emergency management protocols and the species held within the collection. This must include firearms team deployment, firearms selection documentation and checklists, emergency management general and specific responses, and that old or aged escape management documentation is removed from around the zoo to avoid confusion. The zoo licence holder must ensure this change has been completed within twelve months from the date on which this condition takes effect. NOTE: this is not to say that there are any concerns with the emergency response procedures in place, simply that the documentation is inconsistent across the zoo and in some cases considerably aged. It does not reflect the verbally described systems that would be deployed.

7. In order to comply with Appendix 12.1.2 of the SSSMZP (2012), the zoo licence holder must ensure that the pygmy hippo is separated from the public by a barrier of suitable design in order to prevent physical contact between the hippos and members of the public, especially just adjacent to the public entry/exit to the house. The zoo licence holder must ensure this change has been completed within one month from the date on which this condition takes effect.

8. In order to comply with Section 8.13 of the SSSMZP (2012), the zoo licence holder must ensure that the wooden walkway to the north of Budongo Trail chimpanzee facility is maintained in a safe condition. To this end an internal structural review is required and where the wooden slats or supporting structures are found to be rotten or where deck light fittings or other elements have collapsed then the slats must be replaced to ensure that the public are not exposed to slips, trips or falls due to the rotten nature of the walkway, OR the walkway is closed to the public. The zoo licence holder must ensure this change has been completed within one month from the date on which this condition takes effect.

9. In order to comply with Section 8.13 of the SSSMZP (2012), the zoo licence holder must ensure that where yellow step grips have been added to stone or other steps that these are all secure and do not present an additional trip hazard for members of the public, this is especially relevant for (but not limited to) the area to the north of Penguin Rock and adjacent to the Education centre. The zoo licence holder must ensure this change has been completed within one month from the date on which this condition takes effect.

10. In order to comply with Section 3.24, 3.25 and Appendix 1.1.2 of the SSSMZP (2012), the zoo licence holder must ensure that all animal waste and food waste open skips are reviewed and replaced with a covered or sealed alternative that prevents the intrusion of outside pests and vermin. The zoo licence holder must ensure this change has been completed within three months from the date on which this condition takes effect.

11. In order to comply with Section 8.5, 8.6, 8.7 and Appendix 1.1.2 of the SSSMZP (2012), the zoo licence holder must ensure that the netted aviary roofs for the black kite and the Southern ground hornbills in the Animal Antics arena area have the broken roof supporting cables/ropes replaced to ensure the integrity of the aviaries. The zoo licence holder must ensure this change has been completed within three months from the date on which this condition takes effect.

12. In order to comply with Section 2.3 of the SSSMZP (2012), the zoo licence holder must ensure that all broken waterproof plugs (those missing the covers) are replaced to ensure the waterproof integrity of the plugs and to prevent any water-electric hazards to the animals contained within the house, this is especially so in the chimpanzee facility. The zoo licence holder must ensure this change has been completed within one week from the date on which this condition takes effect.

13. In order to comply with Section 8.13 and 8.14 of the SSSMZP (2012), the zoo licence holder must ensure that the door to the ibis pond pump room damaged by a recent vehicular collision is reinstated OR a similarly effective method is utilised, to prevent public or unauthorised access to the reported 440 volts electrical hazard contained within. The zoo licence holder must ensure this change has been completed within one week from the date on which this condition takes effect.

(Conditions continue over the page)

Inspecting team's recommendation to the local authority

Additional Conditions (if appropriate)

14. In order to comply with Section 8.5, 8.6, and Appendix 1.1.2 of the SSSMZP (2012), the zoo licence holder must ensure that the security and operational standards are reviewed and risk assessed for consistency across all category one hazardous carnivores, including ursids, as listed in Appendix 12 of the SSSMZP (2012). This must include the use of visual markers for door operation, consistency in colour coding, and lock out and management protocols with regard to ensuring security of these hazardous animal enclosures. Where discrepancies are identified steps must be taken to address any inconsistencies, especially if these could result in injury or escape. The zoo licence holder must ensure this change has been completed within twelve months from the date on which this condition takes effect.

END CONDITIONS

Inspecting team's recommendation to the local authority

Directions

Where there has been non-compliance with an existing condition on the current zoo licence the licensing authority **must** issue a direction indicating the steps required to be taken to ensure the original condition is met. The existing conditions on the zoo licence included the Section 1A conservation measures, the standard additional licence conditions, and any that may have been added as a result of previous zoo inspections.

