

26 July 2017

David Way

NSW Planning Assessment Commission
Level 3, 201 Elizabeth Street,
Sydney NSW 2000

Dear Mr Way,

RE: THE SYDNEY ZOO (SSD 7228)

Thank you for the opportunity to provide a submission on the revised social impact assessment (SIA) for Sydney Zoo Pty Limited (SZPL).

Taronga Conservation Society Australia has always expressed an interest in being consulted in the SZPL Development; with our particular interest in ensuring any proposed zoological development provides the appropriate facilities required to care and support all animals held under its care.

We have reviewed the social impacts assessment for the proposed SZPL, with consideration to our previous submission relating to the Development Application which went on public exhibition on 10 December 2015, and submit the following:

Social Impacts

Taronga has concerns that SZPL's proposal and responses do not effectively address the potential the social impacts. Key concerns include:

Sydney Zoo Foundation is listed in the SIA as supporting Conservation through 'Animal welfare initiatives with conservation organisations, including fundraising for these initiatives through Sydney Zoo Foundation.' (Pg 21 Section 3.2 Conservation Programs). As with many of the assertions concerning animal welfare the claims are not backed up with any material substance regarding SZPL's capacity to create, staff and administer a functioning charitable foundation with the ability to have impacts at the scale or significance indicated throughout the document.

Conservation is defined and measured through positive impacts on wild populations of animals in wild areas. Taronga remains concerned that SZPL has not demonstrated an understanding of the fundamentals of contemporary conservation and over-claiming their contributions in this area. Within the submitted documents animal welfare, quarantining animals for other zoos in Australia and veterinary care of their animal population are all incorrectly documented as being 'conservation initiatives'.

Further to the point above, the table on page 21 in the SIA has failed to identify Altina Wildlife Park and Taronga Western Plains Zoo as existing and approved quarantine facilities in NSW. The implication is that this fails to recognise their impact and contribution and inaccurately represents SZPL's proposed contribution. (Pg 21 Section 3.2 Conservation Programs)

Stakeholder input (pg 48 purple box) cannot be taken as factual or accurate. For example the following statement is false: ‘There are less than a dozen Plains Wanderers held in captivity, mostly at Taronga and a couple at Featherdale, but there are stacks in private collections and they are very easy to breed. (individual involved in species recovery effort)’. In our first hand experience it is difficult to breed Plains Wanderers and any loss due to implications at Featherdale will impact the recovery program.

Contemporary thinking around the role that ambassador animals play within zoos is directly linked to the ‘connect, understand, act’ model of behaviour change. Taronga remains concerned that SZPL is overstating how they will address the ‘act’ aspect of this model particularly in the area of engaging its visitors with meaningful actions for wildlife and achieving genuine conservation outcomes through its display of exotic and native wildlife.

The basis of Taronga’s concern is that the claims and proposed inaccuracies listed above have influenced the scenarios, assessments and SIA rankings within the SIA. Of particular concern is the implications and impacts to Featherdale Wildlife Park and the credibility of the conservation claims stated throughout the response.

Best Practice Animal Welfare

Taronga notes that SZPL is committed to complying with all relevant guidelines, regulations and legislation in regards to animal welfare in NSW. It is to be noted that Taronga remains highly concerned regarding the risk to wildlife and the risk to the State of NSW. There is risk that SZPL will not meet the welfare needs of the animals in their collection or the ever increasing community expectations regarding animal welfare and zoos. These expectations go beyond compliance with minimum standards. These concerns are raised due to:

SZPL’s Animal Welfare policy does not meet contemporary thinking in animal welfare, the Australasian Zoo and Aquarium Association’s Animal Welfare Accreditation approach or community attitudes towards zoos in relation to animal welfare. Contemporary thinking is based on measurable positive welfare states not ‘ensuring animal’s have appropriate access’ to shelter, water and appropriate nutrition and ‘prevention of pain and disease’ as detailed in the policy.

The SZPL staff listed as being experienced in animal acquisitions and animal welfare are well known to Taronga. Both are experienced in Australian fauna only. An animal collection including elephants, lions, giraffe, rhino, wild dog, chimpanzee, baboon, Orang-utans, bear, gorilla, tiger, leopard, cheetah, Zebra, hippo, Meerkat and a range of other exotic animals requires specialist skills and depth of expertise and experience in exotic animal acquisition and animal welfare. These are animals with complex physical and physiological health and welfare needs. This remains a significant concern to Taronga and to the welfare of these species and the ability of SZPL to care for this range of wildlife in the short and long term.

Taronga Zoo is 28 hectares in size and SZPL is proposing 16.5 hectares with a significant collection of large mega fauna, many more than in the care of Taronga Zoo. This causes concern again regarding space required to not only care for the animals and meet their welfare needs, but also the space between species to ensure that they feel safe and secure in their environments.

Contemporary exhibit design requires investment. Taronga Zoo has recently invested \$17 million in the development of a Sumatran Tiger exhibit in order to achieve our animal welfare and conservation objectives. SZPL is proposing to invest only \$28 million in the construction of the entire zoo.

Page 37 highlights factors to consider in designing zoo and wildlife park programs and experiences. One of the factors considered is ‘Animal Selection’ which refers only to popularity of the species and education outcomes. It is concerning that animal welfare and the suitability of an animal based on its biological parameters are not highlighted as primary considerations in such experiences.

The basis of Taronga’s concerns in regards to animal welfare, is that if SZPL is unable to meet the welfare needs of the animal’s in its care or unable to meet community expectations, the risk is that the zoo will be unable to operate.

Taronga and other zoos in Australia may not be in a position to re-home the animal collection or provide employment for people that would become dependent on SZPL, particularly in the event that SZPL has the unintended consequence of first forcing the closure of Featherdale Wildlife Park.

Workplace Health and Safety

Taronga remains concerned over the specialist skills of the animal management team of SZPL. The team employed by SZPL have only experience with Australian fauna. Drawing upon 100 years experience in caring for exotic fauna Taronga highlights a significant WHS and public safety risk with the lack of skills and experience in caring for exotic fauna. Taronga notes that Peter Clarke from Zoos South Australia bio is listed in Annexure 7BA. Peter is an employee of a zoo in a different State. As a Welfare Committee member only, Taronga would not regard this as adequate specialist oversight or expertise in the development of the zoo exhibits, husbandry plans, safe work procedures or the WHS policies and practices in regards to exotic fauna animal care.

With Taronga's focus on wildlife conversation and welfare, and the risk to the State of NSW, we are willing and available to provide any future input as maybe required.

Yours Sincerely,



Tim Bain

Director Property, Infrastructure and Operations