

1 February 2016

Rebecca Sommer  
Senior Planning Officer  
NSW Department of Planning and Environment  
GPO Box 39,  
Sydney NSW 2001

Dear Ms Sommer,

**RE: THE SYDNEY ZOO (SSD 7228)**

In reference to the Sydney Zoo State Significant Development Application (SSD 7228) for the new zoological facility situated at Bungarribee Park, we wish to provide the following submission.

Taronga Conservation Society Australia has always expressed an interest in being consulted in the Sydney Zoo 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 control.

We have therefore reviewed the Development Application which went on public exhibition on 10 December 2015 and are writing to you to request confirmation that the NSW Department of Planning and Environment ensure the following items are appropriately considered and addressed by the applicant.

**Space Requirements**

- The total site area does not appear to be large enough to meet the various standards for displaying and caring for all of the proposed wildlife. This could have negative impacts on disease and health management, hygiene practices and safety.
- Elephants, giraffe, rhinos, gorillas, oranges, hippo, zebra are all large herbivores requiring substantial food supply and therefore food storage; the area identified in Building 3 does not appear large enough to meet the nutritional needs of these animals.

**WHS and Animal Health**

- The Development Application does not provide an exhibit operational management plan that adequately addresses relevant animal husbandry policies, guidelines and practices, including any requirements under the Exhibited Animals Protection Act 1986
- The administration building (Building 3) indicates an office area for 3 Veterinary staff. This may not be adequate to maintain the health of the animal collection that is being proposed at the high standard that should be set by a new zoo. We therefore have concerns that the animal collections of this size would severely under resourced, if adequate accommodation facilities are not provided.
- Locating rubbish pickup adjacent to Building 3 Veterinary health area may negative impact on animal health management.
- The development application appears to contain little detail on managing biosecurity and associated quarantine considerations relevant for holding exotic fauna.

- It is likely that appropriate quarantine facilities will need to be built or identified that can accommodate the international quarantine of exotic species. Biosecurity policies need to be robust and aligned with the AUSVET Plan.
- There appears to be no provision for the management of large deceased animals. Adequate space for a pathology lab post mortem room should be included.

### **Welfare & Back Of House (BOH)**

- The development application does adequately show how the buildings are being thermally regulated /designed to control temperatures. Many of the species proposed for the zoo are not found in temperatures that are experienced in Western Sydney. For example gorilla, elephant, Sun Bear.
- Similarly, detail is lacking on what amenity (plant and equipment) will be provided with regard to managing aquatic exhibits; and what holding facilities will be provided for management of Nocturnal and Reptile house species. These elements are critical to animal welfare.
- The development application indicates provision for just 3 elephant holding stalls. Australian zoos participating in the elephant program are requested to hold male animals and a breeding herd. We therefore question whether the BOH and holding areas been designed to future proof for breeding of species that will need to be part of the regional breeding program.
- There are some conflicting spatial areas noted between BOH architectural drawings and the same areas in the BOH design principle plans.
- BOH locations need to be designed to take in consideration impact of neighbouring operations, e.g. elephants is adjacent to the car park may require separation/ more seclusion.
- Consideration should be given to minimising cross-over of human spaces and animal spaces to reflect WHS best practice.
- The species of rhinoceros intended for display is not specified. Black Rhino, Indian Rhino and White Rhino (the three species held in Australia) have very different spatial and environmental needs.
- Designs should avoid predator and prey visual lines.
- Zoo Aquarium Association of Australasia (ZAA) Elephant Management Guidelines and the Captive Management Plan for Asian Elephants should be followed in the absence of state or national standards for Asian Elephants.

### **Legislative Requirements**

- The Quarantine Act of 1908 and the Draft Biosecurity Act 2015 is a critical instruments in managing biosecurity in Australia. Any zoo that holds and imports exotic animals must be comply with the provisions of these acts and supporting regulations.

With Taronga's focus being on wildlife conservation and welfare, we are willing and available to provide any future input as maybe required.

Yours Sincerely,



**Tim Bain**

Director Property, Infrastructure and Operations