

CAZA Accreditation Critique

Is this animal from a CAZA accredited facility?



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INTRODUCTION:

Of late there has been much controversy about the Toronto Zoo, the fate of the three elephants that survived there into 2012, and the future of the zoo and how it is governed. (See <http://www.thestar.com/news/canada/article/1253334--marineland-allegations-of-poor-treatment-of-deer-bears-and-links-attached-to-that-article>).

During this period there was an understandable assumption by some politicians, media, and others that the accreditation of the Toronto Zoo by the Canadian Association of Zoos and Aquariums (CAZA) provided a satisfactory level of assurance that any zoo or aquarium met high standards of animal care and professionalism while providing the socially important purposes of conservation and education, additional to whatever entertainment or commercial values they may have. (See, for example: <http://www.thestar.com/opinion/editorials/article/1248863--toronto-zoo-sale-remains-worth-exploring>)

At a time when the Toronto Zoo was using a wide suite of delaying tactics to contravene the Toronto City Council's directive to send the three elephants to a sanctuary, the Toronto Star began a series of expose's about Marineland, a combination zoo, aquarium and entertainment park located in Niagara Falls, Ontario, and accredited by CAZA.

While allegations made by reporters and former staff members and various animal experts recently and through the years remain untested in courts of law, simple observation would presumably indicate that there is vast disconnect between the standard of care, or lack of care, at Marineland, and what has been implied by the term "CAZA accreditation".

The issue gains importance by virtue of the current effort being made by Toronto Zoo to end municipal oversight, an effort based on the argument that CAZA accreditation reflects the opinion of "experts" who are better qualified to judge standards of animal care, education and conservation, than elected officials.

"Violations" of anything that might be called CAZA standards by accredited zoos don't lead to removal of accreditation. It is true that CAZA threatened to remove The Toronto Zoo's accreditation (and may yet) if the elephants are sent to a facility that is accredited as a sanctuary by the Global Federation of Animal Sanctuaries (GFAC). Neither CAZA nor its American counterpart, the Association of Zoos and Aquariums (AZA), accredit sanctuaries, nor can sanctuaries seek accreditation without lowering their own high standards of animal care.

I am not aware of any cases of CAZA or AZA ever threatening to remove status when zoos sent animals to sanctuaries, non-accredited zoos or even animal dealers who have auctioned animals to game farms to be shot by hunters, leading us to at least consider that it is not the animals' welfare that drives the threat.

This document seeks to demonstrate, by analyzing the CAZA accreditation standards, that CAZA standards, even if met by zoos and aquariums, do not necessarily lead to animal welfare, conservation or education. Our purpose is simply to challenge the unwarranted faith in CAZA accreditation.

EVALUATION OF CAZA ACCREDITATION STANDARDS:

1. General standards:

a. Accreditation standards:

The CAZA accreditation document implies that the standards are not mandatory in as much as the word "must" may be waived, (page 3): "While the words 'should' and 'must' are both used in these standards, under certain circumstances, the Commission may waive a 'must' or strongly encourage the implementation of a 'should.' Peer review, by both the Visiting Committee and the Accreditation Commission, will continue to allow certain levels of subjectivity." When "must" becomes a "should", or when "certain levels of subjectivity" and what those levels are, is not stated.

Concerns with this section include:

- visits by the CAZA Visiting Committee occur once every five years and are announced in advance.
- panels may include a member or members known to the owners or staff or visited by them in their capacity as volunteers on similar panels.

b. Governing authority:

This section states "The Commission must be assured that an institution's governing authority understands and is willing to be supportive of the institution abiding by the CAZA Code of Professional Ethics and Bylaws."

These "ethics and bylaws" tend to be vaguely platitudinous and discretionary (*cf* "The Ethics Committee of CAZA shall determine action to be taken in such matters, subject to appeal to the Ethics Appeal Panel, and shall exercise such additional authority as may be delegated to it by the Board of Directors.") CAZA members "pledge" to certain things, but "member" is not defined, and on the CAZA website it lists as "members" only institutions, not individuals, who are, for example, pledged to: "Endeavour at all times to improve zoos and aquariums" and "Promote the interests of wildlife conservation, biodiversity and animal welfare to colleagues and to society at large."

But there can be a wide discrepancy between what CAZA, or zoos and aquariums, might consider to "promote the interests of wildlife conservation, biodiversity and animal welfare" and what experienced conservationists, ecologists or animal protectionists might want to support. Keeping social animals in isolation, forcing underfed animals to beg unhealthy treats from zoo

patrons or breeding animals and then disposing of them or their offspring to animal dealers, for example, may not be what is considered by many animal conservation and animal welfare experts to "promote the interests of wildlife conservation, biodiversity [or] animal welfare." And yet evidence indicates that zoos may do such things and still be deemed to be upholding their pledge.

CAZA states "It is essential to have a good working relationship between the governing authority, CEO/Director, and staff." In the case of the Toronto Zoo, when the "governing authority", Toronto City Council, worked to assist an animal welfare issue, the disposition of the three elephants at Toronto Zoo to a sanctuary, it was continually thwarted by the zoo management. The response from the zoo is a proposal to eliminate the governing authority!

In this section, CAZA states that "While the governing authority may have input, the decisions regarding the animal collection must be made by the professionals who are specifically trained to handle the institution's animal collection, staff, and programs." However, CAZA extends its accreditation to both the Toronto Zoo and Marineland as though the animals in those facilities received equal care.

In fact, CAZA presents a circular rationale for its positions, that being that the Toronto Zoo should lose its accreditation if it sends its three elephants to an elephant sanctuary to improve their welfare but Marineland should maintain its accreditation despite ongoing complaints of animal welfare concerns from multiple sources.

