



How the Government of Alberta is Failing to Protect Animals in Alberta Zoos

Office of the Auditor General
8th floor, 9925 - 109 Street
Edmonton, Alberta T5K 2J8
Canada



Voice for Animals Humane Society, Box 68119, 162 Bonnie Doon Mall, Edmonton, AB T6C 4N6

"Though my evaluation of the legal efficacy of the Zoo Standards and accompanying regulations remains ongoing, I am concerned about the extent to which these standards, in their present form, have the capacity to protect zoo animals from harm. They may have been enacted with the best of intentions, but the decision to invest multiple agencies with the power to address concerns about zoo animal welfare does not seem to have resulted in a clear and cohesive enforcement or administrative regime. There is good reason to believe that animals are suffering as a consequence."

Peter Sankoff
University of Alberta
Faculty of Law
Edmonton, Alberta
T6G 2H5

(780) 492-2599

www.petersankoff.com

Follow me on Twitter: **<https://twitter.com/petersankoff>**



Introduction

For two and a half decades, Albertans have been outraged by the conditions endured by animals in this province's zoos. Lucy the elephant has been languishing alone at the Valley Zoo for years, suffering from a respiratory condition that hasn't yet been diagnosed. Even when she was in better health, the Zoo flat-out refused to consider moving her to a more appropriate habitat. And now, despite her worsening condition, the Zoo refuses to have her examined by a qualified independent expert. Zoocheck Canada and People for the Ethical Treatment of Animals launched a lawsuit against the City of Edmonton in 2010, but it was thrown out, and the Supreme Court of Canada stated in 2012 that it would not hear anything more about Lucy's case.

While Lucy's plight at the Valley Zoo is awful, the conditions at the two biggest Alberta roadside zoos are far worse. The Discovery Wildlife Park in Innisfail was subjected to a review by Zoocheck Canada in 2007, two years after the province enacted the Alberta Zoo Standards. The twelve page written document highlights violations of these standards; more than 50 were found.

Most horrific are the conditions witnessed and documented at the Guzoo Animal Farm in Three Hills. It has been named Canada's worst roadside zoo by Zoocheck Canada, and has drawn the ire of countless animal welfare groups, activists, and Albertans. It has been the source of social media frenzies, inspired numerous petitions demanding its closure, and has been the subject of dozens of exposes and newspaper articles. The details vary, but the theme is always the same: GuZoo is not an adequate facility to house the animals it has, and the owner is neither knowledgeable nor caring enough to have these animals under his care. From animal corpses strewn across the property and maggot-infested food dishes, to injured and sick animals interacting with the public, there are endless reasons why this place should not be operational.

And yet, incomprehensibly this facility is still being granted a permit year after year by the Alberta Government, as is Discovery Wildlife Park.

Since the atrocious conditions were first documented at these facilities, the public's anger has been directed at the facilities and their owners. But it's time for a different approach. The shortcomings and violations at these zoos are well documented, and the people who own and operate them have demonstrated that they are unwilling to change their practices. Now, the onus is on the provincial government - the only ones who can make changes and hold these operators accountable for their blatant disregard of legislation. Up until this point, they have positively failed to do so – and that needs to change now.

In the following document you will read dozens of examples of the Alberta Government's persistent habit of passing the buck between departments in an obvious attempt to sidestep responsibility and avoid taking action to enforce legislation that they themselves came up with. But there are only so many departments to pass the buck to, and when all are questioned and still can't provide any answers, it becomes obvious that something is wrong with the system. Someone must be held accountable for the violations continuously witnessed at these zoos. And since the government won't hold the zoos accountable, the public must hold the government accountable.