The inspecting team recommends that the following directions are issued to the zoo:

1. The walk-in fruit and vegetable fridge and the walk-in meat freezer located in the central zoo stores area were considered to be maintained in an unhygienic state. The fruit and vegetable fridge had black mould-like material all over the front, sides and rear of the fan ventilating the fridge as well as similar material on the walls and roof spaces, this was easily removed with a finger wiped across the surface. The meat freezer had icicles hanging from the ventral aspect of the freezer unit and blood on walls, some of which appeared relatively long standing. In some cases deer carcasses had bled onto cardboard boxes below with no drip trays or similar present.

The inspection on 5th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', and Section 1A (c) of the Zoo Licensing Act (1981), 'accommodating their animals under conditions which aim to satisfy the biological and conservation requirements of the species to which they belong'. The licence condition is not met in relation to a section of the zoo, namely the walk-in fruit and vegetable fridge and the walk-in meat freezer located in the central zoo stores area.

In order to meet the requirements of this condition, the zoo licence holder must ensure that a written protocol is produced that outlines the cleaning methodology and frequency of cleaning for both the fruit and vegetable fridge and the meat freezer and that both undergo a deep clean to ensure both units are maintained in a hygienic manner moving forwards. This action must be completed within one week from the date on which this direction takes effect.

The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

2. On both days of the zoo inspection numerous chopping boards for animal food preparation were noted to be deeply pitted and worn preventing appropriate cleaning and decontamination. Many were affected in this manner including, but not limited to: the chimpanzee house kitchen, pygmy hippo house kitchen, the monkey house kitchen, the penguin kitchen, the carnivore meat preparation area, and the callitrichid kitchen areas.

The inspection on 4th and 5th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', and Section 1A (c) of the Zoo Licensing Act (1981), 'accommodating their animals under conditions which aim to satisfy the biological and conservation requirements of the species to which they belong'. The licence condition is not met in relation to the whole of the zoo.

In order to meet the requirements of this condition, the zoo licence holder must ensure that all chopping boards are reviewed and replaced where they are found to be worn or discoloured. This action must be completed within one week from the date on which this direction takes effect.

The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

3. The back reptile room was found to be a challenging environment to maintain normal environmental parameters, including ambient room and basking temperatures, many were outside the expected ranges for the species e.g. example 01: *Tiliqua scincoides* has a recommended (according to Baines et al, 2016, JZAR) ambient temperature of 28-32°C, basking temperature 35-45°C, and a UVI of 0.7-2.6, whereas those assessed during the inspection (September records) were an approximate average of ambient 19.2-26.4°C, basking 28.8-35.9°C, and a measured UVI during the inspection of 4.1UVI; example 02: the royal python heat lamp was flickering on and off for the duration of the inspection simply because we had entered through the door and let in outside cooler temperatures fluctuating the ambient room temperature considerably but which was difficult to detect on the max min thermometers in the room; and example 3: the *Testudo kleinmanni* tortoises in the open vivarium are reported to

Inspecting team's recommendation to the local authority

Directions

require a UVI of 1.0-2.6 but the UVI was read at 1.0 just above the heads suggesting that at the actual tortoise height the UVI is lower. The facility is in need of considerable renovation. It was also noted that the facility did not have a UVI reader.

The inspection on 4th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', and Section 1A (c) of the Zoo Licensing Act (1981), 'accommodating their animals under conditions which aim to satisfy the biological and conservation requirements of the species to which they belong'. The licence condition is not met in relation to a section of the zoo, namely the back reptile room.

In order to meet the requirements of this condition, the zoo licence holder must ensure that all reptile and amphibian enclosures in the back reptile room must have suitable environments, including temperature gradients, suitable humidity, and provision of appropriate ultra violet (UV) light where appropriate. To ensure this occurs the zoo licence holder must produce and implement a documented environmental management plan for the reptile and amphibian species in the back reptile room. The environmental management plan must clearly define target ranges for each environmental parameter and the processes to be implemented where monitored parameters deviate outside of the defined target ranges. This environmental management plan must include, but not be limited to, details regarding:

