Dear Mr Way,

The Sydney Zoo – D440/16
Response to PAC Submissions

Sydney Zoo provides the following response to the letter dated 26 July 2017 from Taronga Zoo (Taronga Submission) and the letter dated 26 July 2017 from Urbis on behalf of Elanor Investors Group (Urbis Submission).

Response to Taronga Submission

We are pleased that the Taronga Submission has moved on from any material issues relating to facility design or land use. This current submission primarily addresses operational matters relating to animal welfare and conservation. Sydney Zoo welcomes the input of Taronga on these matters, as we have with many other zoological institutions in Australia and South-East Asia. We believe that our common objective of achieving the highest standards of animal welfare is best served where there is an environment of collaborative work, and a collaborative spirit amongst zoos and other animal facilities.

Since our inception, Sydney Zoo has demonstrated a strong track record of industry engagement, particularly as we develop detailed enclosure designs and identify sources for our proposed animal collection. To date, the Sydney Zoo team has physically attended over 35 zoos and wildlife parks across Australia and South-East Asia and we have incorporated our learnings from these interactions in our planning process.

Whilst we have sought to engage on a number of occasions with Taronga, regrettably we have been disappointed by their limited response which we believe has resulted in Taronga having a limited understanding of Sydney Zoo’s operational capability. We note that the Taronga Submission only references summary animal welfare information in the UTS SIA and does not appear to have considered the detailed information in Sydney Zoo’s Response to the PAC’s request for further information April 2017 (SZ PAC Submission). This is the key document addressing Sydney Zoo’s approach to animal welfare and our organisational capacity. Consequently, the Taronga submission contains a number of statements that are erroneous with regard to Sydney Zoo’s animal welfare practices and organisational capacity.

In order to engender a more open line of communication we have written to Taronga offering to provide them with a copy of this response and seeking a meeting to engage broadly on animal welfare and conservation opportunities.

For the record a copy of our detailed responses to the Taronga Submission and the letter we have sent to them are contained in Attachment 1 to this letter. For convenience, we note the following key matters here:
Sydney Zoo Foundation
Operational Capacity

Conservation Initiatives
Sydney Zoo’s approach to conservation is consistent with the stated position of ZAA that conservation activities of zoos include: providing insurance populations, funding research, veterinary treatment of injured wildlife, biosecurity surveillance, messaging and education

Animal Welfare Policy
Sydney Zoo’s Animal Welfare Policy has adopted the World Organisation for Animal Health’s definition of Animal Welfare – this provides that an animal is in a good state of welfare if it is healthy, comfortable, well nourished, safe, able to express innate behaviour, and if it is not suffering from unpleasant states such as pain, fear and distress. Taronga has also adopted this definition in its published Animal Welfare Charter [https://taronga.org.au/sites/tarongazoo/files/downloads/awc-web.pdf]

Animal Selection
The Sydney Zoo animal selection policy is set out in detail in section 4.1, p43 of the SZ PAC Submission. Selection criteria include: Diversity, Welfare, Display, Public Appeal, Conservation Value and Availability.

Sydney Zoo Operational Capacity & Curatorial Staff
The SZ PAC Submission outlines the current organisational capacity of Sydney Zoo and our plans with respect to building organisational capacity prior to animal settlement.

Each of Sydney Zoo’s six curatorial team members is a highly regarded industry leader. The team includes past and current presidents of the NSW FMPA and the current president of the International Congress of Zoo Keepers.

Whilst all operational capability will be maintained in-house, our curatorial team is complemented by the independent expert members of our Animal Welfare Committee – Peter Clark of Zoos South Australia and Dr Derek Spielman of Sydney University. Dr Spielman also previously held the position of Chief Veterinarian/Curator at Taronga.

