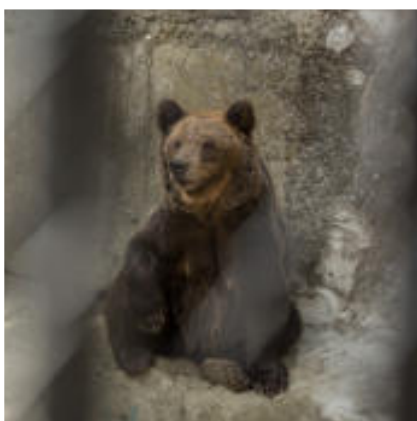
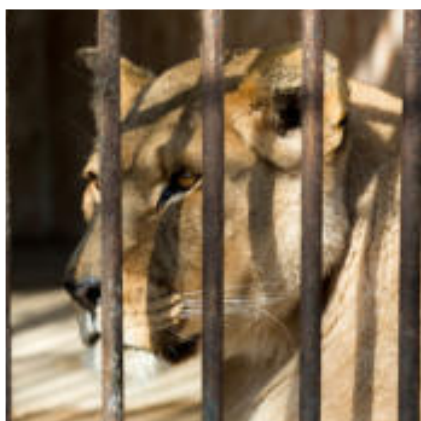
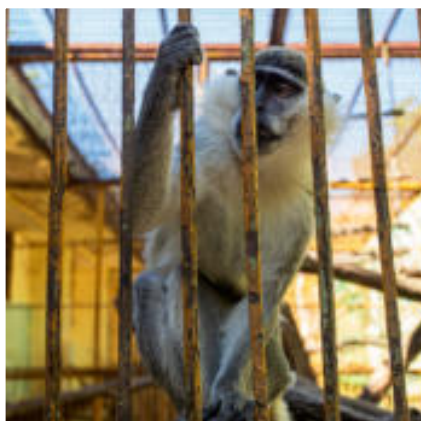
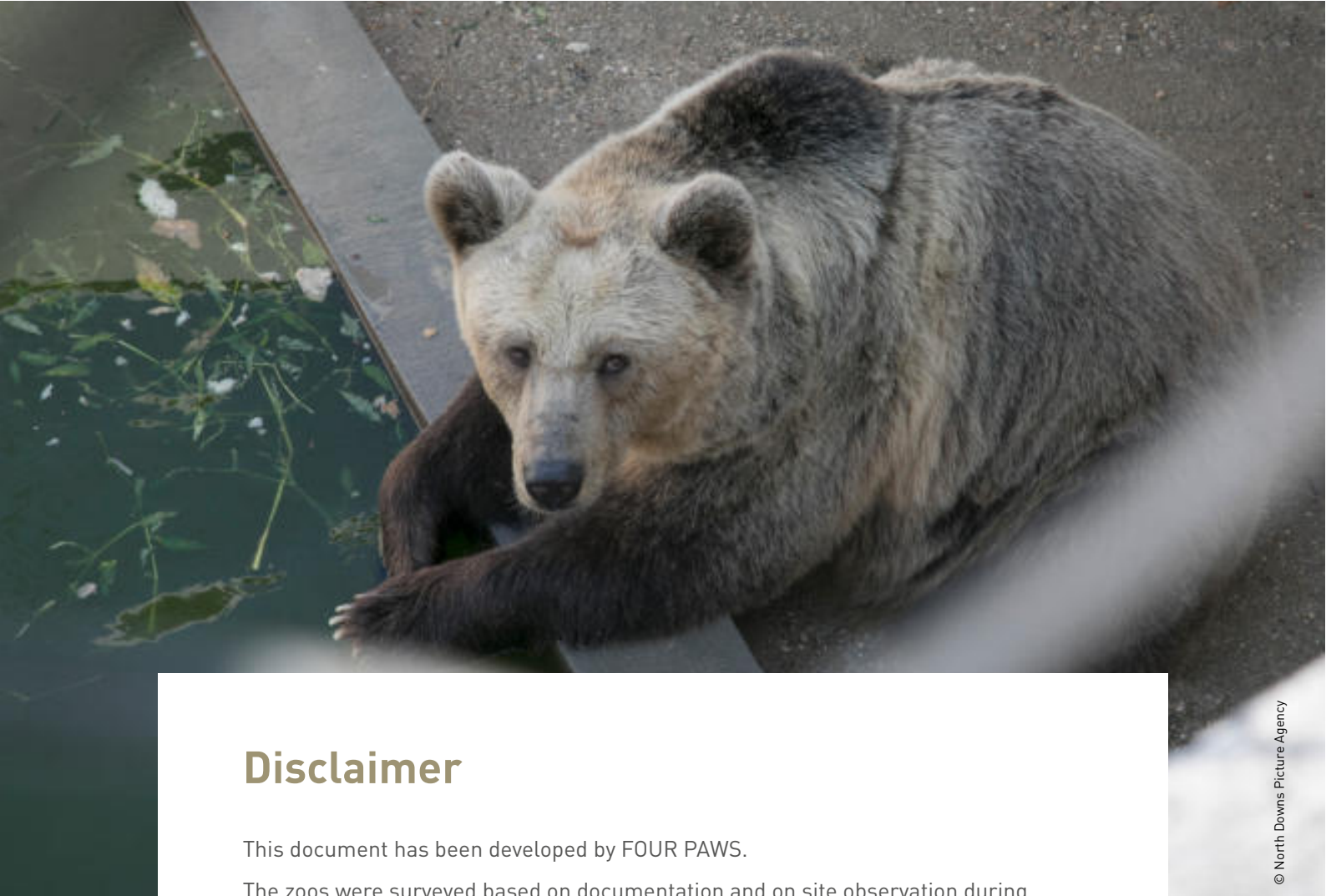


# THE FOUR PAWS REPORT ON ZOOS IN BULGARIA



Animal Welfare.  
Worldwide.





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## Disclaimer

This document has been developed by FOUR PAWS.

The zoos were surveyed based on documentation and on site observation during the period of 2017 to 2020. Considering that part of the information collected may have changed during this period, in 2020 all sites were visited again for photos to be taken and a large part of the data has been updated based on this. The methods used for updating data include field visits and documentary analysis, as well as inquiries to the competent authorities and to the zoos themselves under the Access to Public Information Act (APIA). For the purpose of analysing and assessing the condition of the zoos, data from prepared checklists and information collected by the zoology expert Ruslan Serbezov were used. The report based on the collected data was prepared by the FOUR PAWS team including Marina Atanasova and Magdalena Peneva from the Programmes Department in FOUR PAWS Bulgaria; Dimitar Ivanov - Site Manager of the DANCING BEARS PARK Belitsa from the FOUR PAWS Sustainable Sanctuaries Department, Morgane le Dreau from the FOUR PAWS European Policy Office, Barbara van Genne, Britt Klaassen and Ulrike Wuestner from the FOUR PAWS Wild Animal Rescue & Advocacy Unit and Rebecca Dharmapaul from the Programmes Department in FOUR PAWS UK.

Although all measures have been taken to ensure that the information contained in this report is accurate at the time of publication, it is possible that some information has changed.

**If you want to find out about news and other materials on the subject, you can visit the subpage of our website dedicated to the topic of zoos, at:**

[www.four-paws.org/campaigns-topics/topics/wild-animals/help-for-zoo-animals-in-bulgaria](http://www.four-paws.org/campaigns-topics/topics/wild-animals/help-for-zoo-animals-in-bulgaria)

# CONTENTS

<b>ABBREVIATIONS USED</b> .....	5
<b>INTRODUCTION</b> .....	6
Summary .....	8
<b>METHODOLOGY</b> .....	10
Goals and tasks .....	10
Scope of research.....	11
Data gathering and analysis methods .....	11
<b>LEGISLATION AND LEGAL PROVISIONS</b> .....	14
COUNCIL DIRECTIVE 1999/22/EC .....	14
Section VIII. „Ex-situ Conservation of Plants and Animal Species” of Chapter Three of the Biological Diversity Act.....	15
Ordinance No. 1 of 9 May 2006 on the conditions and order for zoo licensing.....	16
Ordinance No. 6 of 23 October 2003 on the minimum requirements and conditions for the keeping of animals in zoos and in keeping and breeding centres for protected animal species.....	17
<b>ESSENCE OF RESEARCH – Analysis and Evaluation of Zoos Status</b> .....	20
Zoos overview .....	20
Zoo Personnel Education and Qualification .....	22
Conditions related to water and nutrition supply .....	24
Ensuring appropriate environment for the animals .....	24
Provision of veterinary service .....	29
Ensuring normal existence of the animals according to behaviour.....	30
Distress prevention for the animals.....	30
Animal transport and translocation.....	31
Species conservation, research and training.....	31
Safety for visitors, animals, personnel and outdoor enclosures.....	33
Databases .....	35
Legislation implementation .....	36



<b>OVERVIEW AND PRACTICAL EXAMPLES.....</b>	<b>37</b>
Kyustendil Zoo, Kyustendil Municipality .....	37
Razgrad Zoo, Razgrad Municipality.....	41
Blagoevgrad Zoo, Blagoevgrad Municipality.....	46
Pavlikeni Zoo, Pavlikeni Municipality .....	52
„Gergana” Zoo, Knezha Municipality .....	55
„Kenana” Zoo, Haskovo Municipality .....	58
„Kaylaka” Zoo, Pleven Municipality.....	64
Burgas Zoo, Burgas Municipality .....	68
Dimitrovgrad Zoo, Dimitrovgrad Municipality.....	71
Lovech Zoo, Lovech Municipality.....	74
„Zoo – Rescue Centre – Varna”, Varna Municipality .....	79
„Ostrova” Zoo, Pazardzhik Municipality .....	85
Zoo „Forest Farm Gospodinov Ltd” – Goritsa, Byala Municipality .....	89
Aytos Zoo, Aytos Municipality .....	92
„Center for Nature and Animal Protection”, Dobrich Municipality .....	95
Sofia Zoo, Metropolitan Municipality.....	99
<b>CONCLUSION .....</b>	<b>103</b>
<b>RECOMMENDATIONS .....</b>	<b>105</b>
European Commission .....	105
Ministry of Environment and Waters.....	105
Zoo owners or managers .....	106
<b>BIBLIOGRAPHY .....</b>	<b>108</b>
<b>ANNEXES .....</b>	<b>110</b>
Annex No. 1 .....	110
Annex No. 2 .....	114

# Abbreviations used

APIA	Access to Public Information Act
BAN	Bulgarian Academy of Sciences
BDA	Biological Diversity Act
EAZA	European Association of Zoos and Aquaria
EC	European Community
EU	European Union
MoEW	Ministry of Environment and Waters
RIEW	Regional Inspectorate for Environment and Waters

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# Introduction

In July 2020, we were shaken by the unexpected birth of two lion cubs in a Bulgarian zoo, the result of inbreeding. At the time of their birth, the zoo did not have the necessary capacity to look after the young and had to relocate them.

Meanwhile, in another Bulgarian zoo, a lion lives in a cage with a low ceiling, concrete floor, and no enrichment. The cage does not meet the requirements of the Bulgarian legislation. Due to these harsh conditions, the zoo lost its license to operate nine years ago. However, it is still open to visitors today and continues to keep animals.

A tigress was traded between zoos in Bulgaria. At the time that the tigress was given to this facility, it did not have a license to operate as a zoo. It was, however, still open to the public, continued to keep animals and to accept new ones. The tigress was housed in an inappropriate cage, which was once an enclosure for a bear until it was closed in 2009 by order of the Ministry of Environment and Water.

A lion, used for breeding and kept in a very small cage after the birth of its cubs, is kept in another Bulgarian zoo, again in an old cage that used to house bears. Today, he continues to live alone in the cage, in which the required enrichment is missing. The outdoor area is 38 square meters and only furnished with a concrete floor, several pieces of wood and an old tire to play with.

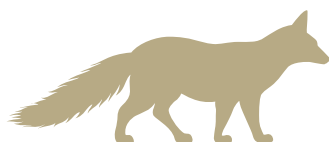
For many years, animals have been kept in Bulgarian zoos without a license, in conditions that do not

comply with the legal regulations. Some facilities are eventually granted a license, even without visible changes and without meeting the necessary conditions.

Unfortunately, this is very common in Bulgarian zoos - wild cats, bears and other species of animals are caged in small and barren concrete enclosures that were built more than thirty years ago. Their outdated enclosures must be urgently renewed and improved, while the care for animals and the understanding of the work of zoos needs to be rethought.

FOUR PAWS has been working to improve the conditions and living environment of animals in Bulgarian zoos for more than 10 years. During this period, we have repeatedly reported problems in the keeping of wild cats and bears in many zoos. We have initiated inspections and have undertaken projects to relocate and find suitable homes for 7 lions and 9 bears from Bulgarian zoos by supporting with transport and/or by looking after the animals in one of the FOUR PAWS sanctuaries.

Every year, citizens contact us regarding problems they see with various animals - from rabbits to jackals, and lions to bears. The problem cannot always be solved by rescuing the animal. A sustainable solution needs to be found, whereby inappropriate enclosures are closed or upgraded, and whereby the rescued animals are not replaced with another who would be destined to spend the rest of its life in the same unfavourable conditions



These examples are part of the overall picture of Bulgarian zoos in 2020, which we will show in its entirety and in detail in this report.



## Summary

There are 21 zoos in Bulgaria, distributed throughout the country. Almost all (19) of them are publicly owned and managed by local municipalities. Seventeen of these zoos are open to visitors, including the Kyustendil Zoo, although it has had its license revoked since 2011.



### OPEN TO VISITORS WITH A LICENSE

Aytos Zoo
Blagoevgrad Zoo
Burgas Zoo
„Center for Nature and Animal Protection“ - Dobrich
Dimitrovgrad Zoo
„Forest Farm Gospodinov Ltd“ – Goritsa
„Gergana“ Zoo – Knezha
„Kaylaka“ Zoo – Plevan
„Kenana“ Zoo - Haskovo
Lovech Zoo
„Ostrova“ Zoo - Pazardzhik
Pavlikeni Zoo
Razgrad Zoo
Sofia Zoo
„Zoo – Rescue Centre – Varna“
Terrarium Mineralni Bani

### NOT OPEN TO VISITORS, WITHOUT A LICENSE

Gabrovo Zoo
Plovdiv Zoo
Shumen Zoo
Stara Zagora Zoo

### OPEN TO VISITORS WITHOUT A LICENSE

Kyustendil Zoo
----------------



At least 14 of the zoos keep lions and brown bears, and 11 of these zoos should urgently improve the conditions for these species. Animals often suffer as a result of living in inappropriate conditions that do not meet the species-specific requirements or even the minimum legal requirements.

This FOUR PAWS study focuses on the 16 of the 17 zoos that are currently open to visitors. The Zoo Terrarium „Mineralni bani” is not focus of the study, as only reptiles are kept in it. The zoos were examined based on documentation and on site observation during the period of 2017 to 2020, and in 2020 all sites were visited again and photos were taken. For the purposes of the study, a checklist on the minimum requirements for the functioning of zoos was created and used, adapted from the main legal documents. The multifaceted analysis of the collected data leads to the following conclusions:

Coherence between European and national legislation is present, with clear requirements for the licensing and control of the licensing of zoos, as well as for the mandatory minimum conditions for animal husbandry. However, these provisions remain rather declarative and ineffective, as they are often not applied in practice.

There is a methodological problem regarding the implementation of the procedure for granting licenses, revoking licenses, and moving animals, as well as the application of strict controls on zoos by the responsible authorities.

At the moment there is a zoo with a revoked license, which does not meet the conditions for keeping the housed animal species. This zoo has not begun the process to move them to another zoo or rescue centre, as required based on the legislation. Meanwhile, some of these animals have died or are missing, and the conditions for the other animals kept at this zoo have not improved.

Several zoos in which the conditions do not meet the criteria for issuing a license under Ordinance No. 1 of 9 May 2006 on the terms and conditions for the licensing of zoos have received their license regardless. Furthermore, it is evident that facilities are having their license's renewed with requirements of the first issued license being repeated, without any graduation or improvement in the conditions under which housed animal species are kept.

There is no comprehensive strategy for the development of zoos. In the meantime, they continue to breed and exchange animals, which they do not have the resources to take care of in the long-term. Animals are not bred for conservation and educational purposes, or for zoos to function as rescue centres. Often it is for the purpose of keeping cages full and to satisfy the public interest in observing an attractive animal species, and especially their cubs, without any regard for their health and their future placement.

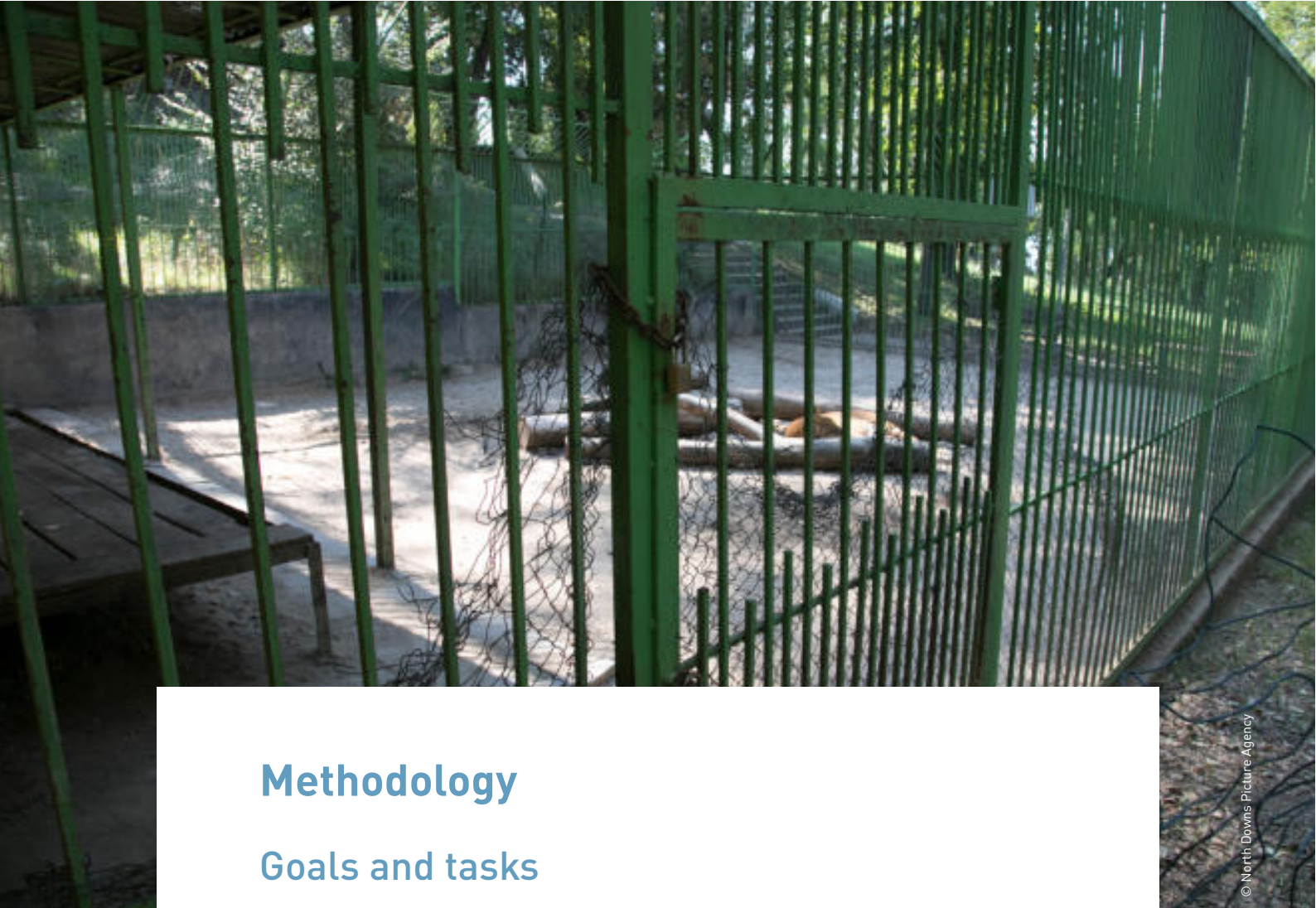
Many zoos do not fulfil their mandatory functions, as described in the legislation. **On average, the zoos that are open to visitors in Bulgaria meet only a part of all minimal legal requirements.**

Only a part of the zoos included in the study ensure that animals are kept in a species-appropriate manner. In terms of providing a suitable environment for animals, zoos on average meet just over half of the legal requirements. The animals are kept in an environment that does not comply with the specific needs of the respective species, regulated in Ordinance No. 6 of 23 October 2003 on the minimum requirements and conditions for keeping animals in zoos and centres for breeding and reproduction of protected animal species, as most zoos lack basic environmental enrichment and natural vegetation. The level of fulfilment of the conditions related to the conservation of species, research and education is also insufficient.

To gain a clearer idea of the specific situation in zoos, the individual animals kept in these zoos and their stories over time, we consider cases related to the problems and/or good practices for each individual zoo included in the analysis.

In conclusion, the results of the study show that there is a need for a change in the way many of the zoos in Bulgaria keep and manage their animals. The organisation of conservation, as well as the scientific and educational activities of the zoos, must be improved, as must the security and integrity of the enclosures. The animals' living environments must be managed according to the needs of kept species and the planning of the collections according to the available resources and capacity.

**The study provides recommendations for improving the situation for decision-makers at local, national, and European level.**



## Methodology

### Goals and tasks

The main goal of COUNCIL DIRECTIVE 1999/22/EC relating to the keeping of wild animals in zoos (The Zoos Directive) is to reassert the role of zoos in biological diversity protection. The Member States are obliged to implement the five conservation measures of the Zoos Directive concerning protection, scientific research and training, education and awareness of the public, animal accommodation, preventing the escape of animals and intrusion of vermin, as well as record-keeping. The Member States should ensure the actual implementation of these conservation measures by adopting and enforcing strict measures for licensing and control.

Given Bulgaria's commitment that zoos should operate pursuant to the European Union' legislation requirements, the present research aims to identify major problems and achievements in the implementation of mentioned legislation, both on the level of documents, and with respect to their practical implementation.

The overall research **aims** are related to the finding of the following answers:

1. To what extent are the Zoos Directive goals transposed into the Bulgarian legislation;
2. How is their achievement guaranteed, e.g. what control measures and resources are envisaged;
3. What is the practical implementation of such measures;
4. What is the status of zoos and in what conditions are the animals kept.

In order to attain the above-mentioned aims, the FOUR PAWS research sets the following as its major **tasks**:

1. To track the extent to which the Zoos Directive regulations have been reflected and included in the Bulgarian legislation;
2. To collect information about the process of zoo licensing and control;
3. To evaluate the status of zoos and the conditions for the keeping of animal species therein;
4. To collect information about major problems and good practices in the zoos;
5. To analyse the degree of alignment between the legal provisions and requirements and their implementation by the zoos.

## Scope of research

In order to establish whether the standards for the keeping of wild animals in zoos are observed in Bulgaria, the **subject of research are 16 of the zoos in Bulgaria, e.g. 21 sites in total**, as follows:

- Aytos Zoo
- Blagoevgrad Zoo
- Burgas Zoo
- „Center for Nature and Animal Protection” - Dobrich
- Dimitrovgrad Zoo
- „Forest Farm Gospodinov Ltd” – Goritsa
- „Gergana” Zoo – Knezha
- „Kaylaka” Zoo – Pleven
- „Kenana” Zoo – Haskovo
- Lovech Zoo
- „Ostrova” Zoo – Pazardzhik
- Pavlikeni Zoo
- Razgrad Zoo
- Sofia Zoo

- „Zoo – Rescue Centre – Varna”
- Zoo „Terrarium Mineralni Bani”
- Kyustendil Zoo
- Gabrovo Zoo
- Plovdiv Zoo
- Shumen Zoo
- Stara Zagora Zoo

**The research focuses on 16 of these zoos, as it excludes Terrarium „Mineralni Bani” and the zoos in Stara Zagora, Shumen, Gabrovo and Plovdiv, which currently in 2020 are without a license and closed to visitors.**

The zoos were researched using documentation and on-site visits over the period 2017-2020. Given that during this timeframe some of the collected information may have changed, in 2020 all sites were revisited, pictures were taken and a significant part of the collected data was updated. The methods used for this update include field visits and documentary research as well as requests for information to the competent authorities under the Access to Public Information Act (APIA).

## Data gathering and analysis methods

To fulfil the research goals, **an overview and analysis of the main legal documents** was conducted, including:

- ▶ COUNCIL DIRECTIVE 1999/22/EC;
- ▶ BDA;
- ▶ Ordinance No. 1/09.05.2006;
- ▶ Ordinance No. 6/23.10.2003.

The Zoos Directive enables the EU Member States with a legislative framework for zoo licensing and inspection, as well as for their role in protecting wild animals and biological diversity in line with Article 9 of the Convention on Biological Diversity (1992). For this reason, an assessment of Zoos Directive`s transposition into the BDA, Ordinance No. 1/09.05.2006, Ordinance No. 6/23.10.2003 was conducted, as well as an overview of the national legislation on zoos.

The evaluation and status analysis of each zoo has been based on the level to which the prescriptions under the above-cited documents have been practically implemented. In order to obtain a detailed picture for every zoo, we utilized and analysed the following **sources of information**:

- Documentation issued by the MoEW for every zoo – we studied the licensing procedure, as we reflected the identified systematic problems and omissions, as well as good practices;
- Professional image and video materials, as well as unprofessional raw pictures;
- Signals, requests, and letters of complaint sent to FOUR PAWS, which complement data about some individual zoos;
- Media and website data with a view of building a full picture of the situation.

Both data collection and zoo status **evaluation and analysis** utilized a **detailed checklist** (Annex No. 1 hereto), which has been developed jointly by FOUR PAWS and an independent zoology and biology expert with a rich experience in the field, obtained in his capacity of a MoEW state expert and RIEW director.

The checklist tracks information concerning:

- contacts and short description of the zoo, including the presence of a license/s;
- personnel education and qualifications according to the legal requirements;
- site status by different categories according to the legal requirements;
- information concerning the license issued by the MoEW, and the implementation of MoEW requirements in the event of a license issued under conditions;
- zoo capabilities as a rescue centre;
- selection;
- evaluation – good practices identified, problems and recommendations for problem resolution.

This checklist has been streamlined with a view to the requirements of Ordinance No. 1 and Ordinance No. 6, and it forms a key tool for measuring the degree of legislative requirements applied by the respective zoo. The sections on personnel education and qualifications and site status have been developed following the checklist sample concerning the conditions and order for zoo licensing (Annex No. 3) of Ordinance No. 1. They include all conditions of categories B. CHECK OBSERVATIONS and C. IMPLEMENTATION OF THE REQUIREMENTS UNDER ART. 4 OF THE ORDINANCE. These sections gather information concerning the presence or implementation of the requirements outlined by the Zoos Directive conservation measures, i.e.:

- available personnel qualifications;
- supply of nutrition and water, as well as nutrition quality for the various animal species;
- environment which satisfies the physical, social, psychological and ethological animal needs depending on the species they belong to, and on the respective environmental enrichment;
- shelter and inhabited area according to the requirements of the legal provision;
- maintenance of buildings and site hygiene;
- veterinary service and presence of a vet dispensary, as well as a contract with clinic;
- animal and personnel safety, intrusion of vermin and mammals in animal enclosures and control thereof;
- record-keeping concerning animal origin and ways of obtaining;
- work with the public and relevant education activities;
- scientific and other research related to the conservation and keeping of species, including such on the reintroduction of wild species to nature.

The checklist, developed for present research needs in section B. SITE STATUS EVALUATION, includes and monitors a further ten criteria, which relate to the licensing requirements under the Veterinary Activities Act.

### **Conditions concerning nutrition and water supply**

Kitchen

Storage area

### **Provision of appropriate animal environment**

Drainage system

### **Veterinary service**

Vet dispensary on site - data

Control over disease

Pest control periodicity – spring and autumn

Everyday inspection

Everyday cleaning

Prevention measures

Sewerage



The checklist, adapted for present research needs, does not include the following criteria available in the checklist for the terms and conditions for licensing of zoos (Appendix № 3) of Ordinance No. 1:

### **Ensuring appropriate environment for the animals**

Environmental parameters: other

### **Veterinary service provision**

Antidotes

### **Species conservation, research and training**

Species conservation measures in line with zoo resources

Species research measures according to the zoo resources

For each of the 16 zoos, the fulfilment of conditions presented in the sections „Personnel education and qualification” and „Site status” is a basic indicator forming the respective zoo evaluation.

The findings have been presented in percentages, which represent the number of kept requirements against the total number of requirements for each subcategory. It should be noted that in order to ensure objectivity of evaluation, all conditions which have been marked as inapplicable to a particular site, have not been considered in the final result calculation. Thus, inapplicable requirements do not impact zoo performance.

Besides the analysis based on the presented checklist, the research also covers case studies on good practices and/or problems for each of the zoos under research. These highlight specific legislation observance aspects and summarize some of the experience of FOUR PAWS, which was accumulated over the years in relation to the zoo topic, and with respect to the individual sites and animal keeping thereof.

In its conclusions, the research provides recommendations and guidance for the further development of and control over zoo activities, which is targeted at the various institutions and stakeholders responsible for:

- the control over observing European and national legislation;
- zoo licensing and planning of animal collections;
- equipment maintenance;
- ensuring the needed animal care in an environment which satisfies animal needs depending on their species.



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## Legislation and legal provisions

Zoos in Bulgaria must operate pursuant to the regulations of national and European Union's legal provisions. They should comply with the prescriptions of *COUNCIL DIRECTIVE 1999/22/EC relating to the keeping of wild animals in zoos (the Zoos Directive)*, transposed into *Ordinance No. 1 of 9 May 2006 on the conditions and order for zoo licensing*, *Ordinance No. 6 of 23 October 2003 on the minimum requirements and conditions for the keeping of animals in zoos and in keeping and breeding centres for protected animal species*, the *Biological Diversity Act*, and the *Veterinary Activities Act*.

### COUNCIL DIRECTIVE 1999/22/EC

COUNCIL DIRECTIVE 1999/22/EC (The Zoos Directive) has been adopted with the purpose to encourage the protection and conservation of wild animal species by strengthening the role of zoos in preserving biological diversity. The Zoos Directive includes rules for the licensing and inspection of zoos, to ensure they respect the conservation measures with regard to research, exchange of information, animal breeding and husbandry, capacity building, and education.

The Zoos Directive represents a basis for Member States' legislation with regards to:

- the licensing of zoos;
- the inspection of zoos;

- the keeping of animals in zoos;
- the training of staff;
- the education of the visiting public;

According to the Zoos Directive, the zoos must:

- ▶ protect wild fauna and to preserve biological diversity by adopting conservation measures and participating in research, the exchange of information, specific biodiversity protection goals, and a long-term goals attainment plan/ strategy (for example, joint captive breeding programmes, in-situ activities, education activities).
- ▶ promote public education and awareness-building: to undertake education activities to provide the needed information and to ensure quality of the two aforementioned activities, to build awareness about the goals

of protection, to take into account the zoo characteristics, size and resources, clear education goals, schedules and evaluation systems.

- ▶ accommodate animals under conditions which satisfy the biological and conservation requirements of the species: opportunities for expressing natural and well-adapted behaviour, to enrich enclosures;
- ▶ prevent the escape of animals in order to avoid possible ecological threats and to prevent unwanted intrusion of pests.
- ▶ keep up-to-date records of the animals in the establishment which vary according to the species.

The Zoos Directive has a broad scope of application and provides Member States with the opportunity to resolve their specific problems nationally. It was adopted in 1999 and entered into force in April 2002. All Member States were obliged to transpose the Zoos Directive requirements into their national legislations. Standards vary across the EU and there are still unregulated and unlicensed zoos. In 2015, the European Commission has published the EU Zoos Directive Good Practices Document to clarify how the Zoos Directive could be implemented by the Member States. Before Bulgaria's accession to the EU, the Zoos Directive had been transposed as follows:

- Section VIII. „*Ex-situ Conservation of Plants and Animal Species*” of Chapter Three of the *Biological Diversity Act*;
- *Ordinance No. 1 of 9 May 2006 on the conditions and order for zoo licensing*;
- *Ordinance No. 6 of 23 October 2003 on the minimum requirements and conditions for the keeping of animals in zoos and in keeping and breeding centres for protected animal species.*

## Section VIII. „Ex-situ Conservation of Plants and Animal Species” of Chapter Three of the Biological Diversity Act

The Biological Diversity Act was promulgated in State Gazette, issue No. 77 of 9 August 2022, as COUNCIL DIRECTIVE 1999/22/EC had been transposed in **Art. 60 of the BDA**, which sets down the compulsory activities in zoos and the main framework and conditions under which they may operate.

**Para 2** of Art. 60 of the BDA regulates zoo obligations with respect to:

- maintaining of documentation on the specimen species and their origin as well as their marking where possible;
- keeping of collection databases by specific criteria as well as concerning technologies and techniques for animal raising;
- information exchange with other institutions with similar purpose;
- providing access to public information related to collection species, their natural habitats and biological diversity protection;
- participating in scientific and other research bearing importance for species protection and keeping;
- conducting education and training activities;
- providing propagules of endangered species for recovery or reintroduction to nature or for animal breeding farms.

