

Due to the ongoing risk of harassment and abuse from a small but highly vocal group of protesters, the independent assessors are kept anonymous. Sadly, in the past team members at Longleat who have tried to engage with those unhappy at Anne's situation have been subjected to online abuse.

Small parts of this review may have been removed if irrelevant to the situation or to protect individuals.

## **Inspection report: 27.7.18**

### **Introduction:**

A representative visited Longleat on the 26<sup>th</sup> July, 2018 to review the care provided for Anne and to assess the documentation with regards to the requirements of the legislation and best practice husbandry needs for elephants. This visit included access to all levels of the team at Longleat, access to documentation including CCTV, ethical review procedures and husbandry documentation, as well as visiting and seeing Anne and her enclosure.

The Secretary of States Standards of Modern Zoo Practice are not an EU directive, but they are legally binding as they are issued under powers in Section 9 of the Zoo Licensing Act (1981) and its subsequent amendments which enact that EU Directive 1999/22/EC. As such they will continue to be enforceable following Brexit which potentially would not be the case if they were solely an EU Directive.

### **Environment – Shelter**

Anne currently does not have a shelter outside. This was discussed with the team at Longleat and it was felt that this was not required as she has 24-hour access to the house which acts as a shelter in inclement weather. She is not locked outside during daily cleaning of the pen (she enters the wash down pens for this activity) and the number of times she is excluded from the house are rare with such occasions being related to major maintenance of the indoor sand paddock and is limited to approximately less than ten times in a year. Occasionally one of the two doors is shut if the weather is considered to be poor, in winter both doors may be closed in extreme weather. In such scenarios she would not be locked outside during maintenance work. I have recommended that Anne is given a shelter to facilitate such a choice but this is optional and at the discretion of Longleat.

With regard to enforcing the SSSMZP Appendix 8.8.24 states the *'outdoor areas must provide all elephants with access to sufficient areas of shelter and protection from extremes of sunlight, welfare and rain'*, as written Longleat currently meets this and provides access to shelter as she has access into the house. I am of the opinion that it is better to allow 24 hours access rather than provide outdoor shelter and thereby potentially allow longer times where she is locked out of the house. Eitherway, this is not an enforcement issue here but one of choice and maximising opportunity for Anne.

**Action:** Recommendation to provide a sheltered area outside to facilitate choice (optional).

**Notes:** Longleat has since introduced an outdoor shelter to Anne's environment.

### **Environment – Bathing opportunities**

Anne has been provided with a pool that is designed specifically taking into consideration her physical capabilities and as such has a shallow gradient with steep walls to allow her to support herself on entry and on exit. It is true that Anne does not utilise the pool very often. I have been shown images and other

media of her using the pool both as a paddling pool and, albeit rarely, submerging in the deep end of the pool.

In addition, Anne has an indoor sand wallow, two outdoor mud wallows, multiple troughs which I witnessed her showering herself with which are provided in addition to drinking water resources. Many of these facilities have been present for a long period of time since the facility opened but are difficult to visualise if looking from the public side of the exhibit as the wall obstructs their view.

With regard to enforcement Longleat are fully compliant with Appendix 8.8.26 and are providing a number of opportunities to bathe. In the Standards a sprinkler is offered as an option but is not a requirement and as such it can only be made as a recommendation. The issue I believe here is choice and Longleat clearly demonstrates that they provide opportunities, that specifically take into consideration Anne's physical compromise, and it is not the fault of the zoo if she chooses not to engage with the options provided.

**Action:** Recommendation to add a shower but optional as multiple variable bathing opportunities, resources and choice available.

**Notes:** Longleat has since introduced a shower to Anne's environment.

### **Environment - Enrichment**

There is considerable enrichment provided primarily in the indoor area where she chooses to remain most of the time but there are also environmental, cognitive, sensory and food enrichment opportunities in the outside enclosure. Independent of the issue of being a lone elephant there is a rich and stimulating environment provided for Anne that she has access to 24 hours through the use of modern technology, including timed winch feeders, and innovative enrichment design by the dedicated keeper team.

There is considerable evidence that Anne has an extensive and varied enrichment programme provided. I would however note that the operator does have poor documentation outlining the use of enrichment but in reviewing CCTV and verbal discussions it is clear that it is being provided and meets the requirements of the Standards. Longleat simply needs to improve the documentation and recording aspects of the enrichment provision which does not have any direct impact on the welfare of Anne, just increase the ease of review at subsequent inspections. I did not have any concerns, other than the poor documentation, with regard to the enrichment aspects of Anne's husbandry programme.

With regard to her environment there is considerable variety in substrate, textures, environmental manipulation and substrate change as well as variable landscaping that provide varied opportunities and choice for Anne whilst ensuring she is not compromised by the environment due to her deteriorating lameness. I believe that this is an active programme of management and meets the requirements as set out in the Standards.

**Action:** Strong recommendation to improve enrichment documentation and a written outcomes- based strategy with respect to enrichment provision.

**Notes:** Detailed documentation is now taken off the back of this review.

## Companionship

The opening statement to this section is not completely reflective of the situation of her rescue. Anne was rehomed from the circus, following an exposé of the poor treatment with regard to her care in the winter quarters. Her health was similar to that as now, although it has slowly deteriorated as is expected with the pathologies thought to be present in her case.

