

# Response to the Defra consultation on Standards for Modern Zoo Practice

## Who we are

1. BVA is the national representative body for the veterinary profession in the United Kingdom and has over 19,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. We welcome the opportunity to respond to this consultation on standards for modern zoo practice.

## Summary of our position

3. Our response focuses on three areas which are of particular interest to BVA members in their role as veterinary surgeons. We are aware that the British Veterinary Zoological Society (BVZS) is submitting a number of more detailed points and suggestions, and we are supportive of their views as our specialist division which support and promotes veterinary knowledge and scientific advancement in the health, welfare and conservation of free-ranging and captive wildlife, zoo animals and non-traditional companion animals.
4. Our response focuses on:
  - the requirements around the provision of veterinary care in zoos. In our view the level of care required and consequentially the number of prescribed veterinary visits should be reflective of both the size of the zoo and the overall number of animals held in the collection / the number of animals with complex care needs.
  - live feeding. We strongly support the proposal that live feeding of vertebrate prey must not occur. Further, although we acknowledge that the live feeding of some types of invertebrates may be necessary in order to meet the needs of some species or individual animals under certain circumstances, we are of the view that it should only occur when absolutely necessary.
  - the restrictions around the use of tethering. We agree that the use of flight restraint techniques should only be used where it achieves a net welfare benefit for the affected animal. However, we are also of the view that tethering may need to remain an option under a wider range of circumstances than those set out in the draft standards.
5. We have also been made aware that the Zoos Expert Committee Handbook is due to be discontinued as part of the update to the standards for modern zoo practice. We would therefore like to support the concerns raised by BVZS and others about the need to replace terminology such as 'where appropriate' and 'where justified' and to provide more detailed guidance in the new standards for the use by zoo licence inspectors, local authorities and zoo personnel.
6. We would also stress the need for adequate resourcing to be made available for some of the extra requirements introduced by the revised standards for example around documentation and regular training for zoo inspectors.

## Section 6: the need to be protected from pain, suffering, injury, disease

### 6.7 Veterinary Care

7. We welcome the proposed increase in requirements for veterinary input and involvement in small and medium size collections. However, this does not seem to be proportionately increased for

larger collections. Frequency should be increased proportionate to the overall number of animals held in the collection or the number of animals with complex care needs.

8. We understand that a number of establishments in the UK continue to operate without zoo licences, despite meeting the legal definition of a zoo in the ZLA. It is important that the loophole which allows smaller collections to change their designation to avoid some of the requirements set out in the standards, particular in relation to veterinary cover, is closed.

## Section 3: the need for a suitable diet

### 3.28 Live feeding

9. We strongly support the proposal that live feeding of vertebrate prey must not occur under any circumstances. Further, we are of the view that live feeding of invertebrate prey should only occur when absolutely necessary.
10. Invertebrates represent an enormous order of animals with arthropods, molluscs and annelids being the main groups used as food for other animals<sup>1</sup>. Live feeding of insects and molluscs can be acceptable under certain circumstances but should only occur when necessary. In all cases, the welfare needs of invertebrates should be met prior to feeding, covering adequate husbandry of feed species including access to food and water, behavioural opportunity, and parasite control. Additionally, a significant welfare issue arises at the time of consumption as not all live food is killed instantaneously, and zoos should be required to try and minimise suffering at that stage.
11. The feeding of invertebrates also carries an increased public health risk stemming from known and unknown pathogens in the production cycle of the invertebrate. There is also the risk of escape and infestation of the premises or wider environment with potential consequences for native populations. The risk of uneaten prey establishing itself in the enclosure/cage also needs to be taken into account.
12. The feeding of live invertebrates to animals forming part of a zoos exhibit, also raises the issue of zoos potentially appearing inconsistent in its approach to invertebrate welfare needs compared to the treatment of its own invertebrate collection. Research of invertebrate's perception of pain is ongoing and the standards should allow for the introduction of new restrictions in this area.

### Appendix 1.6.20 Tethering

13. We are supportive of the views set out in the BVZS position statement<sup>2</sup>. In our view the use of flight restraint techniques is only acceptable if it results in a net benefit in terms of animal welfare. Non-invasive methods of flight restriction should always be the first choice. If that is not possible expert advice should be sought, and an ethical review process established. It should not be used for cosmetic reasons and never become the standard handling procedure for the affected bird.
14. However, in accordance with BVZS, we are of the view that tethering still needs to remain an option under limited circumstances which go beyond the ones set out in the draft standards. In our view tethering should still be allowed for short periods in the following situations:
  - a. Training and retraining
  - b. Securing birds during transport
  - c. Veterinary treatment and rehabilitation
  - d. In emergencies in case of damaged aviary or similar

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<sup>1</sup> Cooper, J.E., Williams, D.L., 2014. The feeding of live food to exotic pets: issues of welfare and ethics. *Journal of Exotic Pet Medicine* 23 (2014), pp 244-249

<sup>2</sup> [https://www.bvzs.org.uk/wp-content/uploads/2021/03/BVZS-Position-flight-restraint\\_part-1\\_tethering\\_FINALv2.pdf](https://www.bvzs.org.uk/wp-content/uploads/2021/03/BVZS-Position-flight-restraint_part-1_tethering_FINALv2.pdf)

15. The use of tethering should therefore be assessed on a case-by-case basis. Any decision to use tethering should be justified in a documented welfare assessment with any decision to use tethering.
16. As set out in the BVZS position paper, current opinion states that non-raptor species should not be tethered, along with owls, old world vultures, caracaras and secretary birds. This also applies to raptor species with particularly long and fine legs.
17. Other species should only be tethered for very limited periods of time