Overview

- 2005 – The **Government of Alberta Standards for Zoos in Alberta** adopted.
- 2006 – Alberta zoos must submit a **Zoo Development Plan** within six months and non-accredited zoos must submit an **Animal Care Protocol**. Necessary facility upgrades must be completed within a year.
- Alberta Zoo Standards falls under 2 departments:
 - Environment and Sustainable Resource Development**. Except for Section III the Standards are administered under the Wildlife Act.
 - Agriculture and Rural Development**. Section III of the Standards is administered under the Animal Protection Act.
- Zoo licenses are issued by **Fish and Wildlife**.
- Inspection for compliance to Zoo Standards to be done by ESRD, except for Section III. This seems to be done sporadically and relies mostly on the Zoo Development Plans submitted by the zoos.
- Inspections for Section III compliance of the Zoo Standards are not done. Inspections done by the ASPCA, which has a mandate under the APA, has no effect on zoo permit/license renewals. Despite the fact a zoo may not be in compliance with the Zoo Standards their license may still be renewed.
- However, s. 141.1 of the Wildlife Regulations state:
 - Zoos must comply with the Alberta Zoo Standards**
- As well, s. 3(3) of the Animal Protection Regulations state:
 - A person who owns or controls a zoo for which a zoo permit is issued under the Wildlife Act must comply with the Government of Alberta Standards for Zoos in Alberta.**
- Due to the high volume of complaints about Guzoo and a number of disturbing articles and pictures in the media, ARD and ESRD contracted **Canadian Association of Zoos and Aquariums (CAZA)** in 2011 to do a review of Guzoo. CAZA found significant problems at Guzoo concluding that it was unlikely that compliance with the Zoo Standards was possible.
- The Zoo Standards had been in effect for 5 years by the time of the CAZA report. This should have been ample time for ESRD and ARD to take measures to ensure that Guzoo was in compliance with the Zoo Standards. However, despite the fact that there were multiple violations, year after year, ESRD continued to renew Guzoo's license.
- As a result of the CAZA report, the Alberta government did not renew Guzoo's license in 2011.
- Gustafsons (Guzoo owners) appealed the decision to the Court of Queen's Bench (judicial review application).
- Guzoo agreed to a Consent Order, which allowed them to continue to operate pending the judicial review being heard.
- Eventually SRD agreed to renew the license and the judicial review was dropped.
- A one-year operating license was again issued to Guzoo in 2013 and 2014 with no apparent changes being made at Guzoo.

Alberta Zoo Standards an Expensive Debacle

The Alberta Zoo Standards fail to protect animals in Alberta zoos largely due to the government's zoo permit process administered by Environment and Sustainable Resource Development (ESRD) Fish and Wildlife division with Section III (animal welfare) falling under Agriculture and Rural Development (ARD). Inspection for compliance with the standards is haphazard and enforcement is almost non-existent. Although the care and welfare of the animals should be of primary importance, however, it is not clear that it has any impact on issuing of zoo permits.

Pursuant to s 141.1 of the *Wildlife Regulation*, zoos must comply with the Zoo Standards.

Undoubtedly, writing new major pieces of legislation is an expensive affair for the government, particularly when it completely fails to achieve its intended purpose. Taxpayer money was spent consulting with a number of agencies to develop the standards as well as the establishment of an Alberta Zoo Advisory Committee. Money continues to be spent to deal with the continuous stream of complaints about GuZoo as well as other Alberta zoos because this government refuses to enforce its own laws.

Most problematic is that in April of 2011 the Canadian Association of Zoos and Aquariums (CAZA) was paid \$15,000 by the provincial government for an assessment of operations at GuZoo Animal Farm. Although this facility received a failing grade no changes are apparent at GuZoo in response to this report. Undoubtedly, this report has been a waste of taxpayers' money.

The following is a quote from the CAZA report. It is inconceivable that this owner can state outright that he has no intention of complying with the Zoo Standards and still continue to get his permit renewed.

"The position of the owner with respect to several key requirements of the Alberta Standards is an issue. The owner has not put in place an identification program and has clearly indicated he does not plan to do so. In addition he has not put in place an environmental enrichment program that includes appropriate staff training, and again has indicated no intention of doing so in the future.

One requirement of the contract was to offer an opinion regarding how long it would take, or even if, the facility could be brought into compliance with the Alberta Standards. Given the underlying issues of insufficient resources and the owners position on the Standards it seems unlikely without a significant change in one or both of these that compliance is achievable."

CAZA Report

May 2011

Below are statements by various government officials and agencies involved with the Government of Alberta Standards for Zoos in Alberta (GASZA) and the Animal Protection Act (APA). These quotes illustrate the level of mismanagement, flawed administration, confusion and shirked responsibilities concerning the Zoo Standards.

