

Toronto Zoo Board of Management  
c/o Dela Ting, Administrator  
City Clerk's Office, 2<sup>nd</sup> Floor, 100 Queen Street West  
Toronto, Ontario, M5H 2N2

May 6, 2011

Dear Members Toronto Zoo Board of Management:

As a zoo planner and designer, and as a former zoo director, I have over the past decade become increasingly concerned about the standards of care for elephants in zoos, particularly with regard to the size and complexity of their exhibit space. To help explain my concerns, I co-edited a 2009 Tufts University publication, "The Elephant In The Room" on The Science and Well-Being of Elephants in Captivity. I also wrote a chapter on Why Most Zoos Don't Deserve Elephants, in the 2008 Johns Hopkins University publication, "Elephants and Ethics."

The zoo community has also been paying more attention to elephant welfare in recent years, and the American Zoo Association (AZA) has published new standards that include such obligations as a minimum of three elephants in any zoo. Such a prerequisite would have been unthinkable even in very recent times. The AZA has also set minimum spatial requirements for zoo elephants.

In response to these new requirements, new elephant exhibits are now appearing in several zoos in the USA, with development costs often in the 30 to 50-million dollar range. These exhibits provide improvements for the elephants, with some care and attention being paid, at last, to physical comforts such as deep pools, mud wallows, soft sand substrates, scattered and diverse feeding points, and other details that will improve conditions for elephant welfare.

These new standards, however, still lag far behind those that my colleagues and I comprehensively detailed in our book on The Science and Well-Being of Elephants in Captivity. Perhaps this delay is inevitable. Changes in attitude and improvements in welfare, be they for people or for animals, have always been slow, usually hard fought, and inevitably incremental.

I am confident that within a decade or so the standards currently set by the AZA will be recognized as entirely inadequate. Because AZA is a trade organization it must give priority to the needs of its member zoos and must consider their financial abilities and spatial restraints when creating standards. Setting standards that are actually focused upon *elephant* needs would require changes that very few zoos could meet.

Although zoos speak proudly about their new standards, and proclaim that meeting them means that all is well, in truth the standards would be very different, and significantly so, if they were written from the point of view of meeting the very challenging social, psychological, behavioral, emotional and physiological needs of elephants themselves.

When zoos design new exhibits they base them not on what animals do in the wild, but on what other zoos have done. That is why for so long it was considered normal to keep zoo animals in small cages. Today it is considered acceptable for a zoo elephant to have a minimum of 1800 square feet. If a zoo provides even 2 or 3 acres of land it is lauded as generous, yet measured by what elephants actually want and need, this is completely inadequate.

For these reasons, I urge you to not only remove the elephants from Toronto Zoo, but also, and most importantly, to meet your community's ongoing responsibilities to the care and well-being of these individuals, by ensuring that they are sent to a home where the elephants' needs are paramount. Delivering them to another zoo will not provide what they truly need and deserve.

If you decide to relocate the elephants from Toronto Zoo I respectfully suggest that your next decision is to provide them with the very best home they could enjoy for their remaining years. In my considered view that would mean one of the two Elephant Sanctuaries in the United States, where they will not only have expert care, equal to any zoo, but in addition the companionship of many others of their own kind, in spaces large and complex to a degree far beyond anything any zoo in the world can provide.

Respectfully,

David Hancocks

Victoria, Australia