## Response to the Defra consultation on Standards for

## **Modern Zoo Practice**

#### Who we are

- 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 and 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