

May 11, 2023

Office of the City Auditor  
Rice Howard Place  
1200 Scotia Pl,  
Edmonton, AB  
T5J 3R8

Edmonton Police Services  
Police Headquarters  
9620 - 103A Avenue  
Edmonton, AB  
T5H 0H7

***Via Email***

To Whom it May Concern:

**Re: Potential Misrepresentations in Edmonton Valley Zoo Requests for City Funding**

I write to you on behalf of Animal Justice – Canada’s leading national animal law organization focused on improving legal protections for animals – to alert you to troubling recent communications that Animal Justice received from Canada’s Accredited Zoos and Aquariums (“CAZA”) with respect to conditions at the Edmonton Valley Zoo (the “Zoo”).

The City of Edmonton’s Proposed Capital Budget 2023-2026 (the “**Budget Report**”) states that the Zoo requested roughly \$61.2 million of City funding to deliver key infrastructure updates to its facilities.<sup>1</sup> The Zoo claimed, in part, that the funding was needed because a number of animal enclosures do not currently meet basic animal care standards (including those required by CAZA).<sup>2</sup> Based on the Zoo’s admitted failure to meet accreditation standards, Animal Justice filed a complaint with CAZA on January 20, 2023, requesting that the group investigate conditions at the Zoo.

CAZA wrote to Animal Justice on May 7, 2023 and advised that its investigation into the Zoo had concluded and it was not able to substantiate the statements made in the Budget

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<sup>1</sup> Available online (conditions at the Edmonton Valley Zoo are outlined between pp.162 - 166 and 235 - 236): <https://www.edmonton.ca/sites/default/files/public-files/Proposed2023-2026CapitalBudget.pdf?cb=1667241622> (the “**Budget Report**”)

<sup>2</sup> *Ibid*

Report. CAZA found that the Zoo is meeting accreditation standards and its claims to the contrary in its funding requests seem “to have been written to look to future investments.”

This finding raises significant alarms. Indeed, throughout budget discussions, the Zoo repeatedly indicated that it required funding in order to meet accreditation standards.<sup>3</sup> The implication of CAZA’s response to Animal Justice is that Zoo spokespeople appear to have made misrepresentations to the City about the state of facilities at the Zoo in order to secure municipal funding. In the alternative, CAZA overlooked serious deficiencies at the Zoo. To be clear, Animal Justice does not allege that either possibility is true but, in either case, steps should be taken to investigate the situation and determine whether misrepresentations have been made.

Animal Justice requests that the Office of the City Auditor (the “**Auditor**”) conduct an investigation into the Zoo’s conduct and representations and produce a report to the Audit Committee to determine whether the Zoo engaged in fraudulent or inappropriate conduct.

Animal Justice further requests that Edmonton Police Services (“**EPS**”) investigate to determine whether any fraud took place in violation of section 380 of the *Criminal Code*, RSC 1985, c C-46 (the “**Code**”) in light of any false or dishonest information being provided to City Council in support of the Zoo’s funding request which deprived Council and the public of City funds which could have been invested in other projects.

Animal Justice has also written to City Councillors to share these concerns.

### **The Zoo’s statements concerning compliance with animal care and accreditation standards**

As a part of its bid for funding from the City of Edmonton, representatives for the Zoo repeatedly indicated that its facilities were not compliant with CAZA standards. Based on the Budget Report, the Zoo stated that a number of enclosures and facilities did not meet “animal care standards”, in some cases leading to “the safety of staff and patrons”, as well as animals, being “compromised.”<sup>4</sup> Per a CTV News report, Roger Jevne, a spokesperson for the Zoo, explicitly told council that “several animal habitats [at the Zoo] do not meet [CAZA] standards.”<sup>5</sup>

Following the Zoo’s representations concerning its facilities, the council voted to give it ~\$25 million (reduced from an initial ask in excess of \$60 million) to “simply meet critical infrastructure requirements.”<sup>6</sup>

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<sup>3</sup> See: <https://edmonton.ctvnews.ca/one-of-those-gosh-darn-decisions-50m-ask-for-valley-zoo-upgrades-slashed-in-half-by-council-1.6189529>

<sup>4</sup> Budget Report, p. 162

<sup>5</sup> See: <https://edmonton.ctvnews.ca/one-of-those-gosh-darn-decisions-50m-ask-for-valley-zoo-upgrades-slashed-in-half-by-council-1.6189529>

