



RECEIVED
 06 MAR 2023

Inspection Report

Date of inspection: 30-31st January 2023 Date report completed: 6th February 2023

Name of applicant or current licence holder: ██████████

Name and address of zoo: Paignton Zoo
 Totnes Road
 Paignton
 Devon

 Postcode: TQ4 7EU

Tel no: ██████████ Licence Number: N/A

Date of last formal inspection: 28-29 May 2019 Type of last formal inspection: Renewal

Timing of next formal inspection: 2025 Type of next formal inspection: Renewal

Type of inspection Statutory composition of inspection team *Please tick appropriate box*

Section 10 Periodical: 2 Defra/Welsh Government nominees; 1 LA vet; option of up to 2 more from LA ..

Section 11 Special: Any number of competent LA authorised appointees

Section 14(1)(b) dispensation renewal under section 6(1A)(a) (where a direction has been made that section 10 shall not apply):
 Defra/Welsh Government nominee/s.....

Section 14(2) dispensation Periodical:
 Defra/Welsh Government nominee/s.....

For a licence inspection (Section 4(1A)(b)) and a significant change inspection (Section 9A(8)) please use the inspection form at Appendix 11A of the Standards.

Name and designation of inspector(s)	Name of zoo representative(s)
██████████ Sec of State Inspector, List 1	██████████ Head of Conservation Services
██████████ Sec of State Inspector, List 2	██████████ Chief Science Officer
██████████ Local Authority Veterinary Inspector	██████████ Business Continuity & High Reliability
██████████ Torbay Council, Licensing officer	██████████ Risk & Compliance Manager
██████████ Environmental Health Officer, TC	

When this form has been completed and signed the original must be sent to the local authority. If the zoo is owned by the local authority, the local authority must send a copy of the completed form to Defra where the zoo is situated in England or to the Welsh Government, where the zoo is situated in Wales.

Preamble to inspectors' report

Information and guidance about the Zoo Licensing Act 1981 (ZLA) is available at <https://www.gov.uk/government/policies/protecting-biodiversity-and-ecosystems-at-home-and-abroad/supporting-pages/species-protection> and <http://wales.gov.uk/topics/environmentcountryside/ahw/zoos/?lang=en>

Preamble to inspectors' report*, including any comments about the current dispensation status, if applicable.

Paignton Zoo houses a large and varied collection of almost 2,500 animals on its attractive 80 acre site in a wooded valley. The zoo is well managed by respected conservation and education charity, the Wild Planet Trust, which also manages Slapton Ley National Nature Reserve and two local nature reserves, as well as Newquay Zoo. The zoo opened to the public in 1923 and over time has developed strong conservation, research and education programmes, supporting the WPT's inspiring newly formulated mission to 'Help halt species decline'.

The period since the last formal inspection has been challenging for the zoo as a result of the covid-19 pandemic, weather related damage to infrastructure, an outbreak of avian influenza on site in 2022 and a recent case of mycobacterial infection, which is still under investigation and has impacted the Balai reapproval process. In addition significant staff restructures have taken place and a new operating model implemented.

Looking ahead, 2023 is the zoo's centenary year and a varied programme of events and activities are scheduled, including an exciting and very commendable initiative to provide free school visits throughout the year. A new collection plan focuses on reducing the current collection in order to work towards a goal of 75% of species held considered threatened and linked to management or species recovery programmes.

Several new enclosures and upgrades are planned in 2023, including improvements to the big cat facilities and ape centre, new lemur housing, changes to the binturong enclosure and a new flamingo facility, as well as a completely new enclosure for the large group of hamadryas baboons. New stabling for the zebras has already been constructed and this along with improvements to the giraffe enclosure will allow these two species to be held together. In the longer term, work is scheduled to significantly enlarge the size of the giraffe house by allowing access to the side of the building that previously housed the elephant.

There have been several escapes within the zoo perimeter since the last inspection, including 4 birds, a gibbon and a gorilla, which remained within the ape centre. The zoo holds one species listed under the invasive species legislation (sacred ibis) which is being managed appropriately. There is no dispensation in place for the zoo, which remains appropriate given the size of the collection.

Informal inspections have been undertaken annually, although the most recent one was not documented. This periodical inspection should have taken place in 2022. The inspectors were provided with a completed pre-inspection audit form and comprehensive supporting documents in advance of the inspection. Other documentation was provided on the day of inspection.