“Enforcement under the Animal Protection Act is reactive, not preventative, and it is our position that zoo animal welfare would be improved by including animal welfare requirements in the zoo permitting process.”

Terra Johnston,

Executive Director of the Alberta Society for the Prevention of Cruelty to Animals (SPCA). March 6th, 2014.

“Part III (Standards Related to the Animal Protection Act) of the Government of Alberta Standards for Zoos in Alberta (GASZA) involves animal care in a zoo. These standards fall under the regulatory authority of the Animal Protection Act, which is administered by Agriculture and Rural Development (ARD), not ESRD.”

David DePape

Resource Manager (Acting)

Fisheries and Wildlife Management

Operations Division

South Saskatchewan Region

“The standards are now maintained by Environment and Sustainable Resource Development.”

Jeff Stewart, Ph.D.

Executive Director

Food Safety and Animal Welfare Division

“The Animal Care standards outlined in Part III of the Alberta Standards for Zoos fall under the regulatory authority of ARD. Never the less if ESRD inspection identified a significant animal care concern this information would be provided to ARD for their action.”

Craig Brown

ESRD Info-Centre

“I absolutely agree that in order to contribute to a permit inspection in a meaningful way, a zoo management specialist is necessary. I am not aware that ESRD or ARD has this expertise in house.”

Michelle Follensbee

Agriculture & Rural Development

“Every department is responsible for developing the inspection and investigation programs and processes for its own statutes. As the Wildlife Act and the Animal Protection Act are under the mandate of ESRD and ARD, those departments are responsible for developing the enforcement programs for those particular statutes.”

Jonathan Denis, QC

Minister of Justice

Inspections under Section III (animal welfare concerns) of the Zoo Standards are not routinely done and they do not have an effect on the permitting process.

“Our peace officers typically conduct two inspections annually at the zoos within our jurisdiction. Because these inspections are under the authority of the Animal Protection Act, they are completely separate from and have no bearing on the zoo permitting process.”

Terra Johnston,

Executive Director of the Alberta Society for the Prevention of Cruelty to Animals (SPCA). March 6th, 2014.

animals at a location into protective custody. However, such an action does not constitute a prohibition against animal-related activities at that location.”

Terra Johnston,

Executive Director of the Alberta Society for the Prevention of Cruelty to Animals (SPCA), March 6th, 2014.

“CAZA determined that Guzoo has not complied with the Standards. No animals have been removed from Guzoo at the behest of SRD or the ASPCA, or any other agency, despite the Animal Protection Act allowing for animals to be removed by a peace officer if they are found to be in distress.’

Lynn Gustafson wrote in his affidavit challenging the closure of his zoo in June 2011.

BY BILL KAUFMANN, CALGARY SUN

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Tortoise taken from embattled Guzoo animal farm. (Photo source Concerned Albertans for Animal Welfare and Public Safety)

“Following a public complaint, an Alberta SPCA Peace Officer removed one Sulcata tortoise from GuZoo Animal Farm out of concern for its welfare. ”
SPCA October 2011.

In addition, raccoons were removed in 1992 and unknown exotics were removed in 1993 when GuZoo was charged with animal trafficking

ESRD requested an updated Zoo Development plan from GuZoo in part as a result of the concerns identified in the CAZA report. The updated Zoo Development plan was a condition of permit renewal in 2013. The updated Zoo Development Plan provides information (no mention of corrective action) in response to the requirements of Section III in the standards.

Craig Brown

ESRD Info-Centre

“Alberta Agriculture and Rural Development (ARD) has jurisdiction over the standards relating to animal exhibits and care, which are administered through the Alberta SPCA.”

Brendan Cox

Public Affairs Officer Justice and Solicitor General

This is simply not true, the ASPCA does not inspect for Zoo Regulation compliance.

“The Government of Alberta works through the Government of Alberta Standards for Zoos in Alberta to ensure zoos provides protection and care for zoo animals...”

