



Review of Submissions

Facility Standard: Zoo Animals Transitional Facilities

19 December 2018

Regulation & Assurance

REVIEW OF SUBMISSIONS

Zoo Animals Transitional Facilities

19 December 2018

Approved for general release

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1 Introduction

The draft Zoo Animals Transitional Facilities was notified for consultation on 24 January 2018.

The Ministry for Primary Industries (MPI) received submissions from the following:

Auckland Zoological Park, Mikaylie Wilson	14 February 2018
Department of Conservation, Rod Hitchmough	12 March 2018
Orana Wildlife Park, Lynn Anderson	23 March 2018

This document summarises the issues raised in the submissions, and presents the MPI response to each.

1.1 Acronyms Used in the Document

MPI	Ministry for Primary Industries		
IRA	Import Risk Analysis		

2 Summary of Amendments

As a result of comments made, the following is a summary of amendments to be made to the *Zoo Animals Transitional Facilities*.

Copies of all external stakeholder submissions in their entirety are presented in Appendix 1.

2.1 Clause 3.1 (7): The operator must review the operating manual, and have this approved by the MPI Inspector prior to the arrival of any zoo animals.

This clause has been amended to:

The operator must review the relevant part of the operating manual to ensure its continuing suitability and effectiveness, and have any required changes approved by the MPI inspector prior to the arrival of any zoo animals.

2.2 Clause 3.4(2): There must be a designated area within the transitional facility for unloading zoo animals. Zoo animals must only be unloaded at the designated area.

This clause has been amended to:

Where zoo animals are required to be removed from the crate or container in the transitional facility, this must occur at a designated area within the transitional facility approved by the MPI inspector.

2.3 Title

The title of the standard has been amended to:

Zoo Animals Transitional Facilities

2.4 Clause 3.3(1): The operator must ensure that waste generated is treated or disposed of as biosecurity waste, as specified in the relevant IHS(s) and/or any measures approved in a CTO direction, either within the transitional facility or after being transferred under MPI authorisation to another transitional facility.

The clause has been amended to:

The operator must ensure that waste generated is treated or disposed of as biosecurity waste, as specified in the relevant IHS(s) and/or any measures approved in a CTO direction, either within the transitional facility, as deep burial within the CF, or after being transferred under MPI authorisation to another transitional facility.

2.5 Clause 3.8(1): The operator must provide the MPI Inspector access to the facility, records and documents when requested; including prior to the arrival of zoo animals, to verify compliance with this standard or to investigate non-compliances.

The clause has been amended to:

The operator must ensure that the MPI inspector, or any other representative of the CTO, is provided with access to the facility, and with records and documents when requested to verify compliance with this standard or to investigate non-compliances. The request may occur prior to the arrival of zoo animals. The operator or a delegate must be present to facilitate the inspection.

3 Internal Submissions

According to MPI process an internal review period is available to staff of MPI to comment and recommend changes prior to public consultation on a transitional facility standard. No internal submissions were received after the internal review deadline.

4 Review of Submissions

4.1 Auckland Zoological Gardens, Mikaylie Wilson

4.1.1 **2.1 (2) The zoo transitional facility must be for the purpose of holding returned New Zealand lizard species, prior to the completion of biosecurity requirements for release.**

We're unsure of the intention of this statement as it seems very specific for lizards? Does this mean that any TF must be suitable to hold NZ lizards? Obviously we cannot meet this requirement when, for instance, our rhino paddock is signed off as a TF. We can, however, have at least one suitable TF on-site, which can to meet NZ lizard import requirements (e.g. our quarantine building which is our main TF site).

MPI Response

Clause 2.1(2) only applies to premises used for the importation of New Zealand native returned lizards. Please note only one, either clause 2.1(1) OR 2.1 (2) needs to be met depending on the use.

4.1.1 **3.1(4) ii) Any relevant import health standard and 3.1 (5) c) ii) A list of the relevant IHS(s) applicable to the animals held at the facility;**

3.1 (4) This would mean regular edits to the TF manual, to have all IHS included which doesn't seem practical. Could it refer to the IHS instead? We do not necessarily know every species that we will need to go into our Quarantine building (main TF).