*this might include general background about the zoo (type of collection, size etc) and any relevant information or comments from the pre-inspection audit

Findings at inspection

Guidance note: Where possible a Yes, No or Not Applicable (N/A) answer should be given. Where not all criteria are met for a particular question, comments and clarification should be made indicating where any deficits occur. If appropriate, means of correction or improvement should be included as Conditions or Recommendations under 'Additional conditions' or 'Additional space' towards the end of the form.

1. Provision of food and water	Marking Yes No N/A	Comments/clarification
Section 1A(c)(ii) ZLA 1981: 1.1. Are animals provided with a high standard of nutrition?	Yes <input type="checkbox"/>	Commended on the variety of fresh browse provided over the winter. Detailed diet sheets available for birds and mammals but not for reptiles and amphibians. See condition 1
1.2. Is food and drink that is supplied appropriate for the species/individual?	Yes <input type="checkbox"/>	
1.3. Are supplies of food and water:		
(a) kept hygienically?	Yes <input type="checkbox"/>	
(b) prepared hygienically?	Yes <input type="checkbox"/>	
(c) supplied to the animal hygienically?	Yes <input type="checkbox"/>	
1.4. Has natural feeding behaviour been adequately considered to ensure that all animals have access to food and drink?	Yes <input type="checkbox"/>	
1.5. Are feeding methods safe for staff and animals?	Yes <input type="checkbox"/>	
1.6. Is feeding by visitors permitted?	Yes <input type="checkbox"/>	Visitors are allowed to feed giraffes, rhinos and giant tortoises under close supervision.
(a) if 'yes', is it properly controlled?	Yes <input type="checkbox"/>	
2. Provision of suitable environment		
Section 1A(c)(i) ZLA 1981: 2.1. Are the animals provided with an environment well adapted to meet the physical, psychological and social needs of the species to which they belong?	No <input type="checkbox"/>	In most cases certainly yes, however spider monkeys and orang-utans would benefit from more climbing opportunities / structures in their outdoor enclosures - see directions 1 and 2. The female Annam leaf turtles have no suitable area for oviposition in their tank and the basking area is small for the number of animals - see direction 3. See also 2.5 below and directions 4, 5 and 6, as well as recommendation 1 re additional perches for scarlet ibis and recommendation 6.
2.2. Are the following environmental parameters appropriate:		UVB lighting provision for reptiles and amphibians excellent, however review needed for callitrichids - see recommendation 2. See also recommendation 3 regarding cleaning of the desert house windows.
(a) temperature?	Yes <input type="checkbox"/>	
(b) ventilation?	Yes <input type="checkbox"/>	
(c) lighting?	Yes <input type="checkbox"/>	
(d) noise levels?	Yes <input type="checkbox"/>	
(e) any other environmental parameters?	Yes <input type="checkbox"/>	

2. Provision of suitable environment (contd.)	Marking Yes No N/A		Comments/clarification
2.3. Are there satisfactory measures in place to safely confine the animals?	Yes	▼	
2.4. Do animal enclosures have sufficient shelter and refuge areas?	Yes	▼	
2.5. Do animal enclosures provide sufficient space?	No	▼	Most enclosures provide sufficient space but see directions 4, 5 and 6 regarding enclosures for hamadryas baboons, red ruffed lemurs and temporary enclosures/pools for false gharials.
2.6. Are backup facilities for life support systems adequate?	Yes	▼	Alternative housing available if localised interruption in power. Contingency plan for site-wide power failure in place including hiring in generators if needed
2.7. Is the cleaning of the accommodation satisfactory?	Yes	▼	To a very high standard
2.8. Is the standard of maintenance adequate for: (a) the buildings?	Yes	▼	Much of the infrastructure is relatively old however proactive programme of repair and replacement in place.
(b) the fences?	Yes	▼	
2.9. Is all drainage effective and safe?	Yes	▼	
3. Provision of animal health care			
Section 1A(c)(ii) ZLA 1981:			
3.1. Are the animals provided with a high standard of animal husbandry?	Yes	▼	
3.2. Do animals on display to the public appear in good health?	No	▼	Almost all the animals in the large collection were in excellent health, with three exceptions (Boyd's forest dragon, mangabey and takin) under veterinary care. See recommendation 4
3.3. Are observations of condition and health made and recorded?	Yes	▼	
3.4. Do animals receive prompt and appropriate attention when problems are noted?	Yes	▼	
3.5. Are enclosures designed and operated in such a way that social interaction problems are avoided?	Yes	▼	
On-site facilities			
3.6. Are catch-up and restraint facilities adequate?	Yes	▼	Races, crushes, nets and other equipment seen
3.7. Is darting equipment satisfactory?	Yes	▼	Darting equipment and training records for firearms team all well kept
3.8. Are on-site veterinary facilities adequate?	Yes	▼	Good veterinary facilities and equipment available on-site

