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**Kelly Bennett, Amanda Welling, Angela  
Santmier, and Matthew Gulczynski,**

**Plaintiffs,**

**v.**

**James H. McDaniel, Jr.  
d/b/a Jim Mack's Ice Cream,**

**Defendant.**

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**THE COURT OF COMMON PLEAS  
OF YORK COUNTY, PENNSYLVANIA**

**NO.: 2014-SU-004473-94**

**CIVIL ACTION – EQUITY**

## **COMPLAINT**

### **I. INTRODUCTION**

1. This case is about the inhumane and unsafe captivity of a Pennsylvania black bear that is being exhibited in a small barren enclosure at a local ice cream store. Jim Mack's Ice Cream, owned by Defendant James McDaniel, Jr., has held the female bear, named Ricky, for more than eighteen years in an enclosure so vacant and inadequate that experienced veterinarians who have visited Ricky have concluded that she is suffering immensely.

2. Defendant's captivity of Ricky violates state regulations promulgated by the Pennsylvania Game Commission ("the Commission") that require the "humane care and treatment" of wildlife and prohibit their "maltreatment, mistreatment or neglect." 58 Pa. Code § 147.281. According to two highly credentialed veterinarians who have visited Ricky, she is suffering as a result of the tiny size of her enclosure, its hard concrete floor, the absence of any environmental enrichment, her inability to engage in essential bear activities such as climbing and foraging, and other deprivations. As a result, Defendant is failing to provide Ricky "humane care and treatment" and is subjecting her to "maltreatment, mistreatment [and] neglect," in violation of Pennsylvania's wildlife protection laws.

3. Defendant has also been cited numerous times – as recently as October 2014 – by the United States Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS), the agency tasked with enforcing the federal Animal Welfare Act. APHIS has cited Defendant for failing to provide regular veterinary care and for failing to maintain necessary fencing for the safety of humans and animals.

4. Despite these violations, Ricky continues to languish at Jim Mack's Ice Cream, necessitating this public nuisance suit.

5. Defendant's violation of Pennsylvania's wildlife protection laws constitutes a public nuisance, because, as the Supreme Court recognized long ago, "[a] legislative proscription, such as that found in the cruelty to animals statute, is declarative of the public policy and is tantamount to calling the proscribed matter prejudicial to the interests of the public. Injury to the public is the essence of a public nuisance. Therefore, [animal cruelty is]

properly enjoined as being contrary to law and prejudicial to the interests of the public.” *Pennsylvania Soc. for Prevention of Cruelty to Animals v. Bravo Enterprises, Inc.*, 428 Pa. 350, 360 (1968).

6. Defendant’s confinement of Ricky constitutes a public nuisance not only because it is inhumane to the animal at issue, but also because it is unsafe to the public. Defendant’s business intentionally attracts young children by offering ice cream, miniature golf, an arcade, and a self-described “mini-zoo,” and encourages visitors to feed Ricky and the other animals. During the Commission’s most recent inspection of Jim Mack’s in June 2014, the inspector noted that one of the pen doors for Ricky’s enclosure was not even locked.

7. Plaintiffs, having found a vastly-superior new home for Ricky at a reputable wildlife sanctuary, now file this complaint asking this Court to declare Defendant’s inhumane and unsafe captivity of Ricky to be a public nuisance and to order her moved to a facility that is better equipped to protect her and the public.

## **II. PARTIES**

8. Plaintiff Kelly Bennett (hereinafter “Ms. Bennett”) is a natural person over the age of 18 years and a lifelong resident of Pennsylvania. She resides at 408 N. Queen Street, Apt. 2, Lancaster, PA 17603. Ms. Bennett has visited Ricky at Defendant Jim Mack’s Ice Cream and has personally witnessed Ricky’s inhumane conditions, which upset her and offended her aesthetic interest in seeing animals in humane conditions.<sup>1</sup> As someone who has personally

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<sup>1</sup> Pennsylvania courts have recognized that harm to a plaintiff’s aesthetic interests in animals confers standing. *See, e.g., Unified Sportsmen of Pa. v. Pa. Game Comm’n*, 903 A.2d 117, 123

visited Ricky and formed a specific emotional attachment to her, Ms. Bennett has suffered an injury different both in kind and in magnitude than that of the general public.

9. Plaintiff Amanda Welling (hereinafter “Ms. Welling”) is a natural person over the age of 18 years and a long-time resident of Pennsylvania. She resides at 405 S. West End Avenue, Lancaster, PA 17603. Ms. Welling grew up in Lancaster and used to go to Jim Mack’s Ice Cream regularly when she was a little girl. There has been a bear there for as long as she can remember. She recently returned to Jim Mack’s as an adult and was saddened to see that Ricky, the same bear as she recalled from her childhood, was still there, confined in a small sterile area and surrounded by screaming children. Ms. Welling has personally witnessed Ricky’s inhumane conditions, which upset her and offended her aesthetic interest in seeing animals in humane conditions. Ms. Welling would like to return to Jim Mack’s as a patron, but must refrain from doing so because she cannot support Ricky’s continued captivity. As someone who has personally visited Ricky and formed a specific emotional attachment to her, Ms. Welling has suffered an injury different both in kind and in magnitude than that of the general public.

10. Plaintiff Angela Santmier (hereinafter “Ms. Santmier”) is a natural person over the age of 18 years and a resident of Pennsylvania. She resides at 88 Kendale Road, Red Lion, PA 17356. Ms. Santmier has visited Ricky at Defendant Jim Mack’s Ice Cream numerous times

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(Pa. Commw. Ct. 2006). Courts have also repeatedly held that aesthetic standing exists where individuals’ aesthetic interests are injured by seeing specific animals in inhumane conditions. *See, e.g., ASPCA v. Ringling Bros. & Barnum & Bailey Circus*, 317 F.3d 334 (D.C. Cir. 2003); *Animal Legal Defense Fund v. Glickman*, 154 F.3d 426 (D.C. Cir. 1998) (en banc); *Humane Society v. Babbitt*, 46 F. 3d 93, 99 n.7 (D.C. Cir. 1995); *Fund for Animals, Inc. v. Lujan*, 962 F.2d 1391 (9th Cir. 1992); *Humane Society v. Hodel*, 840 F.2d 45 (D.C. Cir. 1988); *Animal Welfare Institute v. Kreps*, 561 F.2d 1002 (D.C. Cir. 1997).

and has personally witnessed Ricky's inhumane conditions, which upset her and offended her aesthetic interest in seeing animals in humane conditions. Ms. Santmier observed that Ricky's living conditions are lacking in space, enrichment, shelter from elements, cleanliness, and veterinary care. Ms. Santmier brought her concerns to government authorities to no avail. As someone who has personally visited Ricky and formed a specific emotional attachment to her, Ms. Santmier has suffered an injury different both in kind and in magnitude than that of the general public.

11. Plaintiff Matthew Gulczynski (hereinafter "Mr. Gulczynski") is a natural person over the age of 18 years and a resident of Pennsylvania. He resides at 88 Kendale Road, Red Lion, PA 17356. Mr. Gulczynski visits Ricky at Defendant Jim Mack's Ice Cream regularly and has personally witnessed Ricky's inhumane conditions, which upset him and offended his aesthetic interest in seeing animals in humane conditions. Mr. Gulczynski feels obligated to visit Ricky to check on her condition and to bear witness to her inhumane confinement. As someone who has personally visited Ricky and formed a specific emotional attachment to her, Mr. Gulczynski has suffered an injury different both in kind and in magnitude than that of the general public.

12. Defendant James H. McDaniel, Jr., d/b/a Jim Mack's Ice Cream, (hereinafter "Defendant") is the owner and proprietor of Jim Mack's Ice Cream in York County at 5745 Lincoln Highway, York, Pennsylvania 17406. Defendant is Ricky's owner and is responsible for her treatment, care, and confinement.

### **III. GENERAL ALLEGATIONS**

13. Defendant confines Ricky in illegal and inhumane conditions that cause her to suffer.

14. Ricky is confined in a small and virtually barren concrete and chain-link pen located near the public parking lot of Jim Mack's Ice Cream. Ricky can take only a few steps in any direction before she must turn around. She spends most of her waking hours constantly pacing back and forth on the concrete floor of her cage. This repetitive, purposeless movement is known as "stereotypic behavior" and is widely recognized by animal behavior experts as a sign of intense stress and psychological deterioration. Ricky's stereotypic behavior reflects psychological suffering and is likely causing her physiological damage as well.

15. In order to evaluate Ricky's suffering, two highly experienced veterinarians, Dr. Ursula Bechert, DVM, PhD, and Dr. Mary Denver, DVM, have visited Ricky at Jim Mack's Ice Cream and concluded that she is suffering.

16. A true and correct copy of the report from Dr. Bechert to the Pennsylvania Game Commission regarding Ricky is attached hereto as Exhibit A.

17. Dr. Bechert has been a licensed veterinarian for twenty-three years and has worked closely with domestic and wild animals and conducted research with both free-ranging and captive wildlife species, including bears.

18. Dr. Denver is a licensed veterinarian at Basin Run Animal Hospital in Maryland. Dr. Denver is a former Head Veterinarian at the Maryland Zoo in Baltimore, where she cared for

a variety of exotic animals, including bears, for more than ten years. Dr. Denver has been past president, vice president, and secretary of the American Association of Zoo Veterinarians.

19. Bears are an especially difficult species to keep in captivity because of their extensive physical and psychological needs.

20. In the wild, female black bears like Ricky occupy a home range of approximately 16 square miles, and in some cases more than 30 square miles. Wild bears are active climbers and swimmers. They spend much of their time foraging for food, and their diverse diet includes shoots, branches, berries and other fruits, nuts, grasses, and tubers.

21. Ricky's confinement in a tiny, barren caged area frustrates her every natural instinct. The small size of Ricky's enclosure, coupled with the absence of adequate enrichment, impedes her innate, instinctual drive to explore a vast home range. This frustration manifests itself psychologically and physically. Ricky spends most of her waking hours pacing the short length of her cage, the only home she has known for the past eighteen years.