If, as most certainly could happen, a zoo did serve the interests of education, conservation and animal welfare, then to do so most effectively would be to exercise openness and to sending animals to a facility that only supports animal welfare where necessary for the welfare of the animals. It is simply not possible to humanely keep all species at all times in a facility that is limited by its adherence to zoo standards.

Ninety nine percent of all animal species, endangered or not, are not found in any zoos, but among those that are, often because of their attractiveness to the public, thus their ability to increase visitation, the ability to live lives of comfortable safety varies through their lives and in accordance to their species.

c. Staff:

We note that: "Staff members should be encouraged to actively participate in CAZA programs, as well as other programs developed by conservation-oriented organizations". However, there is no provision to protect whistle-blowers. Our experience is that the nature of the zoo industry is, with a few exceptions, insular, secretive and fraternal. We frequently receive information about zoos and aquariums we can't use because the informant is afraid of reprisals if she or he speaks out. Most zoo keepers want to maintain the option of working at zoos. And yet, as the issues recently reported at Marineland indicated, within a CAZA-accredited zoo, the exposure of animal abuse requires the level of documentation best provided by staff. Such people are

understandably reluctant to come forward, knowing that in doing so they risk being blackballed by the profession.

Physical facilities:

This section deals with the nature of the physical structure in which animals are maintained, but is completely non-specific in its requirements and therefore offers little or no protection for the animals. No species is named, and the varying needs of and problems posed by various species are not examined. For example, we read that the environment the animals inhabit must "not adversely affect the animals considering their auditory, olfactory and light or visual sensitivities." But what that means is not explained. For example, one major concern expressed by animal welfare and marine mammal experts involves the keeping of cetaceans (whales, dolphins and porpoises) in captivity. These mammals make constant use of "sonar" when underwater, emitting a string of high-pitched sounds whose echoes inform the animals about their environment and direct them in daily activity under the surface the same way that vision directs terrestrial species. In captivity all such sound emitted can only return from, at most, a short distance, the sides of the tank. The effect has been compared to a human living in a glaringly bright room made of mirrors with microphones connected to a speaker that repeats every sound made, a second later.

We can only guess at the effect this entirely unnatural situation has on the animals, but it has been noted that not only do cetaceans in captivity often eventually stop echolocation...ending their primary means of perceiving their environment -- rather like us keeping our eyes closed to avoid eye-strain and emotional stress from sensory overload -- they have shortened lives and exhibit unnatural or stereotypic behaviour indicative of stress.

These "general standards" require "appropriate quality of water for those species that are marine in nature..." but do not explain what that means. At Marineland water is chlorinated or otherwise chemically treated to kill micro-organisms that are dangerous to the animals and humans, but which, after constant exposure, can be damaging to eyes of marine animals forced to live in these conditions. But not treating water leads to the possibility of pathogens in a volume of water that is so small (compared to natural habitat -- the ocean) and confined. The situation is further exacerbated by the fact that salt water, that forms the "natural" water in which marine mammals and fish, by definition, inhabit, is very corrosive of ordinary piping and plumbing and paint surfaces. And finally, a sterile water column is the antithesis of what marine animals evolved, through three billion years, to inhabit, begging question of what is "appropriate" let alone how it can be achieved in such contrived, artificial conditions.

Number 7 in these "General" standards for animal facilities states that animals "on public display" must be kept in enclosures the size of which "enables the animal to" exercise "natural behaviours", but also "facilitate public education and interpretation." None of these terms are defined, and in fact are often contradictory. For example, the "natural behaviour" of the

African Savannah Elephant includes occupations of home ranges that, according to the IUCN, "vary in relation to ecological conditions and individual factors. The largest home ranges, over 30,000 km², were found in xeric [dry] habitat while the smallest were found in more mesic (wetter) habitats and were less than 50 km²" both range sizes being vast beyond what any CAZA accredited zoo provides. Further, such "natural behaviours" in African savannah elephants include ranging 5 to 15 km daily in xeric habitat, mixed age groups, a matriarchal herd structure, male enclaves and a vast textural array of substrate (ground walked on) and tactile stimuli, not all propitious for the animals, by any means (draughts, storms, predators and parasites occur in the wild but rarely in captivity) but all non-reproducible in most captive situations.

But it really does not matter because the "standards" go on to explain that "Consideration should be given to the recommended enclosure standards designated under the current government regulations and established guidelines of professional groups." The concern is moot since in many jurisdictions, including Ontario, there simply are no standards designated under the current government regulations -- indeed, no regulations -- and even if there were, they should only be given "consideration", and only for animals "on display". And what about the many individual animals of various species who spend a major part of each year off public display or never being on public display?

In short, for one of the most critical aspects of wild animal husbandry there are no standards that must be met to achieve accreditation under CAZA. These are species that are not domesticated, have not been bred to survive human impositions upon their natural behaviour.

At the bottom of page 6 it is stated that these facilities should "achieve a distance from the public and other specimen (*sic*) at which the animals do not appear to be stressed." Note, again, a total subjectivity, "do not appear to be", and a total lack of specifics or definitions. It's a serious issue because "stress" can be hard to determine in an animal, and when there is an obvious indication of it, it can be denied by the zoo community.

An example of this denial was presented at Toronto's City Hall Toronto Zoo Board Management Meeting on November 1, 2011, when a zoo staff person explained that when elephants are seen to rock back and forth, a stereotypic behaviour commonly seen in zoo elephants, but not wild ones, they were showing "contentment", analogous to the gentle rocking back and forth sometimes seen in people standing in line at the check-out counter of a store. She offered no evidence of research to back up this contention.