Response to Urbis Submission
Urbis, acting as an advocate for Elanor Investors Group, introduces no new evidence or material information and continues to contend that Sydney Zoo and Featherdale cannot co-exist as complementary wildlife facilities in Western Sydney. Sydney Zoo submits that Elanor is seeking to maintain this position for commercial reasons and this is evidenced by the refusal of Featherdale to participate in the stakeholder survey undertaken by UTS IPPG for its Social Impact Assessment (UTS SIA).

The Urbis Submission cannot be supported for the following reasons:

1. It fails to acknowledge the material benefits that Sydney Zoo will deliver to Western Sydney.
2. It overstates the implications of commercial competition.
3. It ignores the available evidence that demonstrates the material differentiation between the proposed Sydney Zoo and Featherdale and the opportunity for complementary co-existence.

The socio-economic evidence provided to the PAC overwhelmingly supports approval of Sydney Zoo as designed with a mix of Australian and exotic animals. Three reports now provide evidentiary support for approval of Sydney Zoo from a socio-economic benefit perspective, including the HillPDA Report commissioned by DP&E.

Having assessed all available evidence, the DP&E has recommended approval of Sydney Zoo, subject to certain conditions designed to ensure that a net positive social outcome is delivered. This position was re-confirmed by DP&E following its assessment of the UTS SIA.
Sydney Zoo submits that Urbis’s proposed restriction on the exhibition of Australian Animals would significantly reduce the social amenity that Sydney Zoo intends to provide by:

- Restricting the only major zoological facility in the Western Sydney area from exhibiting major Australian animals. **A major zoo being precluded from conserving and exhibiting native fauna is without precedent globally.** Such a restriction would adversely affect the credibility of Sydney Zoo as an institution. It would diminish both the amenity of the facility and the value for consumers seeking a full service zoo.
- **Inhibiting Sydney Zoo’s cornerstone Aboriginal cultural advancement and employment strategies,** which would in turn directly affect one of the most disadvantaged segments of our community in Western Sydney.

The importance of the Sydney Zoo - Muru Mittigar Alliance to the Darug people of Western Sydney is illustrated in the letter of support from Muru Mittigar that is provided in Attachment 4.

These matters are discussed in further detail in the following attachments:

- **Attachment 2:** Evidence of Differentiation between Sydney Zoo and Featherdale & Sydney Zoo Aboriginal Advancement Programs
- **Attachment 3:** UTS IPPG Response to Urbis Submission

Should the PAC have any queries or questions in respect of the above, Sydney Zoo will be happy to assist.

Sincerely

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Jake Burgess - Managing Director
### Attachment 1 – Responses to the Taronga Submission.

<table>
<thead>
<tr>
<th>Taronga Submission</th>
<th>Sydney Zoo Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sydney Zoo Foundation is listed in the SIA as supporting Conservation through ‘Animal welfare initiatives with conservation organisations, including fundraising for these initiatives through Sydney Zoo Foundation.’ (Pg 21 Section 3.2 Conservation Programs). As with many of the assertions concerning animal welfare the claims are not backed up with any material substance regarding SZPL’s capacity to create, staff and administer a functioning charitable foundation with the ability to have impacts at the scale or significance indicated throughout the document.</td>
<td>The summary table referenced by Taronga is contained on page 21 of the UTS SIA and reflects the more extensive material contained in Section 4.4.2.d (Charitable Works) of the SZ PAC Submission. Sydney Zoo has registered the name Sydney Zoo Foundation and is committed to its formation and function. Sydney Zoo founders and management have previously established and operated the Sydney Aquarium Conservation Fund (now called the SeaLife Trust under Merlin ownership) <a href="https://www.sydneyaquarium.com.au/conservation/sea-life-trust/">https://www.sydneyaquarium.com.au/conservation/sea-life-trust/</a> Sydney Zoo board members also include the current chairman of the Sydney Swans Foundation <a href="http://sydneyswansfoundation.org.au/">http://sydneyswansfoundation.org.au/</a> and the chairman of the Ottomin Foundation <a href="http://www.ottomin.com.au/about/">http://www.ottomin.com.au/about/</a></td>
</tr>
</tbody>
</table>
the recovery program.