22. Ricky's enclosure is mostly barren and lacks the environmental stimuli and behavioral enrichment that are essential elements of captive bear husbandry. With no foraging opportunities, no nesting or denning materials, and no opportunities to dig, climb, or explore, Ricky lacks the ability to engage in instinctual and species-specific behavior.

23. Ricky's repetitive pacing on the hard concrete floor of her enclosure puts chronic repetitive stress on her skeletal and circulatory systems, which has resulted in a predominant limp possibly caused by arthritis, a leg injury, or a foot lesion. Years of pacing on concrete is likely to result in a host of painful medical conditions including osteoarthritis, muscle strain,

footpad lesions, ulcers, calluses, thermal burns, foot cracks, osteomyelitis, pressure sores, and compromised circulation. On their most recent visits to see Ricky, right before this complaint was filed, Plaintiffs Santmier and Gulczynski observed Ricky walking with a limp.

24. Ricky's suffering is of special concern because of the well-recognized complex needs of bears and the long-term nature of her intensive confinement.

25. As Dr. Bechert writes, "[a] slow and torturous decline in physical and mental health is inevitable for this bear if she remains at [Jim Mack's Ice Cream]."

26. In addition to the small, unenriched nature of Ricky's cage, Dr. Bechert has raised other concerns about Ricky's treatment. Among these concerns is the inadequacy of Ricky's diet, which seems mainly to consist of dry dog food pellets and dried corn that the public purchases from dispensers and feeds to her – unsupervised – through a PVC pipe arranged in the fencing of Ricky's enclosure. The food is funneled directly onto the cement floor of Ricky's enclosure where she also urinates and defecates.

27. Dog food is nutritionally inadequate for black bears such as Ricky, who are omnivorous animals and whose natural diet is approximately eighty-five percent vegetative matter.

28. A healthy diet for a captive bear like Ricky should include a wide and changing variety of seasonally appropriate foods such as fruits, nuts, leafy vegetation such as willow or sugar maple, root vegetables, and whole-boned meats with fat. On information and belief, Ricky receives none of these.



29. Allowing unsupervised visitors to feed Ricky dog food greatly increases the risk that they will transfer microbes or zoonotic diseases to Ricky. It is standard practice for zoo professionals to take every possible precaution necessary to minimize the risks of contaminating foods and transmitting disease when feeding bears. These precautions include wearing gloves when preparing and serving food to bears, minimizing the number of individuals who feed bears, prohibiting public feedings, avoiding breathing on the food, and avoiding dropping food on the floor. Minimizing the number of individuals who feed bears is particularly important. Defendant does not follow these basic and minimal precautions.

30. Defendant also fails to provide Ricky with constant access to potable drinking water in a clean and sanitary water receptacle. Her drinking water, which is contained in a metal trough, is often brown, putrid, and contaminated with dirt and debris.

31. Although Defendant often fails to provide Ricky with access to clean water, one newspaper story reported that Defendant occasionally gives Ricky two-liter bottles of Coca Cola, which, to state the obvious, is not healthy for a wild animal.

32. Defendant has been cited numerous times by the United States Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS), the federal agency tasked with enforcing the Animal Welfare Act. APHIS has cited Defendant for failing to provide regular veterinary care and for failing to maintain necessary fencing for the safety of humans and animals.

33. All of this indicates that Defendant lacks any understanding of the proper care and housing of bears and any willingness to provide Ricky with basic necessities for her physical and mental health.

34. Ricky is suffering and is likely to continue suffering unless and until this Honorable Court enjoins Defendants' ongoing public nuisance.

35. Ricky's confinement is not only inhumane, it is also unsafe.

36. Jim Mack's Ice Cream completely lacks any supervision of the public and their interaction with Ricky and the majority of the public interactions with her involve young children.

37. Despite public complaints and despite Ricky's obvious suffering, Defendant has steadfastly refused to improve Ricky's living conditions or allow her to be moved to a reputable and accredited sanctuary.

38. The world's premiere accreditation organization for animal sanctuaries, the Global Federation of Animal Sanctuaries (GFAS), has agreed to place Ricky in one of the bear sanctuaries it accredits. GFAS-accredited sanctuaries provide top-level care for captive wildlife. GFAS's high standards for bears are attached hereto as Exhibit B.

39. GFAS stands ready, willing and able to provide Ricky with rehabilitation, suitable care, and a vast safe wooded habitat that will meet her innate needs for foraging, swimming, climbing, exploring, digging, nesting, denning, and seeking privacy. GFAS has extensive experience with bears in Ricky's exact situation and has seen cruelly-treated animals thrive in new environments.

40. A GFAS-accredited sanctuary would provide a much more suitable home for Ricky than her current cage at Jim Mack's. GFAS standards require outdoor enclosures for bears to provide appropriate three-dimensional environments designed to "accommodate an array of locomotory and foraging behaviors" and contain "appropriate sleeping and resting areas, including nesting and bedding materials." Accredited sanctuaries provide a minimum of an acre per bear, *roughly 200 times bigger* than the approximately 250 square feet Ricky currently calls home. Sanctuary enclosures are equipped with "dens, appropriate substrate, vegetation and other enrichment materials designed to aid and encourage normal behavior patterns and minimize any abnormal behavior," none of which Ricky has at Jim Mack's.

#### **CLAIM FOR PUBLIC NUISANCE**

41. The prior allegations of this Complaint are hereby realleged and incorporated herein by reference.

42. In Pennsylvania, "[a] public nuisance is an unreasonable interference with a right common to the general public." *Machipongo Land & Coal Co. v. Dep't of Env'tl. Prot.*, 569 Pa. 3, 40 (Pa. 2002) (quoting the Restatement (Second) of Torts § 821B)). This includes "conduct [that] involves a significant interference with the public health, the public safety, the public peace, the public comfort or the public convenience, or. . . conduct [that] is proscribed by a statute, ordinance or administrative regulation." *Id.* (quoting the Restatement (Second) of Torts § 821B).

43. Where the government has proscribed certain conduct, such as inhumane treatment of animals, such a prohibition “is declarative of the public policy and is tantamount to calling the proscribed matter prejudicial to the interests of the public. Injury to the public is the essence of a public nuisance.” *Bravo Enterprises, Inc.*, 428 Pa. at 360. *See also Commonwealth v. MacDonald*, 464 Pa. 435, 454-455 (1975) (public nuisance “includes interferences . . . with public morals, as in the case of . . . indecent exhibitions [and] bullfights”) (quoting W. Prosser, *Law of Torts* § 88, at 583-85 (4th ed. 1971)).

44. Although wild animals like Ricky are exempted from Pennsylvania’s criminal animal cruelty law, the regulations in Title 58 nevertheless require their “humane care and treatment,” reflecting the public policy of treating wild animals humanely. *See* 58 Pa. Code § 147.281 (requiring “humane care and treatment” of wildlife and prohibiting their “maltreatment, mistreatment or neglect”).

45. As with the cruelty law in *Bravo*, these regulations are “tantamount to calling the proscribed matter prejudicial to the interests of the public,” and thus make violations of these regulations an enjoined public nuisance. *Cf. Bravo Enterprises, Inc.*, 428 Pa. at 360.

46. As described in detail above, the conditions to which Defendant subjects Ricky the bear violates 58 Pa. Code § 147.281, which prohibits confining wildlife in an unsanitary or unsafe condition or in a manner which results in maltreatment, mistreatment, or neglect.

47. Defendant’s confinement of Ricky constitutes a public nuisance not only because it is inhumane, but also because it is unsafe. Unsafe conditions constitute a public nuisance. *See*

*Machipongo Land & Coal Co.*, 569 Pa. at 40 (quoting the Restatement (Second) of Torts § 821B)).

48. The regulations prohibit confining wildlife in an “unsafe condition.” 58 Pa. Code § 147.281. Under the regulations, “failure to adequately protect the public from wildlife possessed under this subchapter is a violation.” *Id.*

49. Allowing visitors to feed Ricky increases the risk of transmitting zoonotic diseases.

50. Moreover, the failure to maintain strong barriers between animals and visitors, including children, as noted by state and federal inspectors, poses a significant risk to public safety. During the Commission’s most recent inspection of Jim Mack’s in June 2014, the inspector noted that one of the pen doors for Ricky’s enclosure was not even locked.

51. Because of the risk it poses to public safety, Defendant’s unsafe confinement of Ricky is an actionable public nuisance.

WHEREFORE, Plaintiffs respectfully pray that this Honorable Court:

- I. enter a permanent injunction against Defendant prohibiting Defendant from maintaining a public nuisance, namely confining Ricky in inhumane and unsafe conditions;
- II. enter a permanent injunction against Defendant that terminates all Defendant’s ownership and possessory rights in Ricky and that awards final custody and all

possessory rights of Ricky to a sanctuary accredited by the Global Federation of Animal Sanctuaries for permanent placement;

- III. enter a permanent injunction against Defendant prohibiting Defendant from obtaining another bear or other wild animal;
- IV. All other fees and costs of this action be assessed against Defendant; and
- V. Any further relief this Honorable Court deems just and proper.

Respectfully Submitted,

BAKER & HOSTETLER LLP

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Dated: \_\_\_\_\_

# EXHIBIT A

November 12, 2013

Chad Eyler, Chief  
Special Permits Enforcement Division  
Commonwealth of Pennsylvania  
Pennsylvania Game Commission  
2001 Elmerton Avenue  
Harrisburg PA 17110-9797

Dear Mr. Eyler:

I am writing in support of the Animal Legal Defense Fund's request that you revoke the menagerie permit at Jim Mack's Ice Cream facility located at 5745 Lincoln Highway, York PA 17406 – specifically to re-locate the bear currently held there. I'm a veterinarian (DVM in 1991) who's worked with domestic and wild animals and conducted research (PhD in 1998) with different free-ranging as well as captive wildlife species, including bears.

I visited Jim Mack's Ice Cream facility on November 3, 2013. If the signage is correct, the black bear being held in captivity there is 17 years old. Bears are long-lived animals that typically live into their late-20s, so she is currently in the prime of her life. I do have significant concerns about her current physical and mental health, which are briefly summarized in the table below and described in this letter.



