

Sydney Zoo Review of Taronga Zoo Sky Safari Response to Submissions

SSD 46807958

10th June 2025

This review has considered the Economic Impact Assessment (EIA) dated February 2025 and Social Impact Assessment (SIA) dated April 2025 submitted by Taronga Zoo as part of the Response to Submissions package for the proposed Taronga Zoo Sky Safari (SSD-46807958).

Sydney Zoo contends that Taronga Zoo has still failed to satisfactorily respond to Sydney Zoo's concerns about the adequacy of the submission by Taronga Zoo on this project. Rather it appears that it has elected to try to minimise and avoid the issue.

The Economic Impact Assessment (EIA) states that

*"The refurbishment of the Sky Safari is replacing transport infrastructure that **... is not intended to become a significant contributor to increased visitation levels and revenue.**"*

Consequently, the Social Impact Assessment then also states that

*"The EIA concluded the proposal is **not intended to increase visitation levels or revenue and, as such, is not expected to have any adverse economic impact on Sydney Zoo.**"*

The net effect of these (rather expedient) statements is essentially that Taronga asserts that no further meaningful work needs to be done to satisfy Sydney Zoo's concerns about procedural adequacy in the Taronga submission and the potential impact that this new and significantly expanded Sky Safari might have on the community.

However, contrary to this new idea that visitation will not increase, Sydney Zoo highlights that one of the identified Project Objectives in the EIS is to:

*"Provide unique, affordable, family-focused sightseeing tourism infrastructure that provides comfortable all-season experiences **to support year-round growth in visitation to the Zoo.** This will assist in **securing the financial future** of the Zoo to ensure that it can continue to undertake a range of conservation and education projects."*

This statement was repeated without qualification 4 times throughout the EIS – it is evidently an important objective of the project. The positions of the Project Objectives and the EIS and SIA are contradictory, and this raises a number of issues that need to be addressed by Taronga. The construction of the new and significantly expanded Sky Safari development is EITHER:

- A. A primarily commercial venture that in accordance with the primary objective of the EIS is designed to support visitation growth and the financial future of Taronga, OR
- B. It doesn't increase visitation and therefore undermines a fundamental objective of the project

We note two points in this context,

- 1) that Taronga has elected not to publish any visitation growth or patronage figures for either Taronga Zoo or the Sky Safari that will allow the issue to be closed out.

Without understanding the visitation assumptions, concerned citizens are effectively asked to trust that the expedient logic of "*supporting year growth in visitation to the*

zoo to assist in its financial future" can be reconciled to "not increasing visitation levels or revenues", and

- 2) the statement in the original Project Objective explicitly links increased visitation to Taronga's ability to perform its social good outcomes by "securing its financial future". By implication, this means that any corresponding competitive impact that causes a decrease in Sydney Zoo visitation will necessarily have an adverse effect on Sydney Zoo's ability to perform its social good outcomes. In which case – Taronga must make appropriate submissions to justify the potential social cost.

Continued Inadequacy of Process

The substance of the Sydney Zoo objection is that the EIS has failed to account for the source of these increased visitors and therefore the potential adverse impact on Sydney Zoo visitation and its ability to conduct its own social good activities.

Sydney Zoo receives approximately 1 million visitors per annum. We have done this by substantially growing audience participation in Sydney, especially in Western Sydney. In doing so we have clearly offered a recreation, community and conservation service to the community that was previously unmet, and that is highly valued by the community. These visitation levels are on par with Taronga and this change in the market dynamic needs to be acknowledged: Taronga Zoo is no longer an effective monopoly in Sydney.

As a responsible government agency that now competes in the market for visitors with Sydney Zoo, Taronga needs to do the appropriate work in order to ensure that the substantial community contribution provided by Sydney Zoo is not adversely affected by its actions, especially when developments are funded through grant money that provides them a competitive advantage.