Open Range Zoo which will consist of 16 aviaries capable of holding up to 12 breeding pairs and 40 juveniles.

The document titled “Workshop Report: a conservation breeding programme for plains wanderers” detailed the zoo industry strategy and individual roles for the Plains Wanderer recovery program.

In this document it is clear that responsibility for the program lies with multiple institutions and Plains Wanderer program is unlikely to cease – i.e. the public good outcome will be unaffected – should Featherdale no longer participate.

**Contemporary thinking around the role that ambassador animals play within zoos is directly linked to the ‘connect, understand, act’ model of behaviour change.** Taronga remains concerned that SZPL is overstating how they will address the ‘act’ aspect of this model particularly in the area of engaging its visitors with meaningful actions for wildlife and achieving genuine conservation outcomes through its display of exotic and native wildlife.

Sydney Zoo addressed the ‘connect, understand, act’ model of behaviour change in the SZ PAC Submission and provided significant detail on our proposed initiatives designed to achieve visitor engagement and meaningful conservation outcomes.

The Taronga submission appears to have been made without reference to this material.

**There is risk that SZPL will not meet the welfare needs of the animals in their collection or the ever increasing community expectations regarding animal welfare and zoos. These expectations go beyond compliance with minimum standards. These concerns are raised due to:**

SZPL’s Animal Welfare policy does not meet contemporary thinking in animal welfare, the Australasian Zoo and Aquarium Association’s Animal Welfare Accreditation approach or community attitudes towards zoos in relation to animal welfare. Contemporary thinking is based on measurable positive welfare states not ‘ensuring animal’s have appropriate access’ to shelter, water and appropriate nutrition and ‘prevention of pain and disease’ as detailed in the policy.

Sydney Zoo’s Animal Welfare Policy has adopted the World Organisation for Animal Health’s definition of Animal Welfare – this provides that an animal is in a good state of welfare if it is healthy, comfortable, well nourished, safe, able to express innate behaviour, and if it is not suffering from unpleasant states such as pain, fear and distress. We note that Taronga has also adopted this definition in its published Animal Welfare Charter [https://taronga.org.au/sites/tarongazoo/files/downloads/awc-web.pdf](https://taronga.org.au/sites/tarongazoo/files/downloads/awc-web.pdf)

The SZ PAC Submission also included significant detail addressing our animal welfare philosophy, including the need to satisfy our animals’ psychological needs of social interaction, mental stimulation and choice. Our stated approach to animal welfare is consistent with Taronga’s position as outlined here and its public statements.

Sydney Zoo further notes that our governance and advisory mechanisms, the support from the broader industry, the regulatory oversight by NSW Department of Primary Industries, and our Associate membership of ZAA all act as effective mechanisms for ensuring appropriate animal welfare outcomes consistent with current and evolving community expectations.
The SZPL staff listed as being experienced in animal acquisitions and animal welfare are well known to Taronga. Both are experienced in Australian fauna only. An animal collection including elephants, lions, giraffe, rhino, wild dog, chimpanzees, baboon, Orang-utans, bear, gorilla, tiger, leopard, cheetah, Zebra, hippo, Meerkat and a range of other exotic animals requires specialist skills and depth of expertise and experience in exotic animal acquisition and animal welfare. These are animals with complex physical and physiological health and welfare needs. This remains a significant concern to Taronga and to the ability of SZPL to care for this range of wildlife in the short and long term.

The Taronga Submission appears to only reference the existence of 2 Sydney Zoo staff. This is incorrect.

The SZ PAC Submission outlines the current organisational capacity of Sydney Zoo and our plans with respect to building organisational capacity prior to animal settlement.

Each of Sydney Zoo’s six curatorial team members is a highly regarded industry leader. The team includes past and current presidents of the NSW FMPA and the current president of the International Congress of Zoo Keepers.