3. Provision of animal health care (contd.)	Marking Yes No N/A	Comments/clarification
Veterinary care Section 1A(c)(ii) ZLA 1981: 3.9. Are the animals provided with a documented and maintained programme of preventative and curative veterinary care and nutrition?	Yes	The veterinary department is in a period of transition with a single temporary on-site vet supported by locum cover from the International Zoo Veterinary Group and others. The new structure consisting of a practice manager, veterinary officers and nurses is expected to be in place within a couple of months. There is a detailed preventative care and surveillance document, however this needs updating - see condition 2
3.10. Is there a system for the regular review of clinical and pathological records?	Yes	
3.11. Are appropriate veterinary records kept?	Yes	Detailed records kept
3.12. Are medicines kept and disposed of correctly?	Yes	
3.13. Are controlled drugs used and recorded satisfactorily?	Yes	
3.14. Are appropriate antidotes available?	Yes	
3.15. Are <i>post mortem</i> examination arrangements satisfactory?	Yes	
Isolation and containment 3.16. Is adequate reserve accommodation available for isolation of animals for: (a) assessment? (b) treatment? (c) recovery? (d) quarantine (where required)?	Yes	A variety of off-show accommodation is available, some of which is still being used to isolate birds after the avian influenza outbreak on site last year.
Sanitation and control of disease Section 1A(e) ZLA 1981: 3.17. Are satisfactory measures in place to prevent the intrusion of pests and vermin into the zoo premises?	Yes	Rentokil visits once a week, with zoo staff also trained in pest control procedures
3.18. Does it appear that general sanitation and pest control are effective?	Yes	

4. Provision of an opportunity to express most normal behaviour	Marking Yes No N/A	Comments/clarification
4.1. Do the accommodation and management regimes encourage normal behaviour patterns and minimise any abnormal behaviour, taking into account current enrichment and husbandry guidelines?	Yes <input type="checkbox"/>	However see directions 1, 2 and 3.
4.2. Are animals of social species normally maintained in compatible social groups?	Yes <input type="checkbox"/>	One male gorilla managed as a single animal with regular welfare reviews
5. Provision of protection from fear and distress		
5.1. Are the animals handled only by or under the supervision of appropriately experienced staff?	Yes <input type="checkbox"/>	
5.2. Is physical contact between animals and the public consistent with the animals' welfare?	Yes <input type="checkbox"/>	
5.3. Are interactions between the animals such that they are not excessively stressful?	Yes <input type="checkbox"/>	
6. Transportation and movement of live animals		
6.1. 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?	Yes <input type="checkbox"/>	
6.2. Can the zoo demonstrate that: i) transport and movement equipment is in good order?	Yes <input type="checkbox"/>	
ii) 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?	Yes <input type="checkbox"/>	
iii) catching and transportation techniques take account of the animal's temperament and escape behaviour in order to minimise injury, damage and distress?	Yes <input type="checkbox"/>	
iv) adequate provision is made for the animal's and the public's safety and well-being while the animal is being transported or kept away from the zoo?	Yes <input type="checkbox"/>	

