

Acknowledgment to Directors:

“The AZA Board of Directors recognizes all the incredible work that has taken place in order to comply with this policy since it was originally adopted in 2011. In particular, the Board recognizes the work of the Elephant TAG in developing and carrying out this policy, the PDC for creating and implementing the associated training programs, and the Accreditation Commission for ensuring compliance. The Board also recognizes and appreciates the work of the elephant holding institutions that have made physical changes to their facilities and protocol changes to their elephant care program, as well as the open and honest dialogue that has taken place to help make certain that elephant care professionals have the safest working conditions possible.”

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### **Maximizing Occupational Safety of Elephant Care Professionals At AZA-accredited and AZA-certified Facilities**

The Association of Zoos and Aquariums (AZA) continually strives to advance the occupational safety of elephant care professionals<sup>1</sup> as well as the care and welfare of elephants. Through a series of AZA actions over the past two decades, AZA has attempted to promote significant improvements in safety, care and welfare. Among other things, AZA has developed a Principles of Elephant Management training course and has adopted minimum Standards for Elephant Management and Care, which were made mandatory in 2001. These Principles and Standards have assisted AZA entities and organizations in developing sound practices regarding elephant care professionals.

In January 2011, the AZA Board of Directors initiated another review of the occupational safety of elephant care professionals. As part of this review, in May 2011 the AZA convened a special meeting of all directors of AZA facilities<sup>2</sup> with elephants and their elephant managers to discuss occupational safety in elephant care and management. While every facility is as different as are their elephants, a number of factors emerged from this discussion that have and will continue to increase workplace safety and reduce occupational risk, including adherence to high standards, increased staff training, well-developed management communications and protocols, and frequent program evaluation.

Concurrent with this review, in March 2011, the Association of Zoos and Aquariums Board of Directors adopted revised Accreditation Standards for Elephant Management and Care.<sup>3</sup> These are comprehensive, performance-based standards that were developed over several years.

In March 2014, the Board of Directors convened a task force to review the 2011 policy and proposed language that would better reflect the original intent to maximize the safety of elephant care professionals.

The above-listed safety measures notwithstanding, preliminary information suggests that the amount of time (both frequency and duration) an elephant care professional spends with an elephant in the same unrestricted space increases occupational risk.<sup>4</sup> Therefore the Board of Directors is taking the following measures to maximize the safety of elephant care staff by limiting the sharing of space with elephants, while continuing to advance the care and welfare of elephants.

As soon as possible and no later than September 1, 2014, elephant care providers at AZA facilities with elephants shall not share the same unrestricted space with elephants, except for certain, limited exceptions outlined in II.d below. Within six (6) months of reissuance of this Policy, the Director may request a variance in writing to the Accreditation Commission to allow time for the Institution to meet the criteria of II.d below. Variances will expire June 1, 2017.

Restricted contact is defined as managing elephants with a primary containment barrier between human and elephant.<sup>5</sup> Tethers may be used and if used must be placed on at least two (2) legs of the elephant (one front and one back). Tethers must be placed on the elephant from outside the primary containment barrier prior to entry into the shared space.<sup>6</sup> Routine husbandry should not be performed exclusively while elephants are on tethers.

In order to maximize safety while working in restricted contact, keepers must always monitor the position of themselves and their elephant(s) in relation to the barrier/restraints, the reach of the elephant(s) especially the reach of the trunk and the behavior of the elephant(s). The head and/or torso of a person must never cross the plane of the primary containment barrier unless the elephant is on restraints as this is no longer restricted contact.

The Board recognizes that, in order to achieve the above-stated goal, a transition period will be necessary. This transition period is sequenced to encompass:

- Additional work from the AZA Elephant Taxonomic Advisory Group (TAG) to support AZA facilities in safely managing elephants and providing advanced care and welfare;
- Program safety assessments;
- Immediate steps regarding the management of aggressive elephants;
- Program planning and documentation;
- Staff training; and
- Facilities/infrastructure changes.

The Board:

- I. Tasks the AZA Elephant Taxonomic Advisory Group (TAG) with the following:
  - a. By September 1, 2012, to develop standardized methods and protocols for AZA facilities to maintain daily behavioral profiles/ethograms for each elephant and document all instances of aggression<sup>7</sup> to be applied in item II.e. below;
  - b. By September 1, 2012, to develop an appendix to this document that provides guidance and examples to AZA facilities making modification to their infrastructure to accommodate this change in policy (see item II.i. below).
  - c. By September 1, 2012, to develop standardized methods and protocols for AZA facilities to report annually on:
    1. The exceptions in which elephant care professionals share unrestricted space with elephants versus when barriers and/or restraints are present (see item II.d).
    2. The number of workplace injuries or fatalities, if any, that occurred in the care and management of elephants and the specific conditions under which each occurred.

3. The number of elephant births and mortalities and a description of the specific practices and protocols used during each event.
- d. By January 1, 2013, to develop standardized methods and protocols for AZA facilities to evaluate and maintain records of each elephant care professional's safety-proficiency, in a manner that integrates their experience level with the specific behavioral profiles of the elephants in his/her care (to be applied in II.g. below).
- e. Convene a task force to research means of successful breeding, health care and welfare that will be increasingly effective with barriers in place between elephant care professionals and elephants.