The position of the Elephant Welfare Group is being reviewed with regard to lone elephants, of which Anne is one of many. We are currently producing a positioning statement and a policy with regard to management, justification and mitigation with respect to lone elephants. We agree that the best enrichment for an elephant is other elephants. Our position, whilst still at a draft stage, is that the minimum number of elephants in a facility should be four cows as per Appendix 8.8.12 of the Standards. However, we also recognise that there are exceptional circumstances where a lone elephant, for different reasons, may, in exceptional circumstances, be justified. That justification must be robust and evidence based or the expectation is that the zoo must take active steps to mitigate that individual elephant from being on its own. There are situations where such lone elephants have been found adequate new homes or new companions brought in, but there are equally situations where elephants have been integrated with disastrous results. Each case must be taken on its own merits and all avenues explored.

Specifically, with regard to Anne there is considerable, regularly updated documentation outlining the decision process with regard to the contentious issue of her being a lone elephant. I am satisfied that the decision to maintain her is robust but I have also challenged Longleat to review and explore all of the options available. It is one thing to decide morally that she must be with other elephants but there is a real practical element of how to achieve bringing in another elephant or move her to another facility.

Having seen her for the first time in two years I was surprised at how frail she has become and how, despite her superb care, she continues with the same, if not worse lameness that is supported simply through the health care programme and weight loss that she has achieved. She is a robust elephant with a strength of character, still with a quality of life but she is not comparable to the animal that arrived from the circus all those years ago. In my professional opinion, as both an elephant veterinarian and an individual intimately involved in Anne's care following her rescue, I do not believe she is a suitable candidate for an overseas move. I also do not believe she will reach her eighties and so the risk of 30 years solitary confinement is low but I would argue even 5 years is not acceptable. But the risk of moving her verses the risk of her dying has to be considered and if Longleat were to find an appropriate home in an appropriate distance then the genuine risk potential injury or death during transport verses risk of solitary confinement has to be weighed. The decision (to move Anne) must lie with the zoo whom have active, informed knowledge of Anne's condition and will make any decisions based on her best interests.

Having reviewed the documents, spoken to staff and challenged them with regard to the issue of Anne and a companion I am confident that Longleat has Anne's best interests with regard to her future and act in her best interest from an informed position.

**Action:** to continue active review of the situation with regard to Anne and her being a lone elephant, and to engage with the new EWG policy regarding lone elephants. Unless her health precludes it, it is recommended that Anne is integrated into an elephant herd of at least 4 elephants as per the Standards. If not possible then there must be robust justification as to why this is the case, but this must be an exceptional circumstance.

**Notes:** Longleat carry out regular reviews (usually annually) to weigh up the risks. The risks of moving Anne any great distance remain too great for now, with not suitable local facilities with an ideal match for Anne are available. However, this is still under ongoing review.

### **Ethical Review process**

I can confirm that they (Longleat) do have an active ethical review process and that this regularly includes Anne and her management. The documentation is robust and involves external individuals.

The ethical review process itself includes elements of the five freedoms and biomedical ethics as well as the concept of reduce, refine, replace commonly used in the animal laboratory industry, probably one of the most ethically challenged animal professions. As such they have drawn from proven methods of ethical review and utilise it to address many ethical challenges that any modern zoo faces. This has been in place since 2010, or at least the documents evidencing the process were available that far back.

The requirement of an ethics committee and associated minutes is actually now an enforceable activity with regard to the Standards and zoo licencing but I am pleased to say that Longleat have an active and well established ethics committee with minutes and as such there is no need for action to be taken. In addition, Anne is a regular focus on the agenda and she is regularly reviewed at all levels of the animal and senior management team at Longleat. I believe this will satisfy your concerns that the question of companionship is regularly reviewed.

**Action:** none

### **Conclusion**

There are improvements with regard to elephant husbandry and knowledge of their needs. It is arguable that any form of captivity, be it zoo, sanctuary or circus compromises an elephant and can never truly meet their needs but where they are in captivity there are robust, evidence-based minimum standards that must be met.

In the case of Anne, companionship aside, these are being met on the whole and Longleat was reviewed as part of this process against the current elephant standards as found in the SSSMZP. They meet all of the standards except a small number regarding documentation (the processes are in place and Anne is provided with the elements stated, simply it is not documented well) and the issue of being part of a minimum four elephant herd.

Having reviewed the documentation, processes, and internal ethical reviews that have been and continue to be undertaken by Longleat with respect to Anne I am confident that they act in her best interests from an *informed* position. Whether this means she remain at Longleat, if she is moved or ultimately when her quality of life is poor and compromised that she is euthanised, I believe that Longleat will make the right decision for her. There are numerous internal systems of moral, physical and behavioural review undertaken by the team, supplemented by external assessments and audits from known International specialists, not all being pro-zoo but providing robust challenges to the thoughts and policies regarding Anne.

I believe the following:

- Anne has exceptional care;

- There is a contentious issue with regard to companionship and this has been, and continues to be thoroughly reviewed;
- On the whole Longleat is compliant with the current SSSMZP, areas of improvement are especially with regard to some of the documentation of the processes provided but they are fully compliant with the delivery of the welfare needs (excepting the lone elephant issue) and recommendations for improvement have been made;
- Longleat has a robust, informed and considered approach to assessing Anne's needs and actively discourage any commercial use of Anne, focusing on what is best for her through internal processes and external ethical review.