Health Problems	Potential Causes	Associated Husbandry Practices
Missing/worn down teeth and swollen gums	Nutritional deficiencies Cage gnawing – stereotypic behavior	Unsupervised pelleted feeding No environmental enrichment
Dull, matted coat	Nutritional deficiencies Lack of proper grooming	Inappropriate diet No surfaces for scratching/rubbing
Lame (favors right front leg) and stiff gait	Arthritis; restricted ability to exercise Musculoskeletal and/or paw injury	Small area of confinement Concrete surface; Insufficient diet
Stereotypic behavior (paces, gnaws fence, bobs head)	Boredom Stress and anxiety	Lack of environmental enrichment Close proximity to humans; exposed
Likely decreased muscle mass +/- osteoporosis	Lack of exercise Nutritional deficiencies	Small area of confinement Inadequate diet

As you know, wild bears spend a majority of their time foraging for food, particularly during the late summer and fall. Most of a bear's diet is comprised of vegetable matter (e.g., fruits, berries, nuts, grass herbs, tubers, and grain) but can also include fish, insects, eggs, small mammals and carrion. Insects, like bees, yellow-jackets, ants and their larvae, provide most of the protein and fat in a bear's diet. Their diet also changes markedly with the seasons, not only in quantity but also quality – more fresh shoots, herbs, and grasses (up to 80-90% of the diet) are consumed in the spring. This makes it difficult to maintain bears in captivity. Zoo veterinarians recommend a variety of food items for captive bear diets including omnivore biscuits, bananas, apples, green vegetables, fish, and meat supplemented with vitamins and minerals, and food intake should vary dependent on season.



The bear at Jim Mack's Ice Cream appears to subsist on pelleted dog food. People can obtain pellets in small handfuls for 25¢ from dispensers and share them with the bear via a PVC pipe. There were three dispensers located near cages housing the bear, several peacocks, free-roaming chickens, and a goat. All of the animals appeared accustomed to being fed this way, moving toward and touching the PVC pipes whenever people approached their cages.



The bear routinely “begged” for food by moving the end of the pipe in her cage with her paw, and when fed, placed her paw at the end of the pipe to prevent the pellets from spreading throughout her cage on the concrete floor (smart bear). The two public dispensers in front of her cage were empty. Because multiple animals can be fed with pellets from these dispensers, there is no way to monitor how much food the bear is being fed on a daily basis. Nor was there any supervision of the public's interactions with these animals.

Dry dog food may provide a balanced diet for dogs, but not for bears. Nutritional deficiencies likely account for many of the physical health issues noted in the bear above, including dental and gum disease, dull coat, and musculoskeletal problems. A vitamin C deficiency alone can be associated with anemia, bleeding gums and gingivitis, weakened tooth enamel, decreased ability to fight infection and heal wounds, dry and splitting hair, rough dry skin, slowed metabolism and weight gain, and swollen and painful joints.

Healthy wild and captive bears have a full and shiny coat. Shedding is managed by rubbing against trees and rock outcroppings. Bears also like to bathe as part of their grooming behavior, and this requires a pool in which they can submerge themselves.

The bear at Jim Mack's Ice Cream had a dull and matted coat that is probably due to an inadequate diet (e.g., limited essential fatty acids) as well as a lack of surfaces on which the bear could rub and groom herself. There was a small 1½' high metal barrel in the cage full of black water and rotted leaves – not only could the bear not fit into the barrel, the water quality was abysmal.



As you know, wild bears can spend a lot of time foraging for food and may have large home ranges over a variety of terrain. This means that they remain quite active during the day, especially during dawn and dusk, walking, climbing, swimming, digging, and manipulating food items. These movements not only stimulate mental health, they also strengthen muscles and the skeletal system. Joint health, in particular, is maintained by a diversity of movement.



The bear cage at Jim Mack's Ice Cream was constructed of wire mesh with a concrete floor that was approximately 23'L x 10'W in size. There was no natural flooring in the exhibit, except for an aged wooden plank that led to a plywood platform. When the bear urinated, she stood in her urine where it had pooled. This hard



substrate is what the bear lives on 100% of the time, and in the winter, it gets very cold. This, combined with the lack of an ability to engage in meaningful movement because of the small cage size, favors development of a host of physical health problems, primarily musculoskeletal in nature. The bear's movement was stiff, not fluid, pacing was repetitive, and she walked with a limp, favoring her right front leg. This could be due to arthritis, a leg injury, or a footpad lesion. It's not uncommon for bears who are housed in concrete exhibits to develop ulcers on the bottom of their paws. It's likely that she also has decreased muscle mass, pressure sores, and obesity associated with lack of exercise. Dietary insufficiencies are likely compounding these injuries.



Bears are difficult to properly maintain in captivity because of their unique diet, significant seasonal metabolic changes, and requirements for behavioral enrichment (e.g., foraging, bathing). The Association of Zoos and Aquariums (AZA) provides basic guidelines for the care of captive bears: enclosures should provide adequate space, shelter, materials to nest, den and hibernate as well as opportunities to forage, climb, explore, dig, and bathe. Bears also require hiding cover, which they use for privacy.

The bear at Jim Mack's Ice Cream exhibited stereotypic behavior (pacing, head bobbing/swaying, gnawing on the wire fence), which was not surprising given the small area of confinement and lack of environmental stimuli. There was also no supervision of the public's interactions with the bear – the majority of individuals were young kids and teens. The bear was likely experiencing a lot of stress and anxiety associated with feeling trapped and vulnerable because the exhibit was completely open on three sides, and people were at the same level with the bear, looking down at her only a few feet away.

Zoos used to exhibit animals in cages like the one at Jim Mack's Ice Cream, but public opinion changed that. Now animals maintained for public exhibit at zoos follow AZA guidelines to ensure animals remain physically and mentally healthy. Zoos collaborate with local wildlife agencies and other organizations on research, and they endeavor to education the public about different species and efforts to conserve them. Despite ongoing research to improve captive husbandry methods, zoos struggle with the management of bears, wrestling with seasonal dietary and hibernation (or torpor) needs.



Jim Mack's Ice Cream is not classified as a zoo nor an educational facility; the bear exhibit does not educate anyone about black bears. She is located adjacent to a miniature golf course and ice cream parlor. The public has complained online about the plight of this bear, while praising the quality of the ice cream – the business would survive just fine without this exhibit. A slow and tortuous decline in physical and mental health is inevitable for this bear if she remains at this facility.

Previous Pennsylvania Game Commission inspection reports for Jim Mack's Ice Cream highlighted concerns about enclosures as well as records of transactions and notifications of any acquisitions or disposal of wildlife. A variety of animals were listed in the 6/26/2011 report (e.g., llamas, tortoises, cockatiels, turkeys). The 7/27/2011 re-inspection report described the transfer of turkeys to the game

commission due to inadequate pens and one bear was listed. During my 3 November visit, there were peacocks, chickens, a goat, cockatiels and the bear visible on the premises. Another visitor that day stated that there used to be two bears and a lion at this facility. Do your records list these animals?

I urge you to revoke the menagerie license for Jim Mack's Ice Cream as soon as possible. The Director of Accreditation and Field Operations for the Global Federation of Animal Sanctuaries is willing to commit to finding a new sanctuary for this bear at Jim Mack's Ice Cream. If you have any questions, please feel free to contact me at 215-746-2228 or [bechertu@sas.upenn.edu](mailto:bechertu@sas.upenn.edu). Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Ursula Bechert". The signature is written in a cursive style.

Ursula Bechert, DVM, PhD

# EXHIBIT B

# **Global Federation of Animal Sanctuaries**



## **Standards For Bear Sanctuaries**

**Version:**

**June 2013**

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## INTRODUCTION

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### GFAS PRINCIPLES

The Global Federation of Animal Sanctuaries (GFAS) will designate an organization as “verified” or “accredited” based upon its substantial compliance with the standards listed below. GFAS recognizes that some organizations under consideration will operate valid rescue and rehabilitation programs with a goal of releasing wildlife to the wild pursuant to IUCN and/or other international or national standards. For those animals, lifetime sanctuary care may not be part of the organization’s mission. While the care for these animals may be provided on an interim basis only, the organization is still expected to meet the standards below with regard to all animals in its care and for purposes of these standards it will be identified as a “sanctuary.”

Consistent with GFAS’ philosophy and the standards below, it is expected that a sanctuary does not adopt policy positions that are in opposition to the welfare of the species of animals in the care of the sanctuary (for example, while it is not required that a primate sanctuary affirmatively promote a policy against laboratory research using primates, it should not promote a policy in favor of such research).

Note: Several standards make reference to a sanctuary’s “Director.” GFAS recognizes that a sanctuary may use a different title, and the term “Director” is intended to reference the sanctuary’s Sanctuary Director, who may be called an Executive Director or Chief Executive Officer, etc.

GFAS also recognizes that sanctuaries may rely on volunteers for certain functions, including some aspects of animal care (such as food preparation). Standards referencing “staff” may take into account appropriately qualified and trained volunteers as well as employees.

Appendix I of this document provides further guidance/suggestions on facility design and bear care. These are not requirements but rather provide sanctuaries with access to knowledge gained from experience at other sanctuaries//bear care facilities.