**Para (3)** (as amended in SG, issue No. 94 of 2007) presents the compulsory requirements which zoos should fulfil in order to guarantee appropriate conditions, care and habitats for the keeping of animal species. Namely:

- to accommodate animals under conditions which satisfy their biological, conservation and breeding requirements;
- to ensure individual species-specific environment of the enclosures where they are accommodated;
- to maintain a high standard of preventive and curative veterinary care and nutrition in the keeping and breeding of animals;
- to undertake necessary measures to prevent the escape of animals in order to avoid possible ecological threats to indigenous species.

**Art. 61, Para. 1** of the BDA states that the minimum requirements and conditions under which animals in zoos and centres for keeping and breeding of protected animal species should be raised shall be determined by an order of the Minister of Environment and Waters.

According to **Art. 62, Para. 1** of the BDA, zoo activities are performed on the basis of a license, issued by the Ministry of Environment and Waters, under the conditions and order established by an ordinance of the Minister of Environment and Waters. **When establishing a zoo operation without a license, or an**

operation running counter to the requirements and conditions under which the license was issued, pursuant to Art. 62, para. 3, the Minister determines a time period no longer than 2 years, in which the zoo has to comply with the requirements, and/ or applies a coercive measure, i.e. closes down the zoo or parts thereof under Art. 122, Para. 1, It. 3 of the BDA. In the event of non-fulfilment within deadline of prescription under **Art. 62, Para. 3, It. 1**, the Minister of Environment and Waters imposes the coercive measure, and namely, closes down zoos or parts thereof, and/or withdraws the zoo license.

The procedures mentioned above are in line with Art. 4 Licensing and Inspection, Art. 6 Closure of Zoos and Art. 8 Penalties of COUNCIL DIRECTIVE 1999/22/EC.

## Ordinance No. 1 of 9 May 2006 on the conditions and order for zoo licensing

(issued by the Minister of Environment and Waters) (promulgated SG issue No. 43 of 26 May 2006, amended SG issue No. 29 of 30 March 2018).

Zoo activities are performed on the basis of a license, issued by the Ministry of Environment and Waters under the conditions and order set down by Ordinance No. 1/ 09.05.2006 of the Minister of Environment and Waters, pursuant to Art. 62, Para. 1 of the BDA. This requirement has been brought in line with the requirement under Art. 4, Para. 2 of the Zoos Directive: **Every zoo shall have a license within four years after the entry into force of this Directive or, in the case of new zoos, before they are open to the public.**

As described above, pursuant to the BDA, zoo activities are performed on the basis of a license, issued by the Ministry of Environment and Waters under the conditions and order as laid down by this Ordinance of the Minister of Environment and Waters. Ordinance No. 1 sets down the conditions and order for the issuing of a license to zoos, its relevant operation and cancelation, competent authorities and control over zoos. **Art. 1 of the Ordinance states that the license certifies the zoo's fitness to safeguard wild animal species ex-situ** by their keeping and breeding in controlled conditions, pursuant to the requirements of the Biological Diversity Act and the secondary legal provisions related to its implementation. According to the regulations discussed above, **Art. 3** of Ordinance No. 1 sets down the conditions for license issuing, where the zoo should:

- satisfy the requirements of Art. 60, Para. 2 and 3 and the Ordinance under Art. 61, Para. 1 of the BDA;
- breed wild animals in enclosures;
- provide adapted environment for every animal to satisfy its physical, psychological and social needs, as required by its biological species;
- maintain a database for its collection, including number of different animal specimen, origin of the specimen and ways of obtaining, data of obtaining, birth/hatching, death, exchange and escape of animals, reasons for death for every case of animal death; animal health status and undertaken medical treatment;
- build facilities and undertake measures to prevent the intrusion of vermin and carnivores near the animals in the collection;
- provide the MOEW with a list of available specimens by species, as at the beginning of each year, it should file information about the changes occurred during past year;
- build visitors' protection equipment against animal attack.

**Pursuant to Art. 4, the Minister of Environment and Waters appoints a commission for conducting checks, issuing of licenses, organizing the overall control over zoo activities with respect to complying with the BDA and Ordinance No. 1, imposing coercive measures for license withdrawal and the closing of zoos or parts thereof, as described above under Art. 61, Art. 62 and Art. 122 of the BDA.** The Directors of Regional Inspectorates for Environment and Waters (RIEW) should exercise control over zoo activities, impose penalties on offenders as well as organize the conduction of periodic checks.

Pursuant to **Art. 5** the commission the functions of a consultative body which performs the general and specialized checks. The commission then prepares a report based on these checks and provides the Minister with a grounded proposal concerning:

- issuing or refusing the issuing of a zoo license;
- prescribing measures or imposing coercive measures;
- temporary transferring of animals from one zoo to another.

Pursuant to **Art. 6** of the Ordinance, the commission consists of five members, including a chairman, and is established by an order of the Minister of Environ-



ment and Waters. The commission's chairman is a MoEW representative – a fauna expert, and the other members should include: fauna experts of the RIEW; a husbandry or zoo engineering expert of the Ministry of Agriculture, Food and Forestry; a veterinary expert of the Regional Veterinary Service; and, a representative of the Institute of Zoology of the Bulgarian Academy of Sciences (BAN).

Pursuant to **Art. 14**, within 20 days from its establishment, the commission performs documentary and on-site checks, as well as prepares and delivers to the Minister of Environment and Waters an observation report concerning the presence or absence of conditions for license issuing under Art. 2, and a proposal for: license issuing, license issuing under certain conditions, or refusing license issuing.

Ordinance No. 1 includes a detailed zoo evaluation checklist (Annex No. 3 to Art. 14, Para. 1 of the Ordinance). The report with a proposal for license issuing presented to the Minister shall be drafted according to a sample and on the basis of the checklist.

According to **Art. 15**, in the event of issuing of a license under certain conditions, these may concern improving fulfilment with respect to: database requirements, research and scientific activities, provision of adapted environment for every animal to satisfy its needs, species composition, zoo personnel requirements, personnel safety. Ordinance No. 1 does not prescribe a clear set of requirements for the issuing of a zoo license by number or essence, as it presumes that a minimum set of conditions needed for animal keeping should be fulfilled. Nevertheless, **Art. 17, Para. 1, It. 1- 3** define the cases when the issuing of a license should be refused:

- when there is unfulfillment for some of the requirements under Art. 60, Para. 2 and 3 or the requirements under Art. 61, Para. 1 of the BDA;
- when there is unfulfillment of more than two of the conditions under Art. 3, It. 2-7;
- when there is unfulfillment of the conditions of the last issued license – in the cases when applying for license renewal.

It should be noted that all conditions, including the cited above, are included in the detailed checklist and zoo licensing report, and they have been enclosed to the present research.

With respect to license renewal, pursuant to **Art. 18** of Ordinance No. 1, within three months before license expiry at the latest, the owner of the zoo subject to licensing shall apply for license renewal

under Art. 11, so that to ensure timely fulfilment of the licensing process.

## Ordinance No. 6 of 23 October 2003 on the minimum requirements and conditions for the keeping of animals in zoos and in keeping and breeding centres for protected animal species

(title added in SG issue No. 44 of 2009) (Issued by the Ministry of Environment and Waters) (Promulgated in SG issue No. 105 of 2 December 2003, amended by SG issue No. 43 of 26 May 2006, amended by SG issue No. 44 of 12 June 2009).

Ordinance No. 6 sets down the minimum requirements and conditions for the keeping of animals in zoos and in keeping and breeding centres for protected animal species.

**Art. No. 2** of the Ordinance stipulates the general and principal conditions for animal keeping and feeding. Pursuant to **Para. 1**, there should be ensured living conditions which:

- satisfy the animal biological requirements and protection and breeding requirements thereof;
- ensure sufficient space for free movement and normal motor function behaviour in line with the size and type of animals, their access to food and water, and life-prolonging contribution;
- ensure normal anatomic and physiologic development;
- ensure that the animals are accommodated according to their type and behaviour, as their living space shall be structured by trees, plant islands, hills, large rocks and other spatial elements which can bring the space closer to the natural living conditions of the respective species, and can offer optimally varied living habitat environment;
- ensure that the animals shall not be exposed to pain or suffering, nor there will be animal behaviour anomalies;
- provide maximum distance from external subjects;
- contribute to maintaining the normal

physiologic animal status and breeding capabilities;

- allow for the best satisfaction of animal ethologic needs by ensuring the needed social environment and sufficient personal space for every specimen;
- prevent the escape of animals by building two successive doors at animal enclosures as well as other barriers (electric fences, water or ground ditches, fences of appropriate height, etc.) which do not allow the release of animals out of designated enclosure and which remove objects that could facilitate such possible escape.

Pursuant to **Para. 2 of Art. 2**, zoo owners or directors ensure the following care for the animals:

- food supply in the form and quality corresponding to the requirement of every biologic specimen;
- everyday provision of fresh nutrition and water while observing relevant hygiene requirements;
- everyday control over feeding and keeping conditions;
- everyday control over the equipment and systems ensuring needed temperature, moisture and light in the interior raising premises. The animals should not have direct contact with the heating equipment.
- maintaining high level of preventive and curative veterinary care for the animal health status in order to prevent disease, distress and injuries.

**Art. 3** of Ordinance No. 6 sets down the requirements towards the competent persons and specialists with required education and professional qualifications who perform and direct zoo activities: biologists, veterinary specialists, zoo engineers/zoo technicians, etc. The same article defines the health establishments for provision of veterinary care, which is in line with Art. 3 of the Zoos Directive, and namely:

- Adaptation to animal keeping and breeding conditions should be performed under the guidance of competent persons having higher education and needed professional qualifications in the field of biology.
- Animal nutrition quality and quantity as well and feeding process organization should be determined by specialists having higher or secondary education and needed professional qualifications in the field of zoo engineering and zoo technics, as well as jointly with competent persons with higher education and needed professional qualifications in the field of biology.
- Animal health care service should be performed by veterinary specialists having higher or secondary vocational education, as participation of human doctors is allowed in the case of apes.
- The persons engaged in the everyday care for animal feeding, watering, cleaning, and accommodation disinfection should receive mandatory instruction and training for work with wild animals.
- In order to deliver veterinary service by the persons, the zoo should dispose of a veterinary clinic (health centre) on site, or a vet dispensary (cabinet) on site and a concluded contract with external vet clinic (health centre).

Ordinance No. 6 sets down the specialized conditions under which the animals of different classes and subgroups should be kept. The concrete size of open areas, cages and basins, social structure, and respective requirements towards individual species of mammals are enlisted in **Annex No. 1 of Ordinance Ordinance No. 6** (Annex No. 2 hereto). The specific size of cages and aviaries, premises area and relevant requirements for individual species of single birds or couples of birds are enlisted in **Annex No. 2**, while the terrarium area has been determined in **Annex No. 3** of the same Ordinance. The Ordinance further prescribes the keeping conditions for animals in mixed collections.

On the basis of the conducted Bulgarian legislation review we can conclude that the Zoos Directive has been fully transposed into the Bulgarian law. This conclusion is further supported by the evaluation of the level of implementation and enforcement of the Zoos Directive by the independent EU Zoo Inquiry 2011, which covers 200 zoo collections in 20 EU Member States. The alignment among the basic documents has been legally regulated, having clear requirements for zoo licensing and the relevant control over licensing, as well as concerning the compulsory minimum conditions for animal keeping.



To what extent, however, do zoos in Bulgaria comply with these minimum conditions? Do they obtain licenses against non-fulfilment of requirements and do they work without a license? The research on zoo statuses in Bulgaria conducted by FOUR PAWS looks into how the legal requirements apply into practice and sets forth recommendations based on present lessons learnt.



## ESSENCE OF RESEARCH – Analysis and Evaluation of Zoos Status

### Zoos overview

According to Art. 4, item 2 of the Zoos Directive, every zoo shall have a license within four years after the entry into force of this Directive. In the case of Bulgaria, the Zoos Directive entered into force with its accession to the EU in 2007.

Between 2016 and 2020, 14 of the 16 surveyed zoos operated without a license for a certain period of time. While for some the period is short and can be considered irrelevant to the conditions in the zoo and rather due to technical reasons, the fact that there are sites which were functioning without the needed license for years shows that this is a systemic problem which contradicts both the Bulgarian and the European legislation. **This shows that both MoEW and many zoo owners neglect the licensing process. Examples of municipal zoos functioning without a license for years are the zoos in Kyustendil, Lovech, Razgrad, Haskovo and Pleven.**

SITE	Period of work without a license
Sofia Zoo	1 month
„Zoo - Rescue Centre -Varna”	1 month
„Forest Farm Gospodinov Ltd” - Goritsa	4 months
Gergana Zoo - Knezha	11 months
„Center for Nature and Animal Protection” - Dobrich	1 year
Ostrova Zoo - Pazarzhik	1 year and 8 months
Dimitrovgrad Zoo	2 years and 1 month
Pavlikeni Zoo	2 years and 5 months
Kayluka Zoo - Pleven	3 years and 7 months
Burgas Zoo	4 years
Kenana Zoo - Haskovo	5 years
Lovech Zoo	6 years and 2 months
Razgrad Zoo	6 years and 3 months
Kyustendil Zoo	Over 9 years



The case of Kyustendil Zoo is striking. It started functioning without a license from 2011 when the Minister of Environment and Waters closed down the zoo, property of the municipality of Kyustendil, and ordered that within 9 months from order issuing, all animals should be transferred to other zoos or sites having the required conditions under Art. 60, Para. 2 and 3 of the BDA and Ordinance No. 6. Nevertheless, the Municipality of Kyustendil did not fulfil the Order of the Minister of Environment and Waters. It did not relocate the animals to other zoos or sites with appropriate conditions and the zoo remained accessible to visitors during certain periods of time. That is why we included this zoo in the 16 zoos subject to detailed research, despite the fact that it has no license.

This example illustrates how the Zoos Directive goals, although transposed on the level of legislation, remain largely indicative and unviable. Despite the well-harmonized legal framework and issued order, these have not been enforced into practice, and the animals continue to live in the same conditions, which do not meet minimum animal keeping requirements, for years. This indicates an inefficient control mechanism on the part of competent authorities, and further unequivocally demonstrates the need for change which can ensure the implementation of conservation measures under the EU Zoos Directive in Bulgaria.

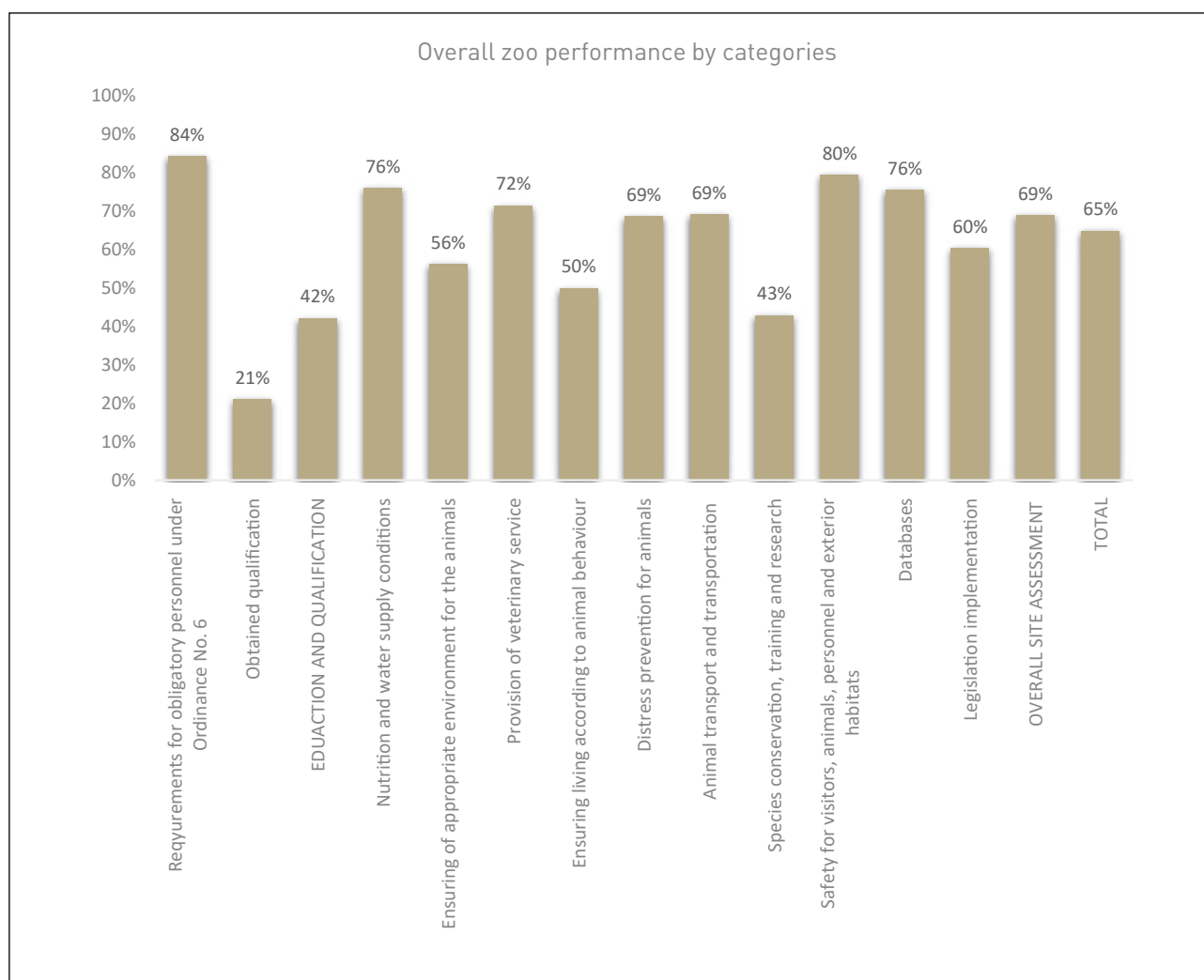
Almost all of the licensed zoos were granted a license under certain conditions to be completed within a period of no more than 2 years. Most zoos did not meet even half of the requirements. We also

noticed that these same zoos had received a large number of conditions, which raises the question of whether they should have been licensed at all. **The FOUR PAWS research established that there is a systematic practice for transferring unfulfilled previous license conditions into new license conditions, although this comes in direct contradiction with Art. 17 of Ordinance No. 1, according to which, if previous license conditions have not been fulfilled, the zoo should be refused a new license.**

The overall zoos performance data about the presence and/or fulfilment of licensing conditions as per the research checklist hereof corresponds with the above-presented conclusions concerning the licensing practice with outstanding multiple conditions. The findings show that the zoos open to the public in Bulgaria meet only a part of all requirements on average. The median total result for section „Site status” is also comparatively low, the different subcategories include requirements for the application of the Zoos Directive’s measures. It is exactly these subcategories concerning the protection, scientific research and training, public education and awareness-building, and animal accommodation that reveal the lowest results; here, we observe fulfilment of least of the requirements („Species conservation, training and research”, „Ensuring living according to animal behaviour”, „Ensuring of appropriate environment for the animals”). The lowest percentage of requirements fulfilment for zoos has been registered in the category „Personnel Education and Qualifications”.



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## Zoo Personnel Education and Qualification

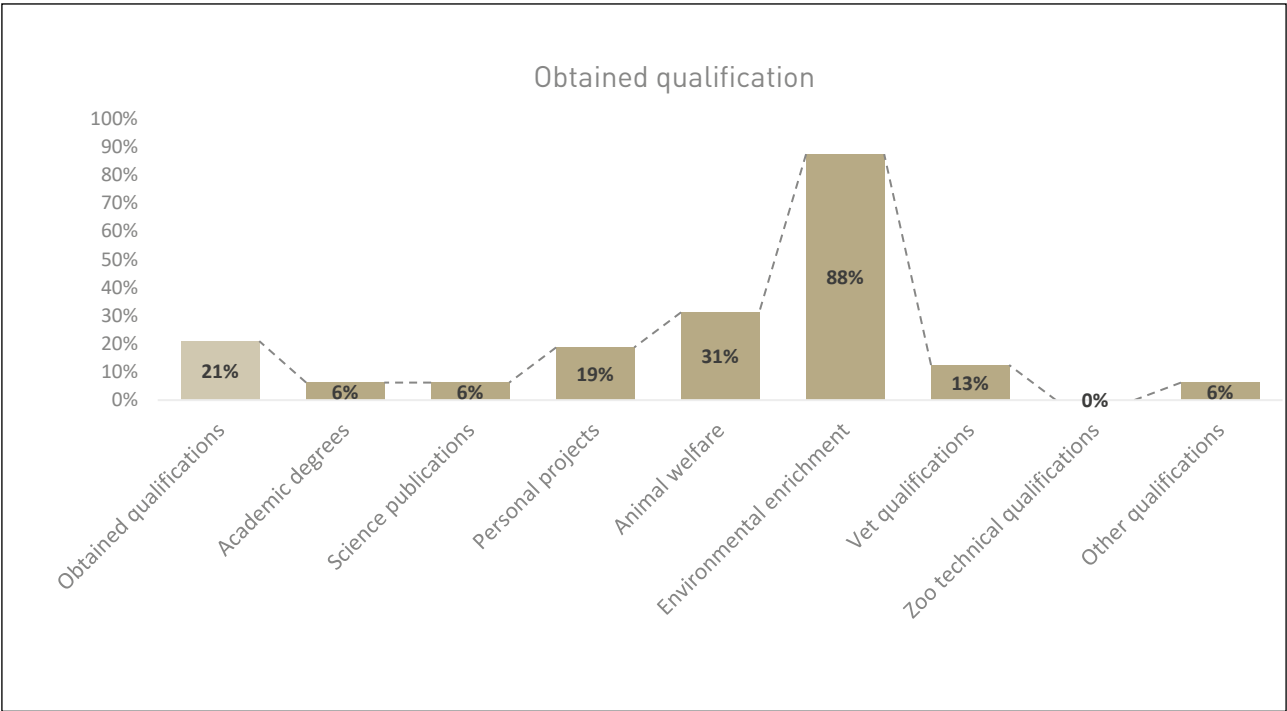
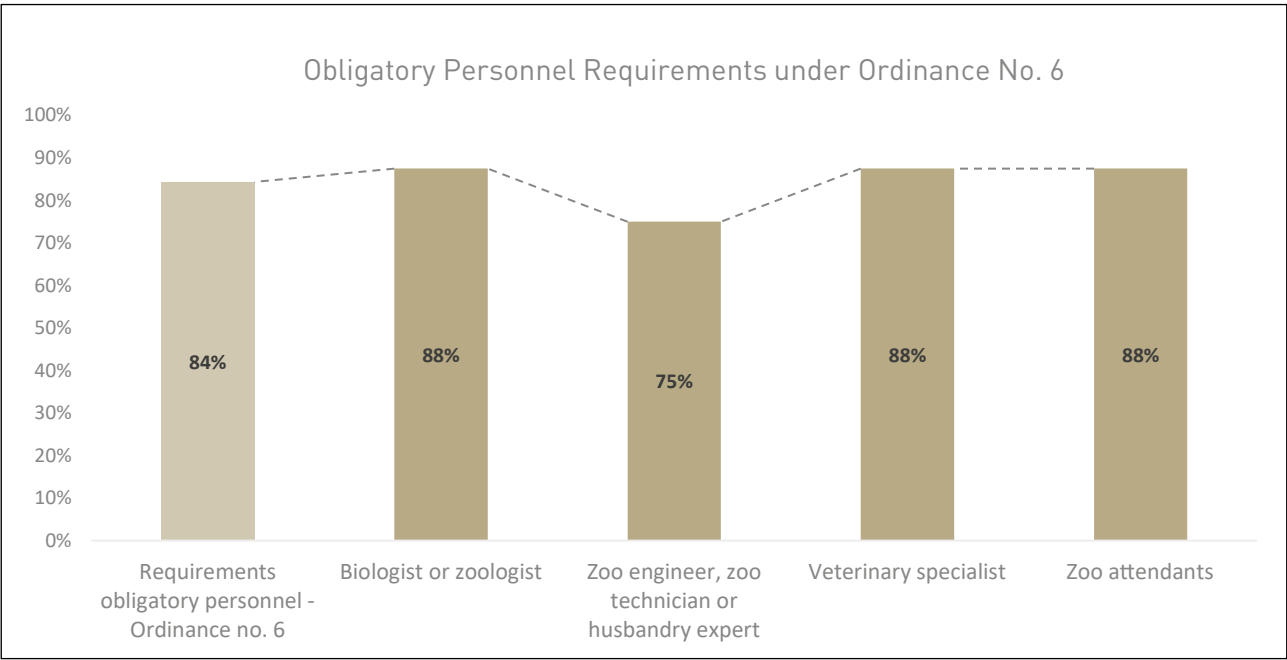
Pursuant to the requirements of Art. 3 of Ordinance No. 6, zoo directors are obliged to provide specialized personnel with higher education and required professional qualifications in the fields of biology, zoo engineering, zoo technics, and veterinary medical specialists, who can direct and be responsible for animal keeping and breeding conditions, feeding processes and health care. Zoos engage people (animal attendants) for the provision of daily husbandry concerning animal feeding and watering, and premises cleaning and disinfection. These people are obliged to be instructed and trained for working with wild animals by the specialized personnel.

Zoos should provide training courses, seminars, etc. to follow the standards in animal keeping and care, and to update the knowledge of specialized personnel and animal attendants. The conditions for obtained qualifications have the

lowest performance percentage of all. In the 2007 – 2020 period, the Ministry of Environment and Waters has organized only small number of courses for raising the qualification of the staff of the zoos and the control bodies of the Ministry of Environment and Waters. The effect is partial, as most of the employees no longer work in zoos and in the control authorities of the MoEW. During the same period, some zoos have organized local staff trainings (e.g. Sofia Zoo).

The lack of further zoo personnel training questions the keeping and accommodation of animals according to their individual needs, and the implementation of EU legislation. These results indicate difficulties met by zoos with respect to the capacity of their personnel. Solutions need to be sought for facilitating the raising of qualification levels by applying good practices such as cooperation with local universities, NGOs or science and research institutes.

Good examples of acquired qualifications are the zoos in Dobrich and Aytos.



## Conditions related to water and nutrition supply

Zoos are obliged to maintain high standards of nutrition in animal keeping and breeding, pursuant to Art. 60, Para. 3, It. 3 of the BDA. According to Art. 2, Para. 2, It. 1, 2 and 3 of Ordinance No. 6, zoos are obliged to provide: nutrition supply in form and quality which meets the requirements of each biological species; daily provision of fresh nutrition and water by observing relevant hygiene requirements; daily control over feeding and keeping conditions. On average, 76% of all requirements related to water and nutrition supply have been observed. Most zoos fulfil the prescription for feeding animals with rations corresponding to their individual needs. Nevertheless, the fulfilment of requirements specifying eating patterns consideration and individual species nutrition programmes provision are comparatively lower in performance. The lowest performance percentage is observed in fulfilling the requirement for ensuring kitchen premises to prepare food, which directly relates to the hygiene requirements, as prescribed in

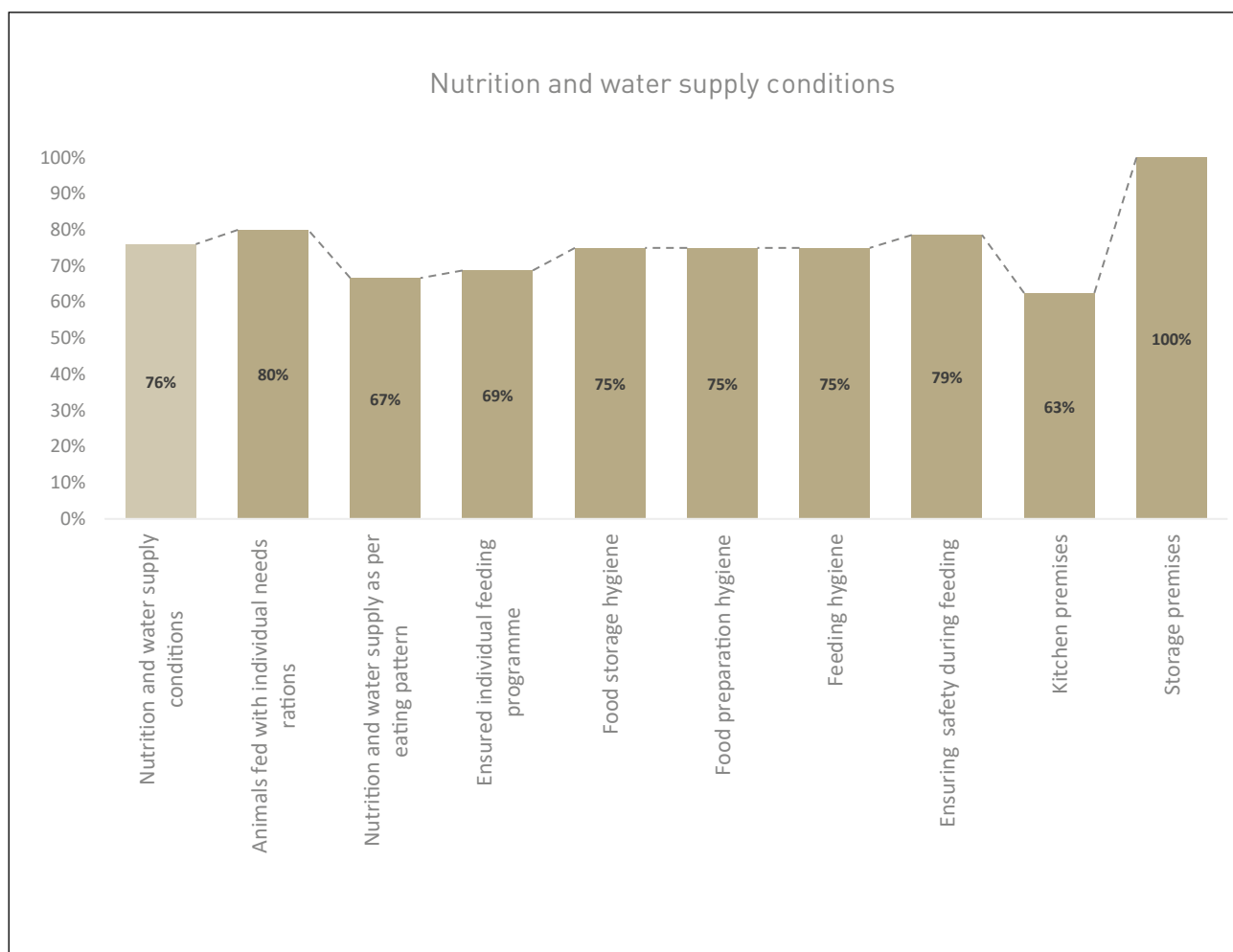
Art. 2, Para. 2 of Ordinance No. 6.

Positive examples are Sofia Zoo and Dobrich Zoo, which have a separate kitchen and a storage room. In contrast, some zoos do not have a kitchen for preparing the feed.

## Ensuring appropriate environment for the animals

Zoos should provide accommodation for the animals under conditions which aim at satisfying individual species biological and conservation requirements, according to the main environmental requirements for animal keeping, as stipulated by Art. 3 of COUNCIL DIRECTIVE 1999/22/EC. The results of the FOUR PAWS research highlight that on average, zoos in Bulgaria fulfil just over half of the legislative requirements, thus not providing appropriate environment for the animals they keep.

The chart shows that zoos meet the environmental parameter conditions related to temperature, ventilation, light, and humidity. It should be observed,







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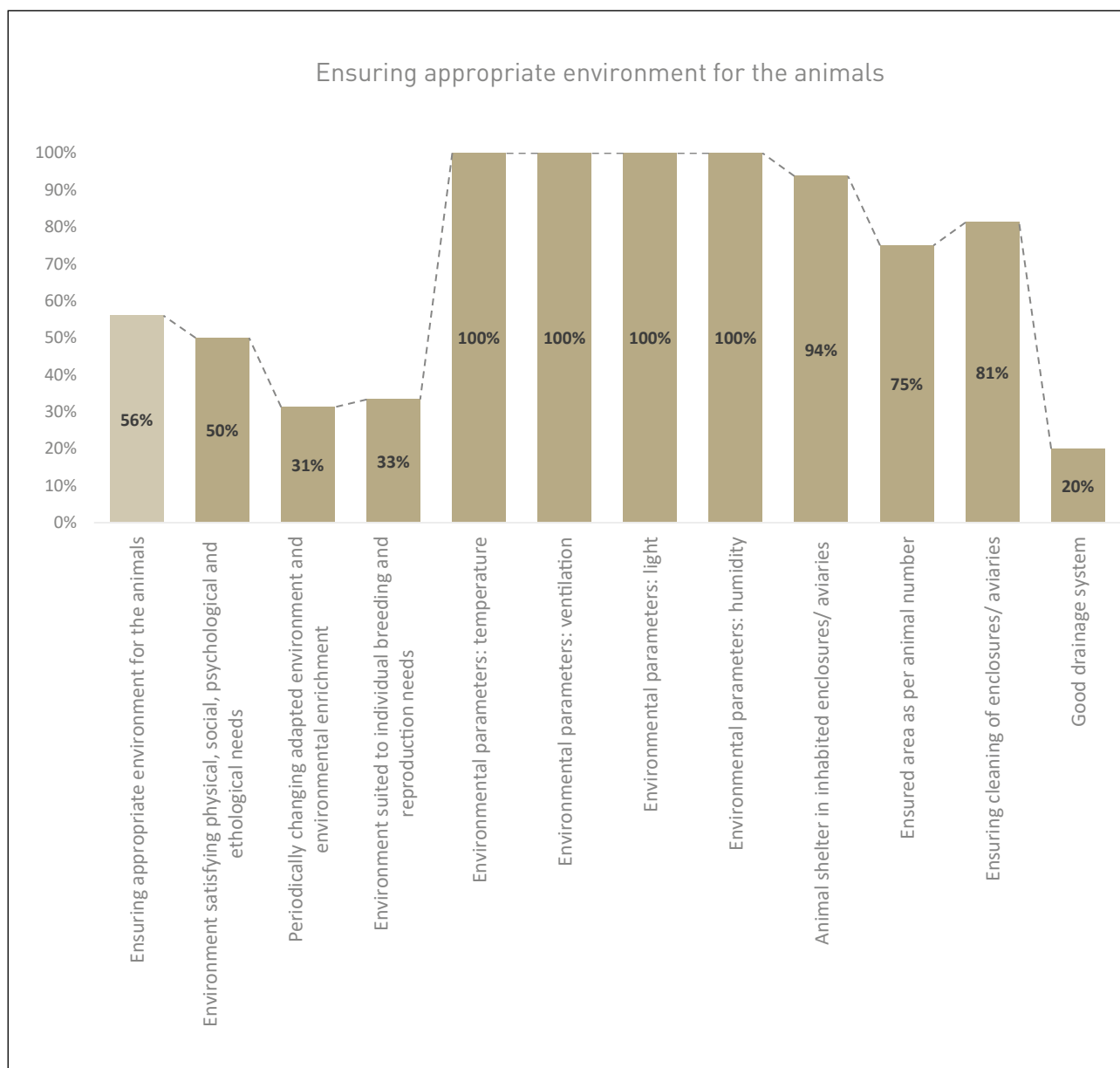
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however, that the results these indicators generate are thanks to natural prerequisites rather than focused activities related to site management.