3.1 (5) c)ii) This seems very restrictive as per 3.1(4) ii) and would require a lot of extra paperwork editing and re-approving the manual if and when a new species comes into the zoo and we hadn't put that particular species IHS on the list. Similarly, as each IHS is updated or new ones are released, we would have to update our manual. As all the IHS are available on-line on MPI website, then is there a need for them to be in a separate copy attached to the TF manual?

MPI response

The operator must be aware of the current version of any IHS that will be used to import species. It is therefore vital to include any relevant import health standards in the manual. MPI allows for this to be demonstrated as the name of the standard followed by the website link to where the standard can be located.

4.1.2 **3.1 (5) d) A description or map of the transitional facility boundaries and key areas, including the area designated for the unloading of zoo animals**

From our experience at Auckland Zoo, the TF locations have changed a lot depending on the species being imported, we have a main TF (Quarantine Building), but not all imports use that area. This means we would need to edit and get the manual re-approved each time we use a different TF as we wouldn't know the descriptions, maps or unloading area of all the options for the TF's in advance. The unloading area might also change depending on the side of the crate and which doors provide better access. Currently, at the pre-audit of the TF we show the MPI veterinary supervisor around the facility and talk through all the plans for unloading, access to the facility, clinical waste location, security etc and then we receive an email to confirm it's approved.

4.1.3 3.1 (6) The operator must review the operating manual, and have this approved by the MPI Inspector prior to the arrival of any zoo animals.

This seems to be suggesting that you require us to get the manual reapproved each time we get an import? This could be on a fortnightly/monthly basis and nothing would have changed since the last import. As such this would be additional work, mostly for the MPI vet, but also for zoo staff. Is it possible to stick with the current procedures and have a pre-arrival audit by MPI veterinary supervisor only?

MPI Response

MPI has noted concerns raised by Auckland Zoo. While approval of any transitional facility manual changes prior to importation is required, the wording was amended to allow for changes to be documented and approved as an appendix to the manual prior to import.

The operator must review the relevant part of the operating manual to ensure its continuing suitability and effectiveness, and have any required changes approved by the MPI inspector prior to the arrival of any zoo animals.

An example of this includes the importation of an elephant which is unable to be housed in the main TF premise and will thus require approval of an elephant appendix prior to importation. This must include a description as required by clause 3.1 (6) d).

4.1.4 3.4 (2) There must be a designated area within the transitional facility for unloading zoo animals. Zoo animals must be only unloaded at the designated area.

When does unloading officially start? is it when the crate (containing the animal) leaves the vehicle (sometimes hand-carried box, sometimes a crane lifts crate)? or is it when the animal leaves the crate ?

Within each TF then we can verbally define to the MPI veterinary supervisor (while completing the pre-audit of the TF) where we envisage unloading the animal – is this sufficient?

If “unloading” starts when the crate leaves the vehicle then we have an issue as we cannot get a vehicle inside our main TF (Quarantine building). We normally park the vehicle near the building and then hand-carry the crate inside, but the technical boundary to the TF will in the future be the walls of the building, and we cant fit a vehicle inside the building.

With our larger animal TF's, the crane and transport vehicle are always parked inside the TF boundary.

If “unloading” is when the animal leaves the crate, then obviously this will always be inside the TF and therefore all contaminated substrate within the crate will be contained within the TF, whatever size animal we are talking about.

MPI Response

Noted. MPI has amended the wording to:

Where zoo animals are required to be removed from the crate or container in the transitional facility, this must occur at a designated area within the transitional facility approved by the MPI inspector.

4.2 Department of Conservation, Rod Hitchmough

4.2.1 Title

We are concerned that the title “Draft facility standard for zoo animals” is insufficiently informative; many would assume that this relates to zoo containment facilities rather than transitional facilities. It is only some way into the document that this is clarified.

MPI Response

Noted. The title of the standard has been amended to: *Zoo Animals Transitional Facilities* to avoid any confusion.

