

**Northern Ireland Environment Agency**  
Natural Environment Division



Our reference: **DAERA/21-281**

Via e-mail-

Biodiversity Conservation Science  
Klondyke Building,  
Cromac Avenue,  
Gasworks Business Park,  
Lower Ormeau Road,  
Belfast, BT7 2JA

Tel: [REDACTED]

Email: [bcsgeneral@daera-ni.gov.uk](mailto:bcsgeneral@daera-ni.gov.uk)

21st September 2021

Dear [REDACTED]

### **Environment Information Act 2004 (EIR)**

With regard to your request for information received by the Department on 25 August 2021 that sought the most recent Elephant inspection report for Belfast Zoo.

I can advise that the Department has completed its search and can confirm that it holds the information you requested. I have attached as **Annex A**, the Belfast Zoo 2019 - Inspection Report.

However the Department has determined some of the requested information is considered Personal Data of which you are not the data subject. This information had been withheld under Regulations 12(3) 13(1) of the EIR. Under the legislation, the Department is required to conduct a Lawfulness, fairness & transparency test. This has been completed and is attached as **Annex B**.

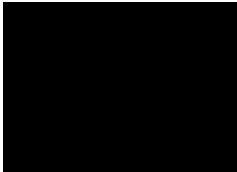
In summary, the Department has considered this element and has determined that no lawful basis for disclosure under EIR exists, bearing in mind that any such disclosure must be considered in terms of disclosure to the "world at large", and not just you the requester. Consequently, the personal data falling within the scope of this request has been withheld.

If you require any clarification, believe that any part of your request has been overlooked, misunderstood or misinterpreted, please contact me in the first instance to see if it is a matter that can be resolved.

If you are unhappy with the manner in which your request for information has been handled or the decision to release/withhold information, you have the right to request a formal review by the Department. If you wish to do so, please contact The Review Section either by e-mailing [daera.informationmanager@daera-ni.gov.uk](mailto:daera.informationmanager@daera-ni.gov.uk) or by post at The Department of Agriculture, Environment and Rural Affairs, Data Protection & Information Management Branch, Floor 2, Ballykelly House, 111 Ballykelly Road, Ballykelly, Limavady BT49 9HP, within two months from the date of this letter.

If after such an internal review you are still unhappy with the response, you have the right to appeal to the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, CHESHIRE, SK9 5AF, who will undertake an independent review of the Department's decision.

Yours sincerely



**Wildlife Officer**

## LAWFULNESS, FAIRNESS AND TRANSPARENCY TEST

DAERA/21-281- Environmental Information Regulations 2004

### Request Details:

Can you provide us with the most recent Elephant inspection report for Belfast Zoo.

### Brief description of the Personal Data falling within the scope of the request

Names of persons involved in completing the report & present for the inspection

## LAWFULNESS

### Please identify the lawful bases for processing

Personal data is processed when it is lawfully disclosed in response to an FOI / EIR request.

The lawful bases for processing are set out in Article 6 of the GDPR and the ICO expects at least one of two lawful bases (Consent / Legitimate Interest) to apply before the personal data held can be disclosed.

- Consent:** This will apply when the data subject(s) clear consent exists that allows you to disclose the personal data falling within the scope of this request.
- Legitimate interests:** the processing is necessary for the Department's legitimate interests or the legitimate interests of a third party that overrides the data subject(s) rights and freedoms, particularly their right to privacy.

Neither lawful bases are met in this case.

### Consideration of Legitimate Interests

#### 1. PURPOSE

As the disclosure of personal data under FOI or EIR is a disclosure to the world at large, doing so on the strength of a requester's private interests alone could constitute a disproportionate and unwarranted level of interference with the data subject(s) rights and freedoms, particularly their right to privacy and family life under the Human Rights Act 1998.

#### 2. NECESSITY

The right of access under FOI or EIR does not in itself constitute a **pressing social need**.

The Department has considered and not identified any such need for the data subject's right to privacy to be interfered with.

### CONCLUSION

Having considered all of the information contained within this test, the Department has established that, on balance, there is no lawful basis for the disclosure of third party personal data falling within the scope of the request [of which the requester is not the data subject.]