<sup>6</sup> *Ibid*

## **Animal Justice's complaint to CAZA**

Animal Justice's January 20, 2023 complaint to CAZA pointed out that the Budget Report concluded that "a number of animal enclosures" at the Zoo did not meet the animal care standards required by CAZA.<sup>7</sup> As was noted in the Report, numerous enclosures at the Zoo are reportedly too small or otherwise inadequate to allow for proper animal training and management, efficient movement of animals, and safe veterinary procedures – with certain enclosures even posing an undue risk of injury to animals, staff, and patrons. The Report further noted that several deficiencies at the Zoo directly jeopardized the health and welfare of animals being exhibited.<sup>8</sup>

In the Budget Report, serious problems were identified in the following animal enclosures: (i) the Grevy's zebra enclosure; (ii) the Bactrian camel enclosure; (iii) the Sichuan takin enclosure; (iv) birds of prey enclosures; (v) the elephant enclosure; and (vi) the seal pools.

On the basis of the above-noted deficiencies, the Report concluded as follows:

There are currently major deficiencies with several of the animal handling areas and fencing that represent a risk to staff, patrons, as well as the animals under the care of the Valley Zoo. Addressing these concerns is necessary from not only a safety perspective but also to ensure that the Valley Zoo continues to adhere to best practices in animal care and control as well as accreditation standards. [emphasis added]<sup>9</sup>

A copy of Animal Justice's January 20, 2023 complaint is appended to this letter.

## **CAZA's response**

On January 31, 2023 Jim Facette, Executive Director of CAZA, responded to Animal Justice and indicated that CAZA would proceed with a formal investigation of the Zoo based on the allegations set out in Animal Justice's complaint letter. Animal Justice asked to be provided with updates as the investigation proceeded. On February 8, 2023, Mr. Facette agreed to provide a summary note upon the completion of CAZA's investigation.

On May 7, 2023, Mr. Facette, on behalf of CAZA, sent Animal Justice a summary note providing that the investigation team examined the deficiencies identified in Animal Justice's complaint. As a part of their investigation, the team reviewed zoo documentation, conducted interviews with the Zoo's staff, and completed an on-site visit of the Zoo on March 27, 2023. It is not clear whether the on-site visit was announced or unannounced. The investigation team ultimately found that the Zoo was compliant with CAZA accreditation standards and the Zoo would continue to be accredited.

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<sup>7</sup> Budget Report, p. 162

<sup>8</sup> Budget Report, p. 162

<sup>9</sup> Budget Report, p. 164

Notably, as a part of their response, CAZA addressed the deficiencies that were identified in the Budget Report as follows:

The budget report pertaining to the Edmonton Valley Zoo's alleged deficiencies contains statements we were unable to substantiate. The funding request to Council seems to have been written to look to future investments. The investigation team understands it can be a challenge to present a case for future investments yet let the reader know they meet CAZA accreditation standards. (emphasis added)

## The Law

The offence of fraud is set out under section 380 of the *Code*, which provides the following:

**380 (1)** Every one who, by deceit, falsehood or other fraudulent means, whether or not it is a false pretence within the meaning of this Act, defrauds the public or any person, whether ascertained or not, of any property, money or valuable security or any service,  
(a) is guilty of an indictable offence and liable to a term of imprisonment not exceeding fourteen years, where the subject-matter of the offence is a testamentary instrument or the value of the subject-matter of the offence exceeds five thousand dollars; or  
(b) is guilty  
(i) of an indictable offence and is liable to imprisonment for a term not exceeding two years, or  
(ii) of an offence punishable on summary conviction,  
where the value of the subject-matter of the offence does not exceed five thousand dollars. [emphasis added]<sup>10</sup>

Put another way, the prohibited act that makes up the fraud consists of two distinct elements:

1. a prohibited act of deceit, falsehood or other fraudulent means. In the absence of deceit or falsehood, the courts will look objectively for a "dishonest act," i.e., what a reasonable person would consider to be a dishonest act; and
2. deprivation must be caused by the prohibited act. The deprivation must relate to property, money, valuable security or any service.<sup>11</sup>

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<sup>10</sup> RSC 1985, c C-46, s 380(1)

<sup>11</sup> See: <https://www.mondaq.com/canada/corporate-crime/665088/what-conduct-gives-rise-to-criminal-liability-for-fraud>

Notably, actual economic loss by a victim is not an essential element of the offence of fraud. All that is required is “proof of detriment, prejudice or *risk* of prejudice to the victim's economic interests.” Risk of prejudice can be established upon proof that a victim has taken some form of economic action that, but for the accused's dishonest conduct, they would not have otherwise taken.<sup>12</sup> As such, even if money has not yet been advanced by the City to the Zoo, fraud can still be established.