4.2.2 General

We are concerned that the requirements, while they seem generally straightforward and sensible, often lack any specificity, so may be subject to too much individual interpretation and difficult to enforce; e.g.:

- a) This area must be of a sufficient size to enable the inspection to be conducted effectively and safely and have the ability to contain any associated biosecurity risk.
- b) The area must be easy to clean.

MPI Response

Import health standards for zoo animals require that biosecurity risk is mitigated offshore during the pre-export isolation period in the exporting country. Pre export isolation is highly regulated and animals are subjected to stringent testing and treatments as required by the IHS.

Post arrival quarantine at a New Zealand transitional facility serves the purpose of enabling MPI veterinarians to check both the animal and the paperwork ensuring the consignment meets all the requirements. An MPI veterinarian must approve the area used by the zoo as a transitional facility prior to the arrival of any zoo animal(s). Specific details must be stated in the operating manual and this must be signed off by the MPI veterinarian prior to the arrival of the animal. Given the variety of zoo animals it would not be practical to state all this in the facility standard. MPI considers the wording in the standard is appropriate.

4.2.3 Isolation of zoo animals

We consider Clause 3.2 (1) b) needs to be reworded for greater clarity. The current wording is: “If imported zoo animals are not isolated from any other zoo animals in the transitional facility, the operator must handle the other zoo animals as if they have the same biosecurity status as the imported zoo animals.” We believe that this version would be clearer: “If imported zoo animals **have contact with** any other zoo animals in the transitional facility, the operator must handle **those** other zoo animals as if they have the same biosecurity status as the imported zoo animals.”

MPI Response

MPI considers the wording is accurate as *isolated* implies a more stringent separation than *have contact with*.

4.2.4 Cleaning

We consider that the phrase “3.5 (1) If the area is a designated transitional facility area it must be cleaned between consignments” is not specific enough – cleaning could mean just sweeping the floor. Thorough cleaning with an agent that kills bacteria, fungi and viruses should be specified.

MPI Response

Please see response 4.2.2 above. If the animal is compliant it poses a negligible biosecurity risk and therefore cleaning with an agent that kills bacteria, fungi and viruses is not justified. However in the case of non-compliance the facility must be thoroughly cleaned addressing the non-compliance.

4.3 Orana Wildlife Park, Lyn Anderson

4.3.1 Title

The Standard should be titled “Zoo Animals Transitional Facility Standard. The omission of the word “Transitional” from the title is highly confusing and does not clearly state what the document relates to.

MPI Response

Noted. The title of the standard has been amended to: *Zoo Animals Transitional Facilities* to avoid any confusion.

4.3.2 Definitions

Clause 2.2(1): IHS should be added to the definitions in Schedule 2.

MPI Response

Please see Part 1 clause 1.2 of the standard. Terms used in the facility standard that are defined in the Act have the meanings set out in the Act not the standard, unless a different meaning is given in Schedule 2. The Act is available at the following website: <http://www.legislation.govt.nz/>.

4.3.1 Zoo animals

Clause 3 (various): “Zoo Animals” should be replaced with “imported Zoo Animals”. It should also be replaced in Guidance sections.

MPI Response

MPI considers the wording is sufficient as the facility standard is written for imported zoo animals.

4.3.1 Waste disposal

Clause 3.3(1): It is not usually feasible to dispose of waste within the transitional facility. The wording suggests that it may only be disposed of within a transitional facility or transferred to another transitional facility. This would rule out deep burial on zoo (containment facility) grounds. With large animals, e.g. antelopes, there is always a

large amount of bedding material as waste. Deep burial is the most economic form of disposal, but is also very effective and appropriately manages biosecurity risks. Therefore, we would like to see the wording changed to make it clearer that this method utilised effectively over many years is still permissible.

Clause 3.3(2): We recommend adding the words “where biosecurity concerns exist”.

MPI Response

3.3(1) Noted. The clause has been amended accordingly.

3.3(2) MPI considers the wording to be accurate as it is.

4.3.1 MPI inspection

Clause 3.8(1): We propose adding “the Operator or their delegate”. It is impractical in larger organisations for the actual registered Operator to be available for all MPI inspections.

MPI Response

Noted. MPI has amended this clause to address the issue.