At this stage the critical function of Sydney Zoo is to build a network of supportive institutions to share knowledge with us on exhibit design and assist us with animal supply. Our staff are highly respected across industry and consequently we have done this very well.

In terms of building capacity, we have received over 100 CVs, including senior keepers from other zoos, and will build significant organisational capacity prior to the receipt of animals. We are not in a position to divulge these due to the sensitivities with current employers.

We also note that one of the formal considerations in the NSW DPI approvals process is the organisation’s numbers of appropriately qualified staff to maintain the level of animal care required.

Taronga Zoo is 28 hectares in size and SZPL is proposing 16.5 hectares with a significant collection of large mega fauna, many more than in the care of Taronga Zoo. This causes concern again regarding space required to not only care for the animals and meet their welfare needs, but also the space between species to ensure that they feel safe and secure in their environments.

Sydney Zoo is working to ensure our chosen animals are provided with screening, space and visual barriers to ensure that all the animals feel safe and secure in their environment and are able to withdraw from other species that may be housed near them. We have detailed our space relative to exhibits and number of species held by Taronga and other leading zoos in the SZ PAC Submission.

The spatial relationships proposed by Sydney Zoo compare favourably with other Australian zoos.

Species enclosure interactions are also tightly controlled by DPI requirements.

All exhibits are subject to design approval and inspection by NSW DPI prior to the settlement of any animals.

Contemporary exhibit design requires investment. Taronga Zoo has recently invested $17 million in the development of a Sumatran Tiger exhibit in order to achieve our animal welfare and conservation objectives. SZPL is proposing to invest only $28 million in the construction of the entire zoo.

Sydney Zoo notes that Taronga is on a steep, restricted access, heritage site on a sandstone bedrock base. These factors alone will significantly increase the costs of development at Taronga. Our site does not pose these difficulties.

Taronga also spent approximately $56 million re-developing the Great Southern Oceans precinct, whereas Sydney Aquarium, which received a Guinness Book Of Worlds Record certificate as being the world’s largest aquarium at the time, was developed by the Sydney Zoo team at a cost of approximately $25 million.
Dear Mr Bain,

The Sydney Zoo – D440/16

I am writing in relation to the proposed Sydney Zoo and your submission to the Planning Assessment Commission dated 26 July 2017.

Sydney Zoo welcomes the input of Taronga on issues of animal welfare and conservation, as we have with many other zoological institutions in Australia and South-East Asia. We believe that our common objective of achieving the highest standards of animal welfare is best served where there is an environment of collaborative work, and a collaborative spirit amongst zoos and other animal facilities.

Since our inception, Sydney Zoo has demonstrated a strong track record of industry engagement, particularly as we develop detailed enclosure designs and secure sources for our proposed animal collection. To date, the Sydney Zoo team has physically attended over 35 zoos and wildlife parks across Australia and South-East Asia and we have incorporated our learnings from these interactions in our planning process. This includes Taronga Western Plains Zoo where we met with several of the curatorial staff to discuss operational procedures and animal welfare.

We have had an opportunity to review your submission and we have provided a detailed response to the PAC as part of the Development Application process. We would be happy to provide you with a copy of our response, otherwise it will be published by the PAC in due course.

We believe that the matters you have raised in your submission have been addressed in detail in Sydney Zoo’s Response to the Planning Assessment Commission’s Request for Further Information April 2017. This document provides a significant amount of information in relation to Sydney Zoo’s animal welfare planning and operational capability. A copy can be obtained from the PAC website at http://www.pac.nsw.gov.au/projects/2016/11/the-sydney-zoo

Going forwards my curatorial team and I look forward to working collaboratively with the team at Taronga to ensure that we are working together to further animal welfare and conservation outcomes. To this end we would like to meet with members of Taronga’s curatorial team to provide further details of our plans and exchange ideas on animal welfare and conservation opportunities. I look forward to hearing from you.