The CAZA document states that animals are supposed to be able to "achieve a full range of body motion and physical movements". However, there are caveats as the CAZA document states: "Animals may be physically altered to preclude certain physical activities (e.g. pinioning) only as a last resort and only if an environment can be provided in which the limitations of the altered state do not create predictable or psychological discomfort."

Pinioning refers to the act of amputating the tip of the wing of a bird, where the outermost flight feathers (primaries) attach, thus rendering it forever flightless.¹

Another generalized requirement (7.4) is that enclosures contain "furniture" (a term that in zoos refers to structures within enclosures, to which the animals contained therein have access) or "...procedures to psychologically enrich the environment and stimulate physical movement and behaviour of the specimen."

Again the problem is that none of this is explained or species-specific and means that with the placement of a log in a cage for a bear to step over, or freeform sculptures beneath the waters of a concrete pool for penguins to swim around, you may have fulfilled the requirement regardless of the complexity of the environments to which such species are native.

There is also a requirement (7.4, page 32) for shelter for animals to protect themselves from sun, rain or snow, although again there are no specific as to how much protection "needs" to be provided, and CAZA accreditation seems to apply to zoos such as Marineland that has long been cited by animal protectionists for the lack of shade provided to its hoofed animals, specifically deer which, in the wild, tend to favour shaded conditions.

Section 8, page 7, does address enclosures that are located off public display. Under section 8.1 it is stated that animals in such "long term or permanent" enclosures must not "appear to be stressed" with such appearances not defined, and must be able "to achieve a full range of body movement."

The term "body movements" is not defined, but must be restricted to movements that do not entail species-specific locomotion, such as running at speed, flying at speed or diving or swimming to depths that they routinely achieve in the wild.

Here, too, "furniture" must be provided that will "physically and psychologically enrich their environment and stimulate physical movement and behaviour." What this all means is again not explained, but presumably means that cages away from public view must have something that the animal must move around.

Under section 9 temporary shelters are adequately described, but no species-specific, or any, definition of such terms as "short term" are defined.

Under section 10, it is simply stated that "quarantine facilities" and "isolation facilities" must be provided. They are not defined.

Under section 11, it is stated that "commissary areas" must be "physically separated from other functions" but again, what constitutes physical separation?

That food is properly stored in a manner that prevents decay or contamination or loss of nutriment value, and that the animals are appropriately fed the foods necessary for the health of the species involved is nowhere mentioned, let alone a "standard" to be met.

Section 12 addresses alarms but again without definitions. It says that "routine" maintenance records must be kept, but does not say what that means. Under this definition a cowbell hung inside a door on a sixty acre zoo that was looked at once a year with such glance duly noted in a log would qualify as meeting CAZA "standards".

Under section 13 it is noted that lighting must be sufficient in indoor facilities, including night houses, "so that maintenance can be accomplished and animals can be observed." But there are no indications of how well animals are to be observed, or what forms of maintenance may be appropriate. And there is no indication that consideration of photoperiodism is required. Photoperiodism (the seasonal lengthening or shortening of daylight) drives hormonal and consequent physiological changes in animals, and may dictate fat deposition, hibernation, migration, food choice, compatibility and breeding condition, particularly in species from temperate and high latitude polar and sub-polar regions. We are not suggesting the more qualified zoo keepers are not aware of this, but rather, such awareness and consequent action is not a requisite to accreditation.

Section 14 says that "a means for emergency lighting must be available." Since nothing is specified or defined, this could mean that simply having a light switch that can be turned on in the event of an "emergency" would suffice as "emergency lighting" for the purpose of meeting accreditation standards.

Section 16 says that animals must be kept within a "natural or fabricated perimeter fence" that isolates them from "direct exposure to the non-visiting public and exposure to feral or domestic animals." We know of no out-door exhibits at the Toronto Zoo or any other zoo that would suffice to prevent direct exposure to native wild animals, such as raccoons or domestic animals such as cats, rendering the restriction meaningless. This section states that "the level of security required will vary according to the species in the collection and the proximity the institution to populated areas, to agricultural land and to sensitive wildlife habitat". What makes wildlife habitat "sensitive" is not explained. It recommends a "minimum" barrier that is the "equivalent of a 2 meter high, chain link fence." A two meter chain link fence is, of course, not much of a barrier to either the "non-visiting public" or to other animals and does not take into consideration the effects of snow build-up in reducing distance from ground to top, and does not take into consideration dogs' and other species' ability to dig under fences. We make these points not to deny the value of enclosing a zoo within an outer, clearly identifiable chain link fence, but to point out that this standard is not "high", but rather a very minimal way of controlling unpaid visitors and vandalism and entry by a few species of animals from outside.

e. Safety and security:

After stating that security should be provided "on a 24-hour, year round basis" the document states that some institutions may not be "able" to do so, and then says "the Commission may approve the use of electronic or other acceptable security measures." Since nothing is defined,

it would appear that what can pass as "security" for the purposes of CAZA accreditation, is quite discretionary...again not a "high" standard, but close to no standard.

Section 3 states that "adequate barriers" must be in place to enable the containment of an escaped animal within the property." We know of animals (mostly birds) escaping the outer confines of accredited zoos, such as Toronto Zoo, without risk to the public, and without the zoos suffering any hint of a challenge to their accreditation. But it is not clear what is meant by confinement within the zoo. Clearly in any zoo animals who escape within the outer perimeter of virtually any zoo would not be "confined". Zoos where people and dangerous animals have come into contact and where injuries or death to humans occur do not lose CAZA accreditation.