7. Conservation, education and research	Marking Yes No N/A	Comments/clarification
<p>Section 1A(a) ZLA 1981:</p> <p>7.1. Is the zoo participating in at least one of the following:</p> <p>(i) research from which conservation benefits accrue to species of wild animals?</p> <p>(ii) training in relevant conservation skills?</p> <p>(iii) the exchange of information relating to the conservation of species of wild animals?</p> <p>iv) where appropriate, breeding of wild animals in captivity?</p> <p>(v) where appropriate, the repopulation of an area with, or the reintroduction into the wild of, wild animals?</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>Conservation output is excellent with an impressive number of projects, far exceeding minimum requirements.</p> <p>Many projects involve research including the Omo Forest elephant project in Nigeria, turquoise dwarf gecko research and the seagrass conservation project.</p> <p>Students on an MSc run jointly with the University of Plymouth are trained in conservation and research skills with skills transfer also a focus of some overseas projects.</p> <p>There is a strong focus on awareness raising, public engagement and environmental advocacy</p> <p>Zoo staff manage several and participate in many EEPs</p> <p>The zoo participates in hazel dormouse and white-clawed crayfish recovery programmes</p>
<p>Section 1A(b) ZLA 1981:</p> <p>7.2. 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?</p>	<p>Yes</p>	
<p>7.3. 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)?</p>	<p>Yes</p>	
<p>7.4. Are on-site education facilities adequate for the resources of the collection?</p>	<p>Yes</p>	<p>Commended on inspirational initiative to provide free visits to school children throughout this centenary year</p>
<p>7.5. Are the conservation efforts adequate for the resources of the collection?</p>	<p>Yes</p>	<p>Excellent</p>
<p>7.6. Are the research efforts adequate for the resources of the collection?</p>	<p>Yes</p>	<p>Excellent research department and output</p>
<p>7.7. Is captive breeding properly managed?</p>	<p>Yes</p>	

8. Public safety	Marking Yes No N/A	Comments/clarification
Section 1A(d) ZLA 1981:		
8.1. Are there satisfactory measures in place to prevent the escape of animals?	Yes <input type="checkbox"/>	
8.2. Are there satisfactory measures in place to be taken in the event of any escape or unauthorised release of animals?	Yes <input type="checkbox"/>	Detailed emergency procedures in place for escaped animals
8.3. Are escape drills carried out four times a year, recorded and regularly reviewed (at least two drills should include the escape of a Category 1 animal where present)?	Yes <input type="checkbox"/>	Five emergency drills carried out in 2022, including three category 1 species - cassowary, kangaroo and lion.
8.4. Will the perimeter deter unauthorised entry and aid the confinement of zoo stock?	Yes <input type="checkbox"/>	However some overgrowth of vegetation behind cassowary enclosure which requires attention - see recommendation 5
8.5. Do stand-off barriers appear adequate?	Yes <input type="checkbox"/>	
8.6. Are adequate warning signs provided?	Yes <input type="checkbox"/>	
8.7. Are prohibited areas appropriately signed?	Yes <input type="checkbox"/>	
8.8. Are exits clearly marked and accessible?	Yes <input type="checkbox"/>	
8.9. Do public areas, walkways and buildings appear safe?	Yes <input type="checkbox"/>	Several newly laid visitor paths were noted
8.10. Are trees regularly inspected and appropriate remedial action taken?	Yes <input type="checkbox"/>	Detailed tree inspection reports and monitoring in place
8.11. Have appropriate risk assessments for direct contact by the public with animals been carried out?	Yes <input type="checkbox"/>	
8.12. Are the special safety requirements for walk-through or drive-through exhibits adequately met?	Yes <input type="checkbox"/>	

9. Records	Marking Yes No N/A	Comments/clarification
Section 1A(f) ZLA 1981:		Very high standard of record keeping
9.1. Are there up-to-date records of the zoo's collection, including records of:		
(i) the numbers of different animals?	Yes <input type="checkbox"/>	
(ii) acquisitions, births, deaths, disposals and escapes of animals?	Yes <input type="checkbox"/>	
(iii) the causes of any such deaths?	Yes <input type="checkbox"/>	
(iv) the health of the animals?	Yes <input type="checkbox"/>	
9.2. Are daily diaries maintained, and do they contain appropriate information?	Yes <input type="checkbox"/>	
9.3. Are animal stock records clear and up-to-date?	Yes <input type="checkbox"/>	
9.4. Are annual stock records completed in the correct format and submitted to the local authority?	Yes <input type="checkbox"/>	
9.5. Are animal source and destination records kept?	Yes <input type="checkbox"/>	
9.6. Are archived records secure?	Yes <input type="checkbox"/>	
10. Miscellaneous		
10.1. Do staff numbers and training of staff appear adequate?	Yes <input type="checkbox"/>	Online training portal used to record staff training
10.2. Is the management structure and organisation of staff adequate to ensure compliance with the Standards at all times?	Yes <input type="checkbox"/>	
10.3. Are effective risk assessments carried out where appropriate?	Yes <input type="checkbox"/>	Large number of detailed risk assessments
10.4. Has an ethical review process been established and implemented?	Yes <input type="checkbox"/>	
10.5. Are public toilet facilities adequate and serviced?	Yes <input type="checkbox"/>	
10.6. Are parking facilities adequate?	Yes <input type="checkbox"/>	
10.7. Is a First Aid policy and accident reporting and recording system in place?	Yes <input type="checkbox"/>	