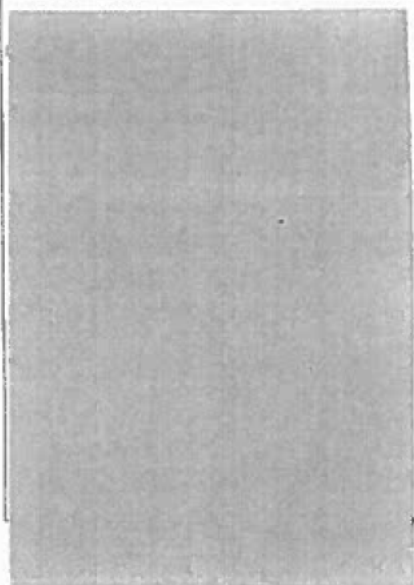
# Zoo Licensing Inspection Form

## Zoo Licensing Regulations (NI) 2003

### Inspection Report

Date of inspection: 27.07.2019


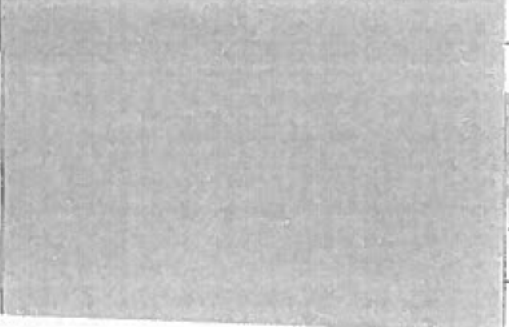
Name of applicant or current licence holder:



Name and address of institution (if different from applicant):

City of Belfast Zoological Gardens  
Antrim Road, Belfast  
BT36 7PN

Licence Number
Date of last inspection: 07.02.2017
Timing of next inspection:
Type of next inspection:

Name of Inspector(s)	Name of Zoo Representative(s)
	

## FINDINGS AT INSPECTION

	Yes	No	N/A	Comments/clarification
<b>1. Provision of food and water.</b>				
1. Are animals provided with a high standard of nutrition?	✓			
2. Is food and drink that is supplied appropriate for the species/individual?	✓			
3. Are supplies of food and water:				
a) kept hygienically?	✓			
b) prepared hygienically?	✓			
c) supplied to the animal hygienically?	✓			
4. Has natural feeding behaviour been adequately considered to ensure that all animals have access to food and drink?	✓			
5. Are feeding methods safe for staff and animals?	✓			
6. Is feeding by visitors permitted?	✓			
a) If 'yes', is it properly controlled?	✓			
<b>2. Provision of suitable environment</b>				
1. Are the animals provided with an environment well adapted to meet the physical, psychological and social needs of the species to which they belong?	✓			A new system of welfare audit for animals in separation/isolation facilities has been introduced.
2. Are the following environmental parameters appropriate:				New area for reptiles has been completed and is a great improvement.
a) temperature	✓			
b) ventilation	✓			
c) lighting	✓			But need to install UV bulbs where necessary in reptile section, together with system of reading and recording.
d) noise levels	✓			
e) any other environmental parameters?	✓			
3. Are there satisfactory measures in place to safely confine the animals?	✓			There are now, but see later comments re actions to resolve recent problems.
4. Do animal enclosures have sufficient shelter and refuge areas?	✓			The possibility of prairie dogs spreading from their enclosure should be closely monitored.

5. Do animal enclosures provide sufficient space?	✓			
6. Are backup facilities for life support systems adequate?	✓			Generators available.
7. Is the cleaning of the accommodation satisfactory?	✓			
8. Is the standard of maintenance adequate for:				
a) the buildings?	✓			The ongoing programme of improvements is noted.
b) the fences?	✓			
9. Is all drainage effective and safe?	✓			
<b>3. Provision of animal health care</b>				
1. Are the animals provided with a high standard of animal husbandry?	✓			
2. Do animals on display to the public appear in good health?	✓			
3. Are observations of condition and health made and recorded?	✓			
4. Do all animals receive prompt and appropriate attention when problems are noted?	✓			See later comments re the planned introduction of Palm technology for data logging by keepers.
5. Are enclosures designed and operated in such a way that social interaction problems are avoided?	✓			

	Yes	No	N/A	Comments/clarification
<u>On/site facilities</u>				
6. Are catch-up and restraint facilities adequate?	✓			
7. Is darting equipment satisfactory?	✓			
8. Are on-site veterinary facilities adequate?	✓			The completion of the upgrade of the veterinary facilities is noted.