Section 4 requires "some method of remote or manual monitoring" of the facility when it is closed to the public. What method, or what degree of monitoring, is not stipulated.

Section 5 states that the public "must be prevented from directly contacting potentially dangerous animals by use of double fencing or other barriers." This stipulation has been ignored for years by Marineland, where the public is invited to lean over a single fence and throw unhealthy food to bears directly below them or to be in direct contact with the deer. While what might be a "potentially dangerous" animal is not identified, there have been situations where even captive deer have been known to injure and kill humans, and yet children freely walk among the deer at Marineland with no risk of losing its CAZA accreditation. Nor did African Lion Safari face any such risk when tigers attacked and mauled two visitors.

f. Standards of Risk Management:

This refers to the need to show a plan to accommodate various potential risks, some of which are named (natural disaster, animal escapes, lost children, first aid, zoonotic diseases, pest management, reportable disease outbreak, terrorist activities, union actions, loss of utilities). Occupational health and safety issues are all mentioned, but there are no specifics as to what level of response to what activity is deemed acceptable. We know that there are very real risks to the animals in the zoo and to residents around zoos when natural disasters like hurricanes occur. We know in some instances that animals escape confinement in these circumstance and are at risk of injury and death themselves but also may be dangerous to area residents. And in the long run, may result in impacts on the natural environment. No standard is set.

We are unable to truly assess the efficacy of this section since it is so vague, beyond saying that facilities must meet existing regulations (when they are in place). Some plans may be very detailed and sufficient, but there appears to be ample room for minimal plans so long as they obey the law and local regulations.

g. Standards for emergency preparation:

This section is similarly vague in defining what is required. For example, section 5.9 states: "All animal housing structures in which there is electrical service, an artificial source of temperature

control, fuel service, or to which the public has access must have at least one appropriate class fire extinguisher *as designated by local regulation.*" (Emphasis ours.) This is not a CAZA regulation, is hardly stringent, and simply means local laws should be obeyed. An unheated, unilluminated barn filled with dry hay could be totally lacking in any fire suppression equipment and still meet CAZA, regulations, so long as it met "local" regulations.

Similarly (5.10), fire extinguishers must used, and staff trained, only "as required by local regulation."

Similarly (5.11), firearms must be stored "under conditions which comply with relevant regulation."

That regulations should be obeyed should be a "given" and has nothing to do with setting some sort of high, or any, standard.

There are other examples of circular reasoning that exclude CAZA from having standards. For instance, under 5.15, page 11, we read, "Security personnel must be trained to handle emergencies in accordance with the policies of the institutions." Those policies are left up to the institution, not CAZA, thus may or may not meet a "high" standard, or the most minimal...it's all the same in terms of CAZA accreditation.

There must (section 5.16, page 11) be a communication system "that can be easily accessed in case of an emergency" but it can be a "walkie/talkie, pager, mobile telephone, intercom, telephone" or alarm, so long as it is electronic. Nowadays virtually everyone carries a cellphone, thus this is hardly a high standard.

5:17 (page 12) states that a "written emergency protocol" should be developed with the "local police or other emergency agencies", it being such agencies, not CAZA, that determine the protocol. We are not suggesting this is wrong, just that it does not represent CAZA-determined standards or reflect any expertise relevant to zoo or aquarium-specific needs beyond those possessed by the zoo or by the emergency services consulted. Virtually all, if not all, public buildings must do the same.

5:18 (page 12) states that underwater equipment "must meet *minimal* operational standards for such diving" (Emphasis ours), which makes our point. CAZA has convinced too many people that it sets some sort of high standard for accreditation, whereas it does no such thing.

5:19 (page 12) states that "Institutions must comply with the applicable laws for their location and size of institution." Yes...but those "applicable laws" apply to us all, and are not made by CAZA and do not reflect higher than the absolute minimal "standards" required by law.

5:20 (page 21) states that pest control should not threaten or contaminate the "animal collection, the staff and the public", but provides no shred of guidance.

It does state, as an "explanation", that: "Rodent control, proper drainage, clutter in work areas, and other housekeeping activities require continuous attention." Yes, but given that inspections by CAZA are announced well ahead of time, and only held once every five years, how can CAZA know if such "housekeeping" is given "continuous attention"?

h. Standards for equipment and chemicals:

Here again there obviously is no objection to saying equipment must be safely stored and maintained, regulations followed or having contingency plans in place, but each of the requirements are again generalities; there are no standards given. The horrific eye problems which the Star articles said were experienced by marine mammals at Marineland suggests that the improper use of such chemicals is not grounds for losing CAZA accreditation, and indeed, CAZA, on the heels of the aforementioned Toronto Star investigation, again confirmed Marineland accreditation.

2. ANIMAL COLLECTION:

a. General standards for animal care:

Each institution accredited by CAZA is supposed to have an Institutional Collection Plan (ICP) to be re-evaluated and updated at least once every five years. The collection should represent the "mission statement" of the institution. This is one of those situations that may look good to laity but in reality it allows zoos and aquariums to make broadly meaningless claims of purpose, specifically "education" and/or "conservation" (and perhaps animal welfare). In addition, it does not address issues of transparency and accountability with regard to public institutions nor transparency of findings when private institutions are investigated for issues of animal cruelty and other non-compliance matters.

The "explanation" for this section, 1.1.1, reads: "The ICP should include a statement of justification for all species and individuals in the institution's planned collection." Most zoos take at least a partly opportunistic approach to what they plan to obtain, balancing supply with their ability to house the species in question, and the economic ramifications of doing so.