Sincerely

Jake Burgess - Managing Director
Attachment 2 – Evidence of Differentiation between Sydney Zoo and Featherdale & Sydney Zoo Aboriginal Advancement Programs

Evidence of Differentiation between Sydney Zoo and Featherdale

A central tenet of the Urbis Submission is that the offerings of Sydney Zoo and Featherdale are not sufficiently differentiated. Based on the empirical evidence there is no justifiable basis for this assertion.

We have previously provided an extensive comparison of the features of Sydney Zoo vs Featherdale that shows the facilities are clearly differentiated:

<table>
<thead>
<tr>
<th>Facility</th>
<th>Sydney Zoo</th>
<th>Featherdale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area</td>
<td>Zoological facility</td>
<td>Wildlife park</td>
</tr>
<tr>
<td></td>
<td>16.5 hectares</td>
<td>3.1 hectares</td>
</tr>
<tr>
<td>Visitation time</td>
<td>3-4 hours</td>
<td>1+ hours</td>
</tr>
<tr>
<td>Parking</td>
<td>1,053 spaces</td>
<td>60 spaces plus small overflow area</td>
</tr>
<tr>
<td>Animal Heritage</td>
<td>Exotic and Australian</td>
<td>Australian only</td>
</tr>
<tr>
<td>Restaurant</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Kiosks</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Educational</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Amphitheatre</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Picnic areas and</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Gardens</td>
<td>Wetlands and Waterways</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Quarantine Facility</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Aquarium</td>
<td>Yes, fish and sharks</td>
<td>No</td>
</tr>
<tr>
<td>Reptile and Nocturnal House</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Insectarium</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Aviaries</td>
<td>No</td>
<td>Yes – 70% of animal collection; &gt;1,000 birds</td>
</tr>
<tr>
<td>Australian Animals</td>
<td>Yes – integrated with</td>
<td>Yes – focus on petting/“up-close” experience; 100% of facility</td>
</tr>
<tr>
<td>(smaller marsupials and mammals)</td>
<td>Aboriginal cultural experience; less than 1.6ha of 16.5 ha</td>
<td></td>
</tr>
<tr>
<td>Primates</td>
<td>Yes – gorilla, orangutan,</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>chimpanzee et al</td>
<td></td>
</tr>
<tr>
<td>Big Cats</td>
<td>Yes – Lion, cheetah, tiger</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>et al</td>
<td></td>
</tr>
<tr>
<td>African</td>
<td>Yes – Giraffe, rhinoceros,</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>hyena, zebra et al</td>
<td></td>
</tr>
<tr>
<td>Other Large Animals</td>
<td>Asian elephant, sun bear,</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>water buffalo, addax et al</td>
<td></td>
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</tbody>
</table>

This is further supported by empirical studies and close examination of actual impacts around the world as contained in the UTS SIA:
Visitor perception of similarity and difference of Sydney Zoo and Featherdale offer

- When provided descriptions and then asked to rate how similar or different survey respondents perceived Sydney Zoo vs Featherdale, **78.6% of respondents provided a score of 6 or higher** – indicating that Sydney Zoo and Featherdale are differentiated product offerings.
- No respondents rated the facilities as very similar or slightly above.

The UTS SIA is the only statistically robust survey of the Western Sydney community that has been performed during the Sydney Zoo development application process. It was composed of an online survey of potential visitors within the agreed catchment (n=650) to both Sydney Zoo and Featherdale. The sample included mostly Western Sydney residents (n=570) with the remainder (n=80) coming from the greater Sydney area. Respondents were representatively sampled according to family composition, age, gender and income.

Urbis has raised a number of specific criticisms of the UTS SIA which are addressed by UTS IPPG directly in Attachment 3 of this letter.

Urbis has previously sought to support its assertion that Featherdale will experience a significant financial impact by selectively publishing quotes from four focus groups of eight participants each. Urbis does not disclose the questions asked in the focus groups nor the framing of those questions. The survey data is not randomised and is not representative of the population. The research design is poor and does not meet social research conventions with respect to sampling, representativeness and independent execution.