Pursuant to Art. 60, Para. 3, It. 1 and 2 of the BDA, zoos are obliged to accommodate animals under conditions which satisfy their biological, conservation and breeding requirements, as well as to provide an environment suitable for the different species in the places where they are kept. Data shows that few of the zoos under consideration fulfil the requirement for ensuring periodically changing adapted environment and environmental enrichment, typical for the individual biological species. The low level of actual implementation of the condition for ensuring adapted and enriched environment, in line with every species breeding and reproduction needs, also raises concern. Pursuant to Art. 3 of the Zoos Direc-

tive, the environmental enrichment should establish conditions close to nature. Ordinance No. 6 specifies that inhabited areas should be structured by trees, plant islands, hills, large pieces of rock or other spatial elements, which can bring animal species closer to their natural living conditions. One of the key conditions for zoo licensing is that every animal is provided with adapted environment which can satisfy its physical, psychological and social needs, as characteristic of its biological species and prescribed by Art. 3, It. 3 of Ordinance No. 1. Many of the zoos under study do not fulfil this requirement.

Pursuant to Art. 17 of Ordinance No. 1, zoos which do not meet the above-presented standards (Art. 60, Para. 2 and 3 of the BDA, and Art. 3 of Ordinance No. 1) should not be granted a license. **The so prescribed legal provisions should guarantee the establish-**

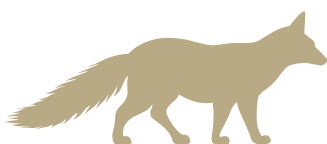


**ment of required conditions for animal keeping; yet, the FOUR PAWS research findings show that these regulations are not applied into practice, as zoos have been licensed although they do not meet contemporary standards. In many zoos enclosures for the animals do not fulfil the minimum legal provisions.** The rich photo material confirms this observation, as well as evidence that animals live in inappropriate environments, which significantly differs from their natural habitats, and most zoos lack basic environmental enrichment and natural vegetation. **Nine years later, there is no essential change from 2011, when the EU Zoos Inquiry 2011 concluded that nine in ten enclosures do not provide appropriate environment, equipment or certain form of behavioural or professional enrichment, which can encourage animals to demonstrate their natural behaviour.**

Animal enclosure and habitat status is also largely due to the outdated facilities encountered in zoos. Understandably, considering the financial resources they require, zoo owners face difficulties in their

modernization and adaptation. In this line of reasoning, the finding of solutions which support zoos in facilities renovation should be a main priority for stakeholders such as the MoEW and zoo owners. Sites research and detailed review of gathered photos categorize zoos into: zoos built in the 60s and 80s, physically and morally outdated, which do not meet elementary conditions of the legal provisions; zoos built in the 60s and 80s, experienced in equipment renovation but with no significant positive results; zoos, which have established some new enclosures for the animals, brought in line with the global good practices; zoos, which have established new animal enclosures.

Positive examples of providing a suitable environment for the animals are Dobrich Zoo, using the characteristics of the natural landscape, electric shepherds and enclosures with conditions that are close to the natural environment of the animals, as well as Sofia Zoo with the new enclosures for some of the animal species.



Animals live in inappropriate environments, which significantly differs from their natural habitats, and most zoos in Bulgaria lack basic environmental enrichment and natural vegetation.





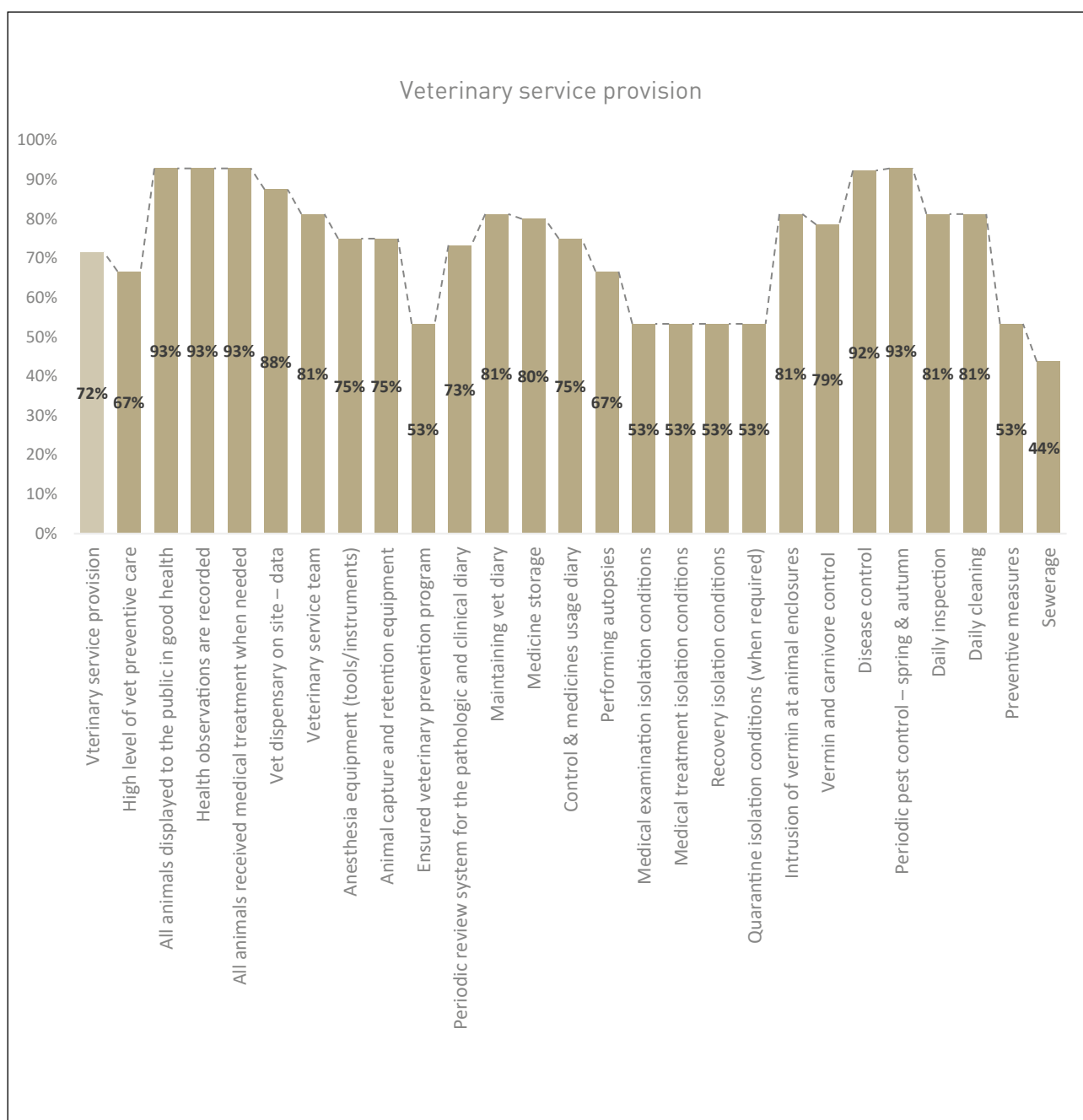
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## Provision of veterinary service

On average, zoos under study fulfil 72% of all veterinary service requirements. The results show high fulfilment of the conditions with respect to the health of the animals, observation of their health status and application of medical treatment when needed. In accordance with the standards, we also analyzed indicators concerning the control of pests and disease prevention. In this respect, the Lovech Zoo is a good example, as it has its own veterinary clinic with the necessary equipment.

Although the zoos have formally fulfilled most of the requirements related to veterinary service, during the on-site visits we saw sick animals for which it is not clear whether the necessary medical treatment had been applied in time. Furthermore, almost half of the zoos do not meet the requirements for application of preventive measures or of a veterinary prevention programme as well as various isolation conditions. In many of the zoos there is a problem with the sewerage.



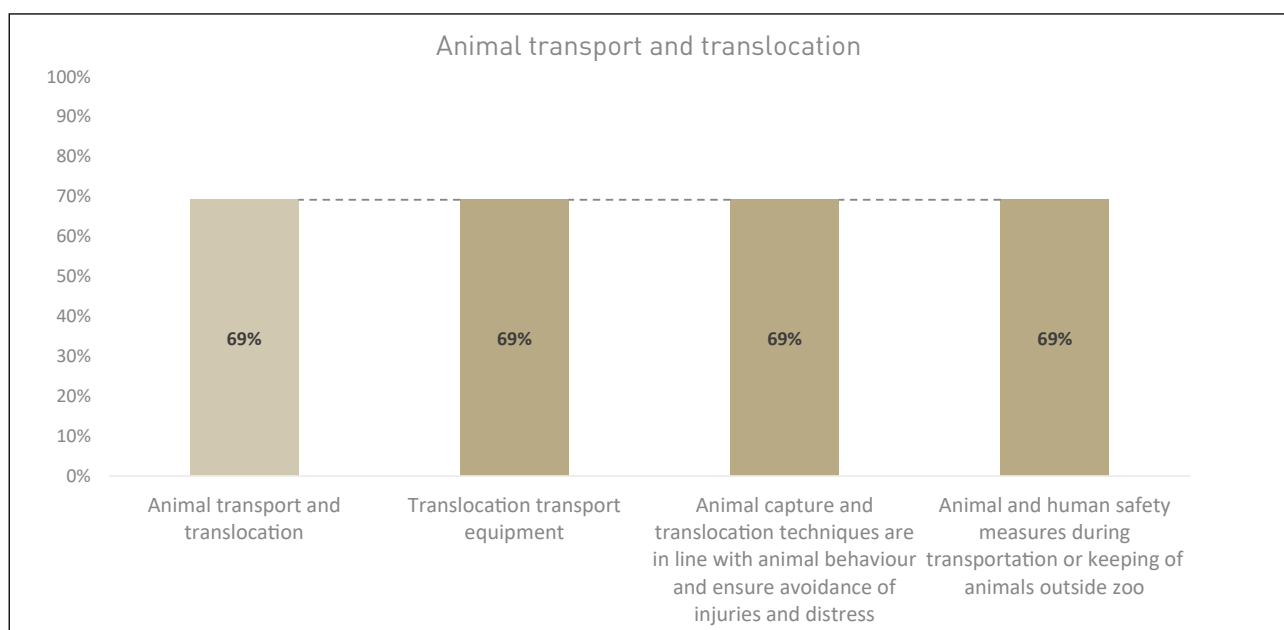
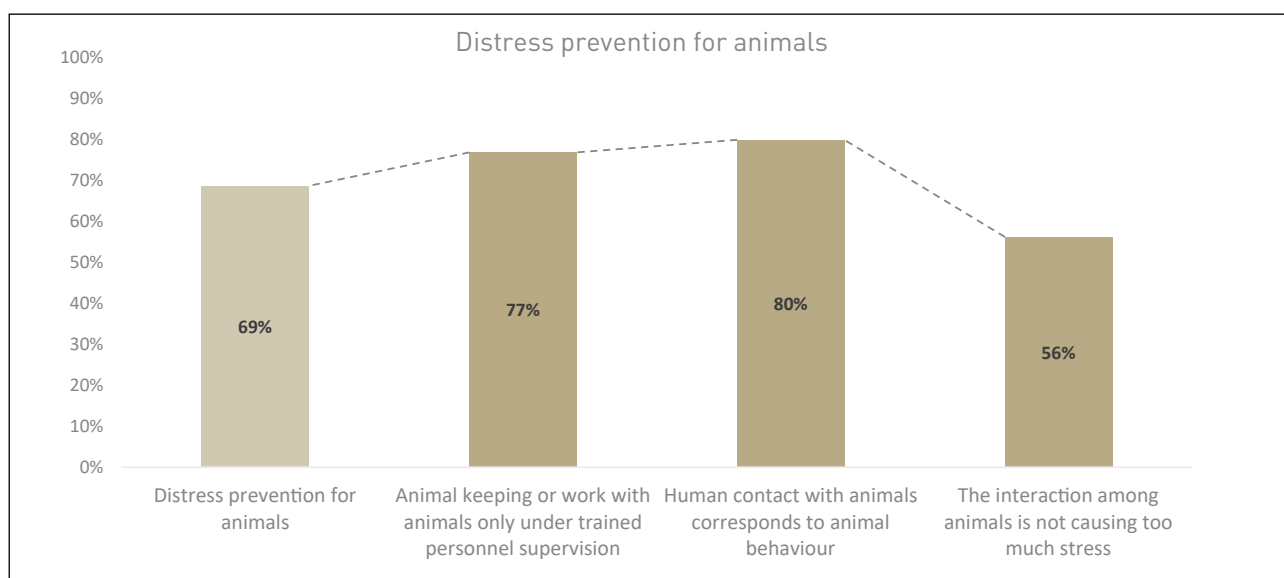
## Ensuring normal existence of the animals according to behaviour

This criterion is related to the social structure in which animals must be kept by species. For example, some species need to be kept in pairs or in family groups. The research of FOUR PAWS identified that the requirements concerning the social structure of the species have often not been fulfilled, as listed in Ordinance No. 6. Animals of the species primates, wolf, serval, lion, brown bear are kept alone in some zoos, instead of in pairs or in family groups, as required by law.

## Distress prevention for the animals

On average, zoos meet 69% of animal distress prevention requirements. In some of the zoos, people can get too close to the animals due to the way the environment is structured or due to the lack of the obligatory two fences.

The zoos in Razgrad, Kyustendil, Varna and Blagoevgrad are a negative example of the lack of distress prevention for animals.



## Animal transport and translocation

Some zoos use the services of animal transport companies to transport the animals. Over the years, FOUR PAWS has also assisted in transporting many animals from Bulgarian zoos.

## Species conservation, research and training

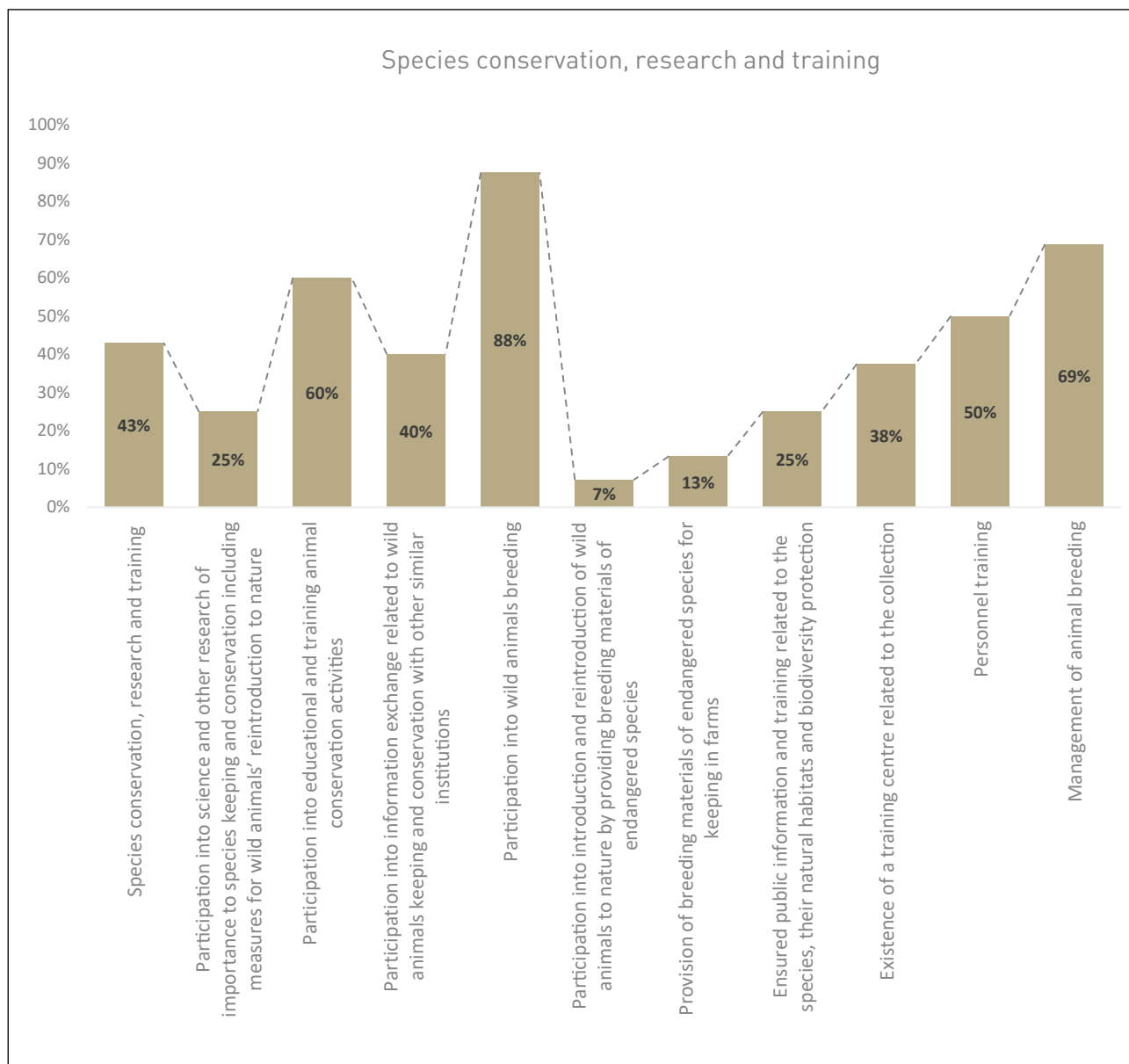
Fulfilling the requirements in this category should ensure the implementation of the conservation measures outlined by the Zoos Directive for animal protection, scientific research and training, and public awareness and education. The same requirements are also compulsory under Art. 60 of the BDA, setting out the main conditions and framework under which zoos must operate. Given the importance of these conditions, and also in order to gather topical data, we presented the zoos under study with category-related public information inquiries, concerning indicators such as: participation in science and other research, conduction of educational and training activities, existence of a training centre and collection management. Despite their obligation to respond to the enquiry within 14 days, as outlined in the law, 3 out of the 15 licensed zoos did not send back the requested information. For these zoos we used the collected data from the research checklist. The result of the requirements analysis under Art. 60, Para. 2 includes the following:

- conduction of training and educational activities (60%);
- information exchange with other institutions with similar purpose (40%);
- provision of information access to the public, which relates to the collection of species, their natural habitats and the conservation of biological diversity (25%);
- participation in science and other research of importance for species conservation and keeping (25%);
- provision of breeding materials of endangered species for keeping in farms (13%);
- provision of breeding materials of endangered species for their recovery or re-introduction to nature or for keeping to animal farms (7%).

**With the exception of Kyustendil Zoo, all other zoos included in the study have an active license. However, this means that a big part of the zoos in Bulgaria have been licensed in contradiction with the legal provisions. This indicates an absence of efficient control, and a licensing process does not reflect the real situation in zoos. We can see the ratio of indicator findings concerning animal breeding. Only 69% manage breeding, and only 7% of zoos participate in introduction and reintroduction of wild animals to nature by providing breeding materials of endangered species. Two striking examples are Razgrad and Blagoevgrad Zoos, which used lion siblings as breeding couples. This has resulted in genetic anomalies in their offspring and lion cubs at risk of severe health problems.**



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According to the legislation, zoos have the task to breed animals in order to contribute to the species' conservation. However, reproduction must be controlled and must be part of a breeding programme.

According to FOUR PAWS inbreeding must not be allowed. The animals must not be bred if a zoo cannot provide the needed conditions and enclosures for their keeping because breeding of animals ex-situ is not necessarily a conservation measure in itself.

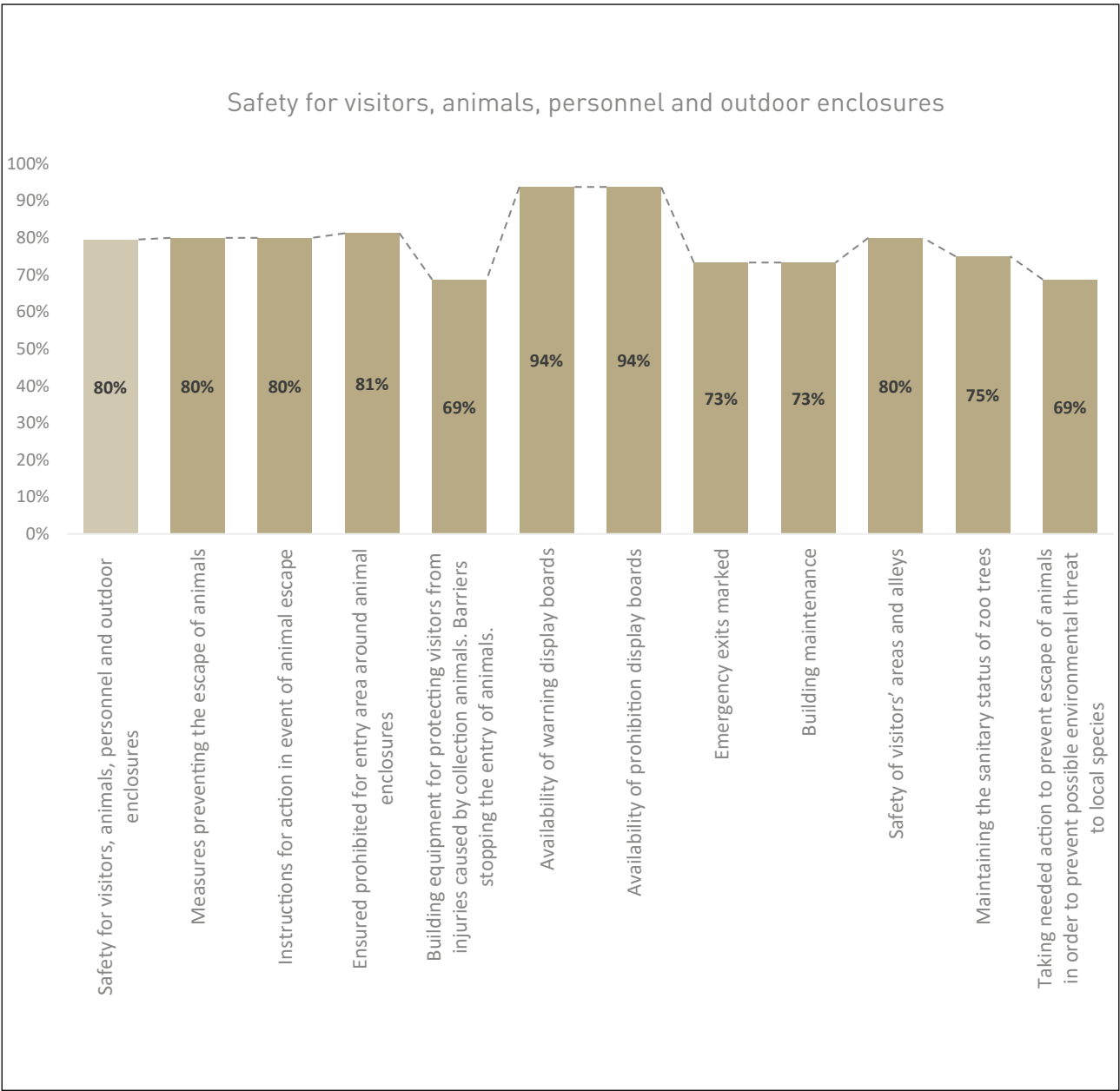


# Safety for visitors, animals, personnel and outdoor enclosures

Zoo enclosures and equipment must prevent the escape of animals in order to avoid possible environmental threats to local species, pursuant to the requirements of Art. 60, Para. 3. It. 4 of the BDA. This requirement is also part of the conservation measures of the Zoos Directive, and zoos unable to ensure the above should not be granted a license. According to Art. 2, Para. 1 of Ordinance No. 6, zoo owners or directors should ensure that enclosures facilitate maintenance of the normal animal physiological

status, prevent the escape of animals by way of two consecutive doors or other barriers (electric fences, water or ground ditches, fences of appropriate height, etc.), do not allow the escape of animals outside the boundaries of the designated enclosure, and ensure optimal distance from external subjects.

Our research findings, checklists and photos show that zoos meet difficulties in fulfilling these requirements. These difficulties are also related to their outdated facilities. Most of the zoos meet the requirements concerning the presence of warning and prohibition display boards. The least observed requirement concerns the measures for prevention of escape of animals and harm to visitors caused by animals.





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Positive examples of safety provision are the zoos in Dobrich and Aytos. Among the zoos where the requirements are not met are Blagoevgrad and Razgrad.

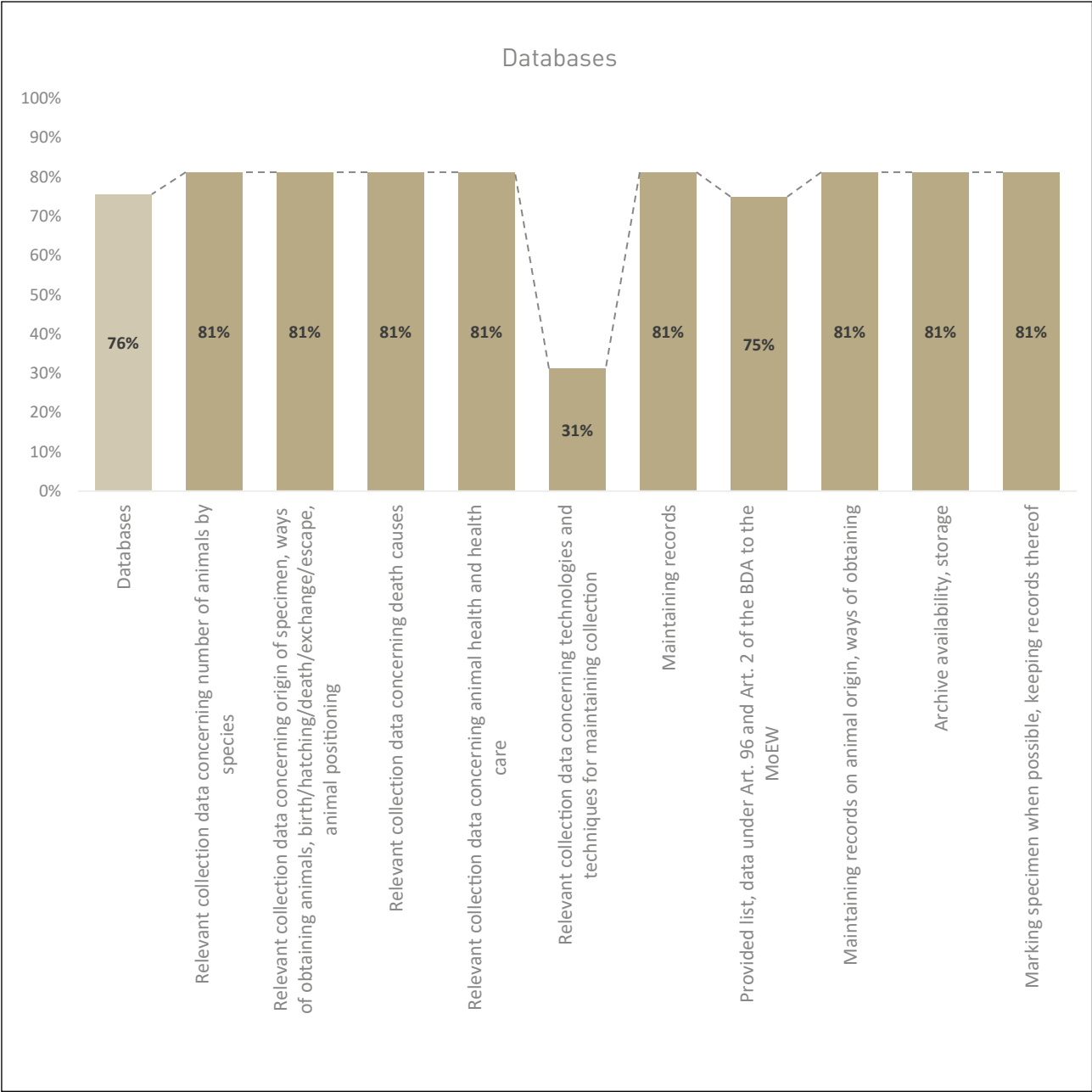
## Databases

Zoos under study meet an average of 76% of the related minimal record-keeping requirements. The level of indicators presented seems high, except for the conditions for providing information to the control body. However, in many zoos there is a trend of non-transparency regarding the animals kept in them.

Art. 96, Para. 2 of the BDA imposes the require-

ment that zoos must provide to the MoEW and RIEW data concerning existing animals by species. At the beginning of every year, they are obliged to provide updates on the changes which occurred during the past year. This requirement is further reconfirmed by Art. 3 of Ordinance No. 1 and is one of the compulsory requirements for obtaining a license.

Keeping records on the technologies and techniques utilized in the keeping and maintaining of collections is one of the compulsory actions prescribed by Art. 60, Para. 2 of the BDA, which regulates the framework and conditions under which the zoos are allowed to operate. This is a requirement which must be met, otherwise a license must be denied, as stipulated by Art. 17 of Ordinance No. 1. Nevertheless, only 31% of the studied zoos have fulfilled this





requirement. This result raises the question to which extent the technologies and techniques for keeping and maintaining the collections are subject to targeted management and planning by owners.

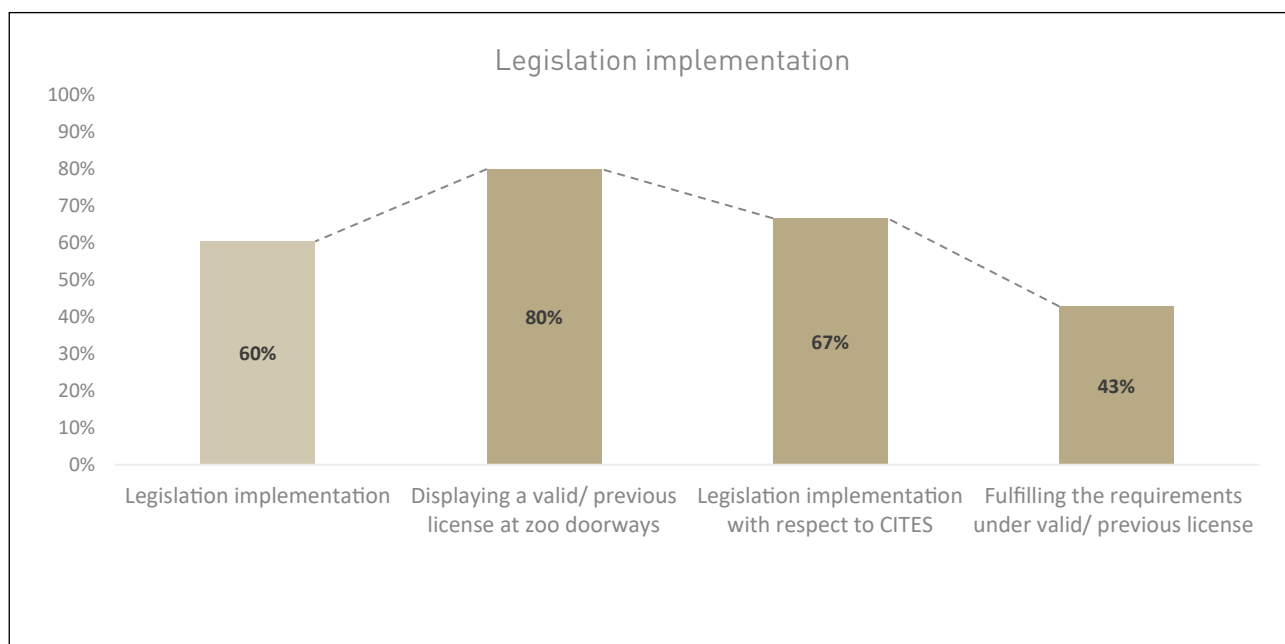
A good example of maintaining databases are the zoos in Sofia and Dobrich, and among the bad examples - the zoos in Blagoevgrad and Kyustendil.