5 Appendix 1: Copies of Submissions

5.1 Auckland Zoological Gardens, Mikaylie Wilson

From: Mikaylie Wilson [<mailto:Mikaylie.Wilson@aucklandzoo.co.nz>]

Sent: Wednesday, 14 February 2018 3:51 PM

To: Maike Thoene <Maike.Thoene@mpi.govt.nz>; Animal Imports <Animal.Imports@mpi.govt.nz>; Animal Imports <Animal.Imports@mpi.govt.nz>

Cc: James Chatterton <James.Chatterton@aucklandzoo.co.nz>; Anita Jacobs <anita.jacobs@aucklandzoo.co.nz>; Kevin Buley <kevin.buley@aucklandzoo.co.nz>

Subject: Draft Facility Standard: Zoo Animals - Auckland Zoo

Hi Maike and Animal Imports team,

We've had the opportunity to read through the draft facility standard for zoo animals, below are our thoughts on behalf of Auckland Zoo.

2.1 (2) The zoo transitional facility must be for the purpose of holding returned New Zealand lizard species, prior to the completion of biosecurity requirements for release.

We're unsure of the intention of this statement as it seems very specific for lizards? Does this mean that any TF must be suitable to hold NZ lizards? Obviously we cannot meet this requirement when, for instance, our rhino paddock is signed off as a TF. We can, however, have at least one suitable TF on-site, which can to meet NZ lizard import requirements (e.g. our quarantine building which is our main TF site).

3.1 (4) ii) Any relevant import health standard (IHS).

This would mean regular edits to the TF manual, to have all IHS included which doesn't seem practical. Could it refer to the IHS instead? We do not necessarily know every species that we will need to go into our Quarantine building (main TF).

3.1 (5) c) ii) A list of the relevant IHS(s) applicable to the animals held at the facility:

This seems very restrictive as per 3.1(4) ii) and would require a lot of extra paperwork editing and re-approving the manual if and when a new species comes into the zoo and we hadn't put that particular species IHS on the list. Similarly, as each IHS is updated or new ones are released, we would have to update our manual. As all the IHS are available on-line on MPI website, then is there a need for them to be in a separate copy attached to the TF manual?

3.1 (5) d) A description or map of the transitional facility boundaries and key areas, including the area designated for the unloading of zoo animals.

From our experience at Auckland Zoo, the TF locations have changed a lot depending on the species being imported, we have a main TF (Quarantine Building), but not all imports use that area. This means we would need to edit and get the manual re-approved each time we use a different TF as we wouldn't know the descriptions, maps or unloading area of all the options for the TF's in advance. The unloading area might also change depending on the side of the crate and which doors provide better access. Currently, at the pre-audit of the TF we show the MPI veterinary supervisor around the facility and talk through all the plans for unloading, access to the facility, clinical waste location, security etc and then we receive an email to confirm it's approved.

3.1 (6) The operator must review the operating manual, and have this approved by the MPI Inspector prior to the arrival of any zoo animals.

This seems to be suggesting that you require us to get the manual reapproved each time we get an import? This could be on a fortnightly/monthly basis and nothing would have changed

since the last import. As such this would be additional work, mostly for the MPI vet, but also for zoo staff. Is it possible to stick with the current procedures and have a pre-arrival audit by MPI veterinary supervisor only?

3.4 (2) There must be a designated area within the transitional facility for unloading zoo animals. Zoo animals must be only unloaded at the designated area.

When does unloading officially start ? is it when the crate (containing the animal) leaves the vehicle (sometimes hand-carried box, sometimes a crane lifts crate) ? or is it when the animal leaves the crate ?

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With our larger animal TF's, the crane and transport vehicle are always parked inside the TF boundary.

If “unloading” is when the animal leaves the crate, then obviously this will always be inside the TF and therefore all contaminated substrate within the crate will be contained within the TF, whatever size animal we are talking about.

Let me know if you have any questions and we'll be happy to talk through anything.

Regards,

Mikaylie Wilson

NZCCM Clinical Coordinator

New Zealand Centre for Conservation Medicine

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e: mikaylie.wilson@aucklandzoo.co.nz

5.2 Department of Conservation, Rod Hitchmough

From: Rod Hitchmough [<mailto:rhitchmough@doc.govt.nz>]

Sent: Monday, 12 March 2018 4:28 p.m.