### ANIMALS COVERED BY THESE STANDARDS

**Note: The information contained in this document does not address the unique needs of the polar bear and giant panda. Sanctuaries caring for these species are encouraged to contact GFAS to discuss appropriate care standards for these species.**

#### Family / Genus/Species/Common Names

Family: Ursidae

Subfamiy: Ailuropodinae, Tremarctinae, Ursinae,

<b>Genus</b>	<b>Species</b>	<b>Common name</b>
<i>Ailuropodinae</i>	<i>melanoleuca</i>	giant panda
<i>Helarctos</i>	<i>malayanus</i>	sun bear
<i>Melursus</i>	<i>ursinus</i>	sloth bear
<i>Tremarctos</i>	<i>ornatus</i>	Andean bear, spectacled bear
<i>Ursus</i>	<i>americanus</i>	American black bear



Global Federation of Animal Sanctuaries – Standards for Bear Sanctuaries

<i>Ursus</i>	<i>arctos</i>	brown bear
<i>Ursus</i>	<i>maritimus</i>	polar bear
<i>Ursus</i>	<i>thebetinus</i>	Asiatic black bear



## BEAR STANDARDS

GFAS notes that there may be other acceptable ways of meeting the intent of each standard, aside from those detailed below, and that in some instances there may be legal, cultural or other significant barriers to meeting GFAS requirements. The standards are considered mandatory, but GFAS will consider specific exceptions to some of the listed requirements (e.g., exact enclosure size, manner of record keeping, legal requirements that impact a sanctuary's acquisition policy, etc.). GFAS encourages sanctuaries to offer feedback on the standards and to explain any reasons why it believes it cannot meet a particular standard, or why the standard is not applicable and/or appropriate to its situation. Sanctuaries are also welcome to indicate a timeline for meeting a standard if the standard is not yet met at the time of application for accreditation or for verification.

The exceeding of the standards is encouraged. In addition to meeting these standards, an organization is expected to comply with all applicable international, national, state/province, and local laws and regulations.

## BEAR HOUSING

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### H-1. Types of Space and Size

**Unless otherwise directed by a veterinarian, bears are provided sufficient opportunity and space to move about freely and rapidly, and to exercise choice in location so as to reduce stress and maintain good physical condition.**

#### General

- a. The habitat and living conditions are species appropriate and replicate, in as much as possible, the bears' wild habitat with a balance between hygiene and the species' physiological and psychological needs. This includes adequate space, both vertical and horizontal, and appropriate space, in terms of diversity and complexity.
- b. The physical space provides varied opportunities for the bears to interact with the environment and key elements are changed often, resulting in a dynamic living space.
- c. Facility design takes into account caregiver-bear safety and ease of maintaining a positive relationship.
- d. Bears are provided access to as many areas of the enclosures as possible, except during staff maintenance activities, unless security concerns dictate otherwise. All enclosures interconnect without creating 'dead ends' to allow for freedom of movement of subordinate individuals.
- e. Outdoor enclosures are either covered, with minimum height to allow for natural behaviors, or open roofed, with cantilever angle, hotwire or sufficient height to prevent escape (see Housing Dimensions for appropriate measurements).
- f. The habitat provides appropriate visual, olfactory, and acoustic barriers.
- g. The habitat provides security from predators and unauthorized human access.

#### Open Space Settings

- h. Open space enclosures, which may be indoor or outdoor units, are designed to provide the maximum possible freedom and complexity for enclosure residents. The enclosures have sufficient area per animal to accommodate natural individual and group activities. While it may not be possible to



monitor every animal in an Open Space enclosure on a daily basis, design allows for regular inspection of animals and facility maintenance as needed.

- i. Where open space settings are the primary enclosure, the following are also provided:
- Shelter which can serve as night housing and/or secure space during inclement and extreme weather.
  - Space for use while the primary enclosure is serviced and/or for animal management needs including introduction of new individuals to a group, or temporary separation for health or social reasons. (Note: This space might also be night housing, lockout, shift yard, transfer tunnels, etc.)
  - Alternate housing for sick or injured individuals.

### **Controlled access settings**

- j. Controlled access enclosures, which may be indoor or outdoor units, provide sufficient space for natural activities but are also designed to allow caregivers to monitor each individual animal on a daily basis, to easily shift individuals, pairs or small groups as needed and to isolate animals for individual care. As with Open Space enclosures, design also includes:
- Shelter which can serve as night housing and/or secure space during inclement and extreme weather.
  - Space for use while the primary enclosure is serviced and/or for animal management needs including introduction of new individuals to a group, or temporary separation for health or social reasons. (Note: This space might also be night housing, lockout, shift yard, transfer tunnels, etc.)
  - Alternate housing for sick or injured individuals.

### **Indoor Housing**

- k. Indoor housing provides year-round protection from the elements. For sanctuaries located in colder climates (where freezing temperatures occur regularly during any part of the year and temperate or tropical species are housed), indoor space is insulated and is large enough to allow for all forms of species-specific behavior (running, climbing, swimming, digging, playing, etc.).

### **Dimensions**

- l. Many factors influence the minimum space required for a group of bears, including, but not limited to: group size, group composition, and enclosure complexity. The following guidelines are minimum recommendations. Facilities should provide as much space as is possible and/or practical.
- m. Sanctuaries meeting only the minimum requirements for enclosure space employ additional environmental enrichment, focusing on physical and mental exercise rather than food, to compensate for reduced space and complexity.
- The use of a rotation system, which allows groups and/or individual bears to regularly spend time in a larger or different space, is strongly encouraged in these circumstances to increase enrichment and encourage activity.
  - Outdoor enclosures for bears - Enclosure shape may be variable to take in natural features in the landscape such as rock formations, hills and trees. Space includes a minimum of one (1) animal transfer door leading to indoor shelter.
    - Minimum 10,000 sq. ft (929 sq. m) for group of up to three compatible bears.
      - 1 acre (0.4 hectares) per bear recommended.
    - Length exceeds width by a minimum factor of 2 to accommodate natural running and walking behaviors.
    - Includes natural or artificial dens to appropriately accommodate the bears' needs.
    - Minimum vertical dimension of 15 ft. (4.6 m), if covered.



- Uncovered enclosures have a vertical overhang.
- n. Indoor enclosures/shift yards for bears - A minimum of one room per bear. Room dimension is dependent on intended purpose and/or duration of confinement.
  - Rooms for are a minimum of 100 sq. ft. (9.3 sq. m) with a minimum vertical dimension of 12 ft. (3.7 m).
  - Shift yards for 1-3 bears are a minimum of 600 sq. ft. (55.7 sq. m) with a minimum vertical dimension of 15 ft. (4.6 m).
    - An outdoor enclosure large enough for 1-3 bears may also serve as a shift yard.
    - Shift yards are covered to prevent escape.
    - Adjacent shift yards are easily accessible from the main enclosure.
  - Rooms and shift yards interconnect without creating 'dead ends' to allow for freedom of movement for subordinate individuals and include a minimum of one transfer door per room/shift yard to the main outdoor enclosure.
  - Bears are familiarized with rooms and shift yards through routine feeding in or transfer through, or by being allowed continuous access.
  - Whenever possible and species appropriate, separated animals have visual and tactile access to group members to facilitate reintroduction.
- o. Mixed species housing
  - Where multiple species share an outdoor enclosure, the total dimension is adjusted to reflect the minimum spatial requirements of each species housed.
  - Minimum indoor dimensions remain unchanged for each species.
  - Each species has a dedicated transfer door between indoor and outdoor enclosures.
  - Mixed species groupings are appropriately researched to ensure compatibility and to avoid unnecessary stress for all species.

## **H-2. Containment**

**Bears are safely contained.**

### **General**

- a. Other than when being transported or for medical reasons, bears are kept at all times in secure enclosures or other appropriate areas.
- b. Enclosures are designed to allow for bears ' normal defense reactions and appropriate 'flight' or escape distances.
- c. All enclosures are designed, constructed and maintained to securely contain bears and to present no likelihood of harm to them.
- d. Distance or barriers between bears and between enclosures and personnel is sufficient to minimize stress to the bears, as well as reduce the risk of disease transmission.
- e. Enclosures are designed to allow for proper, safe cleaning and drainage.
- f. Materials are appropriate for their particular application and are maintained in good repair.



### **Outdoor Enclosures**

- g. Perimeter containment of outdoor areas is constructed so as to prevent digging under the barrier by native wildlife, domestic species and the enclosure residents.
- h. Fences and enclosures are inspected daily for signs of digging. Where fencing meets hard surfaces such as rock or concrete, the fencing is securely anchored in place.
- i. Design takes into account bears' ability to climb, dig, etc.

### **Fencing**

- j. Barbed or razor wire are not used to contain bears.
- k. The supporting posts for fences are firmly fixed into the ground.
- l. Fence material is sufficiently secured to supporting posts in such a way that the weight of the bears could not detach it from the support nor dislodge the supporting posts.
- m. Gates and doors are at least as strong, and as effective, in containing the bears as the rest of the enclosure barriers. In particular gates and doors are designed and maintained so as to prevent animals from lifting them from their hinges or unfastening the securing device.
  - All containment barriers have a mechanism to prevent bears from gaining access to dig under gates.
    - Wire mesh buried a minimum of 3.3 ft. (1 m) under the substrate or, in enclosures greater than 15 acres (6 hectares), hot wires placed near the ground every 1 ft. (0.3 m) are recommended.
- n. Dimensions
  - A maximum dimension of 3 in. x 3 in. (7.6 mm x 7.6 mm) 4-6 gauge or heavier wire mesh or chain link fencing is recommended, particularly where pens share common fence lines (to be avoided as much as possible).
    - Rigid woven wire mesh recommended for brown bears.
  - Minimum vertical dimension of 15 ft. (4.6 m) with an additional 3 ft. (0.91 m) fencing cantilevered toward the enclosure at 35-40° if the enclosure is not covered with roof or fencing.
    - For enclosures greater than 15 acres (6 hectares) minimum 8 ft. (2.4 m) double fencing with hot wires may also be used.

### **Electric Fencing**

- o. Electric fence energizers emit at least 9,000 V with a joule rating appropriate for the length and condition of the fence (25 joules is recommended).
- p. 20-gauge high-tensile wire is required. A stronger gauge (e.g., 12-gauge), may be more appropriate for some species.
- q. Fences are a minimum of 12 ft. (3.66 m) tall, with a maximum wire spacing of 4 in. (101.6 mm) for the first 4 ft. (1.22 m) and 6 in (152.40 mm) thereafter.
- r. Fence is alternating hot/ground to prevent bears from leaping onto the fence and avoiding shock.
- s. Energizers are connected to battery or generator backup for continuous power supply during outages.
- t. In dry climates, the earth rod area is watered to ensure adequate grounding.
- u. If using electric fence as a primary barrier, two separate complete systems are used to increase effectiveness and reduce the chance of system failure.
- v. Enclosure furniture is placed at a safe distance from the fence to prevent accidental contact by bears.
- w. Safety signs on hot wire are visible to staff and bystanders.