Animals are acquired by purchase, trade or, if species are already present, perhaps breeding, the nature of which can establish trade opportunities. But these are to varying degrees unpredictable. For example, the Toronto Zoo may acquire Steller's sea eagles because Steller's sea eagles, the world's largest eagle and native to northern Japan, and attractive to visitors, have become available. Thus they fit the rubric of education because "education" is defined as simply displaying what is held captive, with information about the species perhaps on display nearby, but not necessarily. At the Toronto Zoo, for example, most species on display are only accompanied by their English name, French name, scientific name, with the continent where they are found implied by the pavilion in which they are displayed.

"Conservation" is an even broader term and seems to mean keeping animals that are or may become endangered in the wild, but not actually conserving them. The Steller's sea eagles will not be bred and released back in northern Japan, nor would there be any conservation objective met in doing so.

The "explanation" continues: "The ICP should consider such criteria as: status in the wild, status in zoos and aquariums, existence and priorities of cooperative management programs, ability to maintain the species in both a physically and psychologically healthy environment, exhibit value, exhibit suitability (may include climactic considerations), need for husbandry and other research, recommendations stated in Regional Collection Plans, and any other issues specific to the institution's missions and vision."

This may look impressive, but what does it mean?

"Status in the wild" refers to the size of a population in the wild. Some species, such as the Pere David's deer, California condor and the Guam race of the Micronesian kingfisher are successfully bred in captivity with a view to placement in the wild, and while such activity can best be done in isolation from zoos and zoo infrastructure (in the case of the Toronto Zoo funding for such project must not even come out of the capital budget) some zoos in some instances most certainly play some degree of a supportive role in contributing to the actual conservation of some such species and may even be accredited by CAZA or AZA.

But most animal species displayed in most zoos accredited by CAZA are common in the wild and/or have large, more or less self-sustaining captive populations that will never or unlikely ever contribute to conservation by means of release to the wild. What is meant by "consider" is not explained, rendering the stipulation rather meaningless. Put another way, how, exactly, does the "status in the wild" of a species inform its eligibility, or lack thereof, for CAZA accreditation? At any rate, it is only to be considered, whatever it means.

Similarly, how is considering the "status in zoos and aquariums" supposed to influence zoo or aquarium choices with regard to their eligibility, or lack thereof, for CAZA accreditation?

Consider the beluga whale. CAZA-accredited Marineland has a large number of captive beluga whales and wants more, as does an aquarium in Georgia, USA. Beluga whales are among the most "charismatic megafauna" that, zoos and aquariums have learned, draw visitors. They have been called "the new orcas" because they have much of the appeal of orcas without the drawbacks, including a growing public awareness that orcas fair poorly in captivity and orcas sometimes hurt or kill trainers which is indicative of something wrong. In the wild orcas do not kill humans.

Like dolphins, belugas' faces contain a "fixed smile" that imparts a sense of well-being to uninformed human onlookers. But they don't sustain a captive breeding population -- they don't fare well in captivity, and so there is a constant demand by aquariums that feature them for wild belugas.

So does the fact that their "status in zoos and aquariums" mean that they should be avoided, since displaying them puts pressure on wild stocks, not only the animals captured, or the ones that die during capture intents, but the poorly understood effect of capture on possible social groupings and their subsequent viability? Or does it mean it's okay to seek more from accommodating market sources?

Is there a situation where "status in zoos and aquariums" determines the eligibility, or lack thereof, of an institution to attain CAZA accreditation? And more to the point, has any zoo or aquarium lost their accreditation based on failure to meet eligibility criteria?

While we understand the value to the zoo community in considering "priorities of cooperative management programs" what does such consideration mean? How does such consideration or lack thereof influence an institution's eligibility for CAZA accreditation? If accreditation is not at risk by virtue of the degree of cooperation why is it at all mentioned in this document?

Of greater concern to animal protectionists and those involved in animal welfare is the requirement to consider the "ability to maintain the species in both a physically and psychologically healthy environment".

What does that really mean? How is it determined that a specimen is, or if obtained, will be, "both physically and psychologically healthy as a result of the "environment" in which it is confined within the facility?

Although the Marineland debacle provides a reportedly extreme example of a CAZA accredited facility maintaining animals in "environment(s)" that are both physically and psychologically unhealthy, what is there in this "standard" that would prevent such a thing? Obviously nothing, since Marineland has operated and continues to operate with the CAZA accreditation. There is nothing here to indicate what is meant by evoking an "environment" that is "both physically and psychologically healthy" for animal specimens maintained therein.

If stereotypic behaviour, or extreme lethargy and lack of muscle-tone, are to be taken as indications of less than good psychological or physical health, than by those criteria alone there are numerous examples of CAZA accredited zoos ignoring this concern.

"Exhibit value" presumably refers to the monetary value, or cost, of the animal. Such value derives from a variety of factors, including supply, the ability of the animal to attract paying visitors, the age and condition of the animal in question, the frequency with which the animal is exhibited, how well the species is known, the appeal of the appearance of the species, and so on. Giant pandas would have a very high "exhibit value" since they have a proven ability to attract paying customers. We suspect all zoos consider "exhibit value", thus all zoos, in terms of this one factor, would qualify for CAZA accreditation with regard to this "standard".

Therefore, what any of this has to do with CAZA accreditation meeting any standard is not explained. Do zoos and aquariums who only show animal species of low exhibit value fail to

meet some standard that allows them such accreditation, and if so, why is that not stated, and if not, why is that not mentioned?

What is meant by "exhibit suitability (may include climatic considerations)..."? If climatic considerations may be considered, it obviously means that they may also not be, and one is left with no indication of when it is appropriate to address "climatic considerations", and when it is not, and what those considerations may be. Certainly there is no dearth of both CAZA and AZA accredited zoos containing animals in climates that the species held captive does not, in the wild, inhabit. Placing animals such as polar bears or African savannah elephants in inappropriate climates does not affect CAZA accreditation.