Ron Cambell

Minister of ESRD

The minister completely fails to explain what he means by “works” and how they “ensure” protection for zoo animals. ESRD does not have authority to inspect or enforce Section III of the Alberta Zoo Standards and ARD is unable or unwilling to criminally charge a facility under the APA with zoo standard violations.

These standards were developed by the Department of Alberta Agriculture Food and Rural Development when the GASZA was produced. They were also reviewed by the SPCA, CAZA and the Wildlife Committee of the Alberta Veterinary Medical Association (AVMA). ESRD defers to ARD on matters covered by Part III and the Animal Protection Act.

David DePape, Resource Manager (Acting)

Fisheries and Wildlife Management

Operations Division

South Saskatchewan Region

Section III of the Alberta Zoo Standards is largely unaddressed except by the Zoo Advisory Committee and the Zoo Development Plans. The lack of Inspection and enforcement has effectively invalidated animal care as described in the Standards.

“Neither the Alberta SPCA nor a representative from our organization sits on the Alberta Zoo Advisory Committee.”

Roland Lines

SPCA Communications Manager

Inspections

“It is my understanding that changes to the Inspection powers {Section 10(1) of the Animal Protection Act} for a Peace Officer would be necessary in order for an inspection to cover the entire scope of the Standards. Those powers are currently limited to transport vehicles and the animals themselves. The change in inspection power is possible but that leads me to a next step in the process which takes more work – what would the remedy be for a failed inspection, and, most importantly what are the implications of those remedies for the animals? Our options today, under the Animal Protection Act are limited to prosecution. Ultimately a judge decides on a fine and/or prohibition. I think more options are required to ensure corrective actions are undertaken and in order to make sure there is a positive outcome for animals. These options would need to be applicable to all facilities.”

Michelle Follensbee

Agriculture & Rural Development

Zoo Standards enforcement must be done in the licensing process and not in the courts.

“It is our position that the Alberta Zoo Standards do benefit animals in zoos since the standards set a minimum standard of care which must be met by zoo operators and the animal care protocols required in Section III of the standards are reflected in the Zoo Development Plans which influence Zoo permits.”

Craig Brown

ESRD Info-Centre

Section III Standards dealt with in the Zoo Development Plan are only practiced in theory; however, no inspection occurs to assure these are implemented at Alberta Zoos.

“Our peace officers have the authority to ask to see a zoo operator’s permit, but they do not have access to the zoo’s development plan. As a result, our peace officers’ conduct their inspections or investigations without knowledge of the animal care protocols approved by the Government of Alberta during the zoo permitting process, including any deviations from the Alberta zoo standards.”

Terra Johnston,

Executive Director of the Alberta Society for the Prevention of Cruelty to Animals (SPCA),

March 6th, 2014.

The Zoo Standards do not protect zoo animals. Zoo owners need only file proper paper work for ESRD in order to receive permits. The Actual condition of the Zoo is irrelevant as no agency inspects or enforces Section III of the Standards. If it is unreasonable to charge a zoo owner with animal cruelty for Zoo Standard violations then non-compliance with Section III must be cause to withhold or revoke a zoo permit.

“If we (SPCA) were able to enforce that (zoo standards), I mean, we don’t even have that on our appointment, if that was on the appointment & you know we were able to go out there (GuZoo) and pursue that sort of stuff (Zoo Standards) then it wouldn’t be a problem for sure. It almost seems like everyone is going around in circles in regards to this here & no one wants to take any kind of responsibility for it.”

Rick Wheatley, Peace Officer

Southern Regional Supervisor

Alberta SPCA (phone call recording)

“All Acts and associated regulations are reviewed and revised as needed on a regular basis. The Animal Protection Act and Regulation are scheduled for review in 2015 and July 2014, respectively. The reviews allow for clarification and/or changes to reflect new knowledge or technologies associated with a particular act, regulation, or standard.”

Jeff Stewart, Ph.D., Executive Director

Food Safety and Animal Welfare Division

ARD revisions to the Animal Protection Act will not remedy the inter-ministerial Zoo Standard issues. ESRD must include ARD in inspections for compliance for zoo licensing.

Food

CAZA report photo, May 2011.

Winter holding - food preparation area- generally unkempt and poorly maintained.