## Legislation implementation

The category including criteria for implementation of the legislation scores an average of 60%. This low result is largely due to the indicator showing the fulfilment of conditions under a valid or previous license, which scores at 43%. **One of the most serious systemic problems identified in the implementation of the legislation is that zoos systematically do not observe the requirements that were imposed**

**to them when awarded a license, requirements which are then carried over to the new license. This practice leads to a lack of improvement of the conditions in zoos as it is not expected that the control authority will take measures, including administrative sanctions, coercive translocation of animals and zoo closure.**

In 2020, FOUR PAWS conducted visits to all open zoos and developed an overview of the existing examples of problems and good practices as of that date. Brief descriptions and case studies were prepared for each individual zoo to be considered in relation to the analysis. The cases discussed are ordered by zoo, starting with those that meet the least of the criteria to operate and ending with those that have the greatest number of good practices and fewer problems. **It is worth noting that while a small number of the zoos are close to fulfilling all the necessary criteria, the majority of the zoos are far from achieving the minimal requirements to operate.**







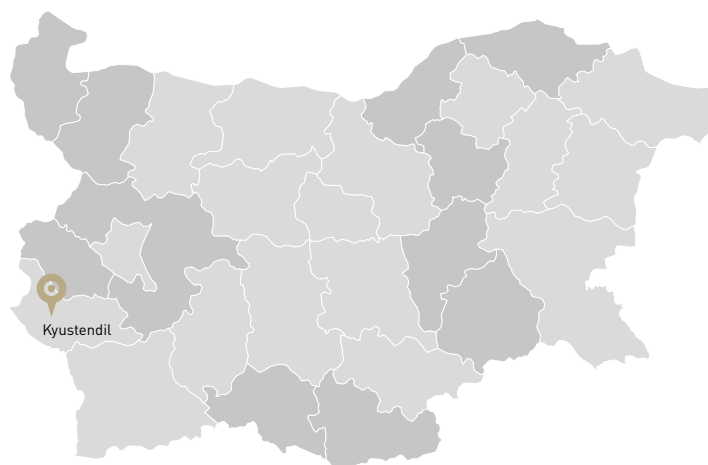
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## Overview and practical examples

### Kyustendil Zoo, Kyustendil Municipality

**Kyustendil Zoo was established in 1962.** Since 1966, it has been located in the Forest Park Hissarluka, close to a medieval fortress, which is a tourist attraction. **The zoo has been managed by the Municipality of Kyustendil.**

**For a period of more than 9 years, Kyustendil Zoo has been operating without a license.** It obtained a license in 2008, which was later in 2011 revoked by Order of the Minister of Environment and Waters. According to the European and Bulgarian legislation, the zoo should have closed down and all of its animals translocated. As of 2020, the zoo keeps 105 animals of 17 animal species. At the beginning of 2021, Kyustendil Zoo is still operational and has not been awarded a new license during the period 2011 – 2020.



## Good practices

1. A reconstruction project for the overall reconstruction of the zoo was developed, however it has yet to be implemented.

## Problems

1. The conditions at Kyustendil Zoo do not comply with the prescribed requirements of the Biological Diversity Act (BDA) and Ordinance No. 6 of 23 October 2003 on the minimum requirements and conditions for the keeping of animals in zoos and keeping and breeding centres for protected animal species.
2. The conditions of Ordinance No. 6 are not fulfilled regarding the keeping of the following species:
  - **wolf** – with respect to ensuring the necessary environmental enrichment;
  - **lion** – with respect to ensuring a sufficient area and enrichment for the cage, height of the cage, social structure of the species;
  - **brown bear** – with respect to environmental enrichment for the cage, height of the indoor enclosure, non-separated outdoor enclosure, social structure of the species;
  - **wild boar and Vietnamese pig** – with respect to ensuring sufficient area of the enclosure, sanded patches of land for lying and rolling, opportunities for separating animals;
  - **roe deer** - with respect to ensuring stables and outdoor enrichment;
  - **mouflon** - with respect to ensuring space and height of the indoor enclosure, opportunities for separating animals, stone constructions structured as climbing rocks and space dividers.
  - **birds** – with respect to the enclosure;
  - **vervet monkey** - with respect to ensuring sufficient area and enrichment.
3. The following other legal requirements are not met:
  - satisfaction of the biological requirements of the animals;
  - provision of a shelter according to the species and their behaviour, and structuring of the enclosures with trees, green islands, hills, large pieces of rock or other spatial elements, which should create conditions as close as possible to the natural living conditions of the species, and offer a living

environment as diverse as possible;

- barriers to the enclosures (electric fences, water or ground ditches, fences of appropriate height, etc.), which ensure optimal distance of the animals from external subjects;
  - provision of a high level of preventive and veterinary care in order to prevent disease, distress and injury.
4. There is no specialized personnel with a relevant specific qualification, including animal welfare or other courses.
  5. A low level of hygiene has been maintained, and there is a lack of appropriate premises for examination, treatment, recovery and quarantine when required.
  6. The order of the Ministry of Environment and Waters' concerning the translocation of animals to other zoos or rescue centres remains unfilled.

**Kyustendil Zoo is a striking example of how, despite being well-defined in the legal framework, legal provisions in certain cases remain on paper only, and thus are ineffective in producing positive change for many of the zoos in the country.** This case proves the need for competent authorities to exercise stricter control and enforce the practical application of the conservation measures of the Zoos Directive in Bulgaria.

## Recommendations

**FOUR PAWS insists on the closure of the zoo for visitors and translocation of animals from Kyustendil Zoo to other zoos or rescue centres which can offer appropriate conditions.** The animals could be re-accommodated in the future if the zoo is reconstructed and appropriate environments for the animals are ensured. Qualified personnel and a plan for the zoo collection must also be provided. It is important to note that the translocation of the animals must be



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carried out as soon as possible, and should not wait for project approval or repair of the existing facilities.

In the event of an overall zoo reconstruction, we recommend the following steps:

- Developing a plan for the species collection in the zoo
- Ensuring that the necessary conditions for the keeping of the animals are met, in accordance with the legal requirements;
- Appointing specialists following the requirements for obligatory personnel in the zoos, as laid down in Ordinance No. 6;
- Preparing nutrition ration tables depending on the species, age, sex and biological condition of the animals;
- Potential returning of some of the animals for which the zoo can ensure appropriate keeping conditions.

## Working without a license for over 9 years and a lonely lion waiting for better times

**Kyustendil Zoo was closed in 2011 with an Order of the Minister of Environment and Waters. The license of the zoo from 2008 was revoked and it was further ordered that, within 9 months of order issuing, all animals from Kyustendil Zoo should be translocated.**

A major reason for revoking the license of Kyustendil Zoo was the non-compliance with the minimum keeping requirements for the majority of the animal species accommodated in the zoo. The enclosures did not satisfy the physical parameters required for the species and the level of hygiene was also low.

The zoo's poor keeping conditions and the revoked license make clear the need for fast transloca-

tion of the animals. Nevertheless, the zoo owner – the Municipality of Kyustendil – has not fulfilled the Order of the Minister of Environment and Waters, and 9 years later, the animals are still stuck in inappropriate and illegal keeping conditions. The controlling body must organize and carry out the translocation of the animals. Since the beginning of 2021 this has still not happened, even though FOUR PAWS has repeatedly offered assistance in translocating the animals.

**One lion remains living in a narrow concrete cage as the last main attraction of the zoo, waiting for the conditions to improve.**

For many years, this lion has lived in a concrete cage, lacking basic environmental enrichment. According to media reports until 2020, the size of the cage was 30 square meters, which is 10 square meters less than the minimum legal requirements for the size of the enclosure. During a site visit to the zoo in September 2020, FOUR PAWS found this lion living in the same poor conditions. In a reply to a Freedom of Information request in October 2020, the control authority informed FOUR PAWS that the lion has been translocated to an enclosure of 51 sq. m. Even in this bigger cage, there is no basic environmental enrichment.



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The living conditions of the lion have not left the citizens of the town indifferent. In October 2020, a subscription signed by more than 600 citizens of Kyustendil, was filed to the municipality and the Ombudsman, requiring an improvement of the living conditions of the lion. In response, the Regional Inspectorate of Environment and Waters (RIEW) conducted an inspection. It concluded that the lion was in a good overall physical condition. Despite the demands of the subscription, there were no indications for improvement of the living conditions of the lion.

**Throughout the years in which the zoo has operated without a license, some of the other animals have died, including a lioness and the two tigers. They did not manage to live through to being translocated to another zoo or to having their conditions improved.**

According to the control authority, the brown bear kept in the zoo was still alive in 2020 but during the visits of FOUR PAWS in 2020 and 2021, the team did not find the bear in the cage.



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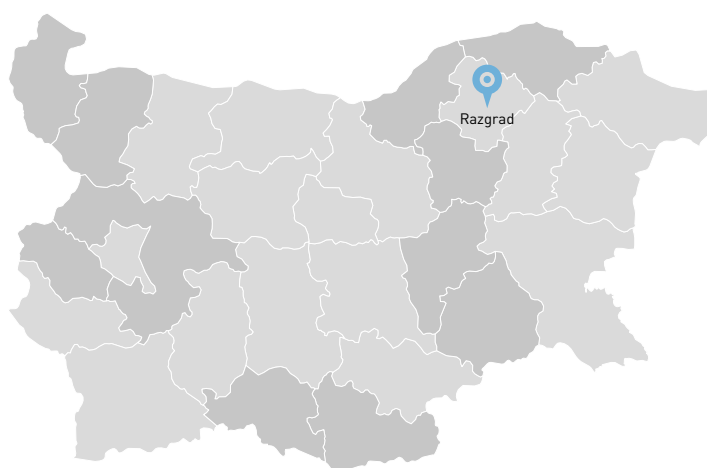




## Razgrad Zoo, Razgrad Municipality

**Razgrad Zoo was founded in 1960 and is managed by the Municipality of Razgrad.** The zoo occupies 0.2 ha in the city park of Razgrad next to a football stadium.

**Zoo's license from 2009 expired in 2014.** After this, the zoo continued operating without a license for over six years. It **obtained a new license on 24.09.2020.** The new license is valid until December 2025. **Meanwhile, there is no visible change to the conditions in the zoo.**



## Problems

The zoo does not meet most of the requirements of the 2009 license. This includes the keeping conditions for the lion, llama and red deer, for which the outdoor and indoor enclosures requirements are not met. In November 2020, these species still remain in the same enclosures, without improvement.

Razgrad Zoo worked without a license from 2014 to 2020. During the visits of FOUR PAWS to the zoo in 2017, a large number of problems were identified:

1. Enclosures satisfying the physical, social, psychological and ethological needs of animals are not provided for most species, including the lions.
2. The zoo is not secure, allowing visitors of the park the possibility to jump over the wire fence or pass through the courtyard, putting them in close proximity to the animals.
3. There is no educational centre related to the collection of the zoo, and the zoo cannot meet the requirements for informing and educating the public concerning the kept species, their natural habitats and biodiversity protection.
4. In 2017, a veterinary centre was registered to the zoo, but, in reality, it does not function, and no urgent veterinary interventions are performed there for the zoo's animals.
5. As of 2017, the zoo has gaps in terms of ensuring personnel requirements under Art. 3 of Ordinance No. 6.
6. In 2017, the hygiene in the zoo did not comply with the minimum requirements for food preparation, storage or feeding of the animals, due to a lack of regular daily cleaning. In addition, animal feed lacked quality nutrition or season specific feeding options, with no nutrition rations relating to species or taking into account their type, age, sex and biological status.
7. Until a veterinary intervention by FOUR PAWS in November 2017, the zoo inbred sibling lions, resulting in numerous genetic diseases and congenital anomalies in the offspring. Such diseases have been registered in several lions born in Razgrad Zoo. Until the intervention, breeding had taken place despite the lion enclosure not complying with the law due to insufficient space, insufficient care for the cubs and numerous other related problems within the zoo.

**According to the regulations of the Bulgarian and European legislation, and with a view to the above-stated violations, during the period when lions were bred in the zoo without a valid license, it should have been closed.**

## Recommendations

1. To translocate animals, for which the zoo does not have the conditions to care, to other zoos and rescue centres with appropriate keeping conditions for the species until a suitable environment is provided in accordance with national legislation or a new zoo in a more suitable place is established.
2. To develop a collection plan and a project for a new zoo according to the abilities of the Municipality, in order to meet the goals of the Zoos Directive and to enable the keeping of only these species for which it can ensure adequate personnel, resources and capacity.
3. To allocate an appropriate area and to build a new zoo at a suitable location, where animals would not be disturbed, and to build said zoo in line with the legislation.
4. Return of the animals included in the collection plan, for which there are resources and capacity, to the newly built zoo.

## The story of Terez, Masoud and Ivan-Asen and the bitter lesson of why control is needed to enforce the legislation on zoos

At the end of 2020, a FOUR PAWS team visited Razgrad Zoo soon after it had received a new license from the Ministry of Environment and Waters. Prior to this, the facility had been operating illegally for six years. The enclosures of the animals do not meet the mandatory requirements laid down in the national legislation.

The cages and fences are located on an alley in the park, right next to the roadway and across from a stadium with capacity for 8,500 people. The loud noise from the stadium is a serious stress factor for the animals kept in these surroundings.

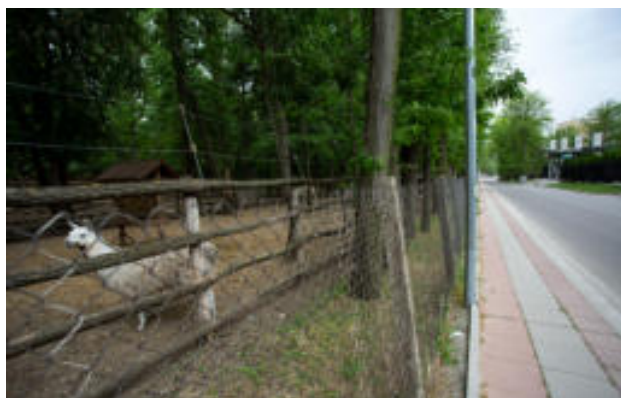
By the end of 2020, the zoo holds several species, including lions, llamas, red deer and various bird species. The enclosure of the two remaining lions - Lubo and Eva - does not meet the legal requirements for the species; it does not provide the neces-



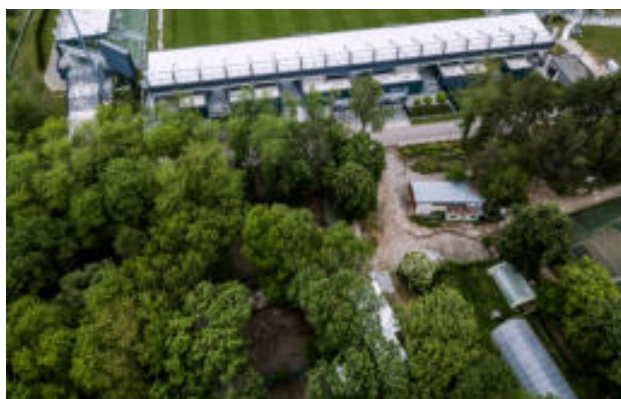
sary enrichment, nor are the animals protected from distress as there is nowhere to hide from the visitors of the city park. For a person who has not visited the zoo, it is difficult to imagine that in 2017, this zoo used to keep five lions and breed cubs in the same dilapidated cages.

In 2017, when Razgrad Zoo did not have a license to operate as a zoo, the lion cubs Terez and Masoud were born. They were two of three lion cubs born at this time, but the third one died soon after birth. Terez and Masoud's parents are brother and sister, and so are their grandparents. Therefore, Terez and Masoud are the result of several generations of inbreeding. This is a serious case of malpractice, as inbreeding can result in a number of genetic problems for the animals and deteriorate health in the long run. With the birth of Terez and Masoud, Razgrad Zoo had seven lions. The zoo did not have the space nor the necessary staff to provide professional care for the animals, even less so for lions with serious and chronic health problems.

Terez and Masoud's older brother, Ivan-Asen, who was about two years old at the time of their birth, was also in a very poor condition. He was locked in a cramped and dirty indoor cage without adequate food and water, suffering from bone, joint and muscle problems due to his immobility and genetic problems resulting from the inbreeding of his parents.



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The practice of confining animals in cramped cages was not new for the zoo: a few years earlier, another lion was confined in a similar small indoor cage after he was used for breeding. This lion had been given to Razgrad Zoo by Stara Zagora Zoo. He was later sent to Knezha Zoo.

**In 2007, Terez, Masoud and Ivan-Asen were in serious health condition. The case was so shocking that citizens from all over Bulgaria joined the cause, demanding that the lions be taken out of the zoo and be provided specialized care. This was necessary because Razgrad Zoo did not meet the requirements of the national and European legislation, and could not provide the necessary care for their animals. The control body did not take measures to close the zoo within the legally prescribed period.**

Several tense months followed, during which the FOUR PAWS team organized emergency veterinary examinations, treatment and relocation of some of the animals. The four adult lions were neutered by FOUR PAWS to prevent further inbreeding and the birth of new cubs. Together with the "Wild Animals" Foundation, FOUR PAWS urgently rescued Terez, Masoud, Ivan-Asen, and later the adult lions Raya and Hector from Razgrad Zoo. The animals were temporarily sheltered at Sofia Zoo before a permanent solution was found, and the "Wild Animals"



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Foundation took over care of raising the cubs Terez and Masoud.

What followed was a series of debates, meetings and a protest in front of the MoEW regarding the future of the lions. Despite the serious and grave condition, the multiple violated legal requirements and the health status of animals kept at the illegal zoo, it transpired that the Municipality of Razgrad intended to give away Masoud and Terez to Pazardzhik Zoo. This decision, however, did not take into account the need for specialized care resulting from inbreeding and the accompanying problems. At this point, the MoEW engaged with the problem and the Municipality of Razgrad handed over five of the seven lions.

In 2018, Terez and Masoud were transferred to the FOUR PAWS FELIDA Big Cat Sanctuary in the Netherlands for rehabilitation. Ivan-Asen was transferred to Sofia Zoo for treatment, and was later also transferred to FELIDA. Hector and Raya were temporarily moved to Sofia Zoo, and from there into a new species-appropriate enclosure in Pazardzhik Zoo.

However, rescuing animals does not mean the end of the story for FOUR PAWS, and unfortunately a rescue is not always enough to compensate for the problems and mistakes made in the breeding and keeping of animals in an unsuitable environment.

In FELIDA, the health conditions of Terez and Masoud were closely monitored by the animal caretakers. When the lions grew into adulthood in 2020, Masoud's neurological problems and motor skills deteriorated. Specialized examinations at the University of Utrecht confirmed that he suffered from a deformed spine, a birth defect resulting from inbreeding. In a short time, the condition progressed to the point where it caused Masoud severe pain. After consultation with neurologists and wildlife veterinarians, it became clear that this condition was untreatable and surgery or painkillers would not offer a solution.

**Uncontrolled (in)breeding of lions in conditions that do not meet the requirements for breeding and keeping of the species must be stopped. A lot of effort and problems can be avoided if the minimum legal requirements for the keeping of animals in zoos outlined in the national and European legislation are adhered to in the zoos in Bulgaria.**





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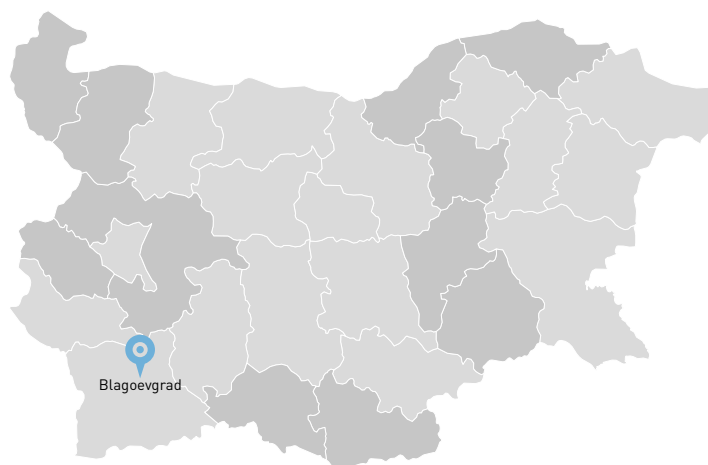
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## Blagoevgrad Zoo, Blagoevgrad Municipality

**Blagoevgrad Zoo was established in 1961. The zoo occupies 5.5 ha at a park in Blagoevgrad and is property of the Municipality of Blagoevgrad.** The majority of the zoo's territory is covered by forests, which provides favourable conditions for some of the zoo's animals, with enclosures built primarily from metal and wood constructions, as well as wire and concrete. As of 2020, there is no entry fee levied by the zoo. In recent years, there have been several reported cases where animals were mistreated by zoo visitors, with stones being thrown at them. **Most enclosures need serious reconstruction.**

**Blagoevgrad Zoo has a license which is valid until 24 February 2021.**



## Good practices

1. There is a new enclosure for brown bears established, allowing keeping of bears close to their natural needs.

## Problems

1. Many of the animals are kept in inappropriate conditions not complying with the requirements of Ordinance No. 6. These species include lion, monkeys, fallow deer, red deer, roe deer, wild boar, mouflon, bison, lama, racoon, nutria, porcupine, wild rabbit, northern goshawk, domestic yak, etc.
2. The lion enclosure lacks the necessary environmental enrichment which can create a close-to-nature setting for the kept individuals. There are no sheltering boxes or caves for sleeping and giving birth established to recreate the lion's natural living environment; external premises have not been properly structured to create areas for privacy and shelter; the enclosure also lacks playground sets, rocks, roots and natural forms creating a close-to-nature environment. There is no interior vegetation to enrich the enclosure. Thus, the requirements of Ordinance No. 6 and the BDA remain unfulfilled.
3. There is no plan for the control of breeding. The zoo carries out uncontrolled breeding of lions without the provision of relevant conditions for their keeping, which violates the BDA.
4. There is a lack of personnel with appropriate professional qualifications needed to ensure a continuous service to Zoo Blagoevgrad, as the regulations of Ordinance No. 6 require.
5. No conditions have been ensured for placing animals in isolation for medical examination, treatment, recovery and quarantine, under the respective BDA requirements.
6. Information on animal origin has not been systematized, as required by the law, nor has the zoo's documentation been ordered by the creation of dossiers for each species, which can enable updates in the event of change.
7. Prepared ration tables are not observed, suggesting animal feeding may not align with the necessary standards.
8. Enclosures and premises are not kept in line with the relevant hygiene requirements. Enclosures are being neglected, as their grounds are soaked with moist and mildew. There is no regular cleaning of the enclosures.

9. The Municipality of Blagoevgrad has not fulfilled the conditions posed by license No. 23/25.02.2016, although deadlines have long expired.
10. There is no educational programme, although in the town where the zoo is located hosts a university which educates teachers.
11. The situation in Blagoevgrad Zoo, with the exception of the enclosure of the Brown Bear species, creates a distorted picture of the wild fauna for the visitors.

## Recommendations:

1. Compliance of the issuance of a new license with the requirements of Ordinance No. 1.
2. To stop uncontrolled and close-relative breeding (inbreeding).
3. To systematize information on animals – to create a dossier for each animal, which can be updated in the event of changes.
4. To carry out a major renovation of the zoo.
5. To develop an educational programme for the zoo, in addition to scientific and research activities plan.
6. To prepare a detailed plan on the collection of species.
7. To appoint professionals, meeting the requirements for obligatory personnel at zoos, as required by Ordinance No. 6.
8. To develop ration nutrition tables depending on the specific species, their age, sex and the health condition of the animals.

## The birth of lion cubs Simba and Bambi (later Kossara), inbred siblings, clearly indicating a systematic problem

Less than three years after an impressive number of citizens, animal advocates and non-governmental organizations joined efforts to save the lions Terez and Masoud from Razgrad Zoo, in July 2020, Blagoevgrad Zoo welcomed the birth of two new inbred lion cub siblings.

Similar to the case of Terez and Masoud, as well as to another case in 2019 at Haskovo Zoo where lion cubs died shortly after being born, the lioness at Blagoevgrad Zoo did not express her maternity instincts and did not manage to take care of her babies. It is highly probable that this type of reaction in female





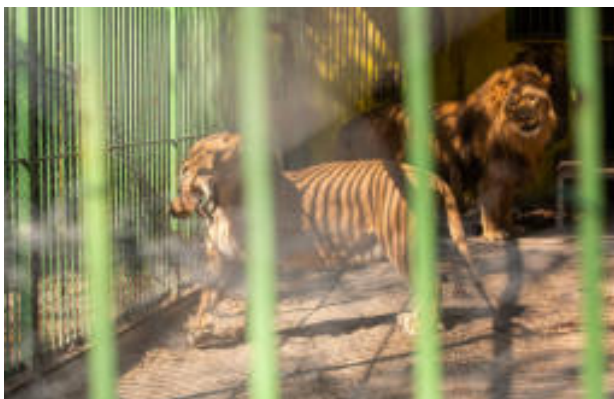
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lions is due to the lack of appropriate and naturalistic environment for the species, environmental enrichment, and other necessary conditions needed for their keeping and wellbeing, which the respective zoos have failed to ensure.

The personnel of the zoo also did not provide the relevant care in the first days after the birth of the cubs, decreasing their chances to survive. As a result of the large amount of public interest in their fate, the two cubs were eventually translocated to recover and be treated in a veterinary clinic in Sofia. They were then transferred to Varna Zoo, as Blagoevgrad Zoo had no capacity to provide the necessary care.

Following these events, some logical questions emerge: why does a zoo perform inbreeding and why does it allow the birth of lion cubs, for which it cannot take care; why were the lion cubs sent to Varna Zoo specifically afterwards?

The answer to the first question appeared in the official statements made by representatives of the zoo, according to which the birth of the cubs was not planned. **It is important to note that the birth of animals in zoos should follow a zoo collection management plan, and it should not be the consequence of pure chance or accidents.** Further, if a zoo complies with obligatory personnel and personnel

qualifications requirements under Ordinance No. 6 of 23 October 2003 on the minimum requirements and conditions for the keeping of animals in zoos and in keeping and breeding centres for protected animal species, and if it fulfills all requirements of Ordinance No. 1 of 9 May 2006 on the conditions and order for zoo licensing, accidental breeding of animals would have been avoided.

Similarly, if a zoo meets the said legal provisions, it would have been prepared to take care of the new offspring in the zoo, ensuring the relevant environmental conditions for raising cubs were met. In the case under consideration, Blagoevgrad Zoo lacks the personnel with appropriate professional qualification to ensure continuous service to the zoo, which is required under Art. 3, Para. 1-3 of Ordinance No. 6; it also fails to ensure conditions for placing animals in isolation during examination, treatment, recovery and quarantine, as Art. 60, Para. 3, It. 3 of the BDA requires.

**Considering the above issues, as well as the fact that the zoo continues to keep lions despite the high number of unmet conditions in the zoo's license, the birth of the lion cubs is not an accident. Rather, it is an indication of a systematic problem, which is a consequence of the lack of control and unmet**



### obligations under the national and European legislation.

The answer to the question of why the lion cubs were translocated to Varna Zoo reveals yet another systematic problem: the exchange of animals amongst zoos with breeding loans and the transfer of responsibilities for the animals in question. It is a common practice that zoos use breeding loans to send animals to other zoos without ensuring that the recipient zoo has the required expertise, capacity and conditions.

In this case, the parents of the lion cubs Simba and Bambi (later Kossara) are siblings Florentina and the Little Prince, born in October 2014 at Varna Zoo. They were brought to Blagoevgrad Zoo under the conditions of a breeding loan, which allowed the host zoo to use them for exhibition and other purposes. In return, Blagoevgrad Zoo were to ensure the relevant conditions for the keeping of the borrowed lions corresponded to their species requirements, in addition to the requirement of any potential offspring which may appear as result of their breeding, until the offspring become mature enough to be separated from their mother. Blagoevgrad Zoo further obliged itself to protect the borrowed animals from impacts which may endanger their health or life. These conditions should be subject to inspection by the lending zoo, i.e. Varna Zoo, on an annual basis.

Both in this case, and in other cases of lending animals with breeding loans, legislation requirements and agreement conditions among parties remain unfulfilled. Animals are kept in conditions which do not satisfy the needs of the species and the lack of the required staff and facilities pose threats to animals' health.

To prevent serious genetic problems, if animals are lent as part of a breeding loan to be kept in the same enclosure, all relevant precaution measures should be put in place to avoid inbreeding. The lending of closely related animals which are to be accommodated in a common enclosure should not be considered as breeding loans. Furthermore, they should exclude the possibility that such animals are bred and create a common offspring.

Even before Simba and Bambi were translocated to Varna Zoo, Blagoevgrad Zoo announced that it would build a new lion enclosure in which they would host the cubs when they grow up. In late 2020, there was ongoing construction work to renovate one of the old cages in the zoo. However, to accommodate the lions in an enclosure with conditions meeting the relevant

legislative requirements, the zoo should undertake more ambitious steps. It should guarantee that the new enclosure provides naturalistic environmental conditions for the species, as well as guaranteeing that it possesses the necessary personnel and financial resources to keep the lions. This is especially important when taking into account the risk that the lions may suffer from health issues related to inbreeding. In addition, the lion cubs need to be separated once they reach a certain age.



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## Other problems at Blagoevgrad Zoo and a best practice – the enclosure of the bears

The enclosure of the lions is one of many in need of reconstruction. **Many of the animals in the zoo live in old cages that fail to meet their needs. Social structure requirements in some cases also remain unobserved. One of the biggest problems of the zoo is the low hygiene and the dirty cages.**

**Another problem is the record keeping of the animals in the zoo and the related issues around tracing animals which have been stolen from the collection or have disappeared from the zoo, as some signals from media reports indicate.** In 2020, it was reported that a new-born bear cub had disappeared. It was photographed by a local photographer and broadcast on national television. The whereabouts of the bear cub remain unknown.

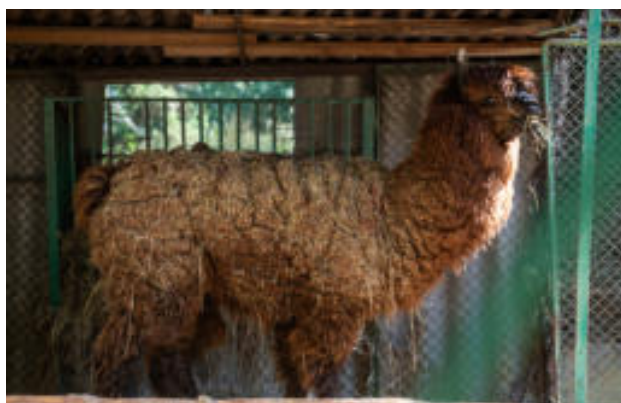
A further necessary improvement is to the fences of the animal enclosures, which is required in order to ensure a higher level of safety for the visitors and animals. Presently, the requirement for ensuring two consecutive barriers has not been met everywhere. Some of the enclosures are old and the integrity of certain fence wires is compromised. There are also problems with the security in the zoo, which in recent years has led to cases of animals escaping their



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enclosures. These cases are reported in the media. **To operate in line with the Zoos Directive, Blagoevgrad Zoo should provide for the safety of all enclosures. It should also ensure a plan for its collection, a plan for scientific and research activities and an educational programme for the visitors of the zoo. All of these are basic and mutually related conditions to ensure that the zoo is in line with the goals of the Zoos Directive.**

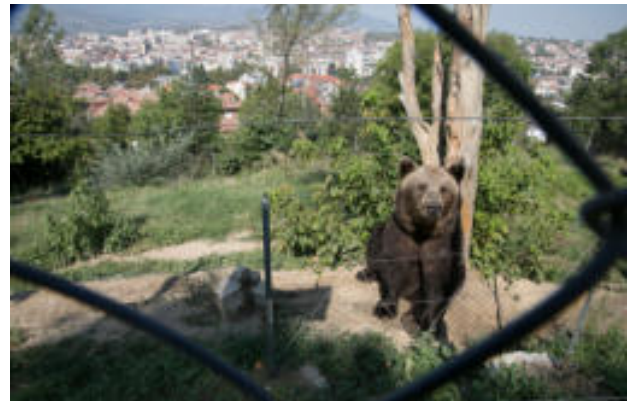
It must be noted that there are also cases of **good practice at Blagoevgrad Zoo. In its bigger part, the enclosure for the brown bears is well-structured and manages to ensure close-to-nature conditions for the species, which has viable populations in near geographic proximity in the wild. Unfortunately, the enclosure is not maintained according to the necessary hygiene standards.**

All other enclosures should also be renovated so that they meet the needs of the species and offer conditions that are closer to their natural habitats. The enclosures must also be maintained according to the hygiene standards. The choice of species to be kept by the zoo in the future should follow a carefully developed plan for the collection of species, and the systemic problems of the zoo should be solved as soon as possible.