What is meant by "exhibit suitability" is similarly not explained. Suitable to whom? Suitable for what purpose? If it doesn't matter, why is it mentioned? If it does matter, why is it not defined so that zoos seeking accreditation could achieve it?

The "need for husbandry and other research" does not reflect any "standard". Zoos may or may not be conducting research on their animals that contributes to a better understanding of their husbandry or other needs, but is any zoo or aquarium denied CAZA accreditation for failing to do so, for doing too much, or for doing research that is in some way inappropriate? If not, why is it even mentioned? If the quality or quantity of research is a factor in accreditation, why are these not defined?

It is stated that the ICP should "consider" the "recommendations stated in Regional Collection Plans". But there is no indication of what such consideration should lead to. Regional Collection Plans are simply reflective of the pragmatic need for co-operation between facilities in breeding and trading animals in specific "regions". How considering them affects CAZA status is not explained. If a facility decides not to co-operate with other facilities is it disqualified from CAZA accreditation? Apparently not. Even if it does not consider such co-operation there is no indication it really means anything.

Section 1.2 states animals must be observed "at least once daily" or "as often as required given the circumstances of the environment, animal condition and behaviour of the animal group" except under circumstances such as hibernation and "periods of particular sensitivity". Thus, so long as a staff person glances at an animal once a day, it qualifies for accreditation...hardly a rigorous standard. How a decision is made that more supervision is "required" is not stated, thus obviously not a factor in CAZA accreditation.

Section 1.3 simply states water "must be available to all specimens." Nothing is said about whether the water should be treated in any way, salt or fresh. Quantity of water is not mentioned, nor the nature of the confinement, and as the Toronto Star's Marineland investigations showed, it was reportedly not unusual for an accredited facility to deny marine mammals access to water for long periods of time, to the detriment of their respective physical and psychological well-being, without loss of accreditation. By these standards a hippopotamus,

a terrestrial species that naturally spends most of its life in water, could be kept in a stall with a cup of water and accreditation would not be affected.

Section 1.4 addresses the keeping of records of individual animals, again with a large degree of discretion in terms of exceptions. Daily reports "should" be kept on individual animals.

Section 1.5 addresses the need for an inventory.

It is (1.5.4) "strongly recommended" that institutions participate in ISIS (International Species Information System). ISIS, founded in 1973, is a non-profit organization using special software to keep track of the international populations of most species of animals that are or may be kept in zoos around the world.

"It is the mission of ISIS to facilitate international collaboration in the collection and sharing of knowledge on animals and their environments for zoos, aquariums and related organizations." Zoos are constantly hampered by the fact that they don't have enough animals of any given species or subspecies or genetically distinct populations to avoid inbreeding. And so if avoiding inbreeding is the objective, such institutions must either continue to replenish stocks from the wild, or avail themselves of animals from other institutions. ISIS is meant to facilitate this effort. There are many "down sides" to participation...it is essentially voluntary and co-operative, and zoos may not want to give up "high value" animals in order that they be bred elsewhere. Marineland had to be ordered by the courts to return an orca to its rightful owners, and even then, police action was required, but of course without any risk of CAZA accreditation. Breaking up family or social groupings of either wild or captive animal is not in the animals' better interest.

But if participation in ISIS were mandatory for CAZA membership, it would at least be an actual standard. It is, however, only "strongly recommended". Given that ISIS membership promotes zoos, it is in the interest of zoos to belong, but it is hardly a rigorous standard, even if it were applied.

One of the most hypocritically misleading statements CAZA makes is contained in section 1.6 (page 14). It states that "Animals must be displayed in exhibits and in numbers sufficient to meet their social and behavioural needs. Display of single specimens should be avoided unless biologically and behaviorally correct for the species or individual involved."

Note use of the word "must". But recent history shows that is not what is meant. There are few animals more "social" than elephants. And yet one of the most controversial elephant displays in Canada is in the Edmonton Valley Zoo, where "Lucy", an Asian elephant, thus a social species, is kept in isolation from any other member of her species, and in a climate that is wrong for the species.

When the zoo sent its other elephant away, Lucy was left alone. The CAZA Elephant Care Manual of March, 2005, stated: "Elephant management facilities should make every effort to

maintain elephants in social groupings. It is inappropriate to keep highly social female elephants singly. Elephant care staff should be aware of each animal's social compatibility and the dominance hierarchies of the herd."

There was no herd. On September 26, 2007, Zoocheck-Canada made this breach of CAZA's "standards" known to CAZA. On October 25, 2007, R.D. Hale, then chairman of the CAZA "Ethics Committee" responded that, "We have consulted with the appropriate provincial authorities, who have confirmed that there has been no contravention of the legislation governing zoos in Alberta and that the Zoo has cooperated fully with them. Based on this information, the Ethics Committee has concluded that the Edmonton Valley Zoo has not violated the CAZA Code of Ethics in this instance."

Clearly, CAZA's "code" is that of the provincial governing body, not its own, which is why we repeat that there are virtually or actually no standards of accreditation for CAZA membership.

Since Ontario has no provincial body governing zoos, any zoo can keep animals in any way without risking its CAZA accreditation, and as we have seen with the recent reports out of Marineland, which follow a long history of such concerns being made known to CAZA, the results can be catastrophic for the animals, and yet Marineland will inevitably retain CAZA accreditation.