- a. An environmental management plan for each reptile and amphibian species in the back reptile room must be written and available for inspection. The environmental management plan must clearly define target ranges for each environmental parameter and the method and frequency for monitoring each parameter must be detailed, using evidence based or peer reviewed ranges where possible.
 - b. The environmental management plan must clearly state critical maximum and minimum values for all parameters and include where these might change according to seasonality.
 - c. All environmental parameters listed in the environmental management plan must be monitored and recorded.
 - d. Parameters must be measured at the level of the animal where appropriate, e.g. basking temperature and UVI should be recorded at the level of the basking animal.
 - e. All life support systems (e.g. lamps, heaters, thermostats, filters, pumps) must be visually checked on a daily basis to ensure that all life support systems are working. All faulty equipment must be replaced immediately.
 - f. All reptiles and amphibians must be provided with an appropriate thermal gradient, which must include natural daily and seasonal variations, suitable to the species held.
 - g. Basking sites must be provided to achieve the correct range of basking temperatures at the point of the dorsum of a basking animal as appropriate for the species.
 - h. Water temperature must be specific to the species requirements and these may need to be heated or cooled and controlled separately.
 - i. All reptiles and amphibians must have lighting of appropriate brightness, photoperiod and type for the species held and provision must include natural daily and seasonal variations (where appropriate).
 - j. UV light (both UVA and biologically significant wavelengths of UVB) must be provided at species specific levels as dictated in the environmental management plan.
 - k. UV Index (UVI) range must be appropriate and maintained within the range appropriate for the species and must be measured using a UVI meter at intervals dictated by the environmental management plan.
 - l. All reptiles and amphibians must be provided with a humidity gradient appropriate to that species which must include natural daily and seasonal variations.
 - m. Ventilation must be appropriate for the species.
 - n. All reptiles and amphibians must have sufficient appropriate aquatic facilities of appropriate size, depth and design for the activities that they would perform naturally, (e.g. swimming, diving and exercise).
 - o. For mixed species exhibits or for exhibits holding multiple individuals, the zoo licence holder must be able to provide appropriate environmental parameters for all animals in the enclosure, this may require the provision of multiple separate resources within the habitat.
 - p. Where monitoring methodologies are similar or the same across the different taxa the Environmental Management Plan can simply have a dedicated section outlining the methods and frequencies of monitoring for the back reptile room or subgroups within the room and any variation from the 'standard' set up noted in the notes for each specific species.
- OR the zoo licence holder must rehome all of the reptiles and amphibians found within the back reptile room to alternative facilities that can provide for the needs for each individual species as outlined above.

This action must be completed within six months from the date on which this direction takes effect and records must be maintained for subsequent inspections demonstrating the ongoing monitoring. The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

Inspecting team's recommendation to the local authority

Directions

4. The back reptile room had a number of vivaria that either did not allow the snakes within to fully stretch out in one direction OR the vivaria were full of hides, climbing structures and other useful furniture such that they did not leave much usable space for the snakes.

The inspection on 4th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', and Section 1A (c) of the Zoo Licensing Act (1981), 'accommodating their animals under conditions which aim to satisfy the biological and conservation requirements of the species to which they belong'. The licence condition is not met in relation to a section of the zoo, namely the back reptile room.

In order to meet the requirements of this condition, the zoo licence holder must ensure that all snakes have continual access to usable space that allows them to fully stretch out in at least one direction OR the snakes are rehomed to an alternative facility that can provide for these needs. This action must be completed within twelve months from the date on which this direction takes effect.

The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

5. During the zoo inspection the case of the metabolic challenges of maintaining the koalas with regard to their need for UV light was described. However, in the case of the nearly 17-year-old, male koala 'Goonaroo', he was moved on the 30th June 2021 from the Koala Territory to the off-show area 'West off-show den (old Pandas)' and was still present there at the time of the inspection whilst work was being carried out on his enclosure. He has not had access to UV light during this time, a period of just over three months.

The inspection on 5th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', and Section 1A (c) of the Zoo Licensing Act (1981), 'accommodating their animals under conditions which aim to satisfy the biological and conservation requirements of the species to which they belong'. The licence condition is not met in relation to a section of the zoo, namely the West off-show den for the koala 'Goonaroo'.

In order to meet the requirements of this condition, the zoo licence holder must ensure appropriate levels and type of UV are provided to the koala 'Goonaroo' consistent with that given to the other koalas held at the zoo as dictated to by the veterinary department. This action must be completed within one week from the date on which this direction takes effect.

The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

6. During the inspection it was noted that the safe systems of work / section working procedures provided for inspection did not list the expected voltages for the electrical containment fences nor were there any processes or written policies that stated expected voltages for fences, this was especially the case for the 'Carnivore Section Working Procedures'. The only exception was the 'Budongo and Living Links Section Working Procedures' which stated that 'The reading should be above 1.5kv. If it is reading low or not at all call the electrician and do not let the chimps out'. However, during discussions with staff on the section chimpanzees were not let out when the fence was at 1.0kv and during the month of September the records demonstrated voltages under 1.5kv on approximately 27% of readings (40/150) and one day there were no readings recorded because the fence tester had been lost. The lack of internally published protocols for voltages on animal containment fences meant there was no standard to adhere to and the one example found in the working practices was not being followed. This was not to say that there were any issues or risk with regard to electrical fence containment, simply inconsistencies on what was published (or not) and measurements taken by staff and how they responded to the values documented. This led to potential concerns with regard to the management of electric fences and the ramifications for hazardous category one management, especially chimpanzees. In most instances the electric fences were secondary barriers so escape risk was low.