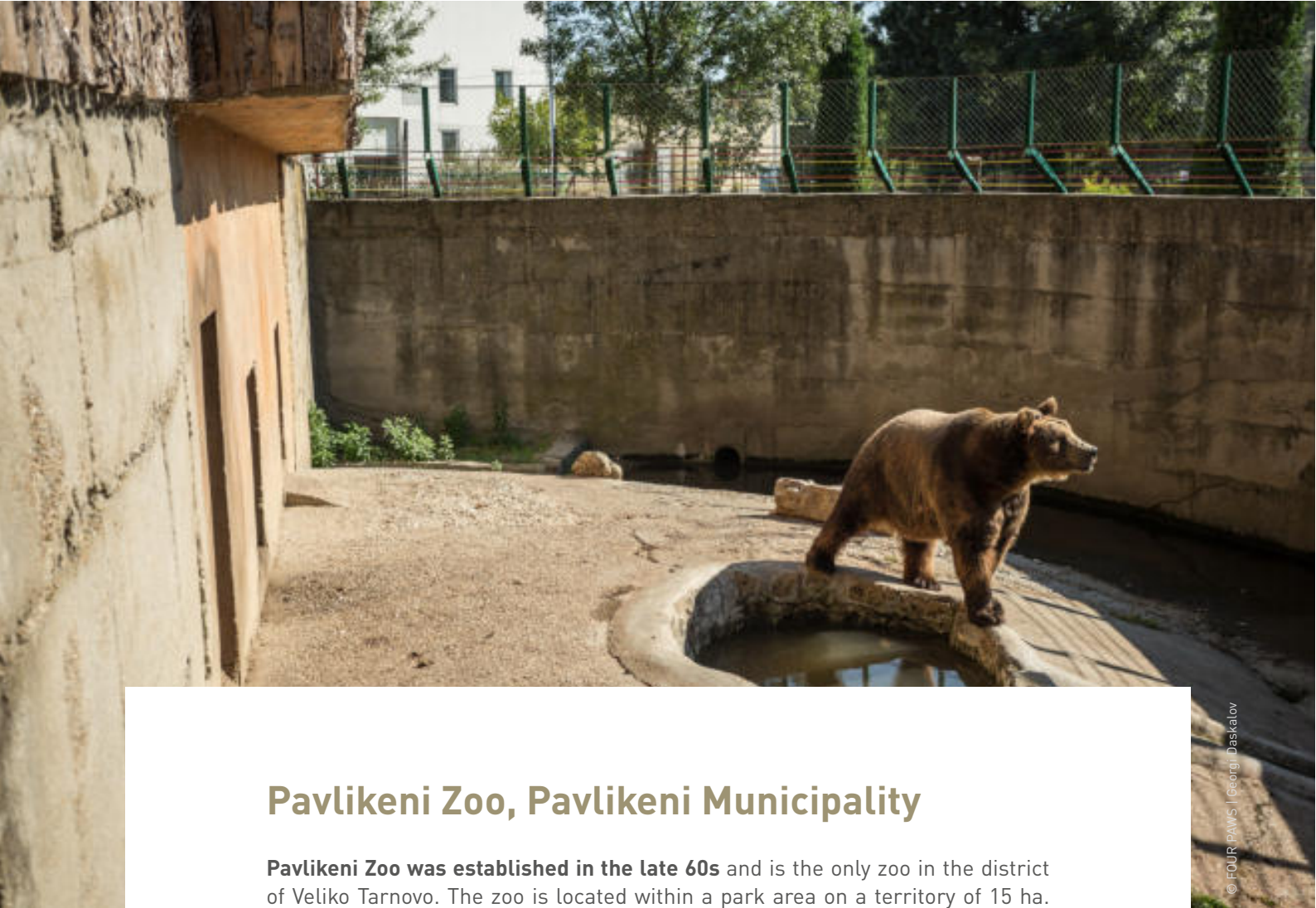
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## Pavlikeni Zoo, Pavlikeni Municipality

**Pavlikeni Zoo was established in the late 60s** and is the only zoo in the district of Veliko Tarnovo. The zoo is located within a park area on a territory of 15 ha. **The zoo is owned by the Municipality of Pavlikeni.** The Municipality has planned an additional area for the zoo's expansion and has also prepared a project for the reconstruction of the zoo, the implementation of which has been postponed throughout the last ten years.

Pavlikeni Zoo obtained its license in 2008 under certain conditions. After the license expired, the zoo continued to operate for over 2 years without a valid license, until it was re-licensed in 2015. This license was once again issued with conditions, which repeated the unfulfilled conditions of the previous license. The same reoccurred **in 2020, when the zoo obtained a new license valid until December 2025.**





## Good Practices

1. The green zones of the park area are well-maintained.
2. The hygiene in the zoo is comparatively well-maintained despite the old facilities of the zoo.

## Problems

1. The buildings, fences and facilities have become obsolete and do not satisfy the current requirements.
2. Quality enclosures do not exist for many of the animals. The enclosures for several species including brown bear were listed as conditions in license from 2015.
3. The enclosure for the brown bear lacks environmental enrichment, which is an obligatory part of the requirements of Art. 9, Items 6-10 of Ordinance No. 6. The concrete facility does not create conditions close to the natural ones for the animal.
4. There is no training centre related to the collection, and no training or educational activities related to the preservation of animal species can occur, pursuant to ordinances of the BDA.
5. Only a small part of the conditions of the license issued in 2015 have been fulfilled, and the ful-



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filled requirements are not related to the quality of the animal enclosures.

6. Consecutive licenses have been issued with conditions that remain unfulfilled from the previous licenses, without improvements to the animal enclosures.

## Recommendations:

1. To conduct a complete urgent renovation of the zoo appropriate to the planned collection of species, and to build new enclosures for these animals. If enclosures with environments that meets the ethological needs of the animals cannot be provided, the animals must be translocated to other zoos or rescue centers with suitable keeping conditions.
2. To create a plan for the collection of species for a period of 5 years.

## An example of how the zoos in Bulgaria can be awarded licenses: Pavlikeni Zoo

In 2008, Pavlikeni Zoo obtained a license with conditions concerning the fulfilment and/or improvement of certain zoo aspects to meet the minimum legal requirements for the keeping of animals in zoos. These conditions related to particular species, environmental conditions, zoo personnel and collection database maintenance.

According to the law and pursuant to Art. 18 of Ordinance No. 1 on the conditions and order for zoo licensing, the owner of the licensed zoo must apply for license renewal up to three months prior to the expiry of the current active license. However, between 2013 and 2015, Pavlikeni Zoo operated more than 2 years without a license.

**In 2015, the zoo regained its license, once again containing numerous conditions, which is in direct contradiction to the national legislation.**



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According to Art. 17 of Ordinance No. 1, the Minister of Environment and Waters shall refuse the issuing of a license when the conditions defined in the last issued license have not been fulfilled. Nevertheless, the zoo obtained a new license in 2015, with the previous unfulfilled conditions being repeated.

**In 2020, Pavlikeni Zoo was once again licensed by the Ministry of Environment without the conditions of the previous licenses having been fulfilled. A big part of the conditions of the license issued in 2015 are not fulfilled. These are determining conditions, which are related to the quality of the animal enclosures.**

**In 2020, quality enclosures for a large number of animals have still not been built. This includes the enclosure for the brown bear, which is located in a cement bunker. The obligatory natural soil, vegetation and environmental enrichment are missing. The view of the surroundings from the inside of the enclosure is also limited as it is below the level of the surface. In 2020, the legally regulated social structure is still not observed, as the brown bear is kept in isolation.**

This example of the brown bear enclosure clearly shows that **over a period of 12 years – from 2008 to 2020 – many of the conditions in successive licenses remained ‘on paper’ only, as there were no suitable enclosures ensured for the animals.** Despite the

clear legislation, it has not been enforced in practice, and the animals keep living in unchanged conditions which do not satisfy the minimum requirements pursuant Ordinance No. 6.

**In order for the Pavlikeni Zoo to function in accordance with the legal requirements, and to implement the objectives of the Zoos Directive, a major reconstruction of the facilities and renewal of the unsuitable enclosures is needed.** If the zoo does not have the capacity and resources to provide the necessary conditions for accommodating a particular species, animals of this species must be translocated to other zoos or rescue centres with the capacity to keep them.



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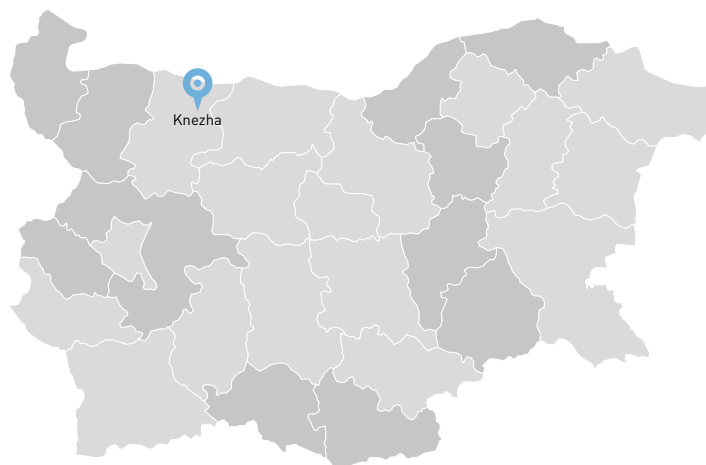


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## „Gergana” Zoo, Knezha Municipality

„Gergana” Zoo was established in 1980, and is located in a forest park in the north of the town of **Knezha**. The zoo covers an area of 5 ha. and is artificially afforested, which provides suitable enclosures for the animals. **The zoo is the property of the Municipality of Knezha** and accommodates fallow deer, wolves, monkeys, a lion, parrots, horses, geese, moufflons, waterfowls and various other animals. The enclosures for the animals consist of metal and wood constructions, wire fences, adjacent outdoor constructions and ponds. The facilities are outdated and do not comply with the legal requirements.

„Gergana” Zoo received a license in 2013. The license expired in 2018, after which **the zoo operated without a license for 11 months. In 2019 it was awarded a new license.**



## Good practices

1. The green areas of the park are well-maintained within the capacity of the zoo.
2. The hygiene of the zoo has been well maintained despite the outdated facilities of the zoo.

## Problems

1. The continuous renewal of the zoo's license without fulfilling the conditions imposed by MoEW in the previous license:
2. License from 2013 was issued with many conditions, out of which only a few were fulfilled;
3. License from 2019 was also issued with conditions, a big part of which were paraphrased in different degrees as the requirements of the license from 2013.
4. The buildings, enclosures and equipment are outdated and do not comply with the contemporary standards and legal requirements. Environmental enrichment and green areas are missing, as well as the provision of the necessary social structure for some of the animals.
5. The enclosure of the lion does not meet the requirements of Ordinance No. 6 and the Biological Diversity Act.
6. The enclosures of the guenons and parrots do not meet the requirements of Ordinance No. 6 and the BDA.
7. The space for the mouflons and goats is not structured appropriately, with separate rocky, high structures for climbing missing from the enclosure.

## Recommendations

1. A full major renovation of the outdated enclosures that do not meet the legal requirements for keeping of the animals and their ethological needs.
2. Translocation of the lion is needed as its keeping conditions are inappropriate.
3. If the conditions for the animals do not change and the legal requirements cannot be fulfilled, they must be translocated to other zoos or rescue centres with appropriate conditions.

## Outdated facilities and a lion kept on 37.6<sup>2</sup> meters outdoor enclosure

„Gergana“ Zoo in Knezha is an example of the neglect of licensing and control processes observed in Bulgarian zoos, as well as of the inconsistencies between legal regulations and their implementation. In 2013, „Gergana“ Zoo was awarded a license with conditions which, according to the law, must be addressed within 2 years of receiving the license.

More than five years later, the zoo had addressed only a part of these conditions. Following this, the zoo operated for 11 months without a license. In 2019, the zoo obtained a new license, which came in contradiction with Art. 17 of Ordinance No. 1. This article states that if the conditions of the previous license are not fulfilled, the zoo should be refused a new license. Instead, the zoo was awarded a new license with conditions, nine of which repeated conditions of the previous license, but in a new format.

**The transfer of the same unfulfilled conditions from a previous license to a new one is systematic bad practice and, as a result, the zoo's animals continue to live in the same environments that do not meet the minimum keeping conditions.**

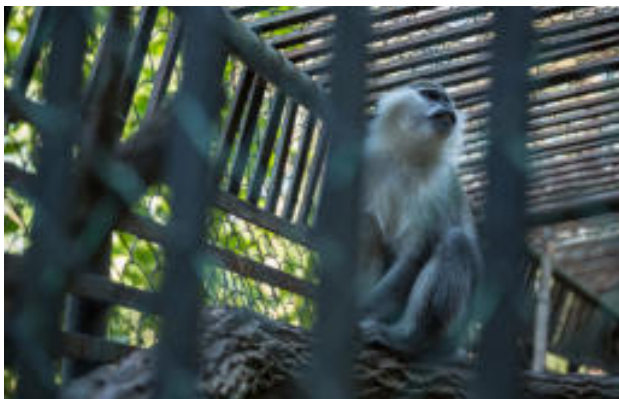


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**The unsuitable environment in which some of the animals are kept is largely a consequence of the poor state of the old facilities in the zoo.**

The worst case is that of the lion, which is one of the key attractions of the zoo. The lion belongs to the zoo in Stara Zagora, and was translocated to Razgrad Zoo with the purpose of breeding. Following the birth of his offspring, he was transferred to a small cage at Razgrad Zoo which did not meet the legal minimum requirements for suitable care. The lion was then transferred from Razgrad Zoo to Knezha Zoo in 2012.

The translocation to „Gergana“ Zoo was widely covered by media, which reported that the lion would be accommodated in a spacious enclosure of 200 square meters. It is still unclear if such location had been available at the time or if the lion was ever housed there. However, it is known that the lion is currently living in a concrete cage consisting of 37.6 square meters of outdoor space and 30.8 square meters of indoor space. **The enclosure lacks natural vegetation and environmental enrichment. These concrete facilities do not provide close-to-natural conditions in line with the needs of the species. The lion has also been living in this enclosure in isolation, which is another deviation from the legal requirements as**

**this does not correspond to the social needs of the species.**

The lion enclosure is not the only one that does not meet the minimum legal requirements. **This also applies to many other cages in the zoo, including those of the guenons, parrots, mouflons and goats, most in relation to the need for better enrichment. The necessary improvements in these enclosures are part of the imposed conditions by MoEW for issuing of a license.**

It should be noted that there has been progress made in terms of education value, with a new visitor education center built in 2019.

**In order for „Gergana“ Zoo to meet the current standards and to provide suitable conditions for keeping its animals, the zoo needs major repair and modernization of the outdated enclosures.** This is possible because the zoo is located in a natural area, where enclosures close to the natural environment of the animals can be constructed. **If the zoo does not have the necessary capacity and resources to provide the needed conditions for all species, it should focus on keeping only the animal species for which it can meet the legal requirements.**

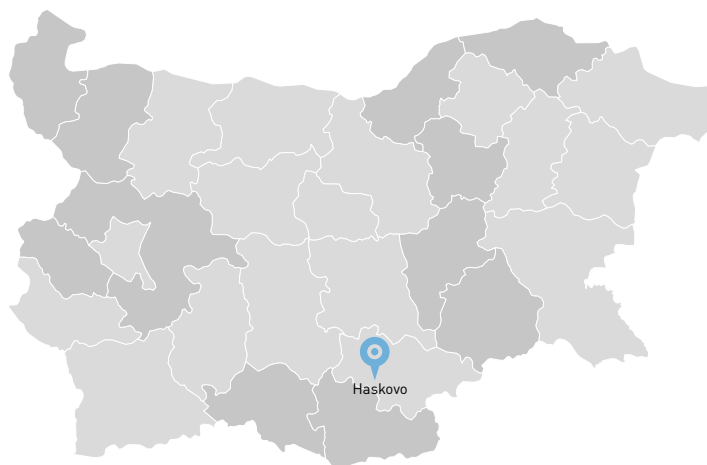


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## „Kenana” Zoo, Haskovo Municipality

**„Kenana” Zoo was established in 1958.** Since 1977, “Kenana” Zoo has occupied a green area of 3.7 ha within the urban forest park of “Kanana”, in the **town of Haskovo**, and is **managed by the Municipality of Haskovo**. The zoo’s animals are kept in concrete facilities and enclosures, built from metal constructions, wire and wood. The terrain of the zoo is fairly green but a significant amount of the enclosures lack the required vegetation and environmental enrichment.

**„Kenana” Zoo operated without a license for 5 years, starting in 2014.** At the beginning of July 2019, the zoo obtained a new license with conditions, although it had not fulfilled the conditions of the earlier license as imposed by the MoEW. The zoo does not comply with the legally prescribed minimum requirements for the keeping of numerous animals, including lions, tigers, and the Nile crocodile.





## Problems

1. “Kenana” Zoo operated without a license for five years over the period from 2014 to 2019.
2. Only a small part of the requirements stated as conditions in the zoo’s 2009 license have been fulfilled.
3. In 2019, the zoo was re-licensed with unfulfilled conditions, a part of which repeated from the 2009 license.
4. The **Nile crocodile** has been kept in an environment which contradicts the minimum legal requirements for the keeping and breeding of this species. These include the size of the indoor enclosure, the environmental enrichment, relevant vegetation for the species, opportunities for water temperature regulation and automatic water cleaning, and the requirement for ensuring a compulsory social structure for the crocodile.
5. The **tigers** have been kept in concrete enclosures which do not comply with the requirements of the BDA and Ordinance No. 6. There are no caves and shelters, and the enclosure lacks structures such as climbing frames, tree trunks, roots, bales of straw protected from the sun and rain, pieces of stone and rock, which ensure privacy and shelter options, in addition to a lack of sufficient vegetation. As a result of these unsuitable conditions, the tiger has manifested clear stereotypical behaviour.
6. The **lions** inhabit concrete enclosures with iron bars which do not comply with the requirements of the BDA and Ordinance No. 6. There is no environmental enrichment including tree trunks, roots, bales of straw or pieces of stone and rock. Additionally, the enclosure lacks privacy and shelter options or any enrichment and vegetation options that mimic the natural conditions of the species.



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7. The **wolves** express numerous stereotypical behaviours as a result of the inappropriate enclosure environment lending itself to the animal’s stress levels. Although the enclosure of these animals was enlarged, it was not well structured; there are no privacy and shelter options, nor caves and shelters resembling the natural living conditions of the species.
8. All **monkey species** are kept in old cages, lacking environmental enrichment of sufficient quality to meet the legal provisions.
9. The cages of the **nutria and racoon species** lack environmental enrichment.
10. The environmental enrichment in the following



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species enclosures do not fulfil the minimal legal requirements: **silver pheasant, golden pheasant, peafowl, common pheasant, hens and all parrot species.**

11. The veterinary centre on-site is not capable of fulfilling its purpose with respect to the big cats and large wild ungulates kept in the zoo.
12. There are no barriers to the enclosures of a part of the animals, ensuring optimal distance between the animals from external subjects. Despite the presence of warning signs, it is a common sight for visitors to feed the animals.

## Recommendations

1. The keeping of animals for whom there are no appropriate conditions must be stopped.
2. Legal coercive measures should be put in place for animal species where their keeping requirements remain unfulfilled. The animals of those species must be translocated to other zoos or rescue centres which provide the appropriate keeping conditions.
3. The license of the zoo should be reviewed with respect to the non-fulfillment of keeping conditions for species under Ordinance No. 6.

## Five lions and two tigers kept in appalling conditions; some of these animals were obtained from other zoos while „Kenana” Zoo did not have a valid license

In 2009, „Kenana” Zoo was granted a license on the condition that it fulfilled 19 requirements. After the expiry of its previous license in 2014, the zoo fulfilled only a few of the requirements imposed by the control authority. This is despite the fact that, according to the law, the conditions must be fulfilled within a period of 2 years. Since 2014, the zoo has continued to operate and remain open for the public illegally.

Despite not having a license, nor the capacity to provide the necessary conditions for the species, to „Kenana” Zoo was transferred a male lion from the Varna Zoo in 2016, to join two lionesses already living in „Kenana” Zoo. In May 2019, one of the lionesses gave birth to two cubs that died soon after birth due to a lack of maternal instinct from the lioness and the zoo failing to take care of them. The zoo bred the lions again and later that same year two more cubs were born - a male and a female. The mother lioness again did not show maternal instinct and the lion cubs were raised by a veterinarian. They were then housed in a separate cage at the „Kenana” Zoo,



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which will be too small for them once they reach adulthood. As a result of the breeding of the adult lions, the zoo now has five lions in its care.

Two questions remain: **1. Why did the zoo breed the lions when it did not have the required facilities and could not ensure suitable living conditions for the species? 2. Why were no measures taken to prevent this uncontrolled breeding, a situation witnessed in some of the other zoos we have studied as well?**

This case illustrates the common practice in some Bulgarian zoos to breed wild animals and use them as an attraction for visitors, without having a plan for the future keeping of the offspring. **If this way of work is allowed to continue and the enclosures are not renovated, each new generation will live in the same unsuitable conditions, with no prospect of improvement.**

During a visit to the zoo in early February 2021, the FOUR PAWS team found that the lion cubs born in 2019 had been moved to one of the adult lion cages, which does not meet the minimum requirements for the keeping of this species. The concrete enclosure lacks natural vegetation and environmental enrichment. The young lions are being kept in the same inappropriate conditions as their parents.

Another bad practice of „Kenana” Zoo is to accept and keep animals without a valid license; at the end of November 2018, the zoo accepted a tigress from Stara Zagora Zoo. Upon her arrival, the tigress was placed in a narrow concrete cage.

**Zoos must take responsibility for the conditions in which animals are kept at their own facilities, as well as taking responsibility for the conditions of any zoo to which they may send their animals.**

In early February 2021, one of the female lionesses was housed in the same narrow concrete cage previously occupied by the tigress who has since moved cage. „Kenana” Zoo continues to use cages that are inappropriate and not approved by the control authority for keeping carnivores. **We note that in 2009 the Ministry of Environment and Waters closed this cage with an order; the same cage used to house the tigress in 2018 and a lioness currently.**

The continued use of this cage has garnered no reaction and, as far as we know, is being used without receiving a sanction from the control authority. Prior to the closure of the cage in 2009 it was being used to house a brown bear, which was then translocated from the zoo with the help of FOUR PAWS.

**FOUR PAWS insists on a sustainable solution such that the inappropriate enclosures are closed fully and the rescued animals are not allowed to be replaced by others, who would spend the rest of their lives in the same unfavourable conditions.**

FOUR PAWS has filed letters and signals to the competent authorities several times. **On 24.04.2019, FOUR PAWS wrote to the Prime Minister and to the Minister of Environment and Waters, expressing the position that „Kenana” Zoo does not meet the legally required conditions for the keeping of tigers, and should not be licensed as this would contradict the national legislation.**

On 15.05.2019, following an invitation from MoEW, FOUR PAWS took part in a joint inspection, con-



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ducted together with the controlling authorities in relation to the issuing of a new license to „Kenana” Zoo. Following this inspection, on 23.05.2019, FOUR PAWS sent a statement to MoEW concerning identified discrepancies with the current Bulgarian legislation related to the enclosures of the Nile crocodile, lions, tiger, all species of monkeys, racoon, nutria, and others. FOUR PAWS recommended the consideration of two licensing options for the zoo. The first is to not award a license unless most of the requirements of the BDA and Ordinance No. 6 are fulfilled. The second is to grant a license to „Kenana” Zoo for the keeping of certain specific animal species. The recommendation was that the license clearly states

that this zoo cannot accommodate animals of the species mentioned above.

**Despite the presented recommendations for the licensing of the zoo and the appeal of FOUR PAWS to translocate those animals kept in inappropriate conditions as required by the law, „Kenana” Zoo obtained a license on 09.07.2019.**



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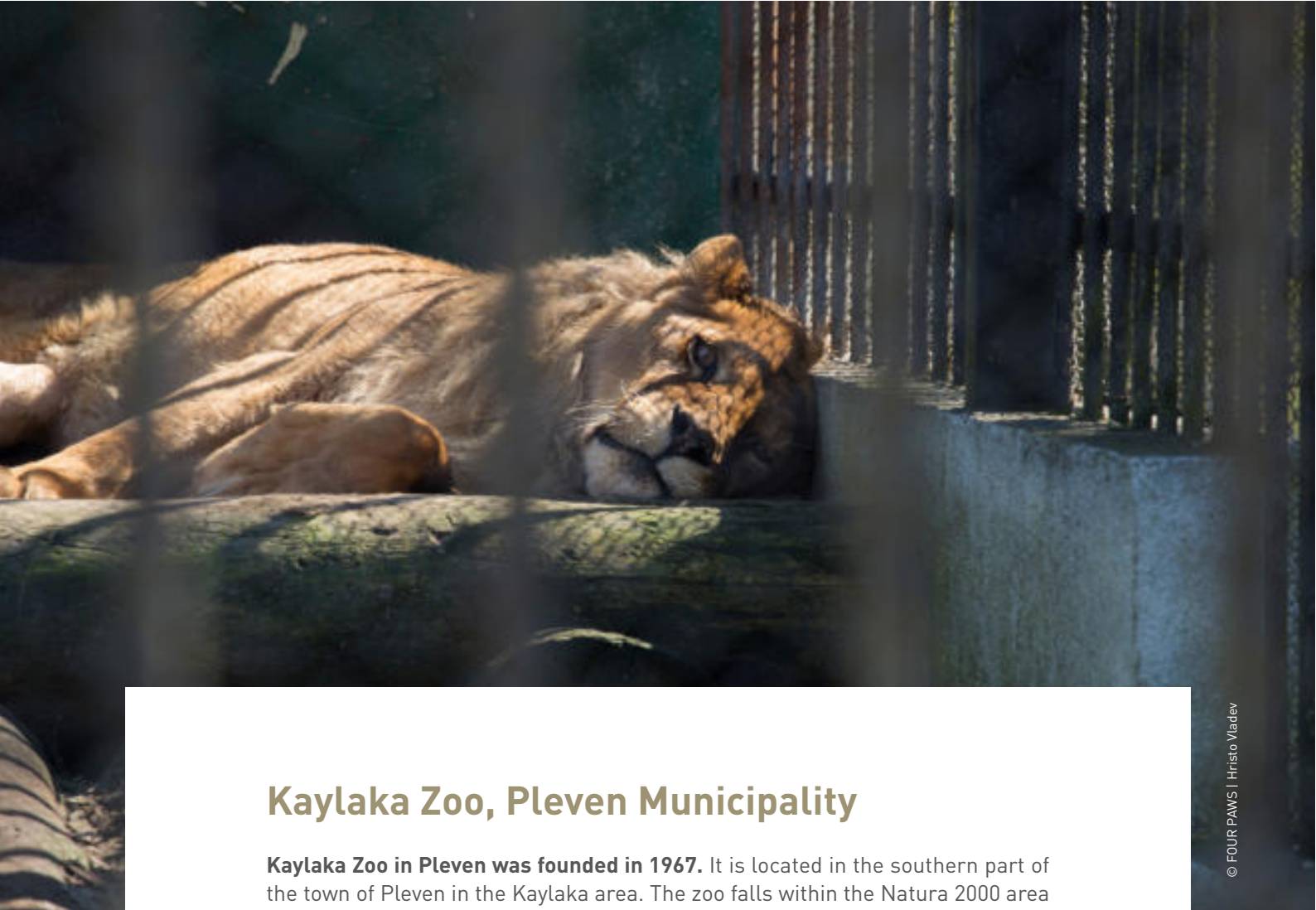




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## Kaylaka Zoo, Pleven Municipality

**Kaylaka Zoo in Pleven was founded in 1967.** It is located in the southern part of the town of Pleven in the Kaylaka area. The zoo falls within the Natura 2000 area Studenets BG0000240. **It is owned by the Municipality of Pleven** and occupies approximately 1.36 ha. Kaylaka Zoo keeps a lion, brown bears, monkeys, mouflons, red deer, peafowls, ponies, goats and waterfowl. The animals are kept in enclosures built of metal and wood constructions, and adjacent buildings. Natural rock is used in the enclosures of the herbivores and brown bears to form stables and artificial caves.

Kaylaka Zoo in Pleven obtained **its current license in July 2019**. After the preceding zoo license expired in 2015, it operated without a license for 3 years and 7 months.





## Good Practices

1. The zoo is located in a protected area which enables the use of natural resources for the provision of good enclosures for the kept animals.
2. A reconstruction of the brown bear enclosure was carried out and it was secured with an electric fence.
3. The construction of an enclosure for waterfowl is in progress and it is expected that the natural water area would be secured with an electric fence.

## Problems

1. Although the zoo is located in an area with well-preserved nature, this resource has not been optimally used for the provision of suitable environments for the animals.
2. Part of the enclosure of the brown bear is in poor condition following reconstruction. In the outdoor enclosure there is not sufficient space or natural vegetation.
3. The past licenses were issued with conditions, very few of which have been fulfilled. In the new licenses, some of the conditions of the previous license are repeated through different wording.
4. There have been reported events of intrusion by external animals in the waterfowl enclosure.
5. The lion enclosure does not comply with the legal requirements of the BDA and Ordinance No. 6 for the keeping of this species.
6. The monkey enclosures do not comply with the requirements concerning environmental enrichment and sufficient vegetation, and do not offer naturalistic living conditions for the respective species.
7. The environmental enrichment and the natural vegetation in the parrot enclosures are not sufficient.
8. There is no educational centre and no development of conservation and education activities.

## Recommendations

1. The zoo requires complete reconstruction and maximum use should be made of the natural resources of the protected area when constructing the new enclosures.
2. Animals in enclosures that do not meet the legal

requirements for keeping the respective species should be moved to other zoos or rescue centres with appropriate conditions. In the case that the zoo is renovated, and necessary conditions are achieved, they may be returned. Animals of species for which the zoo does not have the capacity and resources to care for in the future should not be included in the species collection plan and should be permanently relocated.

3. An educational centre should be built and used to develop and host educational activities for the public.

## A zoo in a protected area that offers inappropriate enclosures in need of full reconstruction

**Similar to the other presented cases, the requirements of the national legislation were not applied throughout the licensing process for Kaylaka Zoo:** the zoo operated without a license for 3 years and 7 months before obtaining a new license in 2019. According to the legal obligations in Ordinance No. 1, the zoo must not have been re-licensed as it only complied with a small number of the imposed conditions from the preceding license. Despite that, the zoo obtained a new license with reworded and repeated conditions from the previous license.

**As of 2020, „Kaylaka” Zoo does not provide the required naturalistic conditions for a number of their species including the parrots, the monkeys and the lion.** In the outdated concrete enclosures, the necessary enrichment and vegetation required by law are missing, and the zoo fails to provide an environment which can satisfy the ethological needs of the animals.

An example of this is the enclosure of the lion species which lacks enrichment, a sand toilet area, and boxes for sleeping typical for the natural environment of the species. The outdoor enclosure lacks privacy or



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shelter, and sufficient vegetation is also missing. In addition, the social structure for the species has not been observed, as after the death of the male lion in 2018, the lioness is left to inhabit the inappropriate enclosure alone.

Kaylaka Zoo has attempted to improve some of the enclosures but has not managed to organize a total reconstruction. The renovations of the separate enclosures have achieved positive results, but with several shortcomings.

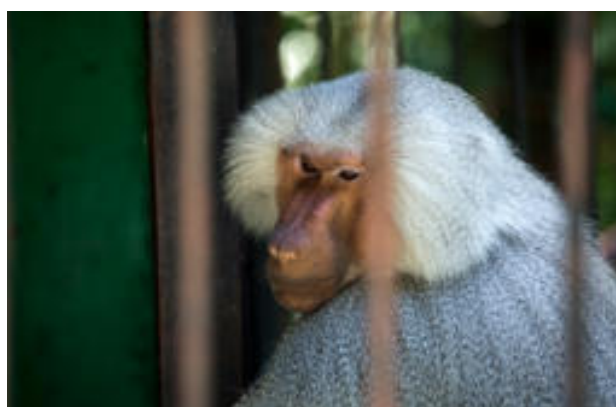
Kaylaka Zoo is located in a protected nature area, with some of the enclosures for the animals including natural caves. **In this case, the natural resources of the protected area may be considered both an**

**advantage and a challenge for improving the environment. Due to area specifics and the existing rocky incline, the opportunities for enlargement of the comparatively small zoo are limited.**

An example of this issue is the overall reconstruction of the brown bear enclosure which is formed around natural rocks. Due to this factor, the outdoor enclosure is difficult to expand. The reconstruction efforts that have taken place to improve the enclosure were of poor quality, and the animals have since destroyed a part of the enclosure. One of the bears even tried to escape, without success. Following this incident, the enclosure was secured with an electric fence with the support of FOUR PAWS.



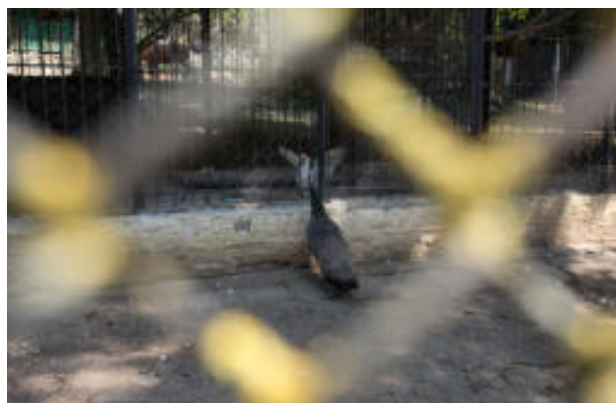
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In addition, several cases of intrusion of external animals into some of the enclosures have been reported in the last few years. The security of these enclosures needs to be ensured by additional improvements to the infrastructure.