To: Animal Imports <Animal.Imports@mpi.govt.nz>; Aubanie.Raynal@epa.govt.nz

Cc: Verity Forbes (Department of Conservation) <vforbes@doc.govt.nz>

Subject: FW: Stakeholder Notification of External Consultation of Draft Facility Standard

Dear MPI and EPA

Thank you for the opportunity to comment on the draft facility standard for zoo animals.

Please note that biosecurity staff at the Department of Conservation were notified of this consultation via the email below from MPI; however, an email was also sent by Aubanie Raynal of EPA on 16 January 2018 to Eduardo Villouta and Anastacia Kirk of DOC, and Phil Bell, who left DOC some time ago, requesting DOC

feedback. Please note that these were not the appropriate people to send this email to, and that all Biosecurity-related communications with DOC should go to Verity Forbes and/or Rod Hitchmough (vforbes@doc.govt.nz; rhitchmough@doc.govt.nz).

We are concerned that the title "[Draft facility standard for zoo animals](#)" is insufficiently informative; many would assume that this relates to zoo containment facilities rather than transitional facilities. It is only some way into the document that this is clarified.

We are concerned that the requirements, while they seem generally straightforward and sensible, often lack any specificity, so may be subject to too much individual interpretation and difficult to enforce; e.g.:

- c) This area must be of a sufficient size to enable the inspection to be conducted effectively and safely and have the ability to contain any associated biosecurity risk.
- d) The area must be easy to clean.

We consider Clause 3.2 (1) b) needs to be reworded for greater clarity. The current wording is: "If imported zoo animals are not isolated from any other zoo animals in the transitional facility, the operator must handle the other zoo animals as if they have the same biosecurity status as the imported zoo animals." We believe that this version would be clearer: "If imported zoo animals **have contact with** any other zoo animals in the transitional facility, the operator must handle **those** other zoo animals as if they have the same biosecurity status as the imported zoo animals."

We consider that the phrase "3.5 (1) If the area is a designated transitional facility area it must be cleaned between consignments" is not specific enough – cleaning could mean just sweeping the floor. Thorough cleaning with an agent that kills bacteria, fungi and viruses should be specified.

Regards

Rod Hitchmough

Scientific Officer (Biosecurity)

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www.doc.govt.nz

5.3 Orana Wildlife Park, Lynn Anderson

ORANA WILDLIFE PARK

FORMAL FEEDBACK/SUBMISSION ON: DRAFT ZOO ANIMALS FACILITY STANDARD – MPI/STD ZOO - UNDATED

INTRODUCTION

We welcome the opportunity to provide feedback on the draft.

Our contact details are:

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CEO
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Email: lynn@oranawildlifepark.co.nz

Telephone: 03 359 7109

SPECIFIC COMMENTS

- Document Title: The Standard should be titled "Zoo Animals Transitional Facility Standard. The omission of the word "Transitional" from the title is highly confusing and does not clearly state what the document relates to.
- Clause 2.2(1): IHS should be added to the definitions in Schedule 2.
- Clause 3 (various): "Zoo Animals" should be replaced with "imported Zoo Animals". It should also be replaced in Guidance sections.
- Clause 3.3(1): It is not usually feasible to dispose of waste within the transitional facility. The wording suggests that it may only be disposed of within a transitional facility or transferred to another transitional facility. This would rule out deep burial on zoo (containment facility) grounds. With large animals, e.g. antelopes, there is always a large amount of bedding material as waste. Deep burial is the most economic form of disposal, but is also very effective and appropriately manages biosecurity risks. Therefore, we would like to see the wording changed to make it clearer that this method utilised effectively over many years is still permissible.
- Clause 3.3(2): We recommend adding the words "where biosecurity concerns exist".
- Clause 3.8(1): We propose adding "the Operator or their delegate". It is impractical in larger organisations for the actual registered Operator to be available for all MPI inspections.

CLOSING COMMENTS

Overall, I consider this to be a very good draft.

Lynn Anderson, Orana Wildlife Park