The broad definition of fraud encompasses objectively "dishonest" conduct. Where there has not been a deliberate deceit or falsehood, the question becomes what is "dishonest" such as to give rise to potential liability for fraud?<sup>13</sup>

In *R. v. Thérout*, the Supreme Court of Canada provided the following description of what constitutes "dishonest" conduct:

The requirement of intentional fraudulent action excludes mere negligent misrepresentation. It also excludes improvident business conduct or conduct which is sharp in the sense of taking advantage of a business opportunity to the detriment of someone less astute. The accused must intentionally deceive, lie or commit some other fraudulent act for the offence to be established. Neither a negligent misstatement, nor a sharp business practice, will suffice, because in neither case will the required intent to deprive by fraudulent means be present.<sup>14</sup>

To establish liability for fraud, it must also be proven that the prohibited act was committed with the requisite criminal intent. This requires proof that the accused was subjectively aware that they were undertaking a prohibited act (e.g., making a statement knowing it to be false) and was subjectively aware that in carrying out this prohibited act they could cause deprivation by depriving another of property or putting that property at risk.<sup>15</sup>

In the case at hand, based on the conclusions of CAZA's investigation which found that the Zoo's "systems and enclosures meet CAZA accreditation standards", the Zoo appears to have provided false, dishonest, or misleading information to City Council in the process of applying for (and securing) City funds. Indeed, spokespeople for the zoo explicitly told council that "several animal habitats do not meet [CAZA] standards,"<sup>16</sup> and that funding was required to remedy these deficiencies as it was "necessary from not

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<sup>12</sup> *Ibid*

<sup>13</sup> *Ibid*

<sup>14</sup> *R v Thérout*, [1993] 2 SCR 5, at para 40

<sup>15</sup> See: <https://www.mondaq.com/canada/corporate-crime/665088/what-conduct-gives-rise-to-criminal-liability-for-fraud>

<sup>16</sup> See: <https://edmonton.ctvnews.ca/one-of-those-gosh-darn-decisions-50m-ask-for-valley-zoo-upgrades-slashed-in-half-by-council-1.6189529>

only a safety perspective but also to ensure that the Valley Zoo continues to adhere to best practices in animal care and control as well as accreditation standards.”<sup>17</sup>

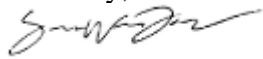
## **Conclusion**

In light of the above-noted concerns Animal Justice requests that the Auditor and EPS take steps to investigate this matter to determine whether the Zoo made misrepresentations to the City to receive funding.

It is clear that there is a serious lack of transparency and oversight to protect animals at the Zoo, and greater City and law enforcement oversight of the facility is required.

Thank you for taking the time to review this letter. Please do not hesitate to contact me if we can be of further assistance.

Sincerely,



Scott Tinney  
Staff Lawyer, Animal Justice  
[stinney@animaljustice.ca](mailto:stinney@animaljustice.ca)

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<sup>17</sup> Budget Report, p. 164

January 20, 2023

Canada's Accredited Zoos and Aquariums  
9 - 2020 Lanthier Drive, Box 107  
Orleans, Ontario  
K4A 3V4

*Via Email*

To Whom it May Concern:

**Re: Troubling Conditions at Edmonton Valley Zoo Highlighted in City Capital Budget Report**

I write to you on behalf of Animal Justice – Canada's leading national animal law organization focused on improving legal protections for animals – to inform you that Edmonton Valley Zoo is not currently meeting CAZA accreditation standards. The fact of this failure is set out in detail in the City of Edmonton's Proposed Capital Budget 2023-2026 (the "**Budget Report**").<sup>1</sup>

The Budget Report, which was released in October, 2022, provides details about the Edmonton Valley Zoo's request for \$10,917,000 of City funding to deliver key infrastructure updates to its facilities. The City's findings with respect to this request, and the current state of the infrastructure at the Edmonton Valley Zoo, are alarming. The Report concludes that "a number of animal enclosures" at the Zoo do not currently meet the animal care standards required by Canada's Accredited Zoos and Aquariums ("**CAZA**").<sup>2</sup> The facilities also appear to fall short of the Government of Alberta's Standards for Zoos in Alberta (the "**Alberta Zoo Standards**").<sup>3</sup> Indeed, numerous enclosures are too small or otherwise inadequate to allow for proper animal training and management, efficient movement of animals, and safe veterinary procedures – with certain enclosures even posing an undue risk of injury to animals.