The inspection on 4th and 5th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the

Inspecting team's recommendation to the local authority

Directions

Secretary of State's Standards of Modern Zoo Practice', and Section 1A (d) of the Zoo Licensing Act (1981), 'preventing the escape of animals and putting in place measures to be taken in the event of any escape or unauthorised animal'. The licence condition is not met in relation to the whole of the zoo.

In order to meet the requirements of this condition, the zoo licence holder must ensure that a written process is developed as a stand-alone document, or as part of the Section Working Protocols, that (i) outlines the design of the electric fence for each species; (ii) defines the voltage range expected for the species; (iii) justifies the choice of the voltage used to contain the animal with evidence based references where possible, accepting similar species as a reference if required; (iv) outlines the process and procedures in place specific to the species with regard to values that are outside the expected stated ranges, especially with regard to allowing animals out into a paddock or area external to the indoor house; (v) outlines the daily and other maintenance checks for the electric fences, including overgrowth of plants and fences touching supporting structures that impede operation; and (vi) whether there is a need for back-up systems and generator requirements in the case of power failures to the site to ensure functioning electric fences. This action must be completed within two months from the date on which this direction takes effect.

The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

7. The single *Chaetophractus villosus* (large hairy armadillo) located to the southeast corner of the Sloths and Armadillo exhibit was noted to be engaging in cyclical repeated behaviour consistent with a stereotypy. The enclosure was looked down upon from above and there were only two covered areas that act as shelter from the public view and there was no evidence of enrichment in the enclosure (the keepers were not available to confirm what enrichment and the frequency given was, as they were involved in a guest experience). The level of visual cover was not considered sufficient for the nature of the exhibit.

The inspection on 4th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', and Section 1A (c) of the Zoo Licensing Act (1981), 'accommodating their animals under conditions which aim to satisfy the biological and conservation requirements of the species to which they belong'. The licence condition is not met in relation to a section of the zoo, namely the Sloths and Armadillos exhibit.

In order to meet the requirements of this condition, the zoo licence holder must ensure that additional shelter or cover is provided to provide the animal with areas away from the view of the public OR the animal is moved to a more secluded area of the house. This action must be completed within two months from the date on which this direction takes effect.

The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

8. There were no generators on site nor a written policy on the steps required to obtain one in the event of a prolonged power cut which would impact both life support systems and in many cases the secondary animal electric fence containment systems.

The inspection on the 4th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', and Section 1A (d) of the Zoo Licensing Act (1981), 'preventing the escape of animals and putting in place measures to be taken in the event of any escape or unauthorised animal'. The licence condition is not met in relation to the whole of the zoo.

In order to meet the requirements of this condition, the zoo licence holder must ensure that either a generator(s) is supplied that provides sufficient power to maintain critical life support for species that require it OR a written policy outlines the steps required to hire a generator, the source for hiring, where it would be installed, how it would be installed, and the capacity required for the site, as well as the priority status of the zoo following core community operations such as hospitals, etc. This action must be completed within three months from the date on which this direction takes effect.

The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

Inspecting team's recommendation to the local authority

Directions

9. The aged Monkey House, currently closed to the public, but still retaining a number of primate species as well as meerkats, was in a poor state of repair and hygiene. Husbandry had been improved with the relatively new heating system but the building was in a deteriorating state with wooden roof panels exhibiting water damage, areas of caging condemned (no animals with access), and variable states of cleanliness with biofloors in the old public areas creating challenges for pest control as well as food receptacles being in need of cleaning. Due to the age and use of the monkey house the pest control issues were significant with cockroach traps being full, having been reported as laid only the night before. Whilst staff attempt to manage the primates in the aged enclosures they are not considered suitable for current primate husbandry and are limited in scope and design. This was further exacerbated by the significant pest issues.

The inspection on 5th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', and Section 1A (c) of the Zoo Licensing Act (1981), 'accommodating their animals under conditions which aim to satisfy the biological and conservation requirements of the species to which they belong'. The licence condition is not met in relation to a section of the zoo, namely the Monkey House.