Photos taken June22, 2013 at Guzoo



June 28, 2013

Filthy food preparation areas with rotten fruit and stickers not removed. Conditions such as these, addressed by the CAZA Report as Zoo Standards violations, continue due to a failure to inspect and enforce Section III of the Alberta Zoo Standards. As well, conditions such as these are not currently Animal Protection Act crimes since the government claims that the animals are not in immediate and dire distress as a result of poor zoo management. The SPCA cannot or will not address zoo standard violations such as this.

Good Zoo management as described by the Zoo Standards is either a permit requirement or the definition of a crime as described by the Animal Protection Act needs to be changed to include poor zoo management as animal cruelty.

Photos taken June 28th 2013 at the Guzoo depict the same unchanged conditions the Guzoo was closed for in 2011. Why are these zoo standard violations not addressed?



Photo taken July 2nd, 2013

Maggots and filthy food preparation are a Zoo Standard violation noted by the CAZA report, a violation the owner claimed he needed time to comply with. Yet 2 years later, he still has the ability to violate the standards due to the lack of enforcement and inspection. The absence of Section III Zoo Standards inspections allows this neglect.



Photo taken July 7th, 2013.

Again it depicts a lack of respect for the following Alberta Zoo standard:

“Feeding and watering containers must be kept clean and self-feeders and watering devices must be checked daily.” Alberta Zoo Standards, pg.16.

Handling and Disposal of Corpses



Photo taken in 2011 displays typical Guzoo food storage.

“The feeding of dead stock tainted with barbiturate resulted in the death of one tiger. All dead stock and road kills represent a health risk because the reason the animal was culled or why it wandered onto the road is unknown.”

CAZA Report 2011.

“Food must be stored in a manner which preserves the nutritional integrity of the material until fed, prevents contamination by organic, inorganic or chemical contaminants and prevents access by pest species”

Alberta Zoo Standard, pg16.

Bone and Hide to be Cleaned Up Daily.

“10) GuZoo Development Plan, 2006.”



March 15, 2013

"I have learned carcass disposal is regulated by the Animal Health Act, which is under Alberta Agriculture and Rural Development.

Also, as per the disposal of domestic animal carcasses, when Agriculture and Rural Development receives a formal complaint (call 310-FARM) about improper disposal of animal carcasses, their investigators visit the property to assess the situation. If the carcasses have not been disposed of properly, investigators work with the property owner to develop an action plan and timelines that must be met."

Brendan Cox, Public Affairs Officer Justice and Solicitor General

Q: "What were the specific regulation which enabled you to demand Lynn Gustofson put his corpses in a fenced off area?"

Voice for Animals

"Disposable Destruction of Dead Animal Regulation and Alberta Health also has legislation that pertains to this matter. I am not familiar with the zoo legislation as you know I am in Agriculture and Rural Development and usually deal with agriculture producers."

Ed Turco

Cages to be Cleaned Weekly

Alberta Zoo Standards

March 30th, 2013, (NOTE; These are the conditions the zoo exhibits during a permit renewal inspection)



Nothing has been cleaned up since March 15, 2013

ARD is unable to address the Zoo Development Plan stipulation to 'clean up Bone & Hide Daily' due to the ESRD Zoo Permit process which fails to include or consult with ARD authorities.

NOTE: The coyote exhibit had the same corpses rotting 15 days later, which is longer than the maximum time allowed by the animal care protocol which states that carnivore exhibits will be cleaned weekly. Non-compliance with this protocol cannot currently be addressed by ARD, who have authority to address the issue, since ESRD will not or cannot divulge the zoo's Development Plan.



June 22nd, 2013. Two horse carcasses. Horses died from unknown causes in a Guzoo Animal Farm shelter.

Corpse Pile

July 7th 2103 at GuZoo. Countless animals are rotting as livestock, wildlife and domestic dogs pose a risk of disease transmission from the Zoo.



June 28th 2013 at GuZoo.

Despite the development plan stipulation, ESRD did not address the improper corpse disposal which should have ended in 2006 when the GuZoo created the development plan that clearly states 'Bone & Hide to be cleaned Daily'.