11. Associated legislation	Marking Yes No N/A	Comments/clarification
11.1. Is electrical equipment routinely serviced?	Yes <input type="checkbox"/>	
11.2. Have fire precautions been agreed and implemented?	Yes <input type="checkbox"/>	
11.3. Is refuse and clinical waste disposed of correctly?	Yes <input type="checkbox"/>	
11.4. Are the required needs of disabled visitors met?	Yes <input type="checkbox"/>	
12. Compliance check including licence conditions		
12.1. Is the current licence or a copy on public display at each public entrance?	Yes <input type="checkbox"/>	
12.2. Is adequate Public Liability Insurance current?	Yes <input type="checkbox"/>	
12.3. Have any Additional licence conditions been met?	Yes <input type="checkbox"/>	

Additional space

The following space is provided for:

- additional notes and comments on the answers to the earlier questions
- recommendations (other than in respect of grant or refusal of a licence and any specific conditions recommended for a licence) including those based on comments already made to earlier questions
- any general remarks which the inspecting team may wish to record

The inspection team would like to thank the Paignton Zoo staff for their transparency, hospitality and efficient management of the inspection process. It was a pleasure to inspect the collection and we were impressed by the enthusiasm and commitment of the knowledgeable staff who showed us around. The excellent conservation, education and research work is highly commendable and the commitment to an ongoing process of significant capital expenditure and enclosure upgrades is impressive, particularly given the financial impact of the covid-19 pandemic.

Recommendations:

1. Additional perching would be beneficial for the scarlet ibis
2. UVB lighting provision for the callitrichids seemed inconsistent - we would recommend reviewing and developing a documented UV provision programme for these animals, considering aspects such as species specific requirements; appropriate UV output and range of bulbs; position of bulbs; and timings of replacement based on best practice for the equipment used. This should also include a system of documented assessment, review and replacement which is incorporated into the animal records or similar.
3. The windows of the desert house were dirty and would benefit from more regular cleaning to allow more daylight into the area for the budgies and other birds
4. One elderly takin was in poor body condition with muscle atrophy over the hindlimbs and has a chronic cough. A detailed risk assessment has been submitted to APHA highlighting that this animal is at high risk of mycobacterial infection. If a timely response is not received from APHA then a veterinary plan to manage this animal should be established and implemented to ensure its welfare and minimise potential spread of disease.
5. Vegetation overgrowing the perimeter fence behind the cassowary enclosure should be cut back and maintained.
6. Consideration should be given to providing more fresh twigs (eg willow) for the parrots to chew on.

Inspecting team's recommendation to the local authority

Having inspected (name of zoo) Paignton Zoo

on: 30th and 31st January 2023

the inspecting team make the following recommendation: *Please tick appropriate box*

- it is recommended that a licence be refused.....
- it is recommended that the above collection be licensed in accordance with the ZLA 1981 subject to the conservation measures in section 1A
- it is recommended that the above collection be licensed in accordance with the ZLA 1981 subject to the conservation measures in section 1A and the following Additional Conditions (N.B Additional Conditions must be clearly worded so as to be enforceable and a timescale applied for compliance)
- it is recommended that the following alterations be made to the above collection's licence conditions

Additional Conditions (if appropriate)

Conditions:

1. In accordance with 1.13 of the SSSMZP diet sheets must be developed for reptiles and amphibians, recorded and implemented. The zoo licence holder must ensure that this change has been completed within three months from the date on which this condition takes effect.

