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Department of Housing,
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Hazardous Category One

Carnivores

Irish Zoo Licence Guidance Notes

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Table of Contents

1	Introduction.....	3
2	The Standards	3
3	Carnivore Welfare Considerations.....	4
3.1	Species Choice.....	4
3.2	Nutrition	6
3.3	Public Safety and Enclosure Security.....	7
3.4	Firearms.....	10

1 Introduction

The following guidance note supplements the Irish Standards of Modern Zoo Practice (ISMZP) (2016) ('the Standards') specifically with regard to the management, both pertaining to the welfare provided as well as the requirements to ensure public safety, of Category One hazardous animals of the Order Carnivora (referred to for the purposes of this guidance note as 'carnivore'), as listed in Appendix Twelve of the Standards.

Where guidance notes are made with regard to specific families or genera, the note only applies to the species or family listed. This guidance note must be read in conjunction with the current ISMZP (2016).

This guidance deals with measures that fall to the operators of zoos that contain, or propose to contain, Category One hazardous carnivores and should be read in conjunction with both the Standards and the Statutory Instrument No. 440 of 2003 European Communities (Licensing and Inspection of Zoos) Regulations 2003 ('the Regulations'). It should not be taken as an authoritative statement of the legal effect of the Regulations.

2 The Standards

The Irish Standards of Modern Zoo Practice (2016) ('the Standards'), are the primary foundation for the minimum standards expected in Irish zoos and are a document that must be read and understood to ensure the expectations and requirements of the zoo licence are met.

Sections 1-12 and Appendix 1-8 are generic and apply to all zoological collections, outlining the minimum standards for welfare, conservation, education and visitor safety. This is followed by detailed Appendices on specific species.

Carnivores in zoos are kept in a variety of ways and for a variety of reasons. These include:

- (a) conservation purposes, as part of national or international breeding programmes;
- (b) as ambassadors, representing the species to promote welfare, conservation or wider engagement in the conservation of biodiversity;
- (c) educational purposes to demonstrate behaviours or traits as part of conservation learning programmes or scientific research;
- (d) rescued animals, either seized from illegal imports, private owners looking to rehome animals or those imported from substandard conditions overseas;
- (e) as display animals to drive visitation or to satisfy curatorial whim.

Each of these categories of keeping brings with it particular requirements in terms of good management. Some of these are outlined below: other relevant information is to be found in various codes of practice and publications specific to the species housed, some of which can be found in the Appendices of the Standards.

The Standards consider the welfare requirements for carnivores using the Five Domains Model for animal welfare. Full details of this model and the areas for consideration can be found in the Introduction of the Standards.

3 Carnivore Welfare Considerations

3.1 Species Choice

There is a huge variety between the carnivore species and their individual needs; their husbandry and environmental requirements; and the safety aspects that need to be considered.

Some species, or in some cases individual animals, do not generally lend themselves well to being housed in a publicly accessible environment. Such species or individuals, where there is a demonstrable issue, should not be retained in a licensed facility to which the public has access.

It is essential that when considering the addition of a Category One hazardous carnivore to a zoo collection that the zoo licence holder has a clear understanding of the needs of that animal, the space required to ensure a quality of life for the animal, and the knowledge and capability of the team that will be required to look after the animal. Facility design is critical for both the welfare and the safe management of hazardous species.

The zoo licence holder must be able to demonstrate knowledge or employ staff with knowledge, of being able to care and work with any new Category One hazardous carnivores being added to the zoo. Senior staff must have a minimum of two years working with the species, preferably five years. Where a member of staff has experience with a closely related species, this may be taken into consideration at the discretion of the licensing authority.

Where the animal care team have little to no experience of working with a new species, it is strongly advised that they spend time working with the animal at a facility that holds the species, or preferably work with the individual animal proposed to be brought to the zoo. Only then, once the species' or individual's needs are understood, should the zoo consider obtaining the animal.

Zoo licence holders are advised before obtaining any new Category One hazardous species of a genus not previously held at the zoo to contact the zoo licensing team and advise them of the possible addition. It is likely that a special zoo inspection would be required to ensure any facilities are suitable for the species and that the staff are capable of providing for the animal's safe care.

Where a carnivore is a rescue or aged animal, the zoo licence holder must ensure that there is an individual health care plan that is regularly updated, at least on an annual basis, to ensure that the welfare, physical and behavioural needs of that animal are monitored and provided for. This must include an end-of-life policy specific to that animal, defining criteria for euthanasia if indicated on welfare grounds.

Preference should be given to acquiring carnivores that form part of a European Endangered Species Breeding Programme or other managed programme that ensures they have a conservation population role to play in a wider programme. Justification must be available to inspectors in instances where this is not the case.

3.2 Nutrition

Water must be provided adlib on a daily basis. All carnivores must have access to clean, wholesome drinking water daily.

Where automatic drinkers are used there must be the ability to isolate them to allow accurate measurement of water intake, especially where older felids are maintained in a zoo.

The zoo licence holder must produce and implement a written meat management policy demonstrating the principles of HACCP have been considered and steps implemented with regard to the management and preparation of raw meat within the zoo to minimise any risks of cross contamination between equipment, utensils and surfaces. This must include consideration of best practice in sourcing food items, storage of frozen meat, stock rotation, appropriate defrosting of frozen meat products, handling of meat and the use of appropriate personal protective equipment, and potential risks of contamination of utensils, hand wash and door handles in the meat preparation areas and adjacent buildings.