- x. A non-electrified barrier is used to keep bystanders and wildlife from coming in contact with the electric fence.

### **Solid Barriers.**

- y. Solid barriers such as concrete block, poured concrete and artificial rock can be used as the sole method of containment or in conjunction with other types of barrier.
- z. Walls are secured in appropriate footings to ensure wall stability, and are of sufficient strength to anchor caging and furniture.
- aa. Care is taken, especially with artificial rock, to ensure that contours in the rock do not provide escape routes from the enclosure.
- bb. Height of the wall is the same as that for fences.
- cc. Design of areas using solid walls allows for sufficient air flow throughout an enclosure.

### **Moats**

#### dd. General

- There is a means provided for escape back into the enclosure should animals fall into them.
- The moat is of sufficient size and depth to adequately confine the bears.
- The moat is accessible by skid steer or similar tractor to meet service and repair needs.
- Moats are surrounded by fences, walls, hedges or shrubbery to prevent others from approaching too close to the edge.

#### ee. Water moats

- Moat width is greater than the usual horizontal and vertical jump distance for the species housed. Perimeter barrier exceeds the reach of the largest bear housed when the individual is at the deepest part of the moat. There are both deep and shallow areas for use by the bears.
- Electric wires are not used as secondary containment.
- The moat does not serve as a primary source of drinking water.
  - Water quality parameters are established and water quality is measured on a regular basis.
- There is a management plan to keep moats free of ice in colder climates.

### **Indoor Enclosures and Shift Yards**

- ff. For mesh/chain link size and vertical dimensions see outdoor enclosure section.
  - Maximum mesh size of 2 in. x 2 in. (5 cm x 5 cm) recommended where mesh separates adjacent cages.
- gg. Solid walls may be used, as described above, in conjunction with other types of barrier.
- hh. Shift yards are topped with mesh or roofing due to their small size, which increases the possibility of escapes.
- ii. Walls are of sufficient strength to anchor caging and furniture.



### **H-3. Ground and Plantings**

**Ground cover indoors and out is healthy for bears. Plantings are appropriate and safe.**

#### **Vegetation**

- a. Any vegetation capable of harming bears is kept out of reach.
- b. Trees within or near animal enclosures are regularly inspected, trimmed or felled as necessary to avoid bears being harmed by falling branches, toxicity, or trauma.
- c. Trees and climbing plants are pruned to prevent their aiding bear escape.
- d. Access to very tall trees which are useful for shade limited by electric wires, barriers etc. to prevent bears breaking branches and to prevent their aiding bear escape.
- e. Any natural materials (e.g., plants and their products, such as seeds or fruit) are assessed for toxicity to the species held before use.

#### **Outdoor enclosures**

- f. All outdoor enclosures have a natural substrate consistent with the needs of the species.
  - The substrate provides easy to clean, dry areas for ground feeding and digging.
  - The substrate can be amended with organic materials, including but not limited to soils, sand, leaf litter, bark mulch, grasses, straw and hay.
  - The substrate drains well.
- g. Bears are provided with appropriate three-dimensional environments to accommodate an array of locomotory and foraging behaviors, as well as appropriate sleeping and resting areas, including nesting and bedding materials.
- h. Bears are provided with suitable substrates for digging and rooting, nesting and bedding materials, as species appropriate. Enclosures are regularly inspected for digging damage.
  - Digging risks (e.g. soil collapse, flooding and caregiver access to animals are taken into account in enclosure design.
- i. Bears are provided with appropriate water sources and water quality is monitored where water sources are not 'dump and fill'.
- j. Where natural topography of an enclosure is not varied, it is created through the addition of natural and placed elements.

#### **Indoor enclosures**

- k. Indoor enclosures have a non-slip concrete floor and, provided adequate septic service is present, the floor is sloped to a drain. Natural substrate, which is routinely replaced may be used as species appropriate.
- l. For new construction, the indoor area is designed to accommodate a deep litter substrate.
  - Deep litter enclosures are designed to allow appropriate litter depth and drainage for proper functioning.
  - Litter is properly spot-cleaned and maintained.
- m. Existing construction ensures that all floors are sealed.
- n. Bedding materials are provided in sufficient amount/depth to prevent contact with the concrete.





- Bedding material suitable for use includes, but is not limited to, bark mulch, leaf litter, wood wool, straw hay, shredded paper and wood shavings. Cedar shavings are used with caution as some species are sensitive to the aromatic oils.
- o. All bears are observed regularly for signs of illness that may be related to ingestion of foreign objects, including wood shavings, bark mulch or other materials that may pose a hazard.

#### **Shift yards**

- p. All outdoor shift yards have a minimum of 50% of the surface area in natural substrate. The remaining 50% may be concrete as appropriate for drainage, sanitation and structural needs.
- q. The substrate can be amended with organic materials including, but not limited to, soils, sand, leaf litter, bark mulch, grasses, straw and hay. The substrate drains well.
- r. Bedding materials are provided in sufficient amount/depth to prevent direct contact with any concrete surfaces.
- s. Shift yards for digging species are secured with buried fencing or a poured concrete pad or apron.
- t. Shift yards which house bears for extended periods include a species appropriate water feature.

### **H-4. Transfer Doors**

**Bear enclosure transfer doors are appropriately designed to ensure both animal and human health and safety.**

#### **General**

- a. Animal transfer doors are a key element of facility design.
- b. Doors are designed to allow transport crates to safely attach to them.
  - Transport crates should be able to be moved in and out of the enclosure through the transfer doors.
- c. A two door policy is observed such that two animal transfer doors are closed and secured between caregivers and animals whenever caregivers enter enclosures to service them.
- d. Transfer doors are designed to remain functional under all circumstances, are maintained in good working order and free from any encumbrances that may prevent opening and closing.
- e. Doors are designed to allow caregiver view of enclosures while operating the doors.
- f. Minimum dimensions of transfer doors are such that bears can maintain normal posture when passing through the opening.
- g. Doors are designed such that people are out of view when bears are being shifted. If not, no eye contact is made with the bears going through the doors.
- h. Doors and door hardware are properly maintained to ensure proper functioning.

#### **Security**

- i. Transfer doors and their frames are constructed of materials similar in strength to those used in the primary enclosure.
- j. Doors are lockable in both the open and closed positions.
- k. For pneumatic or hydraulic doors, pneumatic or hydraulic pressure is sufficient for keeping doors in the open position. A mechanical lock is, however, in place to lock the door in the closed position.
- l. Particular attention is given to preventing hay/shavings from affecting door mechanisms.



### **Animal Safety**

- m. Doors operated via remote control are visible from the control area.
- n. Guillotine doors are not recommended due to risk of animal injury. If used, a backup system should be in place to prevent door from free falling due to mechanical failure or operator error.
- o. Hydraulic systems use peanut or other food-grade oils to prevent risks to the bears in the event of leakage.
- p. Hydraulic and pneumatic door systems include backup systems to allow for door usage in the event of equipment failure.

### **User Safety**

- q. If door handles or locking mechanisms are in close proximity to the enclosure, a solid barrier is present to protect the user.
- r. Double door systems are used to prevent bear escape from holding areas.

## **H-5. Shelter**

**Bears have access to man-made shelter that provides each individual with protection from extreme weather (including, but not limited to, prevailing wind, snow, sleet, rain, sun, and temperature extremes).**

- a. Bears have space to seek refuge from sun, wind, inclement weather and enclosure mates.
- b. Shelter does not create or result in 'dead ends' in which individuals can be trapped by other group members.
- c. Shade and shelter are provided in multiple locations within enclosures to ensure that all bears have access throughout the day.
- d. Shade and shelter can be created through natural and artificial means including hollow logs, rock overhangs, underground dens, shade trees and shade fabric.
- e. Shelter areas provide dry space during wet weather, as well as protection from wind.
- f. Shelter design does not result in dead ends in which subordinate individuals can be trapped by dominant animals.

## **H-6. Enclosure Furniture**

**Bears are provided with an appropriately complex and rich habitat to explore, to ensure the animals' physical, nutritional and stimulation needs are met.**

### **General**

- a. Enclosures are equipped in accordance with the needs of the bears with bedding material, water features, dens, appropriate substrate, vegetation and other enrichment materials designed to aid and encourage normal behavior patterns and minimize any abnormal behavior.
- b. Appropriate complexity is provided through the use of various natural and artificial materials in the enclosure, using a combination of items including, but not limited to, those listed above.
- c. The date that items are placed in an enclosure is noted, and items are removed when they become soiled, damaged or novelty has diminished.



- d. Bears are provided access to the vertical space available within the enclosures.
- e. Bears have access to areas for digging and/or are provided with artificial dens.
- f. Bears have access to species appropriate water features.

### **Outdoor Enclosures**

- g. Visual barriers can be used to avoid confrontation or aggression, and include climbing structures, fallen logs, culvert pipes, walls, shade structures, topography and large enrichment items.
  - Logs are placed and secured in a manner that prevents rolling or falling onto animals.
  - Logs and/or rocks are provided for rubbing to promote skin health and aid in shedding.
- h. Areas for digging are provided where possible. Dens dug by bears are monitored for potential collapse and/or flooding.
- i. Denning sites suitable for seasonal dormancy are provided, as species appropriate, along with suitable nesting materials.
- j. Climbing structures accommodate natural locomotion patterns. When multiple species are housed together, climbing structures created specifically for each species' unique needs are provided. Metal pipe is not used to construct climbers as it becomes dangerously hot in summer sun and can damage skin during cold weather. Climbing structures should be accessible by staff for routine sanitation, repairs and updates and should include:
  - horizontal and vertical elements
  - locations and/or mechanisms to provide enrichment above ground level;
  - resting platforms
  - soft substrate such as soil, bedding material, mulch or leaf litter is installed below climbers to minimize risk of injuries from falls, especially to youngsters and older individuals.
- k. Water sources such as pools, streams or ponds are provided as species appropriate. Permanent pool structures, where present, have an adequate filtration system to maintain institutional water quality parameters or are designed to allow easy draining, cleaning and refilling at suitable intervals to ensure water remains potable.
  - Roots, trees and stumps on shore and in the water provide additional enrichment for bears.
  - In excessive heat, fountains and misters may also be used to cool the air.