ESRD does not share information with ARD and the result is that corpse piles collect in Alberta Zoos and become a health concern for both animals and humans.

"Obviously the contact the dogs had with dead animals was a concern and was addressed."

Garth Gosselin

Supervisor, Red Deer Service Area

Central Zone, Alberta Health Services

A Joint inspection of GuZoo was conducted by ARD, SPCA, Fish & Wildlife and Alberta Health in October of 2013. This inspection was largely conducted based on the concern caused by the failure of the GuZoo to comply with the Zoo Development plan statement 'Bone & Hide to be Cleaned Daily'.

The inspection resulted in an order by Alberta Health & ARD, it states that the owner 'must clean bone and hide daily' and all corpses must be kept in a fenced off area which will prevent access by other animals.

This inspection did not include an assessment of any Section III Zoo Standards concerns since none of the officers involved had the authority or ability to do so. Had ESRD communicated its concerns during the permit process the danger to the public and animal welfare would not have existed for the past 7 years and many other Zoo Standard violations would also have been addressed.

Additional Violations



July 7th, the day an Alberta zoo burned prohibited plastics, tires, shingles & corpses.



After ESRD informed the Guzoo of proper burning practices, the zoo owner further demonstrated his refusal to obey the law and placed tires, more shingles and plastic chairs in his burn pile/zoo corpse pile. This exemplifies both the Zoo owner's lawlessness & the government's utter failure to monitor Alberta Zoos.

Shelter

11) "Elk amendment; amount of space ok. Must ensure adequate shelter, fencing and that appropriate regulations are met." Guzoo Development Plan 2006



The Elk in the top left have no refuge from the winter element. Philip Shaw made several requests to SPCA, ARD, Fish & Wildlife & ESRD to compel the Zoo to provide a shelter for the animals. He was told the animals in nature would take refuge in a forest from a blizzard, they are naturally equipped to survive a -40 Alberta blizzard by laying down and allowing snow to blow over them. Philip Shaw accepted the statements from the officials that they had no authority to instruct the zoo to provide shelter to the animals.

However, the development plan states otherwise which further demonstrates the flawed permit process. It

begs the question why animal care is cited in the development plan. Are citations in the development plan permit requirements or are they useless letters in documents we, as tax payers, are charged for?

“The shelter with the elk is not an issue.”

Constable Rob Harms, Three Hills.

After months of debate regarding elk shelters in a zoo, we finally discovered the zoo development plan which stated ‘Must ensure adequate shelter’. Alberta SPCA and Fish and Wildlife went to Guzoo and then consulted with the Calgary Zoo. Incredibly, adequate shelter has now been defined as ‘divots’ in the ground according to Constable Rob Harms of the RCMP. We must ask the question, why do we pay the Zoo Advisory Committee to develop Zoo Development plan revisions when they are not enforced but instead are ignored for a suggestion by another zoo at the request of the SPCA, RCMP & Fish & Wildlife?

“I have been able to speak to the officers who inspected the site in March. We have determined that this issue was addressed satisfactorily and from our view is sufficient.”

Trevor Miller

Superintendent

Southern Region

Fish and Wildlife Enforcement Branch

Justice and Solicitor General



Photo taken March 15th 2013 depicts Japanese Macaques without weather protected, insulated winter shelter which can maintain adequate temperatures.

“The Japanese macaques should have a weather protected, insulated winter shelter. AZA Minimum Husbandry Guidelines for Mammals suggests access to indoor holding facilities with temperatures between 18-29C (65-85F) during periods of cold temperatures.”

2011 CAZA Report based on Alberta Zoo Standards.

Fencing



March 15th, 2013 at Guzoo. The location of the dog is where we have asked a secondary perimeter fence be built. Video documentation (see link below) has revealed the Guzoo dogs attack the Japanese Macaques through the fence. In response, the dangerous monkeys attack and claw at the dogs. The same behavior can be seen in the video as the dogs attack the secondary perimeter fence that may or may not be intact at the lion and tiger enclosures. This is yet another example of the ignored development plan causing issues and allowing poor zoo management to thrive. <https://www.youtube.com/watch?v=wwuZMLrmc5k>

“Domestic livestock (F-2) have no interaction with licensed animals. Greater security is afforded domestic animals to prevent co-mingling with wildlife, than is possible on everyday farms i.e. primary perimeter fencing and secondary perimeter fencing.”