The zoo licence holder must also be able to demonstrate that the zoo's meat supplies have been assessed for their quality; food chain security (particularly infectious organisms, e.g. spongiform encephalopathies); traceability; and suppliers guarantee that no chemical euthanasia agents or non-steroidal anti-inflammatory agents could potentially contaminate the food and be fed to the carnivores in the zoo, especially where fallen stock is utilised. Documented evidence must be available at inspection.

Presentation of carcasses and meat products to carnivores must take into account both the physical and behavioural needs of the individual species.

3.3 Public Safety and Enclosure Security

The zoo licence holder must ensure that carnivores in Category One of Appendix Twelve must either be separated from the public by a barrier of suitable design in order to prevent physical contact between the animals and members of the public within their designated areas, or, with the prior approval of the licencing authority, be provided with adequate supervision to allow the public and the animals to be in the same area without hazard.

The responsibility for any relaxation of the need to provide non-touch barriers (i.e. prevent direct contact between animals and the public) for Category One species lies with the licencing authority, acting upon the advice of inspectors nominated by the Minister.

Category One hazardous carnivores may only be taken out of their enclosures and into the same areas as members of the public, or the public into the animals' enclosures, if the zoo licence holder, being the keeper of the animals, has reason to believe (by virtue of the animals' ages, sexual states, supervision, training, individual histories, enclosure size and design, or other relevant matters) and has satisfied to the licencing authority in writing that he has such reason, that the animals, being

under the supervision of authorised and experienced members of staff, will not cause injury to the public. Where this is proposed, the zoo licensing department must be informed prior to any such activity to ensure approval is granted and that all appropriate risk assessments and safe systems of work are in place.

Carnivores listed in Category One in the family Felidae, subfamily Pantherinae; Hyaenidae; Canidae; and Ursidae must not be allowed in the same space as the public nor can they be taken out of their enclosures and in to the same area as members of the public, as such notes 5.1 and 5.2 do not apply to these species of these Families. This applies to all ages and life stages of the listed species, except transportation for animal moves to another zoo for veterinary treatment and in the case of animals being hand-reared, those that need to be transported to other accommodations for rearing.

In the case of Category One hazardous carnivores the zoo licence holder must be able to demonstrate:

- (i) appropriate enclosure design;
- (ii) written safe working practices and related policies;
- (iii) implementation of said policies; and
- (iv) documented training of staff (including sign off of capability in working safely with the species) to ensure the safety of both staff and the public at all times.

The zoo licence holder must ensure that carnivores that can climb or jump must be kept in enclosures secure enough to prevent them from escaping. The minimum recommended height and construction of enclosure barriers as stated in national or international industry standards (BIAZA, EAZA or AZA), such as those associations' Husbandry Guidelines, must be taken into consideration. Digging or burrowing animals must be kept in enclosures so constructed as to avoid escape underneath barriers.

Where an overhang is required as part of the containment requirements for a carnivore, the overhang must be the same, or higher, specification as the enclosure barrier fencing. Medium to large felids and all canids must have an overhang, or a roof if appropriate, as part of the enclosure specification unless a justification is made and approved by the licensing authority on an individual case-by-case basis.

Electric fencing is not permitted to be a primary barrier for any Category One hazardous carnivore.

Where a zoo licence holder holds any carnivore, listed in Category One of Appendix Twelve, the keeper entrance to the enclosure must have a double gate/door system in place to prevent escape from the secure area should one gate/door be breached. These must be fully enclosed, including a roof, and made to a similar specification as the enclosure barrier. The design should allow for any lock, latch or bolt to be easily operated from the inside. In the case of infrequently used enclosure entrances, such as vehicle gates, it is not necessary for these to be double gates but they must be secured and locked from within the enclosure, with access to locks not possible from outside an enclosure.

Where a zoo licence holder holds any carnivore listed in Category One of Appendix Twelve the zoo must ensure there are written Safe Operating Practices (SOP) and Risk Assessments outlining all aspects of the safe operation of the enclosure when undertaking normal husbandry procedures. Where lone working occurs, there must be a system of communication to other staff members when a member of the team enters the enclosure and exits the enclosure, and steps to be taken if there is a failure of notification within an expected time period.

The zoo licence holder must be able to demonstrate written protocols regarding key-holder access to Category One Hazardous carnivore enclosures, houses or other aspects of facilities where carnivores have access. This must include a clear and

defined process of named and trained key holders with access to the enclosures; 'lock-out' or similar processes to ensure one member of staff cannot unlock a door or slide to give a carnivore access to an area where another person is working or allows the animal to escape from the enclosure; and demonstrable methods of clearly labelling locking or handle systems for doors and slides so that there is an additional visual aid as to whether a door is closed and secure or not.

3.4 Firearms

Where a zoo licence holder holds any Category One Hazardous carnivore, appropriate firearms must be available, unless a risk assessment, to the satisfaction of the licensing authority, has shown that a firearm would not provide the most appropriate means of protection to the public from that animal, and other arrangements have been made. Firearms, ammunition and darting equipment, where provided, must be:

- (a) available for immediate use by licensed and trained operators;
- (b) cleaned and maintained as recommended by the manufacturer; and
- (c) kept securely when not in use or under maintenance.

The zoo licence holder must be responsible for the selection of the appropriate firearm or darting equipment, as agreed with the local Garda, to deal with escaped Category One hazardous carnivores.

The zoo licence holder must ensure firearms, including darting equipment, are regularly assessed for accuracy and members of the firearms or veterinary teams are able to re-sight firearms as and when required. Records of such assessments must be maintained and made available to inspectors.

The zoo licence holder must ensure that practice sessions in the use of firearms must reflect consideration of complex situations involving members of staff or public

where an animal is to be humanely killed in an emergency and records must demonstrate the training of the decision-making process expected to be made by the individual firearm team member.

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