### **Indoor Enclosures/Shift Yards**

- l. To the greatest extent possible, all visual barriers, digging/denning spaces and climbing structures meet outdoor enclosure criteria, particularly where bears must be housed in these limited spaces for extended periods of time.
- m. Indoor furniture is constructed of materials that can be sanitized or easily replaced when they become overly soiled. Furniture is accessible to staff for routine cleaning and repair.
- n. Benches and other structures allow for climbing and for sleeping above ground level as species appropriate.
- o. Dens and water features are provided, as species appropriate.



## **H-7. Sanitation**

**Proper sanitation is practiced to reduce pathogen transmission.**

### **General**

- a. Local, county, state laws regarding proper waste removal are observed.
- b. Bears are transferred from enclosures prior to cleaning, disinfection and/or sanitizing.
- c. As fomites (shoes, clothing, etc. which carry infectious materials) may be a source of zoonotic disease, all who may come in contact with such materials are made aware of these risks and trained accordingly. (See also Standard V-8, “Zoonotic Disease Program”).
- d. Uneaten perishable food is removed within a timeframe appropriate for the type of foodstuff and size of enclosure, prior to molding or contamination.

### **Removal of Animal Waste**

- e. Animal waste is removed from the habitat as often as necessary to prevent contamination of the bears contained therein, to minimize disease hazards and to reduce odors. This also enables caregivers to collect fecal samples in a timely manner.
- f. Soiled bedding material and substrate are removed and replaced with fresh materials daily, or as needed to prevent buildup. If odorous, bedding is changed regardless of how long in place.
- g. Damaged and soiled enrichment items are removed regularly.
- h. Efforts are made to prevent native wildlife getting access to waste.

### **Tools**

- i. Each enclosure has dedicated tools to prevent cross contamination between enclosures. When resources restrict the ability to have dedicated tools, tools are disinfected between enclosures to prevent the spread of parasites and disease.
- j. Tools are labeled when use is restricted to specific areas.
- k. Sanitation tools or equipment, including wheelbarrows, are not used for transport or storage of foodstuffs or bedding.

### **Cleaning and Disinfection**

- l. Feeding areas, automatic water devices, water and food containers are cleaned and disinfected daily.
- m. Care is taken to minimize overspray of waste, directly or via aerosolizing, into adjacent cages during cleaning.
- n. Animals are not present in enclosures being cleaned using power hoses. Care is taken to prevent accidental spraying of animals in adjacent enclosures when power hoses are used for cleaning.
- o. Concrete floored enclosures are dried with a squeegee, and as needed fans, to ensure floors are dry before bedding material is replaced.
- p. All hard surfaces including walls, floors, ceiling, benches, climbing structures, cage mesh and caregiver work areas are sanitized regularly to the extent possible. Note that in large outside enclosures with plenty of exposure to sunshine and rain, there may not be a need for scrubbing and cleaning but areas must be monitored for potential sanitation problems.
- q. Cleaning and Disinfection Standard Operating Procedures are developed and followed to address:



- safe disinfectant use to prevent hazards to the bears, caregivers and the environment;
  - cleaning and disinfecting protocols for food preparation and veterinary care areas using more powerful disinfectants on hard surfaces;
  - daily, weekly, monthly and quarterly cleaning schedules for all hard surfaces including walls, floors, ceiling, benches, cage mesh and staff work areas designed to minimize the risk of disease transmission;
  - disinfectants and other cleaning products stored separately from foodstuffs.
- r. A Material Safety Data Sheet (MSDS) or equivalent is readily available for all cleaning products in use and all containers are properly labeled as to contents.

## **H-8. Temperature, Humidity, Ventilation, Lighting**

**Temperature, humidity, ventilation, and lighting are appropriately addressed.**

### **Temperature**

- a. The temperature is within an acceptable range for the species housed.
- Weather is considered in addition to temperature.
  - Allowance is made to accommodate individual animals not able to tolerate temperatures above or below the usual range of comfort for the species.
- b. For outdoor enclosures and shift yards, in general, bears have access to heated or cooled areas when ambient temperature falls below 32°F (0°C), adjusted for wind chill, or rises above 85°F (29.4°C) and are provided with dry, well-bedded den space. Great caution is taken with elderly, infant and disabled bears.
- Windbreaks are sufficient in number to accommodate all bears simultaneously with consideration for social structure and relationships in a group.
  - Shade is available throughout the day in a number of areas and adequate size space to accommodate all bears simultaneously with consideration for social structure and relationships within a group.
  - Care is taken to prevent direct bear contact with heat sources. Note: Infrared bulbs or 'heat lamps' are not recommended as heat sources due to risks associated with bulb breakage and tissue damage to bears.
    - Heating blocks/panels, if used, are installed and used so as to ensure they pose no risk to the bears.
- c. For indoor enclosures, an average ambient temperature range of 40°F (4.4°C) and 80°F (26.6°C) is recommended, as species appropriate. For temperatures outside this range heat can be provided by forced air or hydronic heating systems and cool air by refrigerant air conditioning, "swamp coolers", fans, or misters;
- Providing bears with opportunities to choose temperature ranges within an enclosure is preferred. This can be achieved by access to areas near heat vents, skylights, or hog warmers for example.
  - Even when ambient temperatures are 'warm', bare concrete floors, especially damp floors, are too cold for many individuals and are not considered suitable substrate or housing for bears.
  - Den/nest areas are provided for all bears in indoor enclosures.
  - Any climate control systems include back-up power in case of equipment or power failure.



### **Humidity**

- d. Optimal indoor humidity is between 40% and 70%. Humidity should not be kept above 80% in controlled environments to prevent fungal and mold growth. High humidity can be mitigated through proper ventilation or dehumidifier systems.
- Bears are monitored for signs of dry skin where forced air heating is used.

### **Ventilation**

- e. Proper ventilation of indoor enclosures is critical.
- In these areas, Heat Recovery Ventilators and Energy Recovery Ventilators can provide fresh outdoor air with minimal heat loss.
- f. Indoor enclosures ideally have a negative air pressure, with regular exchange of non-re-circulated air.
- A minimum of one complete air exchange per hour is recommended.
  - Where negative air pressure is not used, HEPA filters may be installed to maintain re-circulated air quality.
- g. To the extent possible, separate air handling systems are maintained between animal areas to prevent disease transmission.
- h. Proper window and door placement can ensure sufficient cross-ventilation in warm climates.

### **Lighting**

- i. Light, natural and artificial, is appropriate for the species housed in terms of intensity, spectrum and duration.
- j. Indoor enclosures - Natural lighting is optimal and can be obtained using skylights, windows, roll-up doors and other means. Glass bricks may be considered, taking into account the fact that light intensity will be less than with clear glass.
- Supplemental lighting is provided to ensure adequate light, both day and night, for caregivers to observe animals, clean enclosures and perform related animal care tasks.
  - When animals are confined indoors overnight, sufficient lighting is used to extend the daylight period to a natural diurnal rhythm for the species housed to allow animals time to eat and select sleeping sites.
- k. Outdoor enclosures and shift yards - Supplemental lighting is available for use in outdoor areas in event of an emergency.

## **PHYSICAL FACILITIES AND ADMINISTRATION**

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### **PF-1. Overall Safety of Facilities**

**The premises, tools, equipment, animal care records, and hazardous materials are appropriately kept clean and safe.**

- a. The sanctuary is committed to maintaining a safe and healthy environment for all employees, volunteers, visitors and bears, and conforms to health and safety practices as outlined under applicable national and state/province laws and regulations (e.g., the Occupational Health and Safety Administration ["OSHA"] in the United States or an equivalent international/national occupational safety organization/agency).



- b. Premises (buildings and grounds) are kept clean and in good repair in order to protect employees, volunteers, visitors and bears from injury and to facilitate appropriate bear care.
- c. Materials and equipment are safely stored when not in use, and there is an effective system in place for regular inspection and maintenance of tools and equipment.

## **PF-2. Water Drainage and Testing**

**Water drainage is rapid and complies with all regulations, and soil and water are tested annually.**

- a. A suitable method is provided to rapidly eliminate excess water.
- b. The sanctuary's method of drainage complies with applicable national, state/province, and local laws and regulations relating to pollution control or the protection of the environment.
- c. Enclosures are checked annually for potential water contamination and soil contaminants.

## **PF-3. Life Support**

**There are adequate and reliable utilities, with back up.**

- a. Adequate and reliable electric power, potable water, water supplies and plumbing are available on the premises.
- b. An emergency power system, such as a generator, is in place in the event of a power outage.

## **PF-4. Hazardous Materials Handling**

**Hazardous materials are appropriately handled according to applicable regulations and laws, protective clothing and other equipment in isolation units are not used elsewhere, and waste is taken care of appropriately.**

- a. The method for disposal of sewage, toxic/hazardous materials, garbage, and bear wastes follows all guidelines for hazardous materials. All national, state/province and local legal and regulatory requirements are met.
- b. All hazardous materials are labeled with the name of the contents, appropriate hazard warnings, and the name and address of the manufacturer as provided on the Material Safety Data Sheets (MSDS Sheets) or equivalent, if used in the country in which the sanctuary is based.
- c. If applicable, Material Safety Data Sheets for each hazardous material to which employees may be exposed, are kept in the area where the materials are stored. Employees are made aware of, have access to and understand how to interpret the MSDS Sheets.
- d. All employees, and volunteers where appropriate, utilizing hazardous materials are appropriately trained in the use of, and made aware of the potential hazards of using these materials.
- e. Protective equipment and clothing is utilized where required, such as working with hazardous chemicals and potentially infectious bears.
- f. Accumulations of trash is placed in designated areas and cleared as necessary to protect the health of the bears, staff, volunteers, visitors and the surrounding environment.