Guzoo development plan, page 12

“The lack of any effective separation of animals and groups within the collection combined with the lack of animal identification places the entire animal inventory of domestic and controlled animals ‘at risk’ in the event of an infectious disease outbreak on the premise.”

CAZA Report, 2011

“The Schedule of conditions on the permit states that “domestic animals” will not be allowed to be in the exhibit enclosures. It does not address other circumstances. If the presence of dogs results in the agitation of certain zoo animals, this might be an animal welfare issue and should be taken up with authorities who are responsible for the Animal Protection Act.”

Trevor Miller

Superintendent

Southern Region

Fish and Wildlife Enforcement Branch

Justice and Solicitor General

There does not seem to be a useful, if any, definition of distress in the APA. It should not be left to the discretion of whoever is doing an inspection to decide what is/is not distress.

“As you know we deal in distress, as identified, in the Animal Protection Act. There is no way to prove either the monkey or lions are in distress as a result of the dogs actions. The animal may be agitated but it is not distress as identified under the Act. At this time an investigation will not be commenced.”

Rick Wheatley

Peace Officer

Southern Regional supervisor

Alberta SPCA

“As you know our authority for action comes from the Wildlife Act, and as such there must be reason to believe that a violation of the Wildlife Act or Regulations, or the conditions of GuZoo’s Permit under the Act has occurred. Although I appreciate your concerns, it appears that this is potentially an animal welfare issue, and is more likely the purview of the SPCA or Alberta Agriculture (under Section III of the Government of Alberta Standards for Zoos in Alberta).”

David DePape

Resource Manager (Acting)

Fisheries and Wildlife Management

Operations Division

South Saskatchewan Region

As Mr. DePape had indicated in a separate email message, this is not something we have authority to deal with.

Trevor Miller, Superintendent

Southern Region

Fish and Wildlife Enforcement Branch

Justice and Solicitor General



Photo Taken March 30th 2013 clearly depicts a very dangerous violation of the following Zoo Standard:

“Effective guardrails or barriers must be constructed to prevent contact between the visiting public and any animals posing a safety hazard.” Alberta Zoo Standard Section 2 part H



December 13th 2013 picture depicts broken Perimeter fence.

“The perimeter fence is not an effective barrier to many endemic wildlife species such as coyotes and small deer. It is a visible barrier to the animals within Guzoo but not an effective physical barrier to many of the species held the collection.” CAZA Report 2011

“You asked about the 2011 CAZA report, which ARD has received and reviewed.”

Jeff Stewart, Ph.D.

Executive Director

Food Safety and Animal Welfare Division

Husbandry

With so many Zoo Standards issues unresolved or not addressed which were identified in the CAZA Report as reasons to revoke a zoo permit, the question which must be asked is: did ARD/SPCA/ESRD address the animal welfare Section III of the Zoo Standards raised in this report?

“I have been doing this with the SPCA since 2008 & I have never once been requested to go in there (Guzoo) and pursue anything involving CAZA recommendations”

Rick Wheatley

Peace Officer

Southern Regional supervisor

Alberta SPCA

“ESRD requested an updated Zoo Development plan from GuZoo, in part as a result of the concerns identified in the CAZA report. The updated Zoo Development plan was a condition of permit renewal in 2013. The updated Zoo Development Plan provides information in response to the requirements of Section III in the standards”

Craig Brown

ESRD Info-Centre

“There is little evidence of training that would facilitate husbandry or animal health care procedures. The level of care and husbandry is compromised by a lack of qualified animal care personnel and a lack of knowledge of acceptable animal care standards.”

CAZA GuZoo Report, 2011



Dec. 10th, 2013, The limping goat.

“SPCA consulted with experts at the Calgary Zoo and basically they are happy with everything. They made a couple changes, like there was maybe some goats or sheep that had some long hooves.”

Constable Rob Harms, RCMP, Thee Hills.