These are all problems that need to be resolved in order for animals condition to improve, in addition to improving the quality of enclosures and the care of the animals. However, the main factor that needs to be assessed is what animals the zoo has the resources and capacity to take care for.



Kaylaka Zoo has the potential to make use of the benefits that the protected area it is located in offers and to provide the necessary keeping conditions for its species. However, this cannot happen without an overall reconstruction, and an improvement to the conservation goals and the educational value for visitors.



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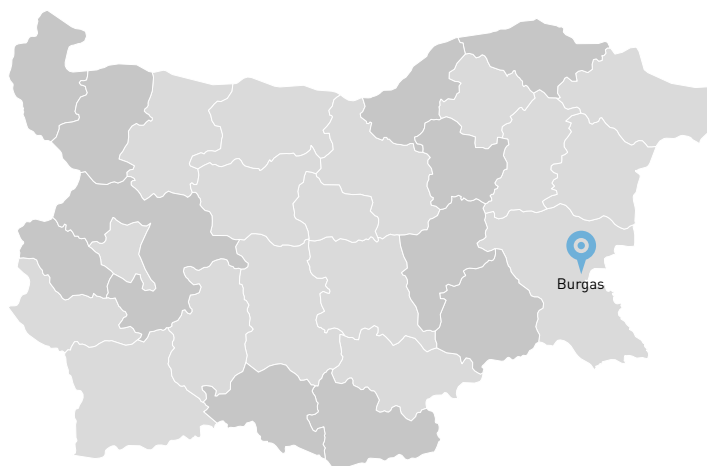


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## Burgas Zoo, Burgas Municipality

**Burgas Zoo started around 20 years ago as a peafowl farm, and is now one of two private zoos in Bulgaria.** It is located in an orchard area near the village of Cherno More, in the Municipality of Burgas, and occupies an area of 3.8 ha. The animals are kept in enclosures made up of metal constructions, wires, panels and wood constructions.

**The transformation of the farm into a zoo started in 2014,** and the zoo obtained its **first official license with conditions in 2019.** Before this, it was open to visitors and operated without a license.



## Good Practices

1. An attempt to apply good practices when building the animal enclosures.
2. The conditions of the license in relation to placing signboards and enclosure barriers were addressed within the set deadlines.
3. The zoo does not keep large carnivores. Instead, until now, it has been keeping animals for which it has the necessary resources.

## Problems

1. The enclosures for many of the animals lack sufficient greenery and the required environmental enrichment.

## Recommendations:

1. To ensure concentrated zoo vegetation with plants that are appropriate for the kept animals, whilst also considering the climate specifics of the region.
2. To provide additional enrichment in the enclosures of many of the animals.
3. To build an educational centre and to carry out educational and research activities.

## A private zoo located in an orchard: steps to fulfilling the legal requirements

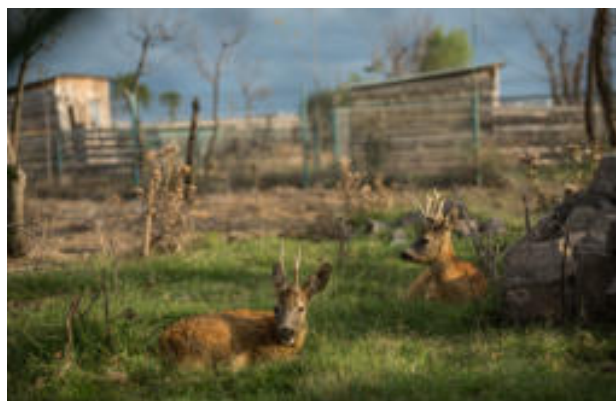
Burgas Zoo focused their efforts on keeping their animals in naturalistic environments, which is significantly aided by the spacious area the zoo occupies. The zoo also aims to apply best practices when building of enclosures.

**Despite this, even in the case of a newly built zoo, the licensing process by the control authority was not completed in full compliance with requirements laid out by the Zoos Directive and Bulgarian legislation. The zoo had been receiving paying visitors for a number of years prior to obtaining its zoo license, which is evident from media publications.**

**In 2019, Burgas Zoo was officially licensed with conditions, and the zoo subsequently fulfilled most of the requirements within the deadlines.** Part of the reason for this is that Burgas Zoo, being a private zoo and one of the newest in the country, is capable of being more flexible and quicker to introduce more contemporary practices, especially when compared to many of the other zoos built in the 1960s. The zoo did not have to carry out a complete renovation or any major repair work on outdated concrete facilities.



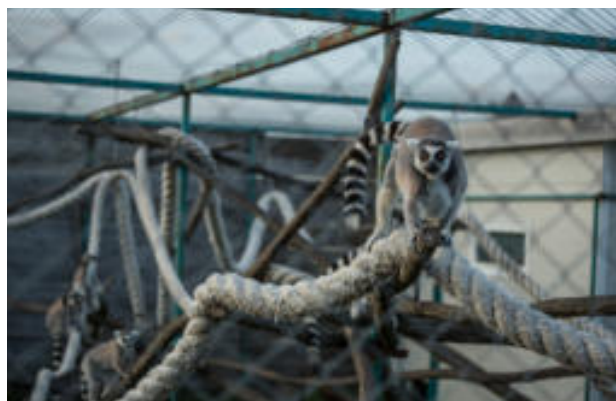
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We should also highlight the best practice applied by the zoo by not keeping large carnivores or other animals for which it is not capable of providing appropriate care. To ensure the provision of suitable environment and care for the animals, it is vital that zoos keep only those species for which they can ensure the required personnel, resources and capacity.

A major problem for the zoo with regards to the keeping of animals is the lack of sufficient vegetation in many of the enclosures. Additional environmental enrichment is needed, in particular for the herbivorous species such as llama, mouflon, roe deer and pony, as well as some bird species, such as the African ostrich.

Burgas Zoo must also work to raise public awareness and engagement in regard to the kept animal species, their protection in their natural environment and the threats to their long-term survival. **In this respect, it is necessary that Burgas Zoo introduces an educational programme.**



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## Dimitrovgrad Zoo, Dimitrovgrad Municipality

Dimitrovgrad Zoo is a small zoo **owned by the Municipality of Dimitrovgrad. It is located on 0.3 ha in a park in Dimitrovgrad.** The animals are kept in enclosures constructed from metal, wire, wooden structures, and adjacent buildings. Part of the park's deciduous vegetation is included in the zoo.

**Dimitrovgrad Zoo's current license was issued in 2019.** The previous license expired in 2017, and between these two licenses the zoo had been operating for 2 years without a license.



## Good practices

The zoo has several good practices related to the keeping of animals:

1. The conditions of the licenses have been fulfilled.
2. An up-to-date database of zoo animals is maintained, according to the requirements.
3. The staff has professional qualifications in the field of biology.
4. The zoo maintains good management of the breeding of the animals.
5. A high level of preventive veterinary care is maintained.
6. Despite the inconvenient structure of the animal enclosures, a large part of the zoo is green and environmental enrichment was added.

## Problems

1. Additional space is needed in the outdoor enclosure of the bears in order to ensure suitable naturalistic conditions in accordance with the biology of the species. The location of the zoo, however, does not allow the size of the enclosure to be increased.
2. More space and additional enrichment is needed for the enclosures of some of the animals in order to achieve better conditions for the respective species.
3. There is no separate educational centre related to the collection, or educational and training activities.
4. The zoo does not participate in (scientific) research related to the conservation and keeping of species within their collection.

## Recommendations

1. Although the zoo complies with the legal requirements, FOUR PAWS find it necessary to ensure a new enclosure for the brown bears if the zoo plans to continue keeping the species.
2. To introduce educational, scientific and conservation activities.
3. To build an educational centre for education and work with the public.

### **The enclosure of the bears Ani and Mitko meets the minimum legal requirements for the keeping of brown bears, but still needs additional space and improvements**

**Dimitrovgrad Zoo is an example of a small zoo that complies with the legal requirements and has improved the care for the kept animals and the conditions of their enclosures over time.** This is one of the few zoos that meets the conditions of its previous and current license within the prescribed periods. The zoo has a plan for its animal collection, and animal breeding is controlled with no new animals being accepted for which the zoo does not have the necessary capacity for. Over the years, additional greenery has been planted in the alleys and in parts of the enclosures. Due to these improvements, Dimitrovgrad Zoo looks better than a few years ago.

The zoo keeps a relatively small number of animals. The collection includes birds, rabbits, a ferret, goats, and fallow deer.

However, the zoo has also been keeping two brown bears for more than 20 years. The two bears are named Ani and Mitko. They were born in 1995 and were given to Dimitrovgrad Zoo by a local company. Their enclosure includes a concrete building and an



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outdoor enclosure with a pool, with a total indoor and outdoor enclosure area of 203.6 square meters. The building is 61.6 square meters and inside there are two cages, separated from each other by a concrete wall. The enclosure of the brown bears is relatively well enriched and the recommendations and conditions set by the control authority were observed.

Currently, the bear enclosure does not violate the requirements of Ordinance No. 6. **Still, we believe that additional space and better structure of the outdoor enclosure is needed to offer species-appropriate conditions. The enclosure needs to be equipped to a greater extent to cover the basic requirements such as more natural vegetation and additional environmental enrichment which provides suitable hiding places, visual barriers, and more climbing structures.**

It should be taken into account that Dimitrovgrad Zoo has improved the conditions over time, nor does it import new animals for which there is no capacity or breed any of its animals. The animals are cared for and their environment has improved over time given the available space and resources. If we compare this zoo to other Bulgarian zoos that keep bears in 2020, Dimitrovgrad Zoo has one of the more appropriate enclosures for this species.

**The example of Dimitrovgrad Zoo shows that some of the minimum requirements of Ordinance No. 6 for the keeping of a number of species, including brown bear, are insufficient. In addition, it is clear that the bar for what is an acceptable enclosure for keeping bears in Bulgaria is extremely low. Most of the bear enclosures in similar zoos in Bulgaria are in worse conditions than that of Dimitrovgrad Zoo, and are unsuitable for the keeping and breeding the species.**

Given the shortcomings of the enclosure and the fact that the zoo is small and has limited resources, it must be considered whether Dimitrovgrad Zoo will keep bears in the park environment in the future. If so - in what enclosure.



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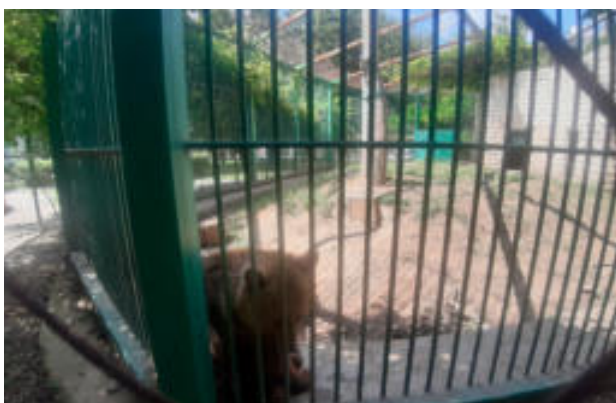
**Given that this is not an isolated case of a zoo in a town park struggling to adequately house its collection, we must also raise the question of which animal species are in fact suitable to be kept by the municipalities in Bulgaria in their town parks in the future, especially in those with limited space.**



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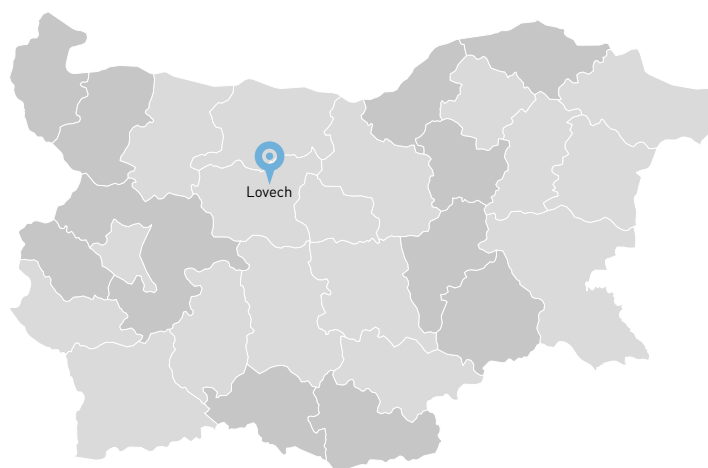
## Lovech Zoo, Lovech Municipality

**Lovech Zoo was opened in 1964.** It is located on an area of 11 ha within a park. **The zoo is owned by the Municipality of Lovech and keeps a large number of animals, including brown bears, lions and tigers.**

The animal enclosures are constructed from a variety of materials, such as metal, wire, concrete, and wood.

Lovech Zoo also has a functioning veterinary clinic.

**Lovech Zoo received its current license in 2019. Prior to this, between 2013 to 2019, the zoo operated without a license for a total of 6 years and 2 months.**



## Good practices

1. There is a functioning veterinary clinic.
2. The staff are well trained in the field of animal keeping and veterinary care.
3. The Municipality of Lovech has a project for reconstruction of the zoo.

## Problems

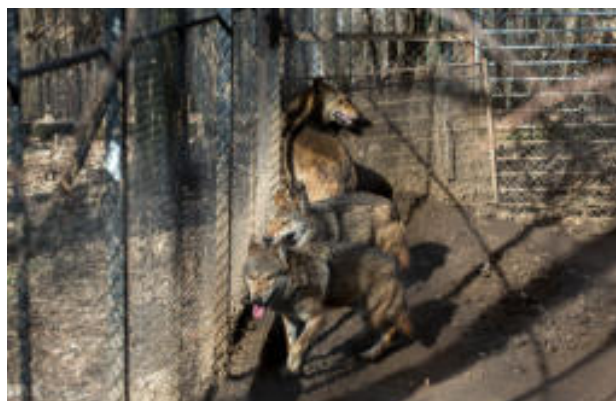
1. Renewal of the zoo license despite not fulfilling the conditions set by MoEW:
  - License № 8 /04.06.2008 was issued with a large number of conditions, of which only a small number were fulfilled;
  - License № 33 /19.08.2019 was issued with the same conditions as the previous license from 2008, in a reworded fashion.
2. The buildings, fences and facilities are outdated and do not meet the legal requirements.
3. Various carnivore species (lions, tigers, wolves, brown bears, etc.) are kept in contradiction with the legal provisions in Ordinance No. 6 and BDA:
  - The brown bear enclosures are relatively small and lack natural environmental enrichment. The outdated concrete structures do not allow for the species' natural environmental conditions to be met;
  - The lion and tiger enclosures lack a sandy toilet area, boxes and caves for sleeping and giving birth, structures for climbing, areas that protect them from sun and rain or provide opportunities for retreat and hiding, stones, rocks, tree trunks, roots, hay bales, sufficient vegetation, and swimming pools for tigers with dimensions corresponding to the requirements of the species. Despite the attempt to renovate parts of the enclosures, they do not address the legal norms regarding the provision of a suitable environment that meets the ethological needs of the animals.
4. The enclosures of all monkey species do not meet the requirements of the BDA and Annex № 1 of Ordinance No. 6. Within the primate enclosures, which should each be designed according to the needs of each species, there are no apertures, niches or other areas for retreat when keeping two or more animals, in addition to a lack of sufficient vegetation.
5. Insufficient security of the facilities through deterrent barriers, to protect visitors and to pre-

vent animal escapes.

6. Poor hygiene in the bear enclosures.

## Recommendations

1. Preventing the breeding of animals for which the zoo does not have capacity or suitable enclosures.
2. Realization of a zoo reconstruction project.
3. When implementing the reconstruction project:
  - Maximise preservation of the park's natural vegetation in the animal enclosures must be considered;
  - Improve the fence infrastructure to heighten safety measures for visitors and animals.
4. Animals species for which the necessary naturalistic conditions have not been provided should be relocated to other zoos or rescue centres with suitable conditions. In the case of a complete zoo reconstruction that provides the necessary environment for the specific species, the animals may be returned.



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## Old facilities in need of complete renovation and six bears

Unlike many other zoos, Lovech Zoo performs conservation activities by sheltering injured or sick wild animals in distress and provides them with the necessary veterinary care. Among the rescued animals are deer and protected species such as white stork, forest stork and brown bear. Among the rescued animals successfully returned to the wild are white stork, common buzzards and green-headed ducks.

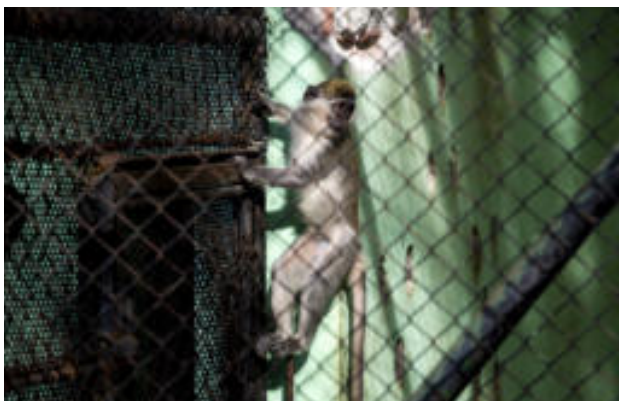
The zoo develops volunteer activities, participates in joint initiatives, and works actively in cooperation with institutions. At the moment, the zoo does not have an educational centre, but does conduct educational activities by organizing group talks and open lessons. Lovech Zoo also participates in an exchange programme with the participation of young people from abroad. In addition, students from the veterinary university in the town regularly visit the zoo and participate in preventive veterinary care for the animals.

**However, despite these good practices, the zoo does not provide the necessary species-specific conditions for the keeping of a large number of their animals.**

**The reason for these bad conditions is the outdated and inappropriate facilities of the zoo, which do not comply with the BDA and Ordinance No. 6 on the minimum requirements and conditions for keeping of animals in zoos. A complete reconstruction of the facilities is needed, as well as a more urgent solution for the six bears that are kept in the zoo.**

Lovech Zoo has created a reconstruction project, however, thus far no funding has been found for its implementation. The lack of funding for a complete reconstruction is a recurring problem that affects many of the older zoos built over 30 years ago in Bulgaria. In this case, as in other zoos, the inability to implement the required renovations is partnered with a lack of compliance with the legal provisions of Ordinance No. 1 and the licensing procedure.

Most of the conditions of Lovech Zoo's license from 2008 were still unfulfilled at its expiration in 2013. In the period between 2013 and 2019, Lovech Zoo continued to operate for over 6 years without a license. Despite the lack of a license and the lack of appropriate conditions, during this period the zoo welcomed new species, including two Siberian tiger cubs in 2016. In 2019, the MoEW awarded a new license to the zoo with conditions which repeated those of the license from 2008.



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The neglected requirements affect mainly the big cats, the bears and the monkeys. The concrete cages do not meet the minimum legal requirements. Some of the facilities are made entirely out of concrete, and the necessary environmental enrichment is absent. The primate enclosures lack apertures, niches and other opportunities for retreat required when keeping two or more animals. There is no vegetation in the cages. The animals are not protected from distress and some of them are located too closely to the visitors.

The lion enclosures lack a sandy toilet area, boxes and caves for sleeping. There is a lack of sufficient environmental enrichment, opportunities for retreat and hiding, and insufficient vegetation to meet the requirements of the species.

Equally unsuitable are the conditions of the tiger enclosure. **All these facilities are far from the natural environment of the animals and could not be made suitable enclosures, even with partial repair and additional environmental enrichment.**

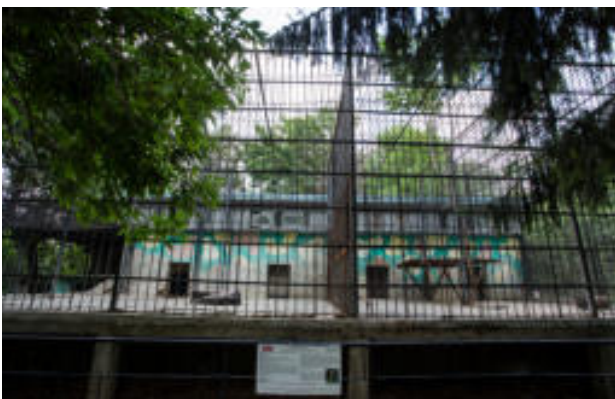
The brown bear enclosures, with their concrete and outdated structures, are also not suitable for keeping the species, and would be even less suitable for taking in more animals. For these reasons, the zoo must prevent the animals from breeding and must not accept new bears. In recent years, however, brown bears have continued to breed in the zoo accidentally. The last bear was born in January 2020. After its birth, visitors to the zoo alerted FOUR PAWS regarding the bad conditions for the bear cub, and as of the beginning of 2021, there have been no visible indica-



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tions that the environment for the cub or the adult bears has been improved.

**During a visit to the zoo in January 2021, the FOUR PAWS team witnessed a case of neglected enclosure and poor hygiene in three of the adult bears. The three adult bears are kept together in an enclosure made entirely out of concrete, without natural vegetation or environmental enrichment and without the possibility for retreat or hiding, on a floor covered with faeces.**

Even if we accept that the poor hygiene we witnessed may be an isolated case, it is still unacceptable. The lack of vegetation and environmental enrichment in the enclosure, which does not provide in any way a

naturalistic environment for the species and does not satisfy the ethological needs of the animals, is also unacceptable. Such conditions must not be allowed.

In conclusion: Lovech Zoo has good practices upon which it can build to provide the necessary conditions for its animals. As the current state of the facilities does not allow this, it is necessary to take immediate action to start reconstruction of the zoo. In addition, an urgent solution must be sought to relocate and improve the situation of the bears living in the zoo. The capacity of the zoo and the current outdated state of their enclosures do not allow them to be kept in accordance with the needs of the species.



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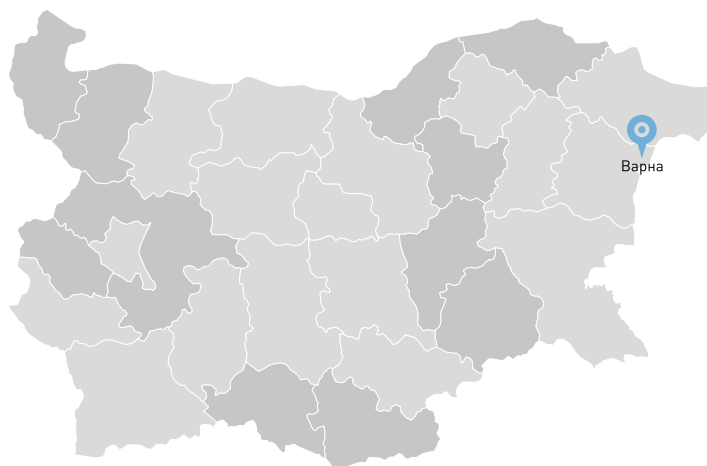


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## „Zoo – Rescue Centre – Varna“, Varna Municipality

„Zoo - Rescue Centre - Varna“, located in Varna’s Sea Garden park, was established in 1961 and is managed by the Municipality of Varna. The animals are kept in enclosures made of metal structures, wires and wooden structures, as well as in buildings that are attached to the enclosures. In addition, the zoo has an artificial pool for waterfowl. The zoo keeps big cats, monkeys, a brown bear, llama, waterfowl and other species in its collection. While some of the enclosures provide suitable conditions, others need to undergo urgent renovation. The zoo is one of the few in the country that collects an entrance fee.

**A new license was issued to Varna Zoo in 2019.**





## Good practices

1. The zoo provides enclosures that meet the legal requirements for waterfowl as well as for some of the other animals.
2. An attempt has been made to enrich and renovate the enclosures of some of the species, as well as to introduce greenery to the brown bear enclosure.

## Problems

1. As of 2020, some species are being kept in unsuitable enclosures. Due to the outdated facilities and the limited space of Varna Zoo within Sea Garden park, suitable enclosures are not currently being provided according to the requirements of Ordinance No. 6 for several species including the brown bear, wolves, foxes and primates:
  - The lion and tiger enclosures lack a sandy toilet area, boxes and caves for sleeping and giving birth, naturalistic living conditions for the species, climbing frames, tree trunks, roots, hay bales, protection from sun and rain, stones, rocks, opportunities for solitude and cover, sufficient vegetation and suitably sized swimming pools;
  - The brown bear enclosure lacks the necessary environmental enrichment, according to the requirements of Ordinance No. 6. The concrete facility does not create naturalistic conditions for the species;
  - When structuring the primate enclosures to the needs of the specific species, there are no apertures, niches and other opportunities for retreat when keeping more than two animals, natural elements of the environment in the floor covering, vegetation, places of sun and shade and protection from rain in the outdoor enclosures, or covering of the outdoor areas with natural materials.
2. There are no high structures for climbing for a part of the animal species.
3. There are no suitable shelters for birds of prey; the aviary is dome-shaped so the birds do not have suitable conditions for horizontal flight.
4. Despite the attempt to renovate parts of the enclosures, such as that of the brown bear, at present their structures do not comply with Ordinance No. 6 with regard to space and meeting the ethological needs of the animals.

5. Some species of wild cats have been bred despite not having the capacity or ability to keep them or their offspring in conditions consistent with their ethological needs inside the zoo or in other zoos.
6. Visitors can maintain close contact with the animals, thus putting the animals in distress.
7. There are missing conditions for the zoo to perform actively as a functioning rescue centre.
8. There is no functioning educational centre.

## Recommendations

1. Unsuitable enclosures in the zoo should be renovated to include the necessary environmental enrichment to meet the mandatory minimum requirements and to ensure naturalistic conditions are met.
2. The breeding of animals must only be carried out according to the capacity and capabilities of the zoo and must be part of a breeding programme. Animals should not be given via breeding loans or through other agreements to zoos that cannot provide the necessary conditions for their keeping.
3. To provide appropriate environment and veterinary care for the inbred lion cubs Simba and Kossara.

## Breeding of large carnivores outside the capacity of the zoo and sending animals to zoos that cannot provide the necessary conditions for the respective species

Varna Zoo has good practices, meets many of the mandatory minimum conditions for obtaining a license under Bulgarian law and has the status of a rescue centre.



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Against this background, however, as with other zoos in Bulgaria, there is a problem with providing an appropriate environment for some of the kept animal species. This is largely due to the old facilities of the zoo, built in the 1960s. As of 2020, some of the enclosures, including those of the lions and the tiger, are unsuitable for the keeping of their respective species. The lion enclosure is not properly structured despite meeting the regulatory space requirement. The enclosure is rectangular and the depth of the cage is too small, making it impossible for animals to move away or hide from zoo visitors. This enclosure creates limited opportunities for animals to establish places for shelter and tranquility.

The zoo has a plan to reconstruct this section, and during its implementation it will be possible for the enclosures to be improved if the listed problems and needs are taken into account.

**However, the old facilities and the need for reconstruction is not the main problem of the zoo. Varna Zoo has a long-standing practice of keeping big cats and breeding them without subsequently providing suitable conditions for accommodating the offspring.**

In 2014, four lion cubs were born at Varna Zoo, of which three survived. After the birth of the lion cubs, the zoo organized various public events, including a competition to choose their names. According to

information published in the media in 2015, sponsors were found for the lion cubs, who gave them the names Florentina, Boyko and the Little Prince. During this period, the lions were the centre of attention - both in the zoo and in the media. However, the lion enclosure in Varna Zoo is not spacious enough to keep five lions, and also lacks the necessary environmental enrichment. The FOUR PAWS team visited the zoo in July 2015 when the lion cubs were about nine months old, and it was already clear that the space in the concrete enclosure was insufficient for all of the lions.

In 2016, one of the lions was sent to Haskovo Zoo to be used for breeding, despite the conditions there also being unsuitable for keeping. The lion received a new name upon arrival and is now called Goran. In 2019, Goran was used for breeding twice at Haskovo Zoo. The first litter of cubs died, and the second litter of cubs, which were born later that year, were raised by a veterinarian and later housed in a concrete cage next to Goran, deprived of enrichment. As of the beginning of 2021, the cubs, which are male and female, are still not separated or sterilized.

In 2017 and 2018, sibling lions Florentina and the Little Prince were given to Blagoevgrad Zoo. At this point the two lions had reached adulthood and, after being moved to Blagoevgrad Zoo, were not mentioned in the media for a long time. The two lions



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were exchanged based on breeding loans and were housed in a cage together. The cage did not meet the legal requirements for keeping the species, in addition to Blagoevgrad Zoo already lacking a large number of other requirements related to veterinary care, mandatory staff and hygiene.

**In 2020, sibling lions Florentina and Little Prince had two cubs at Blagoevgrad Zoo, called Simba and Bambi (later renamed Kossara). This is a problem as inbreeding of closely related animals can lead to serious health problems in the offspring. In addition to the fundamental problem of allowing animals from the same family to be bred, the young lion cubs barely survived.** After a stay in a veterinary clinic in Sofia where the cubs were raised and treated after their birth, they were sent to Varna Zoo. There, Simba and Kossara are housed in the same enclosure where their parents grew up, which has undergone little change between 2014 and 2020. Meanwhile, a facility is being repaired at Blagoevgrad Zoo, which the owners of the zoo claim shall be used to keep Simba and Kossara when they grow up.

**As the future of the lion cubs Simba and Kossara is still unclear at the time of writing, FOUR PAWS calls on the zoos and the Bulgarian institutions to keep in mind that lion cubs that are the result of inbreeding are likely to have more health problems than other animals of the species. This means that they**



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**will need specialized (veterinary) care. In addition, with consideration of all the cases described in this report, we consider it extremely important that the legislation on the conditions for keeping the species is complied with and that Simba and Kossara are provided with an environment that meets the needs of the species. Given that they are the result of inbreeding, they themselves must not be bred and should be sterilized as soon as they reach sexual maturity.**

Another example of exchange of animals between zoos for which there are no suitable keeping conditions is the arrival of a tiger from Pazardzhik Zoo to Varna Zoo in 2017. As of 2020 there is no publicly available information about where this tiger is and what happened to him.

**There is an additional case of breeding animals in violation of capacity by Varna Zoo through the breeding of their bears.** In 2010, two bears were born in Varna Zoo. The zoo bred the bears Svoboda and Karamush even though the bear enclosure in Varna Zoo does not meet the species-appropriate conditions and cannot provide a suitable home for offspring. The zoo raised the cubs until they were one year old and then sent one of the cubs to another zoo. For the second bear cub, Vesko, however, there was no suitable enclosure available for a very long



time. Since no other zoo could provide a home for Vesko, he was moved to Sofia Zoo, which also functions as an emergency reception centre for wild animals. Sofia Zoo looked for a new enclosure for him elsewhere, however during the eight-year interim period the bear remained in the quarantine enclosure at Sofia Zoo. In 2019, Vesko was rescued and moved to an enclosure in the DANCING BEARS PARK Belitsa, which is co-managed by FOUR PAWS and Foundation Brigitte Bardot.

**These cases show that it can take many years to solve the problems associated with breeding of animals in zoos that do not have the necessary capacity and conditions. During those years, the animals suffer under inappropriate conditions and without**



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**the necessary care. This can leave them scarred for the rest of their lives.**

Lions, bears, and other animals for which there is no appropriate enclosure, and for which their breeding is not part of a specific programme join the population of animals that already are confined to small enclosures without enrichment. If an inappropriate enclosure or zoo is finally closed, all of these animals have to be moved to another zoo or rescue centre which lack the capacity to keep the number of animals currently kept in inappropriate conditions.