- g. The sanctuary considers the potential risks of releasing parasites, diseases or non-native plants through effluent water and other routes.
- h. Provision is made for the safe and legal removal and disposal of bear and food wastes, bedding, dead animals, trash and debris.
- i. Disposal facilities are so provided and operated to minimize rodent and insect infestation, odors, and disease hazards while complying with applicable international, national, state/province, and local laws and regulations relating to pollution control or the protection of the environment.

## **PF-5. Security: Bear Enclosures**

**Proper security measures are in place to safely contain bears at all times, and there is a 24-hour security system in place.**

- a. Entry and exit to bear enclosures is through a system of double gates and/or doors, with sufficient space between to allow each gate to be securely closed prior to opening the other.
- b. For very large enclosures into which vehicles enter, the double gates and/or doors are located far enough apart to allow the vehicle to be completely enclosed into the area with both gates secured before entering the enclosure.
- c. The sanctuary has 24-hour systems in place to minimize the risks of theft, malicious damage or release of bears by intruders entering the grounds.
- d. The sanctuary has a key control system designed to ensure that only qualified staff are allowed into certain areas of the sanctuary, such as bear enclosures. Gates and doors to enclosures are securely locked so as to prevent unauthorized openings.
- e. An adequate number of clearly visible safety signs, providing warning by means of a symbol, words or a combination of symbol and words, are displayed at each enclosure as needed.

## **PF-6. Perimeter Boundary and Inspections, and Maintenance**

**The perimeter boundary is designed to discourage unauthorized entry, with suitable exits, and any enclosures in need of repairs is immediately repaired or replaced, or bears are relocated.**

- a. The perimeter boundary, including access points, is designed, constructed, and maintained to discourage unauthorized entry and as an aid to the safe confinement of all the bears within the sanctuary.
- b. Exits through any perimeter fence are suitably located and adequately designated and secured.
- c. Each exit from the sanctuary is kept clear and is capable of being easily opened from the inside to allow the release of staff.
- d. All such gates are capable of being closed and secured to prevent the escape of bears and entry of unauthorized animals and visitors.
- e. Safety signs on any electrified section of the perimeter fence or enclosures are easily visible.
- f. A regular program of sanctuary maintenance is in place.
- g. Any enclosure in need of repair, or any defect likely to cause harm to bears, is immediately repaired or replaced, or the bear(s) are relocated to a secure enclosure.





## **PF-7. Security: General Safety Monitoring**

**Appropriate fire extinguishers and alarms are in place and in working order, weather is monitored, and all physical features of the sanctuary are designed and maintained to ensure the safety of the bears.**

- a. Adequate fire extinguishers and alarms are installed, regularly tested, maintained in good working order and the staff is trained in their use. Fire alarms can automatically be heard from the permanent residence.
- b. The sanctuary has a system in place to provide early warning of severe temperature extremes and weather patterns. This is communicated directly to the sanctuary Director in case of emergency.
- c. Steps have been taken to protect bears as much as possible from fire, flood, and other natural hazards. This includes not storing more than the daily ration of bedding in the same building in which bears are housed.
- d. All plant and fixed equipment, including electrical and heating apparatus, are installed and maintained in such a way that they do not present a hazard to bears, and their safe operation cannot be disrupted by the bears.
- e. Tools and other portable equipment are not left unattended in places where they could cause bears harm.

## **PF-8. Insect and Rodent Control**

**An appropriate, effective, humane and safe rodent control program is in place as needed. Insects are safely controlled as needed.**

- a. An insect and humane rodent control program is in place, supervised by a veterinarian to determine the degree of toxicity that products in use may pose to bears, native wildlife and staff.
- b. Insect and rodent control is implemented in all appropriate areas of the sanctuary, including storage areas for food items.
- c. Any pesticides are used in accordance with government regulations. Whenever possible, less toxic or non-toxic agents such as silica gel, diatomaceous earth or insect growth regulator products are given preference.

## **PF-9. Record Keeping**

**Records are maintained appropriately as required by local, state and national regulations and as necessary for good husbandry, management and veterinary care.**

- a. Detailed individual and group records are necessary for good husbandry, management and veterinary care. All nationally required records are kept, as well as records required by GFAS to meet other standards in this document (e.g. Standard P-2 “Acquisition Recordkeeping and Monetary Exchange”).
- b. Records that, if not required by law, are recommended by GFAS include but are not limited to:



- Individual animal records showing origin, age, species, gender, microchip number, tattoo, photo, bio, etc.;
- Individual veterinary record;
- Reproductive history, if known;
- Contraception records;
- Weight, current diet and record of diet changes;
- Food consumption and preferred food items;
- Enrichment dates, items used and bear's response;
- Where applicable and appropriate, any positive reinforcement training records showing completed objectives and those in development;
- Current and historic enclosure mates, social groups and partners, including response to various phases of introduction and response to other individuals;
- Acquisition documents (*see Standard P-2, "Acquisition Recordkeeping and Monetary Exchange"*);
- Welfare assessment for the bears as a whole including measures of: disease prevalence, morbidity and mortality rates, and activity levels;
- Inspection Reports, as applicable, from international, national, state/province and local agencies, as well as accrediting organizations;
- Other animal documentation, as applicable, such as complaints or police reports pertaining to specific animal, and animal escape reports.

## **PF-10. Animal Transport**

**Bears are appropriately transported to maximize safety and minimize stress and in accordance with all local, state/province, national, international requirements and laws.**

### **General**

- a. Bears are transported only when necessary, such as when being transported to the Sanctuary, to a medical facility for care or to another accredited Sanctuary for reasons as described in acquisition standards.
- b. Pre-transport health examinations ideally include a complete physical exam with attention to parasite checks, necessary vaccinations, and completion of any tests required by regulations of the receiving state/province or country.
- c. Health certificates and any required transport permits accompany the bear when being transported interstate or internationally. All transport abides by local, state/province, federal and international law. A veterinarian is responsible for preparing and signing the health certificate.
- d. Prior to transport, the sanctuary ensures that adequate facilities are available at the receiving end and food items that are familiar to the animal are available.
- e. Where possible and appropriate, bears are acclimated to shipping crate prior to transport. Capture, restraint, and transportation methods consider the bear's temperament and behavior in order to minimize injury, and distress.
- f. At a minimum, transport enclosures meet appropriate animal welfare standards (e.g., IATA, US Animal Welfare Act Transportation Standards or similar).



- g. Transport crates and vehicles are in good condition and meet federal and/or international standards. Equipment suitable for lifting, crating and transportation of animals kept within the sanctuary is readily available.
- h. Transport containers:
  - have impervious surfaces, which are cleaned and disinfected after use.
  - are designed to permit safe transfer into a secondary enclosure.
  - are designed to minimize the risk of the bears being able to make contact with personnel.
  - are placed within a secondary container or closed compartment on the transport vehicle.
- i. Any bear taken outside the sanctuary, for an approved reason such as medical treatment or transfer to a more appropriate sanctuary, is in the personal possession of the sanctuary director, or of competent persons acting on his/her behalf and adequate provision is made for the safety and well-being of the animal and public safety.
- j. All bears taken outside the sanctuary are kept securely at all times. Bears are managed outside the sanctuary in such a way that the animal is under control and not likely to suffer distress, cause injury or transmit or contract disease.
- k. Complete medical records, diet and husbandry information, and identifying papers (e.g., describing tattoos, or other identification methods) accompany all transported bears.

## **NUTRITION REQUIREMENTS**

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### **N-1. Water**

**Fresh clean water is available in sufficient quantity.**

#### **Quantity**

- a. Fresh clean water is available at all times to all individuals.
- b. Multiple water sources are available for group-housed bears to ensure high-ranking individuals do not dominate water sources.

#### **Quality**

- c. Water quality parameters are maintained at a generally acceptable level for bears in terms of turbidity, salts, etc.
- d. Potable water sources are tested for contaminants annually.
- e. All water sources (including water bowls) are cleaned at least daily, and more often if needed.
- f. If automatic water devices are not used in hot climates, water sources are shaded or changed multiple times to avoid overly hot water.
- g. If automatic water devices are not used, care is taken to ensure bowls are secured such that the bears cannot tip them over, play with them or hide them from view and that water is available at all times.

#### **Automatic Water Devices**

- h. Devices are tested daily to ensure water is available.
- i. Devices are easily disabled when animals must be fasted for medical purposes.



- j. When monitoring of water consumption is required, an alternative means of providing water is devised.
- k. In colder climates, steps are taken (such as installation of heat sources) to ensure water consumption does not decrease with lower ambient air temperatures.

## **N-2. Diet**

**A properly balanced and healthy diet is provided appropriately based on the needs of each bear following veterinary instructions for special needs.**

### **General**

- a. A veterinarian or qualified nutritionist periodically reviews all aspects of bear diet at the sanctuary.
- b. Diets of individual bears (including vitamin supplementation) are of a quality, quantity and variety to match the physiological and psychological state of the individual as it changes over time, with consideration for the age, life stage, species, condition, and size of the individual.
- c. Food is wholesome, palatable, free from contamination and of sufficient quantity and nutritive value to maintain all bears in good health.
- d. The sanctuary utilizes a feeding regimen that ensures each individual receives adequate nutrition regardless of status in social group.
- e. Where possible and appropriate, each bear's daily dietary needs are documented and made available to animal care staff.
- f. In open space enclosures, routine observation of feeding activity ensures all animals are able to access sufficient food.
- g. Other than commercial diets prepared specifically for bears, only food "fit for human consumption" is fed.

### **Commercially Prepared Kibble/Dry Food**

- h. The basic nutritional needs of most bear species are met by the use of a high quality commercially prepared complete feed such as omnivore or canine diets formulated for high protein needs.

### **Animal Protein**

- i. Commercially available meat products may be offered to most bear species. They are recommended over muscle meat to maintain appropriate vitamin and mineral balance.
- j. Meat products are offered when the bears are most active and likely to consume the diet to reduce risk of spoilage.
- k. Brown bears are fed meat, fish, whole rodents, quail or other meat sources
- l. Bones, rawhide chews or other chewing substances, as species appropriate, are offered regularly for dental health and enrichment.
- m. Fish may be fed to grizzly and other brown bears with a balance of high and low fat species offered to ensure appropriate levels of fatty acids and B vitamins. Only fresh or flash frozen, human quality fish is fed.
- n. Sloth bears may be fed commercially available insect species.