The Economic Impact Assessment and subsequently the Social Impact Assessment (such as they are) follow a flawed circular logic: i.e. that a fully developed Social Impact Assessment is not required due to the assumption that visitation will now not grow, which is contrary to the stated Project Objectives in the Economic Impact Statement. The logic is flawed because:

- A. The assumption of no increased visitation is not an outcome of the Economic Impact Assessment, but rather an underlying assumption that has informed the scope and methodology of the EIA. The source of this assumption is not published or otherwise accounted for.
- B. The Social Impact Assessment then relies on the Economic Impact Assessment. The SIA goes on to state that: "**Based on the findings outlined in the EIA, the SIA assessed the potential social impacts raised by Sydney Zoo, relating to loss of employment, training and programs, to have **no or very low levels of social impact.****"
- C. This is clearly not true as the EIA makes no such conclusion. Rather, the EIA was based on an assumption (not conclusion) that "*The redevelopment of the Sky Safari is not intended to become a significant contributor to increased visitation levels and revenue.*"

The new premise that the Sky Safari is now **not** intended to be a significant contributor to increased visitation levels and revenue for Taronga Zoo is therefore of major significance in determining the adequacy of the EIA and SIA assessments.

Sydney Zoo simply seeks that the assessment process is fair, equitable and transparent, and we believe that the Taronga submission still fails to address this. Sydney Zoo wouldn't object to a major capital project that has clearly linked conservation outcomes. The Sky Safari has a tenuous conservation linkage and so therefore it demands a level of scrutiny.

The Project Objectives in the original EIS strongly imply that the Sky Safari is, in fact, intended to drive increased visitation, and it seems expedient of Taronga Zoo to now suggest to the contrary as a basis for its Economic and Social Impact Assessments. It seems more likely that

the very significant capital expenditure associated with Sky Safari is actually intended to drive increased visitation, and it is hard to imagine that the expenditure could be justified in any other way.

It is inconceivable that the \$77 million project would be considered without detailed modelling of the underlying visitation assumptions. For transparency, Taronga should publish the visitation assumptions behind the development. We assume this work will have already been done as for NSW Government projects, NSW Treasury sets out clear requirements that state it is **mandatory for a Cost-Benefit Analysis (CBA)** to be conducted before a government project can proceed. These are primarily governed by Treasury policy papers, particularly TPG23-08: NSW Government Guide to Cost-Benefit Analysis, and other supporting frameworks like the NSW Gateway Policy and NSW Economic Appraisal Guidelines.

Having regard for clear Government policies, it would be more appropriate, and result in a more robust assessment, if Taronga Zoo identified a reasonable expected uplift in visitation associated with Sky Safari, undertook a comprehensive assessment of that predicted increased level of visitation, and applied appropriate adverse social impact mitigation and management measures accordingly.

The assessment of Sydney Zoo's own development application (SSD-7228) created a precedent for the assessment of social impacts arising from increased competition between zoological facilities that might result in economic impacts of an existing facility (and therefore affecting their ability to continue delivering their social programs).

Consistent with this precedent, we reiterate that Taronga Zoo should be similarly required to identify the potential economic and financial impacts of increased visitation at Taronga Zoo on Sydney Zoo, and nominate mitigation measures that could be applied to minimise these impacts to a reasonable level – in the same way that Sydney Zoo was required to do in relation to its potential impacts on the Featherdale Wildlife facility.

We note that as a result of the assessments under Sydney Zoo's own development application, the development consent SSD-7228 includes a range of conditions that are intended to manage the impacts of this competition. Conditions were imposed on Sydney Zoo including various daily visitor caps (relating to overall visitation as well as limits for particular activities and particular times of the day), as well as restrictions on certain activities that were deemed to be the most problematic in relation to diverting visitation away from Featherdale (e.g. restrictions on native animal exhibits, bird exhibits and Koala experience activities).

Without the data used by Taronga to justify the proposed \$77 million project, we are not in a position to specifically propose what, if any restrictions, should be placed on the significantly expanded Sky Safari development in order to preserve Sydney Zoo's ability to continue its social good activities (highlighted in the Sydney Zoo CSR brochure – provided as **Attachment A** for context). We note that in the 5 ½ years since Sydney Zoo commenced operation we have established ourselves as an integral part of the community, particularly in Western Sydney, and the importance of the work Sydney Zoo does is very high.

During that 5 ½ year period Taronga has a history of competitive behaviours against Sydney Zoo (e.g. they attempted to sue us over our name, they compete in the market for advertising search terms) which we contend is inappropriate for a government organisation that receives substantial grant funding and therefore has a significant competitive and financial advantage. This history of competitive behaviour is contextually important when considering the motivations of Taronga when crafting its responses to Sydney Zoo.