Several deficiencies at the Zoo directly jeopardize the health and welfare of animals being exhibited. In some cases, these deficiencies have even led to "the safety of staff and patrons [being] compromised". These issues amount not only to breaches of CAZA standards and Alberta Zoo Standards, but also potential breaches of provincial laws

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<sup>1</sup> Available online (conditions at the Edmonton Valley Zoo are outlined between pp.162 - 166): <https://www.edmonton.ca/sites/default/files/public-files/Proposed2023-2026CapitalBudget.pdf?cb=1667241622>

<sup>2</sup> *Ibid*, p. 162

<sup>3</sup> Available online: <https://open.alberta.ca/dataset/fa7f4e97-32e4-4a38-9391-e2f54757b325/resource/7c576e36-90bd-42fe-818c-70b9f782f574/download/aep-standards-for-zoos-in-alberta-2022.pdf>

(including apparent violations of the *Animal Protection Act*, RSA 2000, c A-41 (the “**APA**”)<sup>4</sup> and the *Animal Protection Regulation*, Alta Reg 203/2005 (the “**APA Regulation**”)).

CAZA is responsible for ensuring that its members comply with applicable rules, standards, and policies in order to benefit from accreditation. Given the deficiencies noted in the Budget Report, the Edmonton Valley Zoo is falling short of its CAZA obligations. As such, we request that you attend the Valley Zoo and conduct a full review of the conditions therein. If CAZA standards are not being met, as appears to be the case, we encourage your office to take corrective or disciplinary action as appropriate that may include suspending or revoking the zoo’s CAZA membership.

### **1. Deficiencies at the Edmonton Valley Zoo**

The Valley Zoo’s request for City funding is premised on the fact that infrastructure upgrades are required for a number of animal enclosures in order to meet CAZA standards and provincial standards, and to ensure the safety of zoo staff, patrons, and animals at the facility.

In the Budget Report, a number of specific deficiencies at the Valley Zoo are set out. The following is brief summary of some of the more troubling findings in the Report at numerous animal enclosures:

- Grevy’s zebra enclosure: The barn used to keep zebras no longer meets the basic standards required for the animals’ care and needs to be replaced. Its design has been deemed unsafe to sedate animals due to the floor not having traction for hooves and permanent metal feeders that have scratched animals. Animals have been injured as a result of these problems. Outdated stall design also does not allow for animal training, safe veterinary procedures, and efficient movement of animals.
- Bactrian camel enclosure: Five bactrian camels are kept at the Edmonton Valley Zoo. The space these animals live in was not built for camels and lacks critical infrastructure for managing them. A permanent outdoor holding area and proper training areas (such as an outdoor horse stock, which would allow staff to safely train and perform veterinary procedures) are needed.
- Sichuan takin enclosure: The zoo keeps nine Sichuan takin in two adjacent enclosures. The second enclosure is “no longer adequate” as it was not designed for housing takin, who can sometimes be aggressive. An additional gate between the two yards is required to improve staff and animal safety and a handling chute needs to be replaced to prevent seasonal operational challenges.

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<sup>4</sup> Available online: <https://www.canlii.org/en/ab/laws/stat/rsa-2000-c-a-41/latest/rsa-2000-c-a-41.html>



- Birds of prey enclosures: The zoo keeps various non-releasable raptors, including a bald eagle, peregrine falcon, and snowy owls. The enclosures for these birds are “too small to allow flight and must be increased in order for these species to remain in the Zoo’s collection.” Additional improvements are also necessary to reduce the likelihood of avian flu outbreaks and to provide adequate space for isolation, as required.
- Elephant enclosure: Lucy, a lone Asian elephant, is kept at the Edmonton Valley Zoo. For over a decade Lucy has been held alone in her enclosure – her solitary existence has been the subject of significant controversy, and many people have advocated for relocating her to a more suitable environment.<sup>5</sup> The Budget Report provides new and troubling details about the inadequate nature of Lucy’s enclosure(s). The Report notes that upgrades are required to the Zoo’s elephant enclosure to provide increased access to space and additional necessary enrichments and amenities. A humidifier is required in her barn to eliminate as much dust as possible that Lucy is breathing in. UV lights are also required in the barn. Moreover, the “public fence” surrounding Lucy’s enclosure needs to be pushed back to meet standards that will allow Lucy to use the yard unsupervised.
- Seal pools: There are ongoing leaks in the seal pool basins which are jeopardizing the safety of animals, staff and patrons.