**Even if a zoo has good facilities, in order to avoid keeping animals in inappropriate conditions, it is important that the animals are not bred beyond the capacity and capabilities of the zoo. This includes both the breeding and acceptance of animals for which the zoo does not have the necessary capacity, as well as the lending of animals to zoos that do not have suitable enclosures available and cannot provide the necessary care for the animals.**

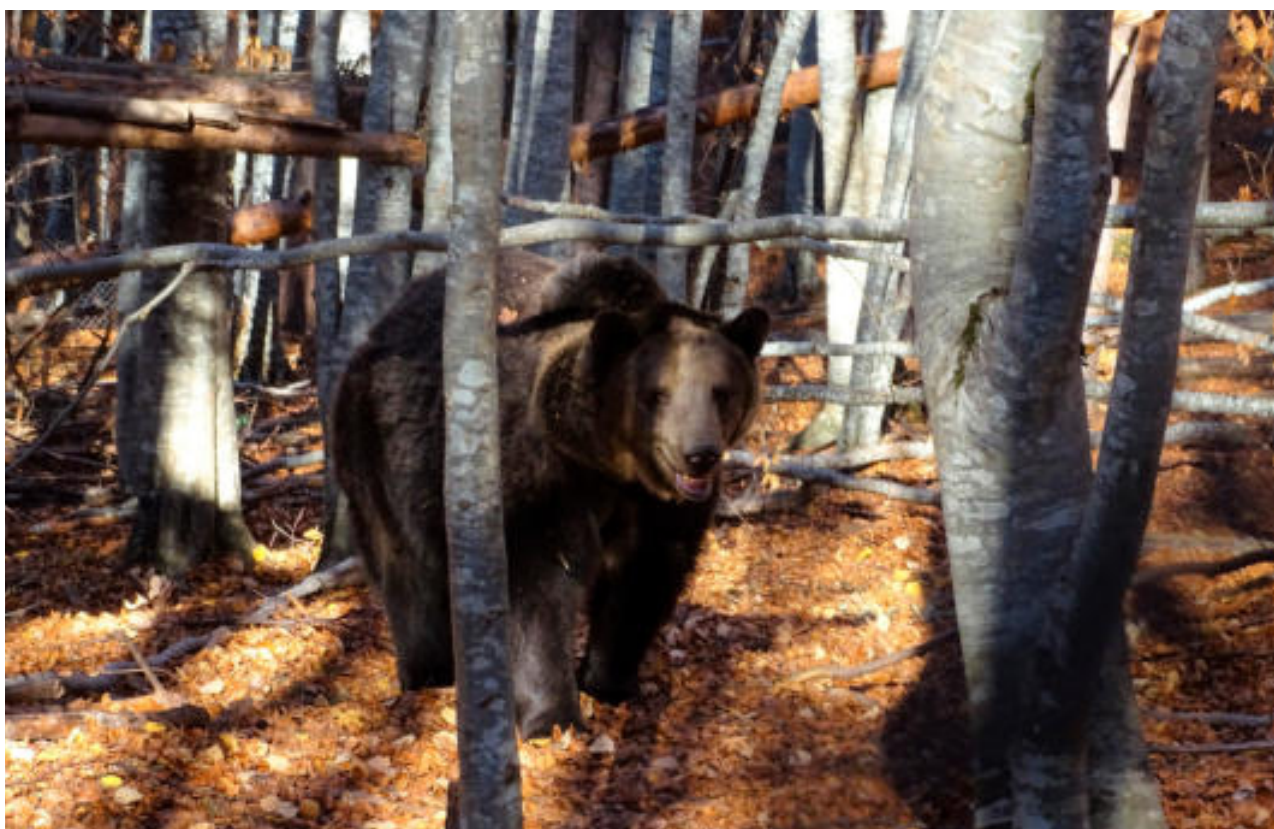
In addition, closely related animals must not be given with breeding loans to live in the same enclosure and, as a result, have offspring, as this offspring will most likely suffer from serious health problems due to inbreeding.



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## „Ostrova” Zoo, Pazardzhik Municipality

**Ostrova Zoo was opened in January 2009. Owned by the Municipality of Pazardzhik,** it is located in a park on an island on the Maritsa River in the town of Pazardzhik and **covers an area of 0.7 ha.** The area is well planted and the animals are kept in enclosures made of wooden/metal structures and wire, in addition to brick and concrete buildings. Unlike most of the zoos built more than 30 years ago, Pazardzhik Zoo has few concrete structures and more greenery.

**The zoo's current license was issued in 2016 and is valid until 26.10.2021. Prior to that, the zoo operated for 1 year and 8 months without a license.**





## Good practices

1. The zoo is located in a park environment, is well maintained and offers enclosures which are to mostly appropriate for the majority of the animal species.
2. The enclosures are mostly well-planted with the necessary environmental enrichment available.
3. Relatively suitable enclosures for herbivores have been built.
4. A relatively good enclosure for tigers has also been constructed, which allows the male and the female tiger to be moved into separate enclosures over a period of time.
5. A suitable enclosure for lions has been built. FOUR PAWS supported this process.

## Problems

The problems in this zoo are relatively small compared to the problems of other zoos and can be solved by adding environmental enrichment to some of the enclosures and by introducing good practices. The current problems include:

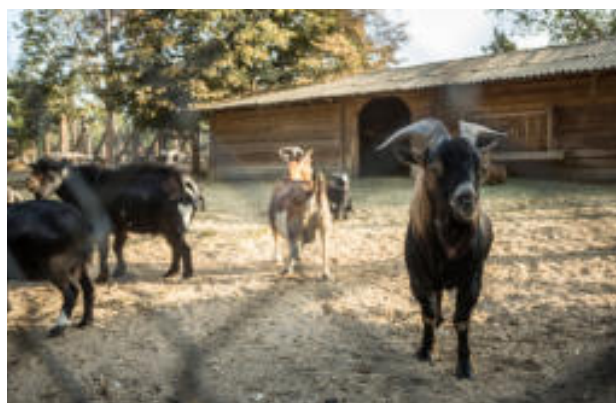
1. A number of enclosures do not contain sufficient greenery and environmental enrichment (e.g., the waterfowl and the monkeys enclosures);
2. There are no climbing structures for mouflons and goats, which would improve the conditions for these species;
3. There is a need for additional environmental enrichment in the tiger enclosure.

## Recommendations

1. Continuation of the current good practices for the maintenance of the animal enclosures;
2. Additional greenery in certain enclosures and enrichment with plants suitable for the species;
3. Providing additional environmental enrichment to the tigers and waterfowl enclosures.
4. Construction of rock or other types of climbing structures for the mouflons and the goats.



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## Well-maintained enclosures, the lions Hector and Raya and their new enclosure measuring approximately 1000 square meters

Ostrova Zoo meets many of the requirements of Ordinance No. 1 on the terms and conditions for licensing zoos, and unlike zoos with older facilities, there are significantly fewer problems to solve in regards to the provision of suitable enclosures for animals tailored to their specific needs.

However, there are still certain areas in need of improvement in Ostrova Zoo, for example regarding environmental enrichment and the subsequent provision of an environment closer to the natural habitats of the animals. These environmental additions can be implemented without a reconstruction of the zoo in the enclosures that already exist.

Ostrova Zoo has a plan for its animal collection, an educational centre and organizes lectures and talks for students. The employees of the zoo have been trained to work with wild animals, and the animals are fed according to the prepared ration tables for summer and winter feeding. The health of the animals is monitored on a daily basis by a veterinary specialist.

In 2017, Ostrova Zoo was one of the potential locations to which the lions Terez and Masoud could have been moved from Razgrad Zoo. At that time, however, and given the genetic problems associated with inbreeding in the lion family, the zoo did not have the appropriate enclosure or the necessary specialized expertise and capacity to raise the young, inbred lion cubs with genetic problems.

After Terez and Masoud left to FELIDA Big Cat Sanctuary in the Netherlands, **Ostrova Zoo prepared a new enclosure with the help of FOUR PAWS to house the adult lion siblings Hector and Raya, also rescued from Razgrad Zoo. Hector was neutered by FOUR PAWS to prevent further inbreeding. To date, the new enclosure in Pazardzhik Zoo is compliant with the legal regulations for keeping the lion species on the territory of the country.**

This case is a good practice of cooperation between FOUR PAWS and zoos, and a successful example of a zoo working to support animals in need. The animals were introduced to the enclosure after the plan and the construction were ready.

After rescuing the adult lions, Pazardzhik Zoo welcomed them into their new enclosure and provided



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the necessary care for them, including specialized veterinary examinations to assess their condition. Unfortunately, like the other lions from Razgrad Zoo, Hector showed irreversible health problems related to his age, and the years spent in poor conditions, and died at the end of 2020.

FOUR PAWS recommends that in the future:

- the zoo continues to rescue animals in need when it has free capacity and to help deal with the problem of keeping big cats in inappropriate conditions in many of the other zoos in Bulgaria
- the zoo does not engage in the vicious practice of uncontrolled breeding of animals, or taking animals from zoos with unsuitable conditions, which are ready to continue breeding as soon as they make room for new animals.

**When an animal is rescued from bad conditions, additional information should be provided for the visitors of the zoo, as well as an explanatory sign next to the enclosure with detailed information about the history of the animal, where they were rescued from, what health problems they have and how they are being treated.**



Given the efforts of „Ostrova” Zoo in recent years to provide a suitable environment for both the lions and other animals, the zoo should continue in this direction. In addition, the zoo should provide additional enrichment to some of its enclosures and ensure that the number and species of animals in the zoo remains within its capacity to ensure appropriate care can be provided.



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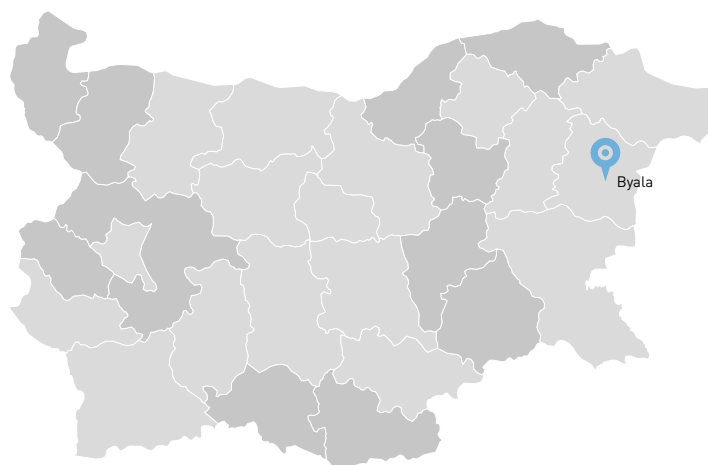




## Zoo „Forest Farm Gospodinov Ltd” - Goritsa, Byala Municipality

**Zoo „Forest Farm Gospodinov Ltd” - Goritsa** was established in 2009 in the village of Goritsa and is one of two private zoos in Bulgaria. The zoo occupies an area of 5 ha in a forest range near Goritsa and keeps animals such as wild boar, fallow deer, red deer, llamas, horses, goats, hares, pigeons, and waterfowl, as well as other species typical of the geographical area. These animals are kept in enclosures primarily built from wood, with some areas using metal grid constructions in addition to surrounding brick building structures.

**The zoo obtained its current license in January 2020.** Following the expiry of its preceding license, it operated without a license for 5 months.



## Good practices

1. The zoo has been primarily built from natural materials such as wood, stone, sand, etc.
2. The wood constructions and enclosures are naturally integrated and incorporated into the forest locale, providing good visibility to visitors without disturbing the animals.
3. The conditions of the previous license have been fulfilled.
4. Climbing constructions for goats have been constructed.
5. The zoo owners have ensured the required personnel under Ordinance No. 6.

## Problems

1. The vegetation in the enclosures for the animals is scarce.

## Recommendations

1. To enrich the habitat environment of the enclosures through additional vegetation.
2. To develop further good practices, such as cooperation with other institutions, organizations and zoos, volunteer program.
3. To engage in best practices such as participation in projects, long-term partnerships, and a donation programme, to provide for the animals in the long term.

## A private zoo which, to a large extent, keeps animal species suited to the natural conditions, in enclosures built from natural materials

Forest Farm Gospodinov Ltd - Goritsa is the first licensed private zoo in Bulgaria. **Unlike most zoos included in this report, it has fulfilled the requirements from the previous license imposed by the MoEW in a timely manner**, and so is not part of the practice of systematic unfulfillment of conditions from preceding licenses.

**The zoo has been built mainly from natural materials** and wooden constructions, with enclosures naturally integrated into the forest scenery. In turn, animal enclosures ensure good visibility to visitors, without them necessarily being in immediate proximity to the animals.



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**The zoo invests effort into assuring the needed environmental enrichment in the enclosures.** A good example of this is the goat enclosure, which accommodates suitable wooden constructions for climbing. The established outdoor guenon enclosure is also suitably adapted for the species, being built around a tall tree and having an inbuilt heating system. This gives the monkeys the possibility to use it during wintertime too.

Nevertheless, it should be noted that for some animals it is necessary to be provided additional vegetation and environmental enrichment.

This zoo in Goritsa is one of the few zoos in the country which **observes the good practice to not keep large carnivores and exotic animals, for which it has no capacity to look after.**

The zoo collection is comprised of mammals and birds, including llama, wild boar, Vietnamese pig, fallow deer, red deer, jackal, peafowl, quail, ostrich, and different pheasants.

The zoo maintains **a plan for its collection** and by 2024 it plans to add just two species of birds and a llama to its collection.

The responsible planning of the zoo collection is a vital condition which ensures that, should a zoo car-



ry out animal breeding or provide accommodation to additional animals, it is done in alignment with its resources and capacity. **The development and approval of a plan for a zoo's collection should be part of the licensing procedure of the controlling body. The ability to provide both the appropriate environment and care for animals in a collection is contingent upon these animals being of a specific species for which the zoo has ensured the appropriate enclosures (according to the needs of the species), correctly qualified personnel and sufficient financial resources in the long-term.**

The timely fulfilment of the conditions of the previous license, the good practices for structuring the environment according to the specific-species needs, the application of natural materials in the enclosures, the future plan for the species collection and the educational activities classify this zoo as one of the better operating zoos in Bulgaria.



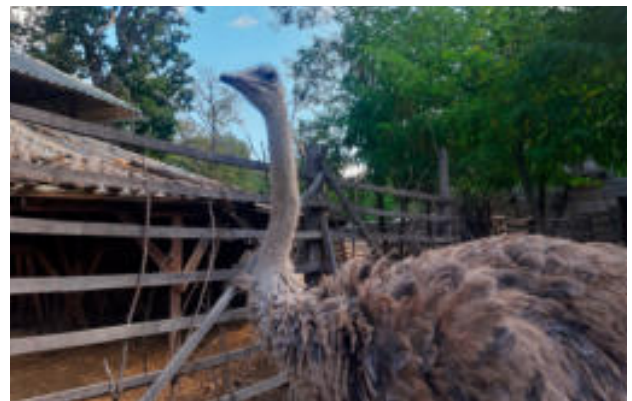
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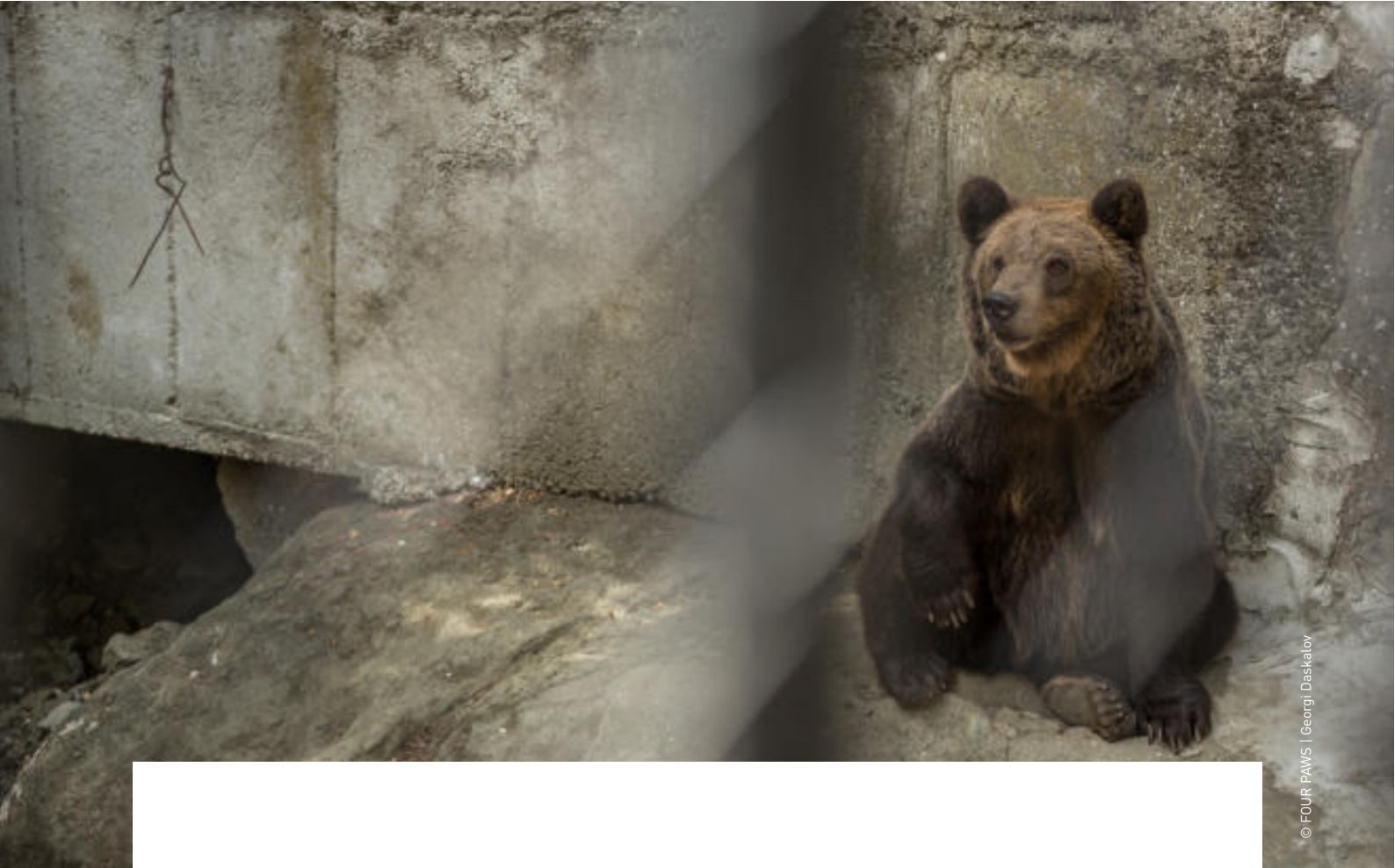


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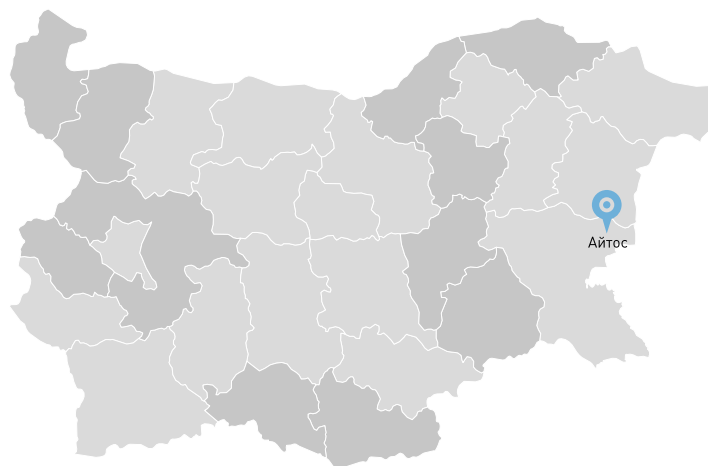


## Aytos Zoo, Aytos Municipality

**Aytos Zoo was established in 1969 and is managed by the Municipality of Aytos.**

It occupies an area of 1.5 hectares in the northern part of “Slaveeva Reka” park and is close to “Three Brothers”, a protected area under Natura 2000, BG 0000119, with numerous nature landmarks and trails nearby which attract tourists. The zoo’s collection includes birds, omnivores, herbivores, primates, and waterfowls.

**Aytos Zoo’s current license was issued on 27.10.2016 and it is valid for five years.**



## Good practices

1. Unofficially, the zoo has established a practice to take in primates confiscated in illegal trade.
2. The zoo performs controlled breeding and specimen reproduction in line with its capacity.
3. The zoo succeeded in building environmental enrichment with natural materials for some of the species.
4. The Municipality of Aytos has applied for funding for reconstruction projects, however, this has been unsuccessful.
5. Aytos Zoo conducts educational activities. A pavilion has been built within the zoo to accommodate visitor groups, and the hall of the municipality is used for events.

## Problems

1. The conditions in the brown bear enclosure are inappropriate for the keeping of this species. The enclosure does not provide the needed environmental enrichment and is not structured appropriately with regards to the natural needs of the bears, in addition to lacking a sufficient amount of light.

## Recommendations

1. To build a suitable enclosure for the brown bears or to relocate the animals to a rescue centre that meets the suitable requirements in accordance with the species' ethological needs.

### Efforts towards improvement in the enclosures despite the scarce budget. However, the brown bear enclosure is not compliant with the needs of the species.

**Despite its limited funds, Aytos Zoo succeeds in providing the majority of their animals with enclosures that meet the needs of the species, mainly through the use of natural materials.** A significant part of the species is kept in enclosures which comply with the legislative requirements.

The zoo's bird section has the greatest species diversity and offers **good facilities for waterfowl**, as each aviary contains a **water basin with continuously running water**.

Aytos Zoo also provides spacious enclosures for wounded storks that have been translocated there from the Green Balkans Wildlife Rehabilitation and Breeding Centre and, applying the legislation under



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CITES, is able to provide **shelter for primates confiscated in illegal trade**, thanks to its proximity to a harbor and its existing infrastructure and appropriate conditions.

Aytos Zoo is making efforts to enrich its environment, however, the condition of the brown bear enclosure remains completely inappropriate. The enclosure has been built entirely from concrete and it does not offer any greenery. The requirements concerning the provision of natural soil, sand toilet ground, structures for climbing, tree trunks, roots, bales of straw protected from sun and rain, privacy and shelter options, and sufficient vegetation have not been fulfilled. **The brown bears at the zoo have been kept in an inappropriate environment, which does not satisfy their specific needs and does not comply with the minimum legal requirements.**

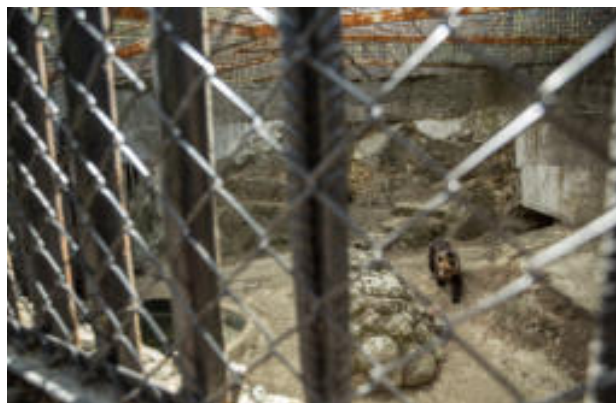
Aytos Zoo explored improvement options by preparing projects to build a more suitable brown bear enclosure, but did not manage to secure the funding they applied for.

**Aytos Zoo is a clear example illustrating the problem of outdated facilities for large carnivores which pervades most Bulgarian zoos, as well as the difficulties faced by zoos in obtaining financial resources for their renovation.**

**The case of Aytos Zoo shows that zoos may attain very good results and a tangible improvement of the overall zoo situation for many of its species, but they cannot overcome their financial limitations when it comes to outdated facilities needing major renovation.**



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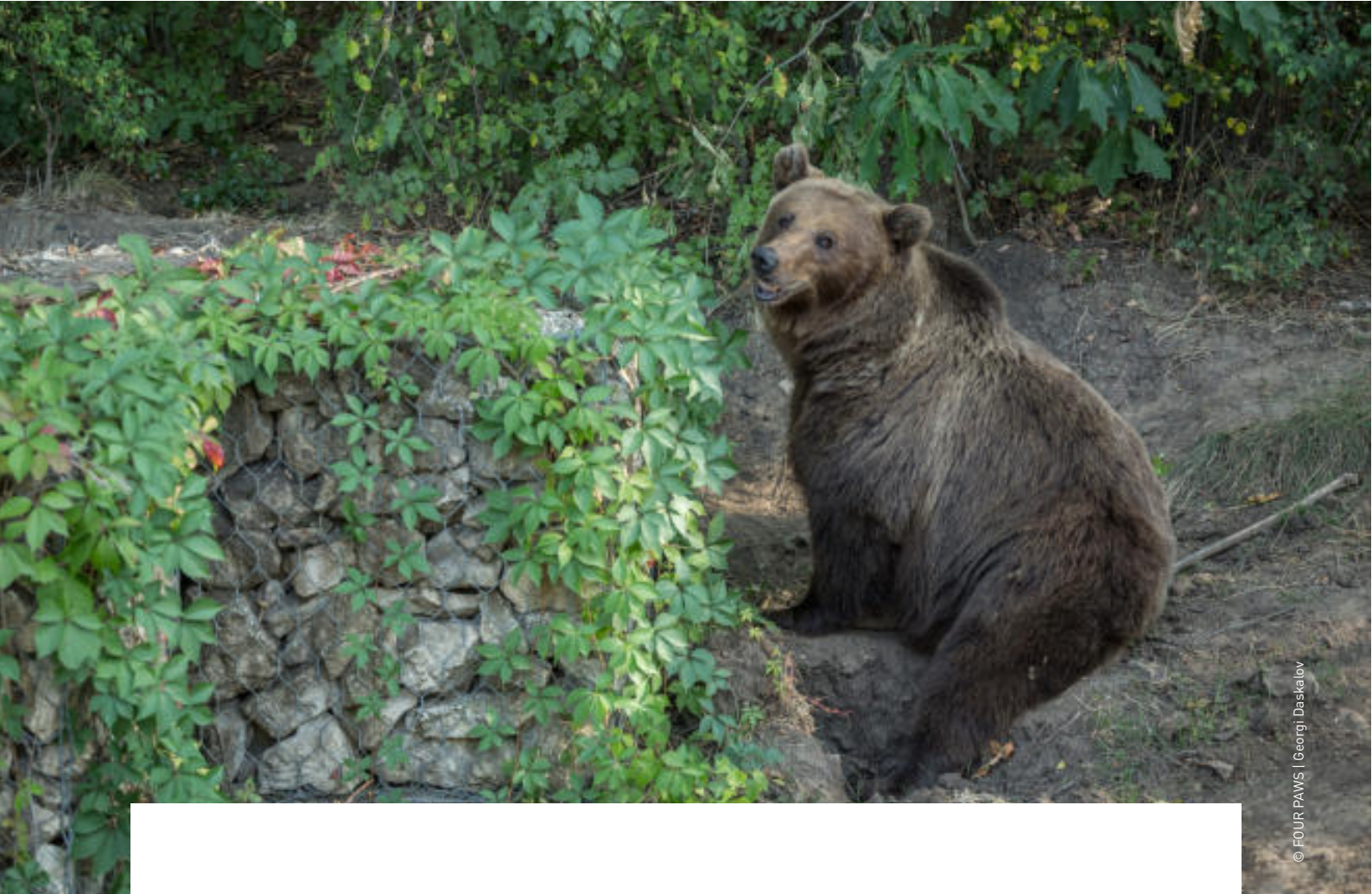


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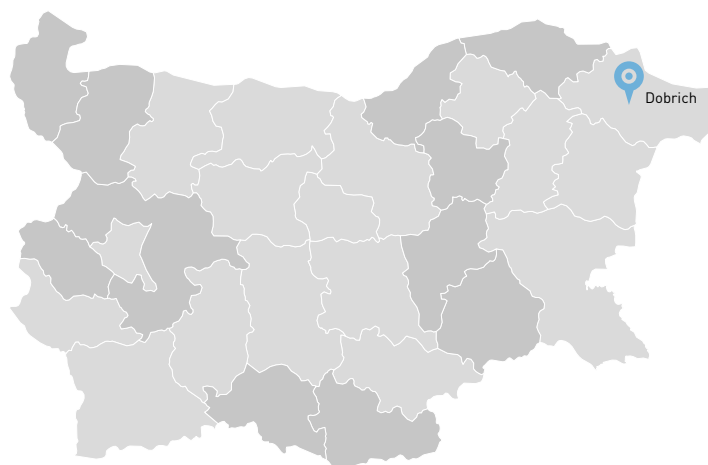


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## „Center for Nature and Animal Protection”, Dobrich Municipality

The current Centre for Nature and Animal Protection – Dobrich, which was established under a Bulgarian-Swiss Project on a total area of 16.2 ha near the city of Dobrich, is owned by the Municipality of Dobrich. It was opened on 25 September 2003 and later became the first licensed zoo in the country. The zoo features rich vegetation such as trees and shrubs, and animals are kept in spacious enclosures which optimally create a naturalistic habitat environment.

The Centre for Nature and Animal Protection – Dobrich obtained its present license in 2019 with conditions which it fulfilled within the deadline set by the control authority. Prior to 2019, it operated without a valid license for 1 year.



## Good practices

1. The zoo successfully applies the practice of free-range keeping for various animals such as water-fowl, hens, Cameroon goats, and Sahel sheep.
2. The zoo implements good practices for building enclosures by using electric fences and utilizing the park environment. Contemporary enclosures have also been built for the zoo's brown bear, Przewalski's horses, and European bison.
3. The zoo utilises the natural resources of the park, and uses organic materials when constructing enclosures to create naturalistic conditions.
4. The conditions of the license have been fulfilled within the deadline.
5. Supervision, planning and control over the animal collection have been carried out.
6. There is a well-established and permanently functioning centre for education and work with the public.
7. There is active communication with stakeholders and the development of volunteer and donation programmes, as well as collaborative work with university and school students.



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## The Centre for Nature and Animal Protection – Dobrich: an example of results achieved by responsible management and good practices according to the available resources

**The Centre for Nature and Animal Protection – Dobrich differs from most other Bulgarian zoos in its natural landscape and its ability to provide its animals a naturalistic environment.**

The territory of the zoo includes diverse broadleaf and conifer trees of 35 species. Instead of inhabiting narrow concrete cages, animals are kept in spacious natural enclosures, with certain species such as birds, sheep, geese, and turtles being kept free-range. For the convenience of the visitors, an elevated viewing platform has been built which allows the observation of all habitats in the zoo.

**The zoo in Dobrich keeps mainly animals which are typical for the geographic area. It is important to highlight the good practice of carefully planning the animal collection and aligning it with the existing capacity and resources. The zoo does not keep exotic animals or a large number of large carnivores, for which it has no financial or human resources.**



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When it exchanges animals with other zoos, the Centre for Nature and Animal Protection – Dobrich is equally attentive to the conditions in which the animals will live in once relocated, and thus conducts preliminary checks.

Dobrich Zoo keeps two brown bears – Berna and Kostadin. Berna was donated in 2013 by the specialized Bear Park within a zoo in Bern, with mediation by Swiss partners from the Pro Zoo Dobrich Society in Schaffhausen. Kostadin came from Kaylaka Zoo in Pleven and has lived in Dobrich Zoo since 2015. FOUR PAWS transported three young brown bears - Victoria, Miladin and Kostadin mentioned above - from Pleven to Dobrich Zoo in support of the Kaylaka Zoo when it performed a renovation of the bear enclosure, and additionally helped perform vasectomies on the bears. After the completion of the bear enclosure renovation, Victoria and Miladin were returned to Kaylaka Zoo and Kostadin remained in Dobrich, together with Berna.

**Berna and Kostadin live in the largest zoo enclosure for bears on the Balkan Peninsula, with a total area of over 0.5 ha including three ponds, two of which are connected by an artificial waterfall.** The bear enclosure was built eight years ago as part of a cross-border cooperation project with Romania. The project also included the construction of a pond for flamingos, a warehouse, kitchen premises, a vet dispensary and isolation premises. The implementation of such projects is a valuable instrument through which zoos can improve their facilities.

The bear enclosure has also been equipped with a bunker where the bears can hibernate, although, Berna and Kostadin habitually dig their own dens. **Falling into hibernation and replicating the natural behaviour of wild brown bears is an indication that the animals feel comfortable in their enclosure and that it meets the needs of the species.**

The Centre for Nature and Animal Protection – Dobrich further ensures the needed social structure for its inhabitants. The zoo aims to only breed and keep wild animals when necessary for species conservation purposes and for their reintroduction into the wild.

The zoo carries out targeted conservation and reproduction activities for endangered species such as Przewalski horses and the European bison and participates in international projects and breeding programmes aimed at increasing the population of rare species in the wild.



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Recently, Dobrich Zoo has been operating as a rescue centre for wild animals and birds, utilizing a renovated ambulance to localize, transport, and rehabilitate wild animals in need, and whenever possible, reintroduces them back into the wild. Some of the rescued animals are various owl species, roe deer, storks, turtles, pelicans, and the lesser spotted eagle.

The Centre for Nature and Animal Protection – Dobrich has a well-established educational centre **which works with students via an internship programme, delivering lectures to pupils in Bulgarian and English and organizing a summer school for children.**

**Dobrich Zoo is active in attracting supporters of the zoo's mission and it is successfully developing a volunteer and donation program.** Local producers provide their support to the zoo by donating a portion of their food produce for animal feed. Furthermore, the coati enclosure has been renovated free-of-charge with the help of a local company.

The zoo implements a continuous improvement of its facilities and invests targeted efforts into raising public awareness regarding its activities. Dobrich Zoo attracts volunteers and donors through holding various events and raising public awareness of their mission.

**The Centre for Nature and Animal Protection – Dobrich is one of the few examples of a zoo in Bulgaria which fulfills the minimal obligatory legal requirements for obtaining a license. The zoo utilizes the natural environment for the keeping of its animals for which they have the necessary resources and capacity.**



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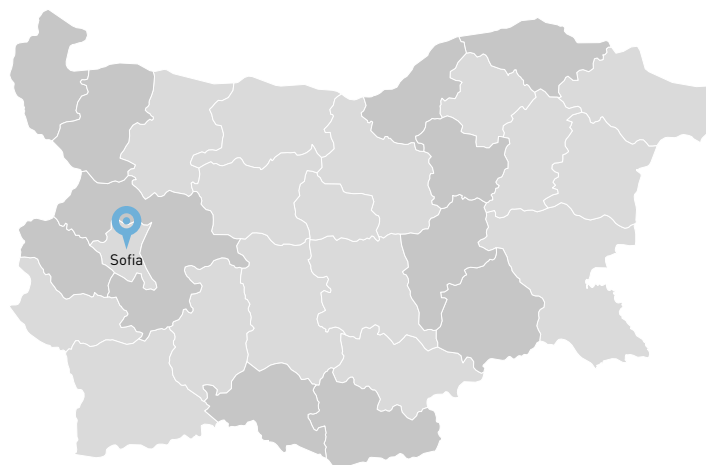
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## Sofia Zoo, Metropolitan Municipality

**Sofia Zoo was established in 1984 in its current location and is the largest zoo in Bulgaria. Property of the Municipality of Sofia.** The zoo is located on a territory of 25 ha and includes a collection of animals encompassing over 230 species including carnivores, primates, herbivores, birds, and reptiles. Since 2012, Sofia Zoo has also officially performed the functions of a rescue centre. The zoo is successfully carrying out education and training activities, including the operating of an educational centre.