Not only that, in the October 2008 manual we see a significant change. Regarding elephants it now states "It is recognized that some socially aberrant adult females currently exist and these elephants can be managed singly if the institution has made every effort to introduce them to a social group and CAZA agrees that the anti-social behavior is not correctable." (Behaviour. 28, page 10)

We know of no study that indicates that Lucy is a "socially aberrant" animal, and not only has no effort been made to introduce her to a social group, every effort to do so at no expense to the zoo or the community has been thwarted!

Clearly CAZA "standards" are malleable to the point of absurdity and seem to be deferential to provincial legislation to determine what facilities should be accredited, but they will change "standards" to accommodate zoos, even if it blames the individual animal.

The use of vague language continues: Section 1.7 (page 14) talks about animals used in "demonstrations". What does "A philosophy on the use of live animals" mean? What are the "housing standards" that "must" be met for animals used in displays?

Section 1.8, states "Institutions which include elephants in their collection must follow the directions within the CAZA Elephant Care Manual", but as we have seen above, provincial (but not municipal) legislation trumps the CAZA Elephant Care Manual, and when a facility is not in compliance, the manual is simply changed, even if it means calling the animal in question "aberrant".

There is nothing objective or scientific or morally correct in this approach.

Section 1.9 states that water quality for "fish, pinnipeds [seals, sealions, walruses, fur seals and elephant seals] cetaceans and other aquatic animals must be maintained." But as we have seen with regard the reports on Marineland, if it is not, there is no loss of CAZA accreditation. No indication is given that water quality must be maintained for "non aquatic" animals, nor what really qualifies as an aquatic animal. Most, but not all, animal species drink water and most terrestrial species enter water at some times; non-aquatic birds, for example, may bathe in clear water with some frequency to the benefit of their overall health and well-being.

Section 1:10 (page 15) states that animals "must be protected from weather detrimental to their health" and goes on to explain, "Animals not normally exposed to cold weather should be provided heated enclosures. Likewise, protection from excessive heat should be provided to those animals normally occurring in cold climates." None of this is defined, and we have already noted various exceptions by CAZA-accredited zoos that have not lost such accreditation.

Section 1:11 states that a "formal written enrichment program is required" that is appropriate for the various "taxa". The term "taxa" is plural for "taxon" and refers to a genetically distinct group of animals, such as a species, or a subspecies, or a genus, family or order -- all are taxa. "Enrichment" refers to the provision of stimuli (objects or actions that encourage an animal to behave normally, or at least have a means to avoid boredom) and usually translates into providing obstacles or toys and "furniture", which may consist of fake rocks, trees, rope nets or other such objects. For example, polar bears at Toronto Zoo are given a big red ball, or fish frozen in ice that they must work to attain. Red pandas have trees and bushes (which don't prevent stereotypic pacing). This is somewhat analogous to providing a bone to a dog, or stuffing a treat into a Kong toy. In the wild, polar bears don't play with big red balls, nor need to.

But as we have seen, there are no standards, no means to evaluate enrichment, nor any loss of CAZA accreditation if enrichment is inadequate or absent.

Section 1.2 is states: "All institutions dealing with collectors of aquatic specimens have the responsibility to determine that the collection procedures are not to be the cause of environmental abuse (e.g. cyanide poisoning and reef blasting, or other unacceptable practices.)" What is "unacceptable"? And to whom? For example, it has recently been disclosed that world-wide various species of seahorse, a taxon of fishes very popular in aquatic displays, are in serious decline. The major source of this decline is not zoos and public aquariums, it is the use of the fish for so-called "TCM", or Traditional Chinese Medicine (increasingly more correctly called "TOC" or Traditional Oriental Medicine") and, to a lesser degree, the commercial home aquarium trade. Any removal of seahorses from their natural habitat now contributes to that decline and is thus antithetical to conservation concerns, so does that mean that institutions buying from dealers selling wild-caught seahorses will lose accreditation?

As we have seen, CAZA accreditation standards barely, if at all, exist, and the only criterion considered is whether or not provincial (or maybe federal?) legislation has been violated. Seahorses are not illegal to buy.

What about the effects of capture on cetaceans (whales, porpoises and dolphins)? Except for animals that have been rescued, these species cannot be captured without negative consequences to the groups of animals to which they belong in the wild, and in species where there are some concerns about declines (such as orcas and beluga whales) the capture methods are hugely disruptive, breaking up family and other groupings to unknown long term effect on the reproductive viability of the survivors.

And finally, for species not requiring certification under the Convention on International Trade in Endangered Species of Fauna and Flora (CITES) there is little or nothing in the way of a solid mechanism to determine the origin of specimens, or the impact of their original capture on the environment. No matter where or how aquatic specimens originate, it has no effect on the eligibility of an institution to have or maintain CAZA accreditation.

The problems of determining the legality of specimens offered (Section 1.13) for sale are too complex to deal with here. Since it is illegal under federal law (WAPPRIITA -- the Wild Animal and Plant Protection and Regulation of International Trade Act (S.C. 1992, c. 52)) the issue is moot.

Section 1:14 states that buildings and substrate (essentially the ground -- what the animal walks on) should be kept clean "as required to maintain a wholesome environment". The consequences of not doing so, in terms of CAZA accreditation, are non-existent. It is not explained how what is "wholesome" is determined.

b. Standards for human animal contact:

Section 1.15 deals with guardrails and barriers, which are a good idea from a liability perspective where the public comes in contact with animals. As we saw in 1985, when a six year old child lost his arm to a wolf at the Toronto Zoo because the adventurous boy entered the back way and approached a barrier never meant to be near the public, a mere fence or barrier is insufficient to protect people (and so long as people can throw things into animal enclosures, there is no way short of a guard at each enclosure during business hours to protect the animals). But that means that some degree of thought must go into how to protect the public from potentially dangerous animals, and at least provide some degree of protection from the public for the animals.