II. Directs all AZA facilities with elephants in their care to:

- a. As soon as possible, move any elephant that displays aggression towards an elephant care provider(s) into management and care with barriers or restraints in place between that elephant and that care provider(s).
- b. By January 1, 2012, perform at least one of the semi-annual program safety assessments, as outlined in AZA Elephant Standard 1.4.9.5.
- c. By January 1, 2012, specifically address the facility's elephant program in the risk management policy required in AZA Accreditation Standard 11.4.1.
- d. By September 1, 2012, amend their existing elephant management plans to include clear exception protocols (including frequency and duration) when elephant care professionals and elephants may share the same unrestricted space.<sup>8</sup>

When there are crises or medical emergencies or for birth management, written protocols used with dangerous animals apply. Examples include critically ill elephants, elephant down, hand rearing of elephant calves (up to 24 months of age) and in rare cases geriatric cows that require special care as prescribed by the staff veterinarian.

The following are not considered to be crisis or medical emergencies and therefore are not exceptions.

- Trunk washes
  - Foot care
  - Blood draw
  - Research
  - Exercise
  - Bathing
  - Donor/guest interaction
  - Routine husbandry
  - Calf training (after 24 months of age)
  - Transportation
  - Routine care and facilities maintenance (e.g. feeding and cleaning of the barn and/or exhibit)
- e. By January 1, 2013, maintain daily behavioral profiles/ethograms for each elephant and document all instances of aggression.

- f. By January 1, 2013 provide a report (required annually) to the Accreditation Commission, the Elephant TAG, and the AZA staff that, for the previous year, defines:
  - 1. The exceptions under which elephant care professionals share unrestricted space with elephants versus when barriers and/or restraints are in place.
  - 2. The number of workplace injuries or fatalities, if any, that occurred in the care and management of elephants and the specific conditions under which each occurred.
  - 3. The number of elephant births and mortalities and a description of the specific practices and protocols used during each event.

The Accreditation Commission and/or AZA staff will follow up where institutional reports indicate challenges in meeting the elephant safety standards.
- g. By June 1, 2013, evaluate and maintain records of each elephant care professional's safety-proficiency, in a manner that integrates their experience level with the specific behavioral profiles of the elephants in his/her care.
- h. By September 1, 2013, train their elephant care professionals to manage and care for elephants with barriers and/or restraints in place that provide employee safety.
- i. By September 1, 2014, have put in place and implemented use of adequate infrastructure to manage and care for elephants with barriers and/or restraints in place that provide employee safety.
- j. By January 1, 2015, if a facility cannot meet the infrastructure standard (see item II.i. above), it must apply for a variance. Before the variance can be issued by the Accreditation Commission the facility must describe to the Commission its plan to meet the standard. Variances will expire June 1, 2017.

### III. Tasks the Professional Development Committee to:

- a. By September 1, 2012, update the Principles of Elephant Management-I course curriculum, which shall include mechanisms to:
    - 1. Manage and care for elephants with barriers and/or restraints in place.
    - 2. Minimize the frequency and duration elephant care professionals share unrestricted space with elephants subject to the exceptions outlined in item II.d. above.
    - 3. Develop and maintain detailed elephant behavioral profiles/ethograms.

All elephant care professionals<sup>9</sup>, managers and directors of AZA facilities with elephants will complete within three (3) calendar years from the date they begin working in that capacity. *E.g. If someone begins work in April of 2018, they are required to complete the course by December 31, 2021.*
  - b. By September 1, 2016, create and deliver a series of online elephant training modules on subjects including: safety, elephant record keeping, behavioral profiling and developing and maintaining elephant ethograms, positive operant conditioning, assessment of elephant aggression, and assessment of personal safety-proficiency.
- All elephant care professionals will complete by June 2017.
- c. By September 2013, create a facilities-based Principles of Elephant Management-II course curriculum, which includes experience with managing live elephants with the use of barriers and restraints and the application of advanced principles of elephant management, care, welfare, and occupational safety.
- All elephant managers will complete by November 2017.

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1

The term “elephant care professionals” includes all who provide for the care and welfare of elephants including veterinary care and other health care providers.

2

In this document the term “AZA facilities” refers to all AZA-accredited and AZA-certified Related Facilities.

3

References to “elephant standards” refer to “AZA Standards for Elephant Management and Care” as approved by the AZA Board of Directors in March 2011.

4

The Board understands that non-AZA entities and organizations may assess and address these risks in a different manner, and the policies adopted herein are only intended to be applied to AZA facilities.

5

See standard 1.4.9.1 for a definition of elephant containment barriers.

6

See Standard 3.3.2.7 for an explanation of tethering requirements.

7

This is an expansion of Elephant Standards: 2.2.1.9 (Daily and life stage variation in patterns of social affiliation, which requires that a behavioral profile must be maintained for each individual elephant and updated annually); 3.3.2.1 (Daily Care, which requires that all elephants must be visually inspected on a daily basis); and, 5.2 (Animal and Keeper Safety, which encourages that a record of all elephant-related keeper injuries or aggression directed at keepers should be kept, and related keeper injuries or aggression directed at keepers, and elephant behavioral profiles should be reviewed annually.).

8

This is an expansion of Elephant Standard 4.1.1 Training Methods.

9

Veterinary staff are encouraged but not required to complete this course. Elephant managers who have already completed PEM-I will not be required to re-take the course but will be required to complete the online elephant training modules outlined in III.b.