On the basis of the above-noted deficiencies, the Budget Report concludes as follows:

There are currently major deficiencies with several of the animal handling areas and fencing that represent a risk to staff, patrons, as well as the animals under the care of the Valley Zoo. Addressing these concerns is necessary from not only a safety perspective but also to ensure that the Valley Zoo continues to adhere to best practices in animal care and control as well as accreditation standards.  
[emphasis added]

## 2. CAZA Accreditation and Guidelines

The policies and rules for applying to CAZA and retaining CAZA accreditation are set out in the “CAZA 2021 Accreditation Process Guide” (the “**CAZA Guidelines**”).<sup>6</sup> CAZA also provides “Accreditation Standards” which are available online<sup>7</sup> and guide the organization in issuing accreditation to institutions. These standards mandate a wide-range of animal care and facility requirements, including the following:

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<sup>5</sup> See: <https://animaljustice.ca/blog/worlds-loneliest-elephant>

<sup>6</sup> CAZA Guidelines, available online: <https://caza.ca/wp-content/uploads/2021/04/2021-Accreditation-Process-Guide-As-Approved-November-2020.pdf>

<sup>7</sup> CAZA Accreditation Standards, available online: <https://caza.ca/wp-content/uploads/2022/04/2022-CAZA-Accreditation-Standards-Normes-d%e2%80%99accre%cc%81ditation-de-l%e2%80%99AZAC.pdf>

- member organizations must have appropriate veterinary staff and facilities for medication to be administered;
- enclosure design must take into account the natural behavior of the species being housed, and incorporate features that will enhance the welfare of the animals;
- all essential equipment must be kept in working order;
- the environment in which animals live must not be likely to adversely affect them (environmental conditions such as lighting, air quality, temperature, and humidity are to be taken into account per the Accreditation Standards);
- habitats in which animals are on public display must be of a size which enables the animal to demonstrate natural behaviors and to achieve a full range of body motion and physical movements;
- institutions must be aware of, and prepared for, period disease outbreaks in wild or other animal populations that might affect the institution's animals (e.g. avian influenza); and
- building materials used in facilities must be in good repair and of a design that would not predispose animals to lacerations, abrasions, or other injuries.<sup>8</sup>

In order to achieve accreditation, CAZA inspectors evaluate how an institution rates against the Accreditation Standards. Scores are awarded to institutions for each applicable standard and are evaluated by the Accreditation Commission against a threshold level established for each of the elements of the inspection form.<sup>9</sup> As a general rule, accreditation “certifies that an institution is currently meeting professional standards of CAZA” and while “future plans are of interest to the Commission, evaluations will focus on what exists at the time of the inspection”.<sup>10</sup> Moreover, an accredited institution “may be reviewed or inspected at any time within the five-year accreditation period, at the discretion of the Accreditation Commission or the Ethics and Compliance Committee (ECC).”<sup>11</sup>

In the case of current members being reviewed, if any institution scores less than a 95% on their inspection but greater than 90% compliance in any given single element of the inspection form, their accreditation is to be conditionally suspended for a six month period. If the facility scores less than 90% in any section of the inspection form, accreditation is to be denied.<sup>12</sup>

Given the Edmonton Valley Zoo's admitted deficiencies, the required standards that are set out by CAZA are not being met. The Edmonton Valley Zoo's apparent failure to maintain its facilities in such a way that meets CAZA's standards warrants revocation of accreditation. While the Valley Zoo is attempting to remedy these concerns through an injection of funds from the City of Edmonton, these future plans, contingent on funding, do not amount to compliance. Indeed, per the CAZA Guidelines, “while future plans are

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<sup>8</sup> *Ibid*

<sup>9</sup> CAZA Guidelines, p 6

<sup>10</sup> *Ibid*, p 5

<sup>11</sup> *Ibid*, p 5

<sup>12</sup> *Ibid*, p 7

of interest to the Commission, evaluations will focus on what exists at the time of the inspection".<sup>13</sup>

We would be pleased to provide further information or to otherwise assist you in your review. Please do not hesitate to contact me at [stinney@animaljustice.ca](mailto:stinney@animaljustice.ca) if we can be of further assistance.