<p><u>Veterinary Care</u></p> <p>9. Are the animal provided with a documented and maintained programme of preventative and curative veterinary care and nutrition? ✓</p> <p>10. Is there a system for the regular review of clinical and pathological records? ✓</p> <p>11. Are appropriate veterinary records kept? ✓</p> <p>12. Are medicines kept and disposed of correctly? ✓</p> <p>13. Are controlled drugs used and recorded satisfactorily? ✓</p> <p>14. Are appropriate antidotes available? ✓</p> <p>15. Are post-mortem arrangements satisfactory? ✓</p>				<p>To a high standard</p> <p>The provision of a new post mortem room is noted and commended.</p>
<p><u>Isolation and Containment</u></p> <p>16. Is adequate reserve accommodation available for isolation of animals for:</p> <p>a) assessment? ✓</p> <p>b) treatment? ✓</p> <p>c) recovery? ✓</p> <p>d) quarantine where required? ✓</p>				<p>See the comments in 2.1 re the introduction of a welfare audit for animals in isolation.</p> <p>The work underway to provide a new isolation/separation facility to avoid using the old zoo site is noted and commended.</p>
<p><u>Sanitation and control of disease</u></p> <p>17. Are satisfactory measures in place to prevent the intrusion of pests and vermin into the zoo premises? ✓</p> <p>18. Does it appear that general sanitation and pest control are effective? ✓</p>				
<p><b>4. Provision of an opportunity to express most normal behaviour</b></p> <p>1. Do the accommodation and management regimes encourage normal behaviour patterns and minimise any abnormal behaviour, taking into account current enrichment and husbandry guidelines? ✓</p> <p>2. Are animals of social species normally maintained in compatible social groups? ✓</p>				

	Yes	No	N/A	Comments/clarification
<p><b>5. Provision of protection from fear and distress</b></p> <p>1. Are the animals handled only by or under the supervision of appropriately experienced staff? ✓</p> <p>2. Is physical contact between animals and the public consistent with the animals' welfare? ✓</p>				

3. Are interactions between the animals such that they are not excessively stressful?	✓			
<b>6. Transport and movement of live animals</b>				
1. Can the zoo demonstrate a knowledge of, and compliance with, the regulations covering transportation of animals, and provide copies of certificates to show compliance when transportation has occurred?	✓			
2. Can the zoo demonstrate that: a) transport and movement equipment is in good order? b) facilities suitable for lifting, crating and transportation of all the types of animals kept within the zoo, to destinations both inside and outside the zoo, are readily available?	✓ ✓			
c) catching and transportation techniques take account of the animal's temperament and escape behaviour in order to minimise injury damage and distress? d) adequate provision is made for the animal's and public's safety and well-being while the animal is being transported or kept away from the Zoo?	✓ ✓			

7. Conservation, Education and Research			
1. Is the zoo participating in at least one of the following:			
a) research from which conservation benefits accrue to species of wild animals?	✓		
b) training in relevant conservation skills?	✓		
c) the exchange of information relating to the conservation of species of wild animals?	✓		
d) where appropriate, breeding of wild animals in captivity?	✓		
e) where appropriate, the repopulation of an area with, or reintroduction to the wild of, wild animals?	✓		Red squirrels
2. Is the Zoo promoting public education and awareness in relation to the conservation of biodiversity, in particular by providing information about the species of wild animals kept in the Zoo and their natural habitats?	✓		
3. Where appropriate, are animals managed in a way consistent with the conservation needs of the species, (such as exchange between zoos, accommodation to encourage natural behaviour and breeding etc)?	✓		
4. Are on-site education facilities adequate for the resources of the collection?	✓		
5. Are the conservation efforts adequate for the resources of the collection?	✓		
6. Are the research efforts adequate for the resources of the collection?	✓		
7. Is captive breeding properly managed?	✓		