It is self-evident that Taronga and Sydney Zoo are competitors and this competitive behaviour by Taronga has the potential to adversely impact Sydney Zoo's economic viability and as a consequence, our ability to deliver conservation, education and charitable outcomes to the general community, and the community of Western Sydney in particular.

It is therefore fair and reasonable that Sydney Zoo seeks to hold Taronga to account on the purpose and return of an extremely expensive capital investment for what is effectively a commercial venture that incidentally supports Taronga's conservation objectives.

The scale of the proposed investment in the Sky Safari project is enormous. To put it in context the budgeted cost of \$77m **exceeds the total original cost** of constructing Sydney Zoo. It is not correct to minimise the development as a "refurbishment" of existing infrastructure: The proposed development is a major increase in the scale and scope of the Taronga Sky Safari that is clearly commercial in nature. The argument of a direct conservation outcome is tenuous, yet the scope and scale of the proposed development is a massive expansion of what is already there.

If, as is now claimed, the primary objective of the \$77m investment is social benefits, not visitor growth, then Sydney Zoo contends that any number of options for investment can provide a higher social return. For example options like free schools admissions would be a higher and better use of the money: In 2022 Sydney Zoo, with our commercial partners Harvey Norman, provided the opportunity for all year 2 students to attend the zoo free as part of an excursion – this was accepted by approximately 20,000 Western Sydney school kids at a cost of \$200k. For \$77m Taronga could facilitate free entry to 80,000 school students a year for almost 50 years.

It seems evident that the Sky Safari is primarily a commercial venture. As a commercial venture, NSW pricing competition policy requires that pricing and competition reflect an economic return - so Taronga must demonstrate the economic return in term or that the proposed social benefits of the Sky Safari are the maximum on offer.

Sydney Zoo believes it will be nearly impossible for Taronga to justify the economic return of the Government's \$77 million funding of the Sky Safari project. In light of the social good that Sydney Zoo provides and the obvious competitive issues, Taronga must demonstrate competitive fairness or that it has fully assessed the social and economic impacts. It has done neither and instead sought to minimise the issue through contradictory statements around no visitation growth.

Conclusion

It is Sydney Zoo's opinion that Taronga should be transparent on the expected visitation numbers and share with the public the Treasury assessment of the project.

Publication of the actual visitation projections will demonstrate that EITHER:

- a. The Sky Safari is, in fact intended to increase visitation as per the stated Project Objectives in the EIS – in which case a full economic and social impact study should be done (it has not), and further, in accordance with NSW government policy, Taronga must demonstrate that the Sky Safari provides a commercial economic return.

If it doesn't provide a commercial economic return, or is expected to adversely impact on Sydney Zoo, then in order to avoid unfair competition and protect Sydney Zoo's ability to continue its socially beneficial work, then something like a separate charge or ticket cost must be implemented for riding the Sky Safari should be implemented as a remedy.

OR

- b. If the Sky Safari doesn't look to increase visitation as is now claimed, then we would request this claim is supported by preparation of a Social Impact Management Plan as per the NSW Dept Planning social impact assessment guideline Feb 2023 (section 5) in order to ensure that there are no inadvertent social impacts from the development after operations commence.

As a minimum disclosure, the Social Impact Management Plan should include specific disclosures and forecasts of patronage as per disclosures provided in the Taronga Annual Report 2017/2018 (ref page 22) – noting that in 2017/2018 Taronga provided detailed audience segment analysis by facility, whereas in the FY 2024 report, it only

provides an aggregate and approximate number – public transparency on this metric has significantly declined in recent years.

As part of the Social Impact Management Plan, and consistent with the Sydney Zoo development consent SSD 7228, Taronga Zoo should be required to make *"genuine and reasonable attempts to consult with local recreational facilities and businesses to enhance regional tourism"* including to *"outline initiatives that can be implemented to encourage and enhance continued operation in conjunction with local recreational facilities and businesses"*.

We are happy to work collaboratively with Taronga on how these initiatives might be achieved and would request that the Social Impact Management Plan should address these matters in the event that there are inadvertent social impact as a result of the significantly expanded redevelopment of the Sky Safari

Taronga Zoo is a major government institution that does a significant amount of public good works. Since 2008 it has received almost \$800m in capital grants (in inflation adjusted terms): That is far more than any other cultural institution in NSW, except the entirely rebuilt and relocated Powerhouse Museum.