Sincerely,



Scott Tinney  
Staff Lawyer, Animal Justice  
[stinney@animaljustice.ca](mailto:stinney@animaljustice.ca)

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<sup>13</sup> *Ibid*, p 5

May 7, 2023

Mr. Scott Tinney  
Staff Lawyer  
Animal Justice Canada  
5700 – 100 King Street West  
Toronto, ON M5X 1C7

Re: January 20, 2023 - Letter of Complaint vs Edmonton Valley Zoo

Dear Mr. Tinney:

This letter will constitute CAZA's summary of findings letter as promised in my initial email of January 31<sup>st</sup> and subsequent emails of February 8<sup>th</sup> and 9<sup>th</sup> 2023.

CAZA members take pride in its Canadian zoological accreditation program and the enforcement thereof. Recognized by provincial governments and federal agencies, the CAZA Ethics and Compliance Committee takes all measures necessary, along with our Accreditation Commission, to ensure all members are held to account.

The nature of Animal Justice's complaint warranted a formal investigation. The investigation was completed by a three-person independent team of volunteers with zoological expertise, one of whom is a zoo veterinarian.

The investigation can be summarized into three parts, they are:

1. A review of all literature – parties involved were invited to provide all relevant documents. All documentation provided was reviewed against the allegations in the complaint letter.
2. Interviews – the investigation team conducted in-depth interviews with staff from the Edmonton Valley Zoo.
3. Site visit – the investigation team completed the on-site visit on Monday, March 27<sup>th</sup>.

The investigation team examined the animal enclosures identified in your original complaint, the alleged concerns over health and safety, and compliance with provincial legislation. The following is a summary of the investigation team's findings.

#### *Grevy's Zebra Barn*

- The zebra enclosures meet the standard for daily and routine husbandry. While there are protocols in place to mitigate risks associated with anesthetizing animals, the existing facilities need improvements to accommodate sedation and anesthesia for medical procedures.
- The facilities should be a priority for review and infrastructure improvements.

#### *Bactrian Camel*

- These facilities meet the standard for daily husbandry care, handling, training, and medical procedures. The inspectors found the Bactrian camel area including associated training infrastructure to be in very good condition.

#### *Sichuan Takin*

- These facilities meet the standard for daily husbandry care, handling, training, and medical procedures.

#### *Birds of Prey*

- The temporary enclosures being used for the red-tailed hawk, the Spectacled owl, Eurasian eagle owls, Snowy owl and pelican meet standard AW- H&E / BEA-H&E 21 for temporary holdings.
- The holding being used for the peregrine falcons meet standard AW- H&E / BEA-H&E 2

#### *Elephant*

- Each year the zoo is required to apply for a CAZA standard variance accompanied by expert advice, 2023 was no different. The team of elephant experts report concluded 'Lucy's' welfare is best served at the Edmonton Valley Zoo.
- The investigation reviewed the expert report, and the allegations laid out in the complaint and found zoo staff are doing everything they can, including suggestions from the experts, to ensure a high quality of animal welfare.
- EVZ has a Variance for Lucy as a solitary animal.

#### *Seal Habitats*

- The seal facilities meet standard AW- H&E / BEA-H&E 2

#### *Filtration Building, Quarantine Barn, Elephant Building*

- PF / IP 2 – Meet the standard.

#### *The City of Edmonton Budget Report*

- The budget report pertaining to the Edmonton Valley Zoo's alleged deficiencies contains statements we were unable to substantiate. The funding request to Council seems to have been written to look to future investments. The investigation team understands it can be a challenge to present a case for future investments yet let the reader know they meet CAZA accreditation standards.

### *Provincial Regulations*

- On April 1st, the Alberta government issued the zoo's operating permit. The inspection team interprets this as meaning the zoo complies with Alberta law and regulations.

### *Alleged accidents endangering staff and visitors.*

- There have been no lost time injuries due to animal interaction.
- No incidents have been reported between animals and guests.

### **Finding**

Edmonton Valley Zoo systems and enclosures meet CAZA accreditation standards. Employee protocols are in place to ensure the safety of animals, staff, and guests.

As per our procedural manual, the Ethics and Compliance Committee has accepted the findings of the investigation team and deems this matter to be closed. The zoo will continue to be CAZA accredited.

We trust the Committee has addressed your concerns satisfactorily.

Best Regards,



Jim Facette  
CAZA CEO, Executive Director

c.c. Mr. G. Dewar, Director, Edmonton Valley Zoo  
Mr. S. Lussier, Chair, CAZA Accreditation Committee  
CAZA Board of Directors