	Yes	No	N/A	Comments/clarification
<b>8. Animal Security</b> 1. Are there satisfactory measures in place to prevent the escape of animals? 2. Are there satisfactory measures in place to be taken in the event of any escape or unauthorised release of animals? 3. For zoos with dangerous animals, are escape drills carried out at least twice a year, recorded and regularly reviewed? 4. Will the perimeter deter unauthorised entry and aid the confinement of zoo stock? 5. Are trees regularly inspected and appropriate remedial action taken (where there are possible animal security and welfare implications)?	✓ ✓ ✓ ✓ ✓			See later comments. It is noted that new firearms arrangements and systems are in preparation in consultation with PSNI.
<b>9. Records</b> 1. Are there up to date records of the zoo's collection, including records of: a) the numbers of different animals? b) acquisitions, births, deaths, disposals and escapes of animals? c) the causes of any such deaths? d) the health of the animals? 2. Are daily diaries maintained and do they contain appropriate information? 3. Are animal stock records clear and up-to-date? 4. Are animal stock records completed in the correct format and submitted to the licensing authority? 5. Are animal source and destination records kept? 6. Are archived records secure?	✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓			Species360 ZIMS
<b>10. Miscellaneous</b> 1. Do staff numbers and training of staff appear adequate? 2. Is the management structure and organisation of staff adequate to ensure compliance with the Regulations at all times? 3. Are fire precautions and procedures adequate (as far as they might affect animal welfare)? 4. Is electrical equipment routinely serviced (in so far as it might affect animal welfare)?	✓ ✓ ✓ ✓			

<p>5. Is refuse disposed of correctly?</p> <p>6. If Licence Conditions have been applied, have they been met?</p>	<p>✓</p> <p>✓</p>			<p><u>Update on Conditions from previous inspection report:</u></p>
				<ol style="list-style-type: none"> <li>1. The written plan with proposals to resolve issues at the sea lions was completed as required. Some action has been taken and some is pending.</li> <li>2. The written plan regarding giraffe management and the issues around the need for a 'crush' was completed and a decision has been taken to go ahead with provision of a 'crush'.</li> </ol>

THE FOLLOWING SPACE IS PROVIDED FOR:

- ADDITIONAL NOTES AND COMMENTS ON THE ANSWERS TO EARLIER QUESTIONS
- RECOMMENDATIONS (OTHER THAN IN RESPECT OF GRANT OR REFUSAL OF A LICENCE)
- ANY GENERAL REMARKS WHICH THE INSPECTOR MAY WISH TO RECORD

Members of the senior management team at Belfast Zoo are thanked for their courteous and helpful welcome on inspection day and the provision of detailed advance paperwork.

The inspection team commends the following programme of improvements, either completed or underway since the last zoo licensing inspection:

1. The decision to provide crush facilities to improve the management of giraffes.
2. Improved lighting in the spider monkey house.
3. The work underway to provide new isolation/separation facilities so that the old zoo site does not need to be used for this purpose.
4. The introduction of a welfare audit system for all animals held in isolation/separation areas away from their normal accommodation.
5. The completion of the upgraded veterinary facilities, including the provision of a post-mortem room.
6. The provision of additional emergency firearms and licensed operatives and the ongoing development of new procedures in co-operation with PSNI.
7. The appointment of a new Zoo Manager.
8. The planned introduction of Palm data collecting technology for keepers to improve animal record keeping across the Zoo.
9. The upgrading of all electric fencing systems.
10. The recognition by the management team that some areas of the Zoo are aging and some enclosure barriers are possibly being compromised by overgrowing vegetation, and the appropriate action is being taken.

11. The careful assessment of the animal collection and the review of the sustainability of certain species that has been undertaken. This has resulted in the removal from the collection of tigers and hyena, but a long-term commitment to the lions and the planned provision of new accommodation for them.

**Recommendations:**

1. A review should be carried out of the need for UV broad spectrum light bulbs in the reptile section and where necessary such bulbs should be installed. Output should be read and recorded daily and bulbs replaced as required.
2. The freezer for cadavers waiting to be sent to museums is unlabelled. All freezers and fridges in the animal department should be labelled to ensure correct usage.

**Inspection team comments regarding recent animal escapes:**

The inspection team examined in detail the circumstances of recent animal escapes of chimpanzee, spider monkey and red panda and the team is satisfied that the Zoo management has implemented an effective programme of actions to reduce the risk of future escapes.

**INSPECTOR'S RECOMMENDATIONS**

Having inspected: The City of Belfast Zoological Gardens

on 27.07.2019

The inspector makes the following recommendation.

- ~~• It is recommended that a licence be refused~~
- It is recommended that the above collection be licensed in accordance with the Zoo Licensing Regulations (NI) 2003 without Conditions
- ~~• It is recommended that the above collection be licensed in accordance with the Zoo Licensing Regulation (NI) 2003 subject to the following conditions:~~

*(delete as necessary)*



Signed :

Date: 09.08.2019