Despite the tangible public good that it does, Taronga still has a responsibility to ensure that the capital it applies to its major developments minimises any adverse consequences on the community at large. The substantially increased scope and scale of the Sky Safari redevelopment is primarily commercial in nature. Any conservation benefits are tangential to the stated Project Objective of increasing visitation. It is appropriate therefore, that Taronga performs the work required to ensure that there are no adverse social effects from this significant and costly commercial venture.

Sincerely



Jake Burgess - Managing Director
Sydney Zoo

SYDNEY ZOO

Corporate social responsibility

JANUARY 2025





VISION

**Connect people
with animals to secure a
sustainable future
for wildlife.**



MISSION

**Deliver a world class
guest experience that
encourages the
community to make
a difference.**



Australia's most advanced zoo in the heart of Western Sydney

Sydney Zoo opened on December 6th, 2019.

It is a world-class zoo that has quickly become one of Western Sydney's iconic institutions.

Embracing technology and innovation to improve animal welfare, visitor engagement and education, Sydney Zoo exhibits a wide range of animals (exotic and native) in a safari-like experience.

Clever designs hide barriers to make it more immersive and engaging than traditional zoos.

The development of Sydney Zoo has provided families with a major attraction unlike any other in Australia.



Sydney Zoo Snapshot SINCE OPENING

4.0m visitors



120,000
MEMBERS



241,258
STUDENTS



2,300,000 RESIDENTS LIVE WITHIN 20 MINUTES



98% OF SURVEYED VISITORS AGREE THAT SYDNEY ZOO WORKS TO PROTECT WILDLIFE AND WILD PLACES



4,000+
animals

180+
species

NATIVE & EXOTIC



42
ACRES



5
PRECINCTS



\$702,000

**Donated and raised
for charitable causes**

(cash and in-kind)



3 RETAIL
OUTLETS



5 FOOD
OUTLETS



336
EMPLOYEES

Animal welfare

Animal welfare is our top priority.

- ✔ Sydney Zoo is operating at the gold standard for animal welfare. Our animal's habitats exceed modern standards on average several times over.
- ✔ In May 2020 we achieved our ZAA Accreditation for high standards of animal welfare.
- ✔ We are one of a handful of zoos in Australia performing regular self-audits on animal welfare on all species in our care.
- ✔ We have developed specialised welfare self assessment for reptiles.
- ✔ Animal husbandry practices introduce daily variance to promote natural behaviour and provide mental and physical stimulation.
- ✔ We are an active participant in ZAA administered, endangered animal breeding programs.
- ✔ We report to an external Animal Welfare committee composed of industry leaders, microbiologists and animal welfare specialists.

ANIMAL WELFARE ADVISORY BOARD



Mauritz Basson



Will Meikle



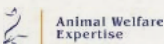
Jake Burgess



Dr Derek Spielman



Dr Isabella Clegg



Stephen Standley

Animal welfare expert

Our footprint

ENHANCING WESTERN SYDNEY BIODIVERSITY

- ✔ Over 5,000 native trees and plants have been added to the site
- ✔ 32 nest boxes for micro bats and native birds
- ✔ Floating islands for wetland habitat improvement
- ✔ 7.6 acres of riparian native vegetation buffer zone
- ✔ Cumberland plain vegetation protection zone
- ✔ Over 100 wild native species have been spotted on site

OUR FOOTPRINT

CARBON NEUTRAL ENERGY

66% OF WASTE TURNED INTO COMPOST

- ✔ 66% of all produced waste is sorted and processed as organic waste and turned into compost.

6 MILLION LITRES OF RAIN WATER HELD ON SITE

- ✔ 80% of all water used for irrigation and moats is captured on site through the zoo's reticulated water system design. Over 6 million litres of water is held in our moats and dams.

Solar energy

A 300kw solar system has been installed as part of our goal to reduce our carbon footprint. Over 600 solar panels across 8 buildings are estimated to prevent over 200 tonnes of CO2 within the first year.



Community recognition

GLOW is the biggest and brightest light festival in Western Sydney.

Our inaugural event in 2022, was a 37-night festival that was sold out to an audience of 107, 000 visitors. Sydney Zoo received a letter of community recognition from the State Member for Prospect.