Enforcement

“Do you consider neglect of the Zoo Standards to be animal cruelty?”

Answer; ‘No, not necessarily’ Constable Rob Harms, RCMP, Thee Hills.

“For many years, the Alberta SPCA has dealt with numerous public complaints about one of Alberta’s zoos. Largely because of the issues outlined above, our peace officers have found it difficult to address even the most basic animal care issues there, such as supplying adequate water. Enforcement under the Animal Protection Act is reactive, not preventative, and it is our position that zoo animal welfare would be improved by including animal welfare requirements in the zoo permitting process.”

SPCA

The CAZA report identified issues related to the Zoo Standards; the issues CAZA raised caused the government to close GuZoo. The zoo’s permit was renewed with more conditions. However, the conditions were not inspected and we find limping goats, filthy cages, disgusting food preparation areas, unheated monkey shelters, elk without shelters, maggots in food dishes, algae in filthy water dishes, missing lion fencing, corpses rotting in and outside of cages much longer than allowed and the list goes on 2 years later. The

problem is not with Alberta Zoos, the problem is a total failure on the part of the government to inspect and enforce section III of the Alberta Zoo Standards.

Summary

In a News Release issued by SRD in 2005 announcing the new Government of Alberta Standards for Zoos in Alberta, then Minister Dave Coumts stated “Albertans expect zoos to be well run and to take the care of animals seriously” and claimed “these enforceable standards will move Alberta zoos to a new level” and “Alberta government raises the bar for zoos.” Somewhere along the way, these lofty promises fell by the wayside.

The reality is that nothing has changed, the bar has not been raised, the same ramshackle roadside zoos are still here and accredited municipal zoos routinely ignore regulations for self-serving agendas. Lucy, the Asian elephant at the Edmonton Valley Zoo is a solitary elephant and has been for most of her life at the zoo. Elephants are extremely social animals, in the wild they live in matriarchal groups for their entire lives. In fact, Canadian Association of Zoos and Aquariums (CAZA) and Association of Zoos and Aquariums (AZA) (zoo accreditation societies) have policies which state that female elephants must be kept in groupings of no less than three.

Section III.B.1 of the Zoo Standards states “All animals must be maintained in numbers sufficient to meet their social and behavioural needs.”



Tyson, a solitary baboon at GuZoo. Like Lucy, he is a social animal; baboons normally live in large troops.

Concluding Statement

As you can see, there are numerous problems with the way zoo permits are being issued. The inspection process and permitting process are flawed in a way that allows substandard facilities to remain open when they should be decommissioned. This is a result of a few different factors: a lack of communication and organization between different intergovernmental departments, inadequate knowledge and experience of relevant officials & inspectors, and a blatant lack of enforcement of the Alberta Zoo Standards overall.

For a permit to be issued responsibly, the following steps must be taken:

- Every relevant department must be included in the inspection and permitting process. This includes ARD, ESRD, and the SPCA.

- Qualified personnel (exotic veterinarians, zoological experts, at least one official who is educated in the Alberta Zoo Standards, and a representative from every departments listed in a) must perform a joint inspection before a zoo permit is issued to ensure that every aspect of the Alberta Zoo Standards are met.

- ALL complaints received in the previous year must be reviewed and taken into consideration before the permit is issued, with an emphasis on repeat offences and ongoing issues.

- Absolute compliance must be achieved in ALL aspects of operations as outlined by the Alberta Zoo Standards for any facility to obtain a zoo permit. These standards were conceived by the government of Alberta, and must be fully enforced.

Facilities such as the GuZoo are an embarrassment to this province, and a perfect example of a complete negligence on the part of various departments of the Alberta government. Animal welfare advocates, zoo experts, and even the general public have voiced their disdain for these lapses in enforcement. These issues must be addressed promptly to prevent further shame from befalling our province.

“None of the zoos in the province are in compliance and Lucy is a clear example of how the province has failed to enforce the zoo standards.”

Julie Woodyer, ZooCheck Canada Inc.

Contact: Voice for Animals Humane Society
info@v4a.org

Phone: Stephanie Belland – 780-966-1709

Philip Shaw – 780-289-9866

Tove Reece – 780-918-5385