In order to meet the requirements of this condition, the zoo licence holder must ensure that a comprehensive, written animal husbandry audit is undertaken for the primate and meerkat species held within the Monkey House. This must include an animal welfare audit; a disease risk assessment with regard to the significant pest control issues within the house; a comprehensive enrichment programme review for the species within the house; a full maintenance programme and structural assessment of the facility where the fabrication of the building impacts animal welfare, this must be undertaken in conjunction with the veterinary department; and a review of zoonoses risks related to the management of the facility and pest control issues. Any areas of concern identified in the review must be addressed or processes implemented to mitigate any such concerns. OR all of the primates are rehomed to facilities that cater for the animal's needs, this can include new builds or modifications of enclosures elsewhere on the Edinburgh Zoo site. This action must be completed within twelve months from the date on which this direction takes effect.

The monkey house is required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction (it is noted that the building is already closed to the public).

10. During the zoo inspection it was clear that the site was suffering from a significant, bordering on severe, pest control issue. In the majority of exhibits it was relatively easy to identify cockroach frass and adult bodies, as well as traps which contained significant numbers of carcasses filling traps within a 24-hour reported window. Believed two species noted during the inspection: *Periplaneta americana* was the most common observed in the traps. The same was found for rodent faeces from both rats (common) as well as smaller rodents, suspected mice. Small rodent faeces was even found in hand wash basins. Live rodents were seen on a number of occasions during the two-day visit. Grey squirrels were common and their interaction with aviary netting had been reported responsible for at least one ibis escape, a bird which was not recovered. Corvids were noted to filter through skips and throw food around, this including primate waste. Other pests were present but were being well managed and actively encouraged to prevent additional animals entering the site e.g. foxes. The site was not particularly well managed with regard to basic environmental controls and site cleanliness with spilt food being common and open skips actively supporting pest species and a tendency to hoard materials in off show areas providing escape routes and habitat for the pest animals. Some of the older buildings had defunct environmental systems which formed perfect living spaces for pest species. There appeared to be no active engagement between external pest controllers and the staff at the zoo, and the frequency of visits, considering the severity of the pest control problem, was questioned by the zoo inspectors. There were considerable zoonosis and welfare concerns raised by the inspectors due to the large number and frequent evidence of pests within the zoo and this was not considered compliant with the Standards nor the ZLA (1981).

The inspection on 4th and 5th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', 1d 'The Zoo shall introduce practical measures designed to prevent the intrusion of pests and vermin into the premises of the Zoo', and Section 1A (e) of the Zoo Licensing Act (1981), 'Preventing the intrusion of pests and vermin into the zoo premises. The licence condition is not met in relation to the whole of the zoo.

Inspecting team's recommendation to the local authority

Directions

In order to meet the requirements of this condition, the zoo licence holder must ensure that a written audit of the pest control programme is undertaken to ensure it is effective and encourages a holistic approach to pest management. This must include, but not be limited to: confirmation of the primary pest species of concern on site (both vertebrate and invertebrate); a review of the current control methodologies for each target species; a site review of environmental controls including cleanliness, hygiene and management of off-show areas with regard to habitat provision for each pest species; review of reactive and proactive control strategies; review of internal or external or integrated internal and external pest control provision; general staff training in pest control management including both control and preventative methods; and development of key performance indicators for success and monitoring of the pest control programme that can be used for annual reviews of the efficacy of the pest control programme. Any areas for improvement or recommendations made by the review must be implemented. This written audit document must be completed within six months from the date on which this direction takes effect.

The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

11. During the inspection it was noted that for the period 2018 to 2021 out of the last possible 16 emergency animal escape drills only 6 had been undertaken with a possible two additional drills still possible this year, that is only 50% of the mandatory emergency animal escape drills had been undertaken in the last four years.

The inspection on 5th October 2021 highlighted that the zoo licence holder had failed to comply with the following licence condition: 1b 'The Zoo shall accommodate and keep the animals in a manner consistent with the Secretary of State's Standards of Modern Zoo Practice', and Section 1A (d) of the Zoo Licensing Act (1981), 'preventing the escape of animals and putting in place measures to be taken in the event of any escape or unauthorised animal'. The licence condition is not met in relation to the whole of the zoo.

In order to meet the requirements of this condition, the zoo licence holder must ensure that at least two emergency animal escape drills are carried out before the 31st December 2021 and that these are recorded and reviewed, with changes made to the escape policies where failings are identified. This action must be completed by the 31st December 2021.

The zoo is not required to be closed to the public during the period in which the zoo must make changes needed to comply with this direction.

NOTE: the requirement for four animal escape drills is being added as a specified mandatory condition on the zoo licence in the proposed Schedule 2 zoo licence conditions, as noted above.

END DIRECTIONS

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.