Rewilding the Eastern Quoll

In January 2025, Sydney Zoo achieved a remarkable milestone releasing five eastern quoll joeys – a species that has been extinct on the Australian mainland for over 60 years.

This rewilding initiative, in partnership with WWF–Australia, marks a major step in the zoo's mission to restore native species populations and support Australia's fragile ecosystems – a significant accomplishment for a zoo that has only been operating for five years.

The Eastern quoll release will see these joeys transferred to a rewilding sanctuary in NSW, where they will be safely reintroduced into a predator-free environment. The sanctuary provides an ideal habitat, free from the threat of feral animals, giving the quolls the best chance to thrive. These joeys will play a vital role in helping restore balance to Australia's ecosystems and offer hope for a brighter future for this locally extinct species.

EASTERN QUOLLS HAVE NOT BEEN
SIGHTED ON MAINLAND AUSTRALIA
SINCE 1963



Community charity support

Sydney Zoo benefits the Western Sydney and wider NSW community.

Our activities consider the social and environmental implications and our behaviour makes a genuine contribution to the community. We've made a promise to make a difference and we do this by supporting a range of charities that make a difference in the community.

\$702,000 TOTAL
DONATED AND RAISED

The Sydney Zoo Foundation, its partners and Directors have donated over \$702,000 cash or in kind support for both conservation and community charities.

HIGHLIGHTS

3,000

SICK/DISADVANTAGED CHILDREN & FAMILIES HOSTED AT SYDNEY ZOO

Highlights of the year were hosting the What Ability group at GLOW, and the Variety Christmas Party for over 3,000 kids and families who are sick or disadvantaged.

\$30,000 WHEELCHAIR DONATED

TO ZAHARRA, PROVIDING NEWFOUND MOBILITY AND INDEPENDENCE.

William Buck and Sydney Zoo, with the support of Sunrise Medical donated a customised wheelchair during GLOW.

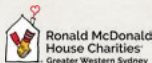
\$30,000 DONATED

TO RONALD MCDONALD HOUSE CHARITIES DANCE FOR SICK KIDS

\$25,000 TICKETS DONATED

TO WHAT ABILITY FOUNDATION

OUR CHARITABLE PARTNERS





Cultural focus

Sydney Zoo offers the largest First Nations heritage program in Australia that honours the Darug people of the land on which the zoo is built.

Developed in collaboration with Darug consultants, the Bungarribee Wildlife Experience celebrates ancient traditions, stories, and practices that highlights the deep connection Aboriginal people have shared with the land for tens of thousands of years.

Each year, tens of thousands of students and hundreds of thousands of visitors are immersed in Culture while surrounded by free-roaming native animals, leaving with a deeper appreciation for our shared environment.

- ✓ We have a meaningful First Nations employment program
- ✓ Sydney Zoo is committed to a minimum 10% full-time equivalent First Nations employment target
- ✓ We have recruited and trained First Nations people from the local Blacktown community
- ✓ We are developing a system for on-going training and progression for our cultural cohort
- ✓ Our team are mentored and supported by Darug consultants
- ✓ This is a unique experience delivered through guided tours





Conservation charity support



Sydney Zoo aims to inspire and empower our community to take meaningful action to protect wildlife through our Choose, Change and Contribute model.

Our Ambassador Species Program promotes positive behaviour change and support for our hero species: chimpanzee, tiger, eastern quoll, bull shark and rhino. This empowers our guests to take action for wildlife and connects our community with our chosen conservation causes.



"The Jane Goodall Institute Australia is thrilled to be partnered with Sydney Zoo. Their generous support is helping us create a safe and healthy future for chimpanzees and their habitats throughout Burundi."

JANE GOODALL INSTITUTE

OUR CONSERVATION PARTNERS





Educate our audience about what products they can buy that support wildlife.

CHOOSE

Products which are:



DESIRED OUTCOME

Zoo guests influenced and educated to choose sustainable and wildlife friendly products.



Educate our audience about what they can do in their daily lives to support wildlife.

CHANGE

Behaviour by keeping pet indoors at night, planting native trees in your backyard and recycling your old mobile phones.

DESIRED OUTCOME

Zoo guests to change their behaviour at home.



Educate our audience about what charities they can contribute to or assist the zoo in supporting from a monetary sense.

