

ZOO STANDARD VIOLATIONS

Alberta Standards for Zoos

The zoo is in clear violation of the Alberta Standards for Zoos on several items including, but not limited to:

1) All animals must be maintained in numbers sufficient to meet their social and behavioural needs.

- The standards require a minimum of 3 female elephants to be housed together, meanwhile Lucy has been alone for many years.
- It is universally acknowledged that elephants are herd creatures with strong family ties essential to their health and well-being. To keep Lucy alone is one of the most severe forms of cruelty that an elephant could endure.

2) Habitat enclosures must be of sufficient size to provide for the physical well-being of the animal.

- Lucy's barn is described as very small by recent experts who evaluated her. It must also be noted that due to our subarctic weather, Lucy is restricted to her indoor barn area far more than an elephant in a warm-weathered zoo would ever be. Elephants should have access to the outdoors 24 hours a day.

3) All animal habitats must be of a size and complexity sufficient to provide for the animal's physical and social needs and species typical behaviours and movements.

- In addition to Lucy's enclosure being far too small for her needs, it is mostly concrete which has caused her significant arthritis and foot infections which are the leading cause of death in zoo elephants. It is a bleak and depressing space with no living trees or plants. It was noted by the city that Lucy not only needs a new heating and ventilation system, but she also needs UV lighting and more space. Her current enrichment does not mimic an elephant's natural behaviour in any logical way.
- As noted by Dr. Trish London DVM in her report:
 - *"The elephant house where Lucy spends the majority of her time is very small, approximately 250 m2 total."*
 - *"One room in her enclosure has a sand bed but the sand is very coarse and contains small pebbles. The rest of her barn is concrete flooring. Rubber pad had been applied in the past, 7 but Lucy has removed a significant portion by pulling it up. The padding that does remain is very thin and not appreciable to be adding any comfort or cushion for her."*
 - *"It appears she is provided with the same enrichment every day creating an environment of predictability and monotony. In the dome, there were also many "enrichment" items that did not focus on encouraging natural behavior of the species and instead were geared more towards human enjoyment. These items include drums, paint, soccer balls, and chimes."*
 - *"During the hours we were with Lucy, she had constant attention which didn't allow her any autonomy, independence or the opportunity to explore on her own. She was never given access to, or showed any interest, in going out to either of her yards during my visit."*

4) Enclosures must be of sufficient size and design to allow individual animals the opportunity to avoid or withdraw from the view of visitors.

- There is nowhere for Lucy to retreat from view of the public, a clear violation of the Alberta Standards for Zoos. EVZ's violations of these standards are attracting negative attention to the City of Edmonton. Additionally, the EVZ was recently named the #1 Worst Zoo for Elephants in North America by the respected organization, In Defense of Animals. The EVZ has made the top ten list almost every year since 2009. Is this a portrayal of our city we want to share with the world?

5) Animals in areas where direct contact with visitors is possible must pose no danger to the public.

- EVZ continues to parade Lucy around the zoo in close proximity to patrons, including allowing patrons to stand next to her for photo opportunities. The evidence for this is constant and overwhelming. Lucy is an extremely large animal in physical pain and mental distress, one kick of her leg could be fatal or cause a serious injury. Regardless of one's opinion on zoos as they pertain to animal welfare, it should be of deep concern that the zoo puts staff and visitors, including young children at risk by breaching this standard.
- The Association of Zoos and Aquariums (AZA) which the Alberta Zoo Standards are based on, no longer allows elephants to be walked around zoos. They have instituted a bullhook ban and they no longer permit their members to enter the enclosure with elephants because they are considered to be dangerous animals. Progressive zoos use protected contact management of elephants which utilize shift areas to prevent any direct contact with the elephant(s). Therefore, there is no longer a need to manage elephants with cruel circus style implements like bullhooks. The EVZ still utilizes bullhooks and manages Lucy with outdated Free Contact management which is condoned by the Canadian Accredited Zoos and Aquariums (CAZA).

Animal Protection Act (APA)

The EVZ is in contravention of Section 2(1) which states the following:

For the purposes of this Act, an animal is in distress if it is (a) deprived of adequate shelter, ventilation, space, food, water or veterinary care or reasonable protection from injurious heat or cold, (b) injured, sick, in pain or suffering, or (c) abused or subjected to undue hardship, privation or neglect.

- **Deprived of adequate ventilation:** Recent inspections of EVZ have reported that Lucy has been breathing in dust in her barn and that the installation of a filtration system to eliminate the dust, a humidifier, and UV lighting are required. It is important to note that EVZ has claimed Lucy suffers from an undiagnosed breathing issue which they claim puts her at risk if she was to be relocated to a better facility. Suggestions to properly test her environment and address inappropriate materials in her enclosure have gone unheeded for decades.
- **Deprived of adequate protection from injurious heat and cold:**
 - COLD - Asian elephants are subtropical animals and should not reside in Canada as they are not equipped to handle the sub arctic climate in Edmonton. Lucy is taken outdoors year-round when temperatures can dip as low as -15 to -20C. Lucy is forced to walk in

the snow and ice, even getting to her exercise tent requires her to walk outdoors through snow and ice. On extremely cold days, Lucy is forced to stay indoors in her concrete enclosure for periods of up to 2 weeks or more. It has been reported that Lucy spends up to 2/3rds of her time inside. Elephants are not designed to be indoor animals. This is one reason that Lucy is 1500 lbs. overweight, she does not get enough exercise due to the climate, and inadequate space.

- HEAT - Lucy is walked on asphalt pavement when temperatures exceed 25C. At 25C (77F), the temperature of pavement can be as high as 52C (125F). At 30C (86F), the pavement temperature can be as high as 62C (143F). Video of Lucy walking on pavement on a day where temperatures were 32C have been recorded.
- **Deprived of Water:** Numerous reports by EVZ visitors that Lucy's water troughs are empty have been received by LEAP. We were notified very recently (May 2023) that there was still no water inside her troughs. Lucy is given a water hose to drink from when staff are present. Since Lucy is alone up to 12 hours a day, that means she has no access to water for half a day. For the rest of the time, she is at the mercy of her keepers to provide water for her.
- **Deprived of Adequate Veterinary Care:**
 - Recent expert consultations have proven that Lucy has been deprived of appropriate veterinary care. A large uterine tumour was discovered by consultants during veterinary consultations performed in October 2022. An 80-pound tumour was observed via ultrasound which had remained improperly diagnosed and treated for several years. The Valley Zoo has noted that Lucy has been observed displaying signs of abdominal pain, which was indicated by unusual posturing, laying down when out for a walk, slapping her trunk against her abdomen and reluctance to eat and drink until given pain medication. While previous examinations had speculated that Lucy may be suffering from a uterine issue, diagnostic testing was not performed. The international experts that examined Lucy were easily able to diagnose the issue with simple ultrasonography. They then recommended a simple treatment with medication that has reportedly alleviated Lucy's symptoms of abdominal pain.
 - Lucy's long standing undiagnosed respiratory condition was speculated to be due to issues stemming from misaligned molars causing pressure on one side of her trunk. The new consultants stated Lucy's breathing problems were unrelated to her teeth and also remarked that previous trunk endoscopies were not able to visualize the areas claimed in their reports, as the scope they were using was unable to reach the areas described and it would have been difficult to visualize these areas without providing sedation.
- **Subjected to Undue Hardship and Privation:** Experts have stated in sworn affidavits that the climate and conditions Lucy lives in have contributed to her ill health and that she suffers from privation.