**The license of Sofia Zoo was renewed in 2020 and is valid until August 2025.**





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Given the size of the zoo and the large number of enclosures and animals, this report focuses only on certain examples that can serve as good practices for other zoos, and provides more concrete general recommendations for the overall activity of the zoo. Although some of the enclosures have an outdated material base, part of which needs to be renovated according to the indicators used for the analysis of these zoos, this is the zoo in Bulgaria which scores highest in terms of the number of fulfilled mandatory conditions. Sofia Zoo meets the conditions for issuing a license to the greatest extent compared to other zoos in Bulgaria, and given its resources and capacity, has the ability to carry out projects to renovate and enrich the animal enclosures, to introduce additional activities and to actively participate in and organize scientific and educational activities.

## Good practices

1. The enclosures of the big cats, primates, racoon, coati, and foxes have been renovated.
2. A number of waterfowl species are kept free-range in a spacious water area.
3. The zoo participates in science and research activities.
4. A contemporary educational centre has been established.
5. The zoo carries out educational activities, some of which are in partnership with FOUR PAWS, including an interactive tiger exhibition.
6. Sofia Zoo has applied for membership to the European Association of Zoos and Aquaria (EAZA).
7. A project for the reconstruction of the bear enclosures is under implementation.

## Problems

1. Inappropriate enclosures for a number of bird species, the bears and for some of the other animals.
2. Some of the buildings are old and do not fulfill well their corresponding functions.
3. There are difficulties in the zoo's work as a rescue centre.

## Recommendations

1. To complete the reconstruction of the bear enclosure to enable suitable animal keeping in an appropriate environment.
2. To improve the enclosures for the animals whose enclosures do not offer the required environment.
3. To renovate the old buildings and facilities.
4. To improve the activity of the zoo in its role as a rescue centre.



## Consistent actions to improve the enclosures species by species

Sofia Zoo meets the contemporary standards for the keeping of animals by providing appropriate enclosures for the majority of its inhabitants. The zoo also functions as a rescue centre, providing care to animals from other zoos in cases where zoos have closed or have bred animals for which they do not have the resources or capacity to care for them.

### Education

Since 1998, an environmental scientific and educational centre has operated in Sofia Zoo. This centre has a screening and lecture hall with a capacity of 30 people. The main activities conducted in the centre include the implementation of programmes, projects, presentations and games aimed at raising public awareness about the environment, as well as work with organized groups of university and school students. The centre organizes information campaigns aimed at visitors and creates all information materials about the zoo such as signs, educational boards, and a photo archive.

The environmental education centre takes part in national and international scientific research, and also organizes and implements training of the zoo staff. In addition, there is a club for interests and a summer school is held every year.

### Renovation

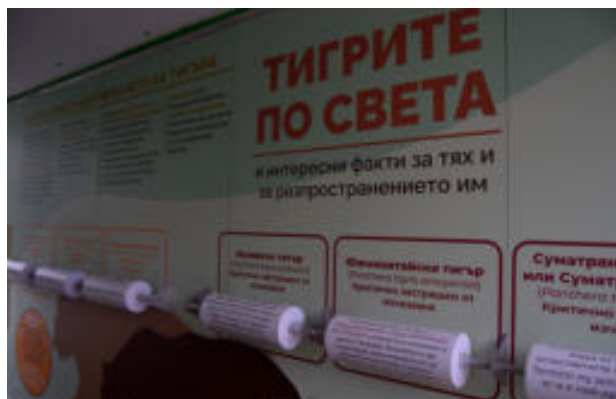
Sofia Zoo is a good example of how, with consistent actions and focused efforts, the facilities of zoos and the environments for different species can be improved.

The animals at Sofia Zoo are currently kept in enclosures made of metal constructions, terrariums, or fenced enclosures with ditches and ponds, where waterfowl and turtles are kept free-range. The enclosures of all big cats have been renovated and are built in line with the legal requirements of Ordinance No. 6. They offer a spacious environment with the necessary vegetation and the fenced areas are structured with climbing frames, tree trunks, stones and rocks, as well as opportunities for rest and hiding. The new fences also meet the conditions for measures to prevent animals from escaping through smooth walls and electrical security.

Since the end of 2020, all primate enclosures have been upgraded with good environmental enrichment and align with the contemporary standards.



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**The newly-built enclosures for big cats and primates illustrate what the environments for these species could look like in order to provide suitable conditions for the keeping of the animals according to their specific needs.**

A new project for the construction of bear habitats has been prepared. Sofia Zoo is making efforts and gradually updating the material base, largely meeting the regulatory requirements.

**Even so, there is still room for improvement, especially concerning the enclosures of many bird species and some of the enclosures for other animal species. It is necessary to consider restructuring and providing further enrichment in the elephant, rhinoceros and hippopotamus enclosures, in order to make them more appropriate for the keeping of their respective species.**

All these activities for the renovation and modernization of the zoo require serious financial resources. Sofia Zoo uses various fundraising methods, unlike most of the other zoos which rely solely on the municipal budget. Sofia Zoo has a well-developed donation program, as well as a volunteering scheme. The zoo is also one of the few in the country that has an entrance fee. An entrance fee is a relatively quick and easy tool that zoos can implement to increase their funds so that they can invest in improvements.

**With many of its good practices, Sofia Zoo can set an example for the development of other zoos in the country. However, in order to achieve such results, it is vital for the projects to be well planned in the long run and for the necessary conditions for keeping the animals to be provided according to the resources and capacity of the zoo.**



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# Conclusion

The data presented in this report is a snapshot of good and bad practices, as well as of the overall condition of the zoos in Bulgaria at the time of study. The collected data and examples are the result of the long-term work of FOUR PAWS on the topic in Bulgaria.

Although the study looks at many of the important aspects of the topic, it does not cover them all.

In this study we focused on the implementation of the EU Zoos Directive at a national level, in the zoos operating within Bulgaria in 2020, according to the provisions of the European Union and the national legislation for the functioning of the zoos. The EU Zoos Directive has been adequately transposed into the Bulgarian legislation; in the Bulgarian legislation there are clear requirements for the licensing and control of the licensing of zoos, as well as for the obligatory minimum conditions for keeping of different wild animal species. Adequate control over the implementation of legislation should ensure that these conditions, and therefore the objectives of the EU Zoos Directive, are met. However, the results of this study by FOUR PAWS show that in practice, the legal requirements are often not observed.

As found by this study, zoos open to visitors in Bulgaria meet only a part of the minimum requirements. Many animals live in unsuitable conditions that are very different from their natural environment, with most zoos providing basic environmental enrichment and limited or no suitable landscaping. In addition, the compliance with the conditions related to species conservation, education, training and research is generally low across most establishments.

A qualitative change and a full renovation of the obsolete enclosures is needed, as well as a change in the outdated perception that exhibiting animals should simply fill an existing enclosure space, rather than the enclosure existing to meet the needs of the individual animal. Animals kept in bare concrete cages are not a sight that can educate the visitors of zoos. In order for the animals to be perceived as individuals representing species with their own biological needs and characteristics, as part of an ecosystem, and to make a real contribution to public education through their presence in the zoo, the overall concept of many of the zoos should be changed to better comply with the objectives of the EU Zoos Directive. This includes the development of educational and conservation activities, as well as the presentation of animals in a naturalistic environment.

There is an urgent need to prepare and implement projects for complete renovation and/or construction of new habitats in most of the zoos we studied. In addition, there is an urgent need to stop keeping certain species, especially large carnivores such as bears and big cats, in zoos that cannot properly accommodate them due to lack of space, suitable environment and/or other resources.

The prepared analysis of the condition of the Bulgarian zoos that FOUR PAWS studied shows that there are several serious systemic problems which are largely due to the financing, management and planning of the zoo collections.

The study identified the following systemic problems in the licensing and control of zoos:

- In the period between 2010 and 2020 there was a systematic practice for zoos to operate without a license and to remain open to visitors;
- Zoos without a license were not closed by the control authority and thus the national legislation was not fulfilled;
- The zoos that were closed by the control authority continued to operate and the animals continued to be kept in the same substandard conditions;
- Contrary to the national legislation, licenses were awarded to zoos who did not fulfill the conditions set in previous licenses and thus the same unfulfilled conditions were repeated in the new licenses;
- Zoos with facilities that were built 50 - 60 years ago received licenses despite being unsuitable for keeping wild and domestic animals as they do not meet the legal requirements;
- Some animal species were subject to uncontrolled (in)breeding and/or breeding loans between zoos in Bulgaria without the possibility to be kept in species-appropriate conditions;
- The rescue centres located in some of the zoos did not have the necessary conditions and capacity to receive urgent cases of animals in need.



**In order for these problems to be addressed sustainably, they need to be recognized as such, good practices need to be adopted and a better solution must be sought for animals kept in inappropriate conditions. To improve the conditions for animals in Bulgarian zoos, it is necessary to ensure the active participation and joint work of various stakeholders, including the control body - the Ministry of Environment and Water, and NGOs in the sector. The public must also be educated and informed about the problem. Zoo owners should have an active role as well, in order to implement the needed changes and improve the situation in their own zoos.**

In the years since Bulgaria's accession to the EU, the Ministry of Environment and Water closed one zoo (Plovdiv Zoo), issued an order to close Kyustendil Zoo (which was not implemented), refused the license to some zoos for a certain period of time and closed separate enclosures for specific animal species. Several zoos are currently being renovated, and others have reconstruction plans in place. In many of these cases, FOUR PAWS worked actively with the Ministry of Environment and Water to find suitable homes for the affected animals and to offer transport for them. These cases are a good example of active steps taken towards solving the problem.

In the cases where there is no prospect to improve the conditions in a zoo or to update enclosures to meet the species-specific needs, it is necessary to comply with the legislative requirements and thus the respective zoo or enclosure must be closed. Ideally, this should also happen with a clear understanding on the part of zoo owners. These zoos need to transition towards keeping only animals for which they can provide the necessary conditions.

In order to improve these necessary conditions, the zoo must prioritize the projects and adopt a systematic and proactive approach to the renovations, and in turn the transition to a newly developed zoo. An extremely important element of this is that the breeding of wild animals should be carried out according to the capacity not only of the zoo, but also to the total capacity throughout all Bulgarian zoos. The position of FOUR PAWS is that breeding and trade should only be allowed as part of the coordinated and registered conservation breeding programmes led by zoological institutions, e.g ex situ conservation programmes as run by EAZA. Capacity and resources must be considered comprehensively before trading or breeding occurs. In the absence of suitable enclosures for a particular species in Bulgarian zoos, that species should not be bred until the zoos involved that have the interest and ability to breed it build appropriate enclosures for the future offspring of the animals. Again, this should not be an end in itself, but in view of the educational and conservation objectives and benefits for the society and the animals.

Overcoming the above problems and ending the bad practices should be on the agenda of:

- The European institutions and the ad hoc forum aimed at helping Member States in their implementation work, as a systemic problem;
- The national control authority - the Ministry of Environment and Water - as a problem that requires more soft measures such as training for zoo staff, but also more stringent measures and sanctions for the closure of unsuitable enclosures, an end to uncontrolled breeding, and the moving of animals to better conditions when needed;
- The zoo owners and managers as a step forward to providing a better end product with higher added value for visitors.

This is the only way for the Bulgarian zoos to start functioning within the framework of the European and the national legislation, and for the animals to be kept in a suitable environment according to the contemporary standards. The improvement of the keeping conditions for the animals should not be postponed as numerous animals are stuck in dire conditions.

# Recommendations

FOUR PAWS has more specific recommendations regarding the support for zoos to put into practice the objectives of the EU Zoos Directive, the implementation of control and strategic planning for sustainable improvement of the zoos by the competent authorities at national and European level, and the implementation of good practices and effective management by the owners of Bulgarian zoos.

## The European Commission

- Should provide EU guidance for Member States' national action plans for animal rescue, along with a European register of appropriate rescue centres and sanctuaries.
- Should provide funding for the construction of rescue centres for the relocation of endangered animals and financial support for the existing rescue centres in Europe.
- Should continue to organize and support educational programmes related to the training of zoo staff members and employees of the control authorities, taking into account the most recent scientific findings (especially on providing adequate accommodation for animals in their keeping).

## The Ministry of Environment and Waters

### Improving the conditions and general framework for the operation of zoos:

- Maintain a detailed central register of the animals kept in zoos for easier tracking of problems and addressing cases of missing or dead animals.
- Stop issuing licenses to zoos that do not meet the conditions for obtaining said license.
- Change the system for licensing zoos so that a license includes the species and exact number of individuals for which the zoo has appropriate keeping conditions according to the legal requirements.
- Exercise control over the plans for a zoo's species collections - the plans should be in accordance with the capacity, resources and capabilities of the zoos.
- Implement coercive measures to stop the intake, breeding and breeding loan exchange of animals in zoos that lack suitable conditions for their keeping.
- Introduce a legal ban on inbreeding in the legislative framework.
- Carry out active monitoring and implementation of measures according to the existing legislation.
- Organize training for zoo staff to improve the management and husbandry of the animals.
- Exercise control over the mandatory implementation of educational and conservation activities.
- Upgrade Ordinance №6 in alignment with the contemporary standards and best practices for the keeping of wild animals in captivity.

### Zoo closure and translocation of the animals

- Carry out active monitoring by the control body and implement measures according to the legal requirements.
- Coercive translocation of animals when closing individual enclosures or zoos that cannot meet the minimum legal requirements.
- Set up a system for rescuing wild animals kept in captivity and a unit to oversee the procedure for relocating animals kept in inappropriate conditions or other cases in which relocation is needed.
- Construct new rescue centres.
- Coercive translocation of individuals of the brown bear, lion, tiger and other species kept in enclosures that are not suitable for the keeping of these species.
- Introduce strict sanctions for non-compliance with coercive administrative measures.

## Zoo owners or managers

### Improving the conditions and operation of zoos

- Increase the educational value of zoos by developing information materials and implementing educational activities and programmes for visitors. Construct educational centres (where there is none) and develop educational activities.
- Carry out conservation and research activities.
- Improve the security and safety in zoos.
- Improve the qualification of the staff and providing adequate remuneration for the employees in the zoos.
- Manage the population of the animals in zoos according to a plan for the species collection, which should be in accordance with the issued license under the new licensing system. Put an end to the non-professional breeding practices.
- Introduce long-term financial planning for each zoo to ensure the necessary conditions and animal welfare measures can be met annually.
- Renovate zoos according to natural conditions and preservation of landscape elements in order to provide an appropriate species-specific environment. In cases where repairing old concrete enclosures is not possible or cost effective, consider building new enclosures with less concrete and more natural materials.
- Provide appropriate conditions to meet the biological needs of the animal, including environmental enrichment and sufficient space for free movement, according to the species, size and number of kept animals.
- If, after funding possibilities have been exhausted, a zoo is unable to meet the legal requirements for the keeping of certain species, the zoo needs to close the inadequate enclosures and seek opportunities to relocate the animals. This should happen together with the control authority. In this case, the zoo should be closed or focus on only keeping the species for which it can provide a suitable environment.
- Zoos should give or loan their animals only to zoos that comply with the legislation and have appropriate conditions for keeping the respective species.
- Carry out mandatory prevention of inbreeding, including the prevention of reproduction by inbred animals to prevent health problems.
- Use breeding loans only if this corresponds to the actual purposes of the relocation of the animals, ensuring it is part of coordinated and registered conservation breeding program and that host zoo has the necessary capacity and resources.
- Zoos that are owned by municipalities and which are located in city parks must take into account the kept species in relation to the limited space and the specifics of the urban environment.

### Introduction of good practices

- Collaboration (internships, exchange programs) with other institutions such as universities, schools, other zoos, etc.
- Conservation activities through partnerships with non-governmental organizations.
- Development of sustainable volunteer initiatives and transparent donation programs for assistance in various forms (financial support, time and labour, food, repairs, construction/natural materials/plants for afforestation and landscaping, etc.).
- Collaboration with stakeholders to participate in projects and establish long-term partnerships.
- Development of educational activities by providing information materials, talks, organization of thematic events, media appearances, etc.
- Introduction of an entrance fee for all zoos, the revenues from which should be used for infrastructure improvements and other current expenses related to the conditions for the keeping of the animals.



#### A final note:

Throughout the report, FOUR PAWS has given multiple recommendations for addressing the problems in each zoo. These recommendations are valid in case the zoo intends to continue keeping the species currently part of the zoos' collections and to provide the appropriate environment to the animals. However, where these measures cannot be implemented and the zoos cannot comply with the legal requirements within the deadlines outlined in the legislation or where the said deadlines have already passed, FOUR PAWS urges the control authorities and the zoo owners to take urgent measures and to improve the situation of the animals suffering in poor conditions. Even the zoos which are performing relatively well according to the criteria in the checklist used for the analysis, should stop keeping animals for which they cannot ensure the appropriate conditions, care and expertise within the zoo.



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- Application for access to information with ent. № 26/28.10.2020 from RIEW Burgas
- Application for access to information with ent. № 334/13.11.2020 from RIEW Haskovo
- Application for access to information with ent. № 1602/20.11.2020 from Zoo Forest Farm Gospodinov Ltd Goritsa
- Application for access to information with ent. № 69-00-25/23.11.2020 from Razgrad Municipality
- Application for access to information with ent. № 7271/A3/23.11.2020 from RIEW Varna
- Application for access to information with ent. № 9200-152/24.11.2020 from Knezha Municipality
- Application for access to information with ent. № 7819/26.11.2020 from Pavlikeni Municipality
- Application for access to information with ent. № 1952/30.11.2020 from Zoo-Rescue Centre Varna
- Application for access to information with ent. № 20-08-153000/30.11.2020 from Metropolitan Municipality
- Application for access to information with ent. № 42/01.12.2020 from Lovech Municipality
- Application for access to information with ent. № 551/01.12.2020 from Ostrova Zoo Pazardzhik
- Application for access to information with ent. № 808/03.12.2020 from Dimitrovgrad Zoo
- Application for access to information with ent. № 19621/10.12.2020 from Zoo-Rescue Centre Varna
- Application for access to information with ent. № 7/18.02.2021 from MoEW
- Biological Diversity Act of 9 August 2002. State Gazette issue No. 77 of 2 August 2002, last amended by State Gazette issue No. 98 of 27 November 2018
- Born Free Foundation (2011). The EU Zoo Inquiry. An evaluation of the implementation and enforcement of EC. Report findings and recommendations.  
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- Council Directive 1999/22/EC of 29 March 1999 on the keeping of wild animals in zoos (The Zoos Directive)  
<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A31999L0022>
- Council Directive 79/409/EEC of 2 April 1979 on the conservation of wild birds  
<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex:31979L0409>
- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora  
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A31992L0043>
- Council Regulation (EC) No 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein  
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:31997R0338>

European Commission (2015). EU Zoos Directive Good Practices Document.

Publications Office of the European Union, Luxembourg.

[https://ec.europa.eu/environment/nature/pdf/EU\\_Zoos\\_Directive\\_Good\\_Practices.pdf](https://ec.europa.eu/environment/nature/pdf/EU_Zoos_Directive_Good_Practices.pdf)

Letter for access to information with ent. № 53-00-748/23.07.2020 from Blagoevgrad Municipality

Letter for access to information with ent. № 25/20.11.2020 from Aytos Municipality

Order No. 826 of 2 November 2012. MoEW

Ordinance No. 1 of 9 May 2006 on the conditions and order for zoo licensing. State Gazette issue No. 43 of 26 May 2006, amended by State Gazette issue No. 29 of 30 March 2018

Ordinance No. 6 of 23 October 2003 on the minimum requirements and conditions for the keeping of animals in zoos and in keeping and breeding centres for protected animal species. State Gazette issue No. 105 of 2 December 2003, amended by State Gazette issue No. 43 of 26 May 2006, amended by State Gazette issue No. 44 of 12 June 2009



# Annexes

## Annex No. 1

### A Checklist, developed and applied in data collection and zoos assessment

REPORT ON ZOOS STATUS					
Owner of zoo:					
Name of zoo:					
Telephone number (including city code):					
Fax (including city code):					
Email :					
Availability of valid/ previous license: YES <input type="checkbox"/> NO <input type="checkbox"/>					
If YES, please specify:					
License No. and date of issuing:					
Work without a license:					
Date of check:					
Preamble of the Report– general notes, zoo’s overview, zoo’s year of opening, etc.					
You should mark either YES, NO or NON-APPLICABLE (N.A.)					
A. EDUCATION AND QUALIFICATIONS					
No.	REQUIREMENTS	YES	NO	N.A.	NOTES
<b>A.1.</b>	<b>Requirements for obligatory personnel in zoos and in keeping and breeding centres for protected species under <i>Ordinance No. 6 of 23 October 2003 on the minimum requirements and conditions for the keeping of animals in zoos and in keeping and breeding centres for protected animal species</i></b>				
A.1.1.	Biologist or zoologist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.1.2.	Zoo engineer, zoo technician or husbandry expert	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.1.3.	Veterinary specialist	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.1.4.	Zoo attendants	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>A.2.</b>	<b>Obtained qualification</b>				
A.2.1.	Academic degrees	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.2.2.	Science publications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.2.3.	Personal projects	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.2.4.	Animal welfare	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.2.5.	Environmental enrichment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.2.6.	Veterinary qualifications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.2.7.	Zoo technical qualifications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A.2.8.	Other qualifications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B. SITE STATUS ASSESSMENT					
No.	REQUIREMENTS	YES	NO	N.A.	NOTES
<b>B.1.</b>	<b>Nutrition and water supply conditions</b>				
B.1.1.	Quality feeding				
B.1.1.1.	Animals are fed with rations as per their species, age, sex and biological condition	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.1.1.2.	Nutrition and water supply have been brought in line with the eating habits of each species	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.1.1.3.	Ensured individual feeding programme for each species	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.1.2.	Hygiene:				
B.1.2.1.	Food storage hygiene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

B.1.2.2.	Food preparation hygiene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.1.2.3.	Feeding hygiene	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.1.3.	Ensuring animal and personnel safety during feeding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.1.4.	Kitchen premises	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.1.5.	Storage premises	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B.2.</b>	<b>Ensuring of appropriate animal environment</b>				
B.2.1.	Environment satisfying physical, social, psychological and ethological animal needs depending on the species they belong to	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.2.	Providing each animal with periodically changing adapted environment and environmental enrichment to meet the physical, social, psychological and ethological needs which characterize its species	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.3.	Environmental conditions suited to individual species breeding and reproduction needs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.4.	Environmental parameters:				
B.2.4.1.	temperature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.4.2.	ventilation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.4.3.	light	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.4.4.	humidity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.5.	Animal shelter in inhabited enclosures/ aviaries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.6.	Ensured appropriate area as per number of animals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.7.	Ensuring of cleaning of enclosures/ aviaries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.2.8.	Good drainage system	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B.3.</b>	<b>Provision of veterinary service</b>				
B.3.1.	Maintaining of high level of vet preventive care	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.2.	All animals displayed to the public are in good health	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.3.	Health and health condition observations are recorded	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.4.	All animals receive due medical treatment in the event of disease	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.5.	A vet dispensary on site – data	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.6.	Veterinary service team	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.7.	Anesthesia equipment (tools/instruments)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.8.	Animal capture and retention equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.9.	Ensured veterinary prevention programme	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.10.	A periodic review system for the pathologic and clinical diaries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.11.	Maintaining of a vet diary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.12.	Medicine storage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.13.	Control & medicines usage diary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.14.	Performing autopsies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.15.	Ensured isolation conditions in the event of:				
B.3.16.	examination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.16.1.	treatment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.16.2.	recovery	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.16.3.	quarantine (when needed)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.16.4.	Intrusion of vermin and carnivores at animal enclosures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.17.	Control over vermin and carnivores	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.18.	Control over disease	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.19.	Periodic pest control – spring & autumn	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

B.3.1.20.	Daily inspection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.21.	Daily cleaning	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.22.	Preventive measures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.3.1.23.	Sewerage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B.4.</b>	<b>Ensuring of living according to animal behaviour</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B.5.</b>	<b>Distress prevention for animals</b>				
B.5.2.	Animal keeping or work with animals only by, or under the supervision of, trained personnel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.5.3.	Human contact with animals corresponds to animal behaviour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.5.4.	The interaction among animals is not causing too much animal stress	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B.6.</b>	<b>Animal transport and translocation</b>				
B.6.1.	Animal transport and translocation equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.6.2.	Animal capture and translocation techniques are in line with animal behaviour and ensure avoidance of animal injuries and distress	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.6.3.	Animal and human safety measures during transportation or keeping of animals outside the zoo	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B.7.</b>	<b>Species conservation, research and training</b>				
B.7.1.	Participation into the following activities and programmes:				
B.7.1.1.	science and other research of importance to the species keeping and conservation including measures for wild animals' reintroduction to nature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.7.1.2.	conducting educational and training animal conservation activities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.7.1.3.	information exchange with similar institutions related to wild animals keeping and conservation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.7.1.4.	wild animals breeding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.7.1.5.	introduction and reintroduction of wild animals to nature by providing breeding materials of endangered species	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.7.2.	Provision of breeding materials of endangered species during keeping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.7.3.	Ensured public information and training related to the species, their natural habitats and biodiversity protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.7.4.	Availability of a training centre related to the collection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.7.5.	Personnel training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.7.6.	Management of animal breeding	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B.8.</b>	<b>Safety for visitors, animals, personnel and external habitats</b>				
B.8.1.	Measures preventing the escape of animals	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.2.	Instructions for action in the event of animal escape	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.3.	Ensured area surrounding the animal cage which is prohibited for entry	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.4.	Building equipment for protecting visitors from injuries caused by collection animals. Barriers stopping the entry of animals.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.5.	Availability of warning display boards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.6.	Availability of prohibition display boards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.7.	Emergency exits marked	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.8.	Building maintenance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.9.	Safety of visitors' areas and alleys	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.10.	Maintaining the sanitary status of trees on zoo territory	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.8.11.	Taking needed action to prevent escape of animals in order to avoid possible environmental threat to local species	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B.9.</b>	<b>Databases</b>				



B.9.1.	Relevant collection data concerning:				
B.9.1.1.	number of animals by species	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.9.1.2.	origin of specimen and ways of obtaining animals, birth/hatching, deat/exchange, escape, and animal location	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.9.1.3.	death causes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.9.1.4.	animal health and health care	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.9.1.5.	technologies and techniques for keeping and maintaining collection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.9.2.	Database maintenance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.9.3.	Provided list and data under Art. 96 & Art. 2 of the BDA to the MOEW	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.9.4.	Maintaining a database on animals' origin and ways of obtaining,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.9.5.	Available archive and storage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.9.6.	Marking specimen when possible and keeping records thereof	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>B.10.</b>	<b>Legislation implementation</b>				
B.10.1.	Displaying a valid/ previous license at zoo doorways	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.10.2.	Legislation implementation with respect to CITES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B.10.3.	Fulfilting the requirements under valid/ previous license	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<b>Valid/ previous license conditions</b>	Ful-filed	Unful-filed	N.A.	Notes
RESCUE CENTRE					
SELECTION					
<b>Species</b>		<b>Breeds</b>	<b>Hybrids</b>	<b>Animal Specimen</b>	<b>Comments</b>
<b>1.Mamals</b>					
<b>A. 1.1. Carnivores</b>					
<b>Tiger</b>					
<b>Lion</b>					
<b>Jaguar</b>					
<b>Leopard</b>					
<b>1.1.1. Puma</b>					
<b>1.1.2. Cheetah</b>					
<b>1.1.3. Lynx</b>					
<b>1.1.4. Bear</b>					
<b>1.1.5. 1.1.8.1. Brown Bear</b>					
<b>1.1.6. 1.1.8.2. White Bear</b>					
<b>1.1.7. 1.1.8.3. Hima-layan Bear / Asian Black Bear</b>					
<b>1.1.8. 1.1.8.4. Amer-ican Black Bear</b>					
<b>1.1.8.5. Sun Bear</b>					
<b>1.1.8.6. Sloth Bear</b>					

1.1.8.7. Specta- cled Bear					
1.1.8.8. Panda					
2. Birds					
3. Reptile					
4. Amphibia					
5. Fish					
6. Invertebrates					
TOTAL					
D. ASSESSMENT					
1.	Good Practices				
2.	Problems				
3.	Problem Resolution and Recommendations				

## Annex No. 2

**Annex No. 1 of Ordinance No. 6 on the minimum requirements and conditions for the keeping of animals in zoos and in keeping and breeding centres for protected animal species – Predators: Cats and Bears**

PREDATORS (Carnivora)	Num- ber	Outdoor enclosure, m2 (+m2 in addition for every next)	Indoor enclosure		Tempera- ture, mini- mal (°C)	Social structure	Notes/ specifics
			Space area, m2 (+m2 in addition for every next)	Height (m)			
<b>CATS (Felidae)</b>							
<b>Cheetah (Acynonyx jubatus)</b>	Two (male and female)	80 (+ 10)	20 (+ 5)	3	Above 15	In groups	There should be en- sured a box sized 5 m2 for each animal. Boxes should be spatially separated from one another. There should be provided a separate- ly enclosed section for females with little ones.
<b>Lion (Panthera leo)</b>	A couple (+little ones in the case of lions)	40 (+ 10)	25 (+ 4)	3	Resistant to winter condi- tions	Family groups	When kept outdoor during the whole day, they should be provided with dry boxes for the night, sized at least 3 m2 per animal.
<b>Tiger (Panthera tigris)</b>						Single, in couples	

<b>Leopard (Panthera pardus);</b>	A couple	30	15	4		In couples when the animals are well socialized/ compatible	For tiger and jaguar - bathing basins.  With the exception of the lion, females and little ones should be kept separately.
<b>Jaguar (Panthera onca);</b>							
<b>Puma (Puma concolor);</b>							
<b>Snow Leopard (Panthera uncia);</b>							
<b>Clouded Leopard (Neofelis nebulosa)</b>							
<b>Eurasian Lynx (Lynx lynx)</b>	One	20 (+ 3 )	20 (+ 2)	2,50			
<b>Black-footed Cat (Felis nigripes);</b>	One	6 (+ 1)	6 (+ 1)	2,50	Above 18		
<b>Geoffroy's Cat (Oncifelis geoffroyi);</b>							
<b>Leopard Cat (Prionailurus bengalensis)</b>							
<b>European Wildcat (Felis silvestris);</b>	One	10 (+ 1)	10 (+ 1)	2,50	Resistant to winter conditions		
<b>Pallas's Cat (Otocolobus manul)</b>							
<b>Jaguarundi (Herpailurus yagouaroundi)</b>					18		
<b>Serval (Leptailurus serval);</b>	One	15 (+ 2)	15 (+ 2)	2,50	18	In couples	
<b>Caracal (Caracal caracal);</b>							
<b>Ocelot (Leopardus pardalis);</b>							
<b>African Golden Cat (Profelis aurata);</b>							
<b>Fishing Cat (Prionailurus viverina)</b>							
<b>BEARS (Ursidae)</b>							
<b>Polar Bear (Ursus maritimus)</b>	A couple	200 (+50)	12	3	Resistant to winter conditions	Single, in couples or small groups	



<b>Brown Bears (Ursus arctos)</b>		150 (+20)				In couples	Bathing basins should feature medium depth of 1,5 m and a size of 60 m2.
<b>Asian Black Bear (Selenarotos tibetanos);</b>					Above 12		
<b>Spectacled Bear (Tremarctos ornatus);</b>							
<b>Sloth Bear (Melursus ursinus)</b>							
<b>Sun Bear (Helarctos malayanus)</b>	A couple	60 (+ 10)	8	2	Above 12 indoors		Compulsory heating

FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. Founded in 1988 in Vienna by Heli Dungler, the organisation advocates for a world where humans treat animals with respect, empathy and understanding. FOUR PAWS' sustainable campaigns and projects focus on companion animals including stray dogs and cats, farm animals and wild animals – such as bears, big cats, orangutans and elephants – kept in inappropriate conditions as well as in disaster and conflict zones. With offices in Australia, Austria, Belgium, Bulgaria, Germany, Kosovo, the Netherlands, Switzerland, South Africa, Thailand, Ukraine, Hungary, the UK, the USA and Vietnam as well as sanctuaries for rescued animals in twelve countries, FOUR PAWS provides rapid help and long-term solutions. [www.four-paws.bg](http://www.four-paws.bg)

**More information and contact details:**

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[\*\*four-paws.bg\*\*](http://four-paws.bg)

[\*\*facebook.com/4lapi\*\*](https://facebook.com/4lapi)

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[\*\*instagram.com/fourpawsbulgaria\*\*](https://instagram.com/fourpawsbulgaria)

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