CONTRIBUTE

Charitable support

DESIRED OUTCOME

Zoo guests inspired to give money or time to a cause that supports wildlife conservation.



Education

At Sydney Zoo we believe that education is fundamental in a modern zoo. We have advanced education opportunities for students in Western Sydney.

Sydney Zoo delivers engaging curriculum linked programs developed by qualified teachers. Students can be amazed by the living world; inspired by our First Nations education team who tell stories of ancient Australian history and culture; or even learn the

aspects of the business behind a zoo. These programs are delivered on-site by experienced teachers, at schools or centres around Sydney via school incursions, and even reach audiences further afield through virtual excursions.

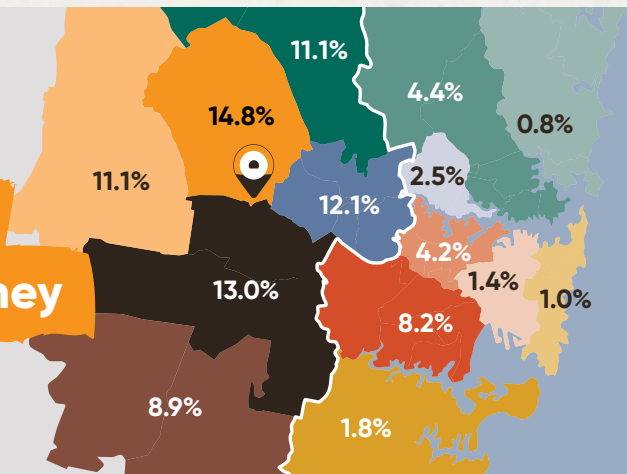
We offer formal education workshops that are tailored to the NSW syllabus:

Bungarribee Dreaming – A First Nations education team create a personal narrative as students learn about traditional music and dance, art, history, and the responsibility to care for Country wherever they find themselves.

171,293*

**Students from
Western Sydney**

*As at Nov 30, 2024





Living World – Explore environments, animal features, classification and adaptations as students get up close to our ambassador animals.

NEW Senior programs – Stage 5 Environmental change and management, Stage 6 Biological diversity and operating a zoo.

NEW Teacher professional programs – Offer teachers the opportunity to develop skills in traditional weaving, art and storytelling from our First Nations Education Team to benefit children in the classroom.

We provide free syllabus-linked resources from our website. Kids can connect with our animals through weekend and school holiday hands-on, child-focused programs.

241,258

STUDENTS HAVE ATTENDED

43,000

FREE EXCURSIONS ATTENDED
AS PART OF SYLLABUS
LINKED WORKSHOPS

\$180,000

SCHOLARSHIP FUNDING



3 Scholarships per year at Western Sydney University for tourism and ecology studies.

VOCATIONAL TRAINING

20 TAFE STUDENTS AND 20 TVET
STUDENTS EACH YEAR



Vocational training as required
Certificate III in Captive Animals.



Vocational training as part of their
Certificate II Animal Studies or
Primary Industries course as part
of their HSC.

WORK PLACEMENT

12 UNIVERSITY VET STUDENTS
EACH YEAR

Contributing to the growth and prosperity of western Sydney

At Sydney Zoo we're committed to a 10% full time equivalent First Nations employment target. Our Cultural Education program is led by Aboriginal guides who receive regular professional learning opportunities with First Nations consultants both

onsite and on Country. A mentor-style team structure of both Junior and Senior Aboriginal guides provides opportunities for continuous learning and support throughout employment with Sydney Zoo.



147

**Employees are from
Western Sydney**

As at Nov 30, 2024

"Sydney Zoo is one of Western Sydney's most significant tourism assets, attracting hundreds of thousands of local, domestic and international visitors every year. A world class attraction, with a new Airport set to open on its doorstep, it's going to play big role in Western Sydney's burgeoning visitor economy."

ADAM LETO
CEO, WESTERN SYDNEY LEADERSHIP
DIALOGUE

"Sydney Zoo successfully addresses the many needs of the Community. The Chamber board and the broader Business Community are thrilled to have Sydney Zoo as members. They actively support the local business community through advocacy, networking, and campaigning."

TREVOR OLDFIELD
PRESIDENT, GREATER BLACKTOWN
BUSINESS CHAMBER





SYDNEYZOO.COM

700 GREAT WESTERN HIGHWAY, BUNGARRIBEE NSW 2767