Standards would be a good idea, but none are given. A "guard rail" can mean just a bar between posts; a "barrier" can be almost anything, a beaded curtain, a spray of mist, a pane of glass or a hedge.

Section 1:16 states: "Potentially dangerous animals must be held in facilities that prevent physical contact with staff and visitors, unless a full risk assessment has been conducted and the results used to develop procedures which minimize the likelihood of attacks on handlers and visitors where they are permitted to come into contact."

Again note the lack of any standards to determine what might constitute a "potentially dangerous" animal? What constitutes a "full risk assessment" and how are the "results" to be used to develop procedures to "minimize the likelihood of attacks on handlers and visitors..."? People have been attacked, even killed, in CAZA and AZA accredited facilities without such facilities losing accreditation. In the absence of standards, what one person might see as a minimal risk (allowing elephant rides, for example, or children to harass deer, or interaction with cetaceans) another might see as posing an unacceptably high level of risk.

Section 1:17 may be designed to answer the concern posed above. It states: "Where direct contact between animals and the visiting public is allowed the animals concerned must be carefully selected, monitored, treated humanely and with respect at all times; staff must be on hand and visible at all times to ensure this, and monitor public behaviour."

But one need only to visit the Toronto Zoo to see freely roaming peafowl recurrently harassed by visitors, or to see children touching the kookaburra in the Australian pavilion, with no supervision by staff; no staff present, visible or otherwise, and yet there is no loss of accreditation. The "petting zoo" conditions at Marineland where visitors mingle with hungry deer begging for poor-quality food hand-outs hardly represents animals "treated with respect at all times".

Section 1.18 states "Where direct contact between animals and the visiting public is promoted, hand washing and/or sanitizing facilities must be provided, and the public must be encouraged to use them." In the absence of any standards, this could mean that so long as there is a washroom on the premises, or a jar of hand sanitizer, "washing and/or sanitizing facilities" have been provided, but even so, we have never seen the public encouraged to wash their hands after contact with any animals. It may sound good, but it is meaningless in terms of accreditation.

Section 1:19 addresses the need to check animals that are "in contact programs" to assure that they are "free of infectious processes transmissible to people."

But there is no indication of how they are to be "checked". Should animals not in contact programs not be "checked" and what of animals not in contact programs who nevertheless associate with animals that are in such programs? Does looking at an animal and thinking that it appears healthy, or does not have nasal discharge, suffice, or is there a range of tests on blood or tissue to be conducted, and if so, to look at what possible diseases and by whom in what way? The admonition is, in the absence of such standards, functionally meaningless.

Section 1.20 states "Animals displayed in an area that the public enters and are encouraged to have direct contact with, must have a separate area to which they may retreat and be isolated from the public. Public feeding of contact animals must be monitored by staff to ensure proper nutritional requirements of the animals is met." At Toronto Zoo this feature is met by virtue of the animals that are exposed to the public (with the exception of the camels used in rides) having the ability to reach areas the public can't follow (peafowl, when chased, normally enter thickets, for example) but at Marineland not only do not such options exist, by keeping the animals hungry so they will beg for food, as reported in The Star, the safety of flight is counteracted by the need for sustenance in a situation where areas they can isolate themselves from the public do not exist.

Section 1:21 states: "Animals in a contact area must be monitored by facility staff on a regular basis to ensure they have not become aggressive, putting the public in harm's way. The facility should have protocols in place to deal with aggressive animal behaviour." Again there is no sense of what constitutes an "aggressive" animal (for example, swans, kept in many zoos, may challenge or even chase anyone approaching their nests, and yet such behaviour may be deemed normal, as opposed to an animal engaging in an unprovoked and unpredictable attack). What is meant by "protocols" and what standards are they to meet, if any?

Section 1:22 states: "Animals that appear in meet the keeper presentations, or that are used in presentations either on or off the facility site and are in contact with the public, will be considered to be animals in contact areas and must have the same rules of hygiene and food monitoring applied. This includes animals in drive-through exhibits where feeding is allowed as part of the visitor experience and for institutions that allow animal feeding or contact through a barrier." But, as we have seen at Marineland, as reported in The Star (or as can be seen at other CAZA-accredited zoos) it is easy for the public to feed animals food that is not healthy, and at Marineland, it reportedly is encouraged by the facility. No real "rules" have been articulated for "hygiene and food monitoring" at any rate.

Section 1.23 states: "A review must be undertaken should a member of the public be injured in a contact situation." No indication is given of what that really means. Obviously, if only for insurance and liability reasons, no facility wants to see a member of the public hurt by an animal, but does a "review" simply mean noting what happened, or should there be recommendations against a recurrence, and how is it to be evaluated in terms of CAZA accreditation? Does CAZA, for example, review all, or any, such review or even hear of any incidents? There appears to be no provision for it, thus it hardly constitutes a "standard".

THIS ENDS THE CRITIQUE OF THE FIRST HALF OF THE CAZA ACCREDITATION STANDARDS; THE SECOND HALF TO FOLLOW AT A LATER DATE.

Conclusion: Because of the immediacy of the situation, we have, to date, only had time to write a critique of half of the CAZA Accreditation Standards. It is, we feel, crucial for people to understand that in terms of evaluating zoos, CAZA accreditation is essentially meaningless.

This document is simply meant to start people analyzing what the CAZA accreditation process really means, and does not mean, and to explain how a facility such as Marineland could qualify for CAZA accreditation.

Respectfully submitted:

September 17, 2012