2. In accordance with 3.7 (and 3.8) of the SSSMZP the veterinary health/preventative programme must be updated, and reviewed to reflect current procedures and appropriate best practice for the collection. This must include, but is not limited to: (i) a routine health surveillance programme including vaccination, parasite and microbiology screening, including anthelmintic selection and parasite management options; (ii) quarantine, isolation and import policies and procedures for each taxonomic group including species specific recommendations; (iii) a process of documented review of clinicopathological records; (iv) post mortem examination (PME) procedures; (v) nutritional and dietary review processes; (vi) pharmaceutical dispensing, storage and management policies, and (vii) a documented zoonosis policy that includes a review of zoonotic pathogens considered a risk in the collection, surveillance programmes in place to monitor for such pathogens, risk assessments specific to zoonosis management and the mitigation strategies deployed to reduce risk to staff and visitors, including hand washing and sanitation strategies. The zoo licence holder must ensure that this change has been completed within six months from the date on which this condition takes effect.

Directions - The zoo is not required to be closed to the public during the period in which the zoo must make the changes needed to comply with the following directions:

1. In view of their arboreal lifestyle and in accordance with 4.3 and 4.4 of the SSSMZP improved climbing/swinging opportunities/structures must be provided for the spider monkeys in their outdoor enclosure - within 6 months
2. In view of their arboreal lifestyle and in accordance with 4.3 and 4.4 of the SSSMZP some climbing/swinging opportunities/structures must be provided for the orang-utans on their largest island - within 12 months
3. In accordance with 4.3 and 4.4 of the SSSMZP the Annam leaf turtles must be provided with a suitable substrate for oviposition and a basking area sufficient in size for all animals in the enclosure - within 3 months
4. Although allowed access to a large walk-through enclosure for much of the year, during the winter months the group of red ruffed lemurs are confined to a house and outdoor enclosure both of which are considered too small for the species. In accordance with section 2 and 4.3 and 4.4 of the SSSMZP the lemurs must be provided with an indoor and outdoor enclosure of sufficient size to provide an environment well-adapted to meet the physical, psychological and social needs of the species - within 6 months
5. The large group of hamadryas baboons is housed in a ' baboon-rock ' type enclosure with inadequate indoor holding areas for the number of animals, limited isolation/separation areas and with artificial rock-work which is cracked and deteriorating. In accordance with section 2 and 4.3 and 4.4 of the SSSMZP the baboons must be re-housed in an enclosure of sufficient size and complexity to provide an environment well-adapted to meet the physical, psychological and social needs of the species - within 12 months
6. As a result of storm damage to the roof of Crocodile swamp, the false gharials are currently housed temporarily in off-show pools which are very small for the size of the animals. One is due to be exported but in accordance with 4.3 of the SSSMZP the other two animals must be returned to a larger enclosure - within 1 month

Inspector(s) signature(s)

Date signed

6/2/23

10/2/23.

03/03/2023

The Data Protection Act 1998 – Fair Processing Notice

The purpose of this Fair Processing Notice is to inform you of the use that will be made of your personal data, as required by the Data Protection Act 1998.

The local authority in England (or in Wales as the case may be) is the data controller in respect of any personal data that you provide when you complete this zoo inspection form. The information that you provide may be used by the local authority in its consideration of issuing or amending a zoo licence in accordance with the Zoo Licensing Act 1981 (ZLA). The local authority may be required to release information, including personal data and commercial information, on request under the Environmental Information Regulations 2004 (EIRs) or the Freedom of Information Act 2000 (FOIA). However, local authorities will not permit any unwarranted breach of confidentiality nor act in contravention of their obligations under the Data Protection Act 1998 (DPA).

Where the zoo, to which this inspection report applies, is owned by the local authority, the local authority must send a copy of the completed form to Defra (in accordance with section 13(2) of the ZLA) where the zoo is situated in England, or to the Welsh Government where the zoo is situated in Wales. Defra or the Welsh Government (as the case may be) may use the information contained in the form to ensure that local authorities are carrying out their duties correctly in accordance with the ZLA.

Defra and the Welsh Government are also subject to the EIRs and the FOIA and so may be required to release information, including personal data and commercial information, on request. However, as above, Defra and the Welsh Government will not permit any unwarranted breach of confidentiality nor act in contravention of their obligations under the DPA.