Urbis bases its assessment on a flawed “exclusive catchment methodology” that views the zoo visitor market as a zero-sum-game – i.e. a visitor to Sydney Zoo will be at the expense of Featherdale. **The UTS SIA provides the only empirical evidence of consumer intentions as a result of the development of Sydney Zoo.**

Impact of Sydney Zoo on zoo and wildlife park visitation

- The UTS SIA found that Sydney Zoo will increase consumer participation in the market – i.e. “grow the pie”. The zoo visitor market is therefore demonstrably not a zero-sum game:
Sydney Zoo and Featherdale visitation scenario

- The UTS SIA survey found that 41% of people would attend both Sydney Zoo and Featherdale, and that 10% of people surveyed had an outright preference of Featherdale over Sydney Zoo, i.e. 51% of people surveyed still intend to visit Featherdale after the development of Sydney Zoo.

The PAC is now in possession of three reports that assess the social and economic contribution of Sydney Zoo to the Western Sydney Community. All three reports unambiguously conclude that Sydney Zoo offers a net positive socio-economic benefit to the community of Western Sydney and these conclusions support approval of Sydney Zoo as proposed.

DP&E Assessment

In its assessment of the proposed Sydney Zoo, DP&E addressed the issue of differentiation. In its Environmental Assessment Report provided to the PAC in November 2016, DP&E stated that:

“The Department supports the Applicant’s approach to differentiating its facility such as through placing an emphasis on having exotic animals and integrating an Aboriginal cultural experience with its exhibition of native animals. This differentiation will assist in the continued operation of Featherdale, enabling Western Sydney to continue to grow as a tourist destination.”

The Department went on to recommend that the conditions reflect “a restriction on the exhibition of Australian native animals to a specified area of the proposed development”. This was manifest in draft condition B6:

Australian native animals shall comprise less than 1.6 hectares of the overall exhibited animal collection and shall be displayed as part of an Aboriginal Cultural Experience (See Condition C21). This area is to be in accordance with the area designated for Australian animals presented within the Site Plan (see APPENDIX A). Any additional Australian native animals can be displayed as part of educational sessions or ‘micro displays’ within the commercial facilities across the site (i.e. restaurants, cafes and shops).

At the time these proposed conditions were made public, Glen Willis CEO of Elanor was reported as saying:

“If the department’s conditions are adhered to as specified the continued operations of Featherdale is assured,” Mr Willis said.

“The new zoo can complement Featherdale very well if the focus is on exotic animals and they don’t seek simply to replace Featherdale.”

Following its review of the submission of the new information requested by the PAC, the Department reconfirmed its assessment report and concluded that no further amendments or alterations to the recommended development consent conditions were required as a result of the submission of the new information.

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1 Daily Telegraph, Nov 29th 2016
Sydney Zoo Aboriginal Advancement Programs

Based on empirical evidence, further restricting the proposed Sydney Zoo Australian animal displays as proposed by Elanor is unnecessary. It would adversely impact a central element of the social benefits that Sydney Zoo intends to offer by eliminating our ability to deliver our Aboriginal jobs Program and Aboriginal Cultural Advancement program.

Sydney Zoo has publicly committed to these initiatives by signing a memorandum of understanding (MOU) with Muru Mittigar via an MOU “signing ceremony” and public announcement that was attended by the former NSW Minister for Tourism - Sturt Ayres and the Australian Senator Marise Payne representing the federal government. The announcement received extensive press coverage:

<table>
<thead>
<tr>
<th>Channel</th>
<th>Link</th>
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It is not correct to state that there is no commitment to this initiative, as Urbis does in its latest response.

The importance of the Sydney Zoo - Muru Mittigar Alliance to the Darug people of Western Sydney is illustrated in the letter of support from Muru Mittigar that is provided in Attachment 4.
Attachment 3 – UTS IPPG Response to Urbis Submission

[see separate file]
Attachment 4 – Letter from Muru Mittigar

[see separate file]