### **Vegetables, Fruits and Seeds**

- o. A variety of leafy greens, vegetables, nuts and fruit are offered as a basic component of bear diets.



- p. The fresh produce portion of the diet is not primarily over-ripe and/or sugary fruits.

#### **Browse**

- q. Freshly cut plant material including leaves, flowers and berries, can be offered regularly to promote natural feeding behaviors.

#### **Vitamins/Supplements**

- r. Prior to offering supplemental vitamins, the health and condition of the individual bear, as well as the diet, is reviewed by a nutritionist experienced in bear care and/or the attending veterinarian.

#### **Treats/Enrichment items**

- s. Preferred food items from the basic diet can be reserved for enrichment.  
t. The calories in foods used as enrichment are considered when planning the overall diet.

### **N-3. Food Presentation and Feeding Techniques**

**Food is prepared and presented in a safe and appropriate manner to meet bears' health and social needs.**

#### **General**

- a. Feeding and drinking receptacles are placed in positions that minimize the risks of contamination from soiling by the bears themselves, wild birds, rodents and other potentially invasive species.  
b. Food receptacles, where used, are appropriate for the species housed in terms of number, size and placement, and are cleaned daily.  
c. Receptacles for animal food and water are designed to minimize spillage and are not used for any other purpose.  
d. Bears fed a balanced commercial diet are fed a minimum of twice daily during the active feeding time of the species housed. For most species, multiple feedings are recommended.

#### **Feeding Techniques**

- e. Food is provisioned at multiple feeding sites throughout enclosures to ensure all bears have access and to reduce or eliminate aggression that results from competition for food resources, especially preferred items.  
f. Food may be offered in shift yards and indoor areas to increase bear comfort with those areas and improve reliability in transferring from one area to another.  
g. Bears have regular access to food and constant access to potable water throughout the year. Food is not removed during the winter period, except in response to the bear's behavior. Food is not restricted to try to force hibernate bears.

#### **Diet Changes, Increases or Decreases**

- h. Adjustments made to an already formulated and nutritionally balanced diet are made to the entire diet to ensure continued nutritional balance.  
i. Considerations for diet increase include weight and condition of the bear, food consumption, season, activity level and other medical or behavioral considerations.



- j. Diet increases or decreases are made in modest increments with animal response to the change assessed for a minimum period before additional changes are made.
- k. Underweight individuals experiencing health or behavioral problems may be separated for supplemental feeding as needed to avoid undesirable weight gain in conspecifics.

#### **N-4. Food Storage**

**Food is stored appropriately.**

##### **General**

- a. Separate and secure facilities are provided for proper and hygienic storage of food.
- b. Dry goods are stored in clean, dry storage areas in sealed containers or on pallets. Products are dated and rotated to use oldest stock first, and expired food, as well as bags damaged by pests, are discarded.
- c. Perishable foods are kept under refrigeration.
- d. Items frozen for use are dated and labeled, and no frozen items are thawed and refrozen. Items that are not fed frozen are thawed in a refrigerator to minimize risk of spoilage. Fish may be thawed in cold water.

#### **N-5. Food Handling**

**Food is handled and prepared in an appropriate manner to retain nutritional value, freshness, and freedom from spoilage, invasive species or other forms of contamination.**

##### **General**

- a. Food is protected against dampness, deterioration, mold, and/or contamination by insects, birds, rodents or other animals.
- b. No food that is spoiled or otherwise contaminated is served.
- c. Diets are prepared in a safe and hygienic manner to reduce the possibility of contamination or spoilage.
- d. Separate cutting boards, utensils and food preparation surfaces are used when meats, fish and produce diets are prepared in a common kitchen area.
- e. Food preparation techniques meet all local, state/province, and national regulations.
- f. Food preparation surfaces are thoroughly cleaned after use.
- g. Staff and volunteers wash hands thoroughly prior to handling food, and wearing gloves during food preparation is recommended.



## **Veterinary Care**

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### **V-1. General Medical Program and Staffing**

**There is a written veterinary medical program, overseen by a veterinarian, with adequate support staff at the Sanctuary, with 24/7 veterinary care available on call.**

- a. The sanctuary has a written veterinary medical program, including long term preventative medical protocols and disease surveillance and containment procedures, that is developed and carried out under the supervision of a licensed veterinarian – the attending veterinarian - who has training or experience in providing medical care for the bears and other species housed at the sanctuary, and who is aware of specific health concerns regarding the bears at the sanctuary.
- b. One or more full-time veterinarians specifically concerned with the veterinary medical program is highly recommended for sanctuaries whose budget will support the salaries of such trained personnel. Sanctuaries unable to employ a full-time veterinarian have access to a part-time veterinarian, under a contractual or other similar arrangement, with training and appropriate experience with the bears housed at the sanctuary.
- c. Veterinary care is available 7 days per week and 24 hours per day for the sanctuary on an on-call basis when a veterinarian is not physically on grounds. When the primary veterinarian is unavailable, there are other suitably experienced veterinarians on call.
- d. There are support staff to carry out the following roles: (1) Husbandry (bear caregivers), (2) Technical (medical technologists, veterinary nurses, or individuals trained at the sanctuary), and (3) Clerical. The sanctuary has available properly trained and qualified professional and supporting personnel as necessary to implement these roles.
- e. A staff member is trained to serve as a medical program director, dealing with emergencies until a veterinarian arrives or is reached. He or she is able to direct any restraint of the bears, be responsible for administration of post-surgical care, and be skilled in maintaining appropriate medical records.
- f. Medications are stored appropriately on site, according to label directions. Medications requiring refrigeration are stored separately from food items.

### **V-2. On-Site and Off-Site Veterinary Facilities**

**Veterinary facilities are appropriately located, designed and equipped.**

- a. Any on-site veterinary facility at the sanctuary meets all local and state/province building regulations
- b. Surfaces in the on-site veterinary facility with which bears can come in contact are non-toxic and can be readily disinfected.
- c. The on-site facility is located away from areas of heavy public use to minimize the noise levels for hospitalized bears.
- d. The on-site facility has separate areas for any of the following veterinary functions performed on-site: physical examinations and medical treatments, enclosures for hospitalized bears, sterile surgery, necropsy, medical quarantine, laboratory, radiology and pharmaceuticals storage which includes,



when necessary, a safe for narcotics that meets the standards set by applicable regulations (e.g., the Drug Enforcement Administration [DEA] in the United States).

- Food preparation areas, storage areas and staff locker room/housing with showers are separate from the medical facility.
- e. If the sanctuary does not have an on-site veterinary facility, or only a partially outfitted veterinary facility it has a contract or similar arrangement with a nearby veterinary hospital for off-site treatment as needed. The hospital should have a sterile surgical facility with anesthetic equipment to include radiology equipment, a laboratory, and pharmaceutical storage. If necropsies are performed at the hospital, there is a separate area for necropsies and a separate storage refrigerator for storage of carcasses.
- f. See also Standard V-4 “Clinical Pathology, Surgical, Treatment and Necropsy Facilities.”

### **V-3. Preventative Medicine Program**

**The sanctuary has a complete preventative medicine program.**

- a. Appropriate preventative medicine programs are in place to manage all bears, with special attention paid to geriatric animals.
- b. The preventative medicine program includes quarantine procedures, parasite surveillance and control, immunization, contraception, infectious diseases screening, dental prophylaxis, and periodic reviews of diets, husbandry techniques and invasive species control.
- c. When circumstances permit, and as appropriate for the individual animal, an overall examination is performed annually, blood is collected, serum banked as a baseline control and the results are recorded. The attending veterinarian, in consultation with the sanctuary director, determines any schedule for routine physical examinations, including ocular, dental and musculoskeletal assessment, and implements any necessary treatment.
- d. A veterinarian, veterinary technician, or other trained person performs regular fecal examinations to look for parasites and other pathogens (random enclosure sampling is adequate for group-housed bears). Results are recorded. Fecal examinations are repeated following treatment to evaluate efficacy.
- e. All bears are immunized as recommended by the attending veterinarian, using currently recommended procedures and products as appropriate for the country, species and individual. Where possible, killed vaccines are utilized to minimize the potential for adverse reactions. Schedules and products are dictated by the disease status of domestic and wild animals in the area surrounding the sanctuary and relevant local and national laws.
- f. When bears are immunized, the type, serial number, and source of product are recorded in the individual animal's medical record.

### **V-4. Clinical Pathology, Surgical, Treatment and Necropsy Facilities**

**Clinical pathology, surgical facilities and services, medical treatment for sanctuary bears and necropsy are all high quality, humane, professional, legal, and safe.**

#### **Clinical Pathology**

- a. Diagnostic laboratory services are available on- or off-site to assist with the examination of bears and the diagnosis of disease.





- b. Diagnostic capabilities include radiology, cytology, microbiology, parasitology, complete blood count, blood chemistry, urinalysis, serology and other appropriate laboratory procedures.

### **Surgical**

- c. The sanctuary has access to surgical facilities (either on-site or at a nearby veterinary hospital) that are clean, free from excessive noise and unnecessary pedestrian traffic, have adequate lighting, ventilation, and temperature controls, and that can be easily cleaned and disinfected. For sanctuaries utilizing off-site aseptic surgical facilities, an on-site area that can be adapted for occasional or emergency aseptic surgical use is available.
- d. Surgical facilities have access to appropriate anesthetics including injectable and inhalant anesthetics, reversal agents, etc. Where gas anesthetic equipment, including scavenger units, is used equipment is cleaned and calibrated and filters are replaced, annually at a minimum. Gas cylinders are safely stored and replaced regularly.
- e. Facilities have sterilized surgical packs, surgical preparation solutions, intravenous fluids, fluid administration equipment, pulse oximetry, heart monitoring equipment (e.g. electrocardiogram, stethoscope), and emergency drugs on-site with appropriate maintenance and/or replacement schedules for each.
- f. If on-site, the sanctuary ensures that surgical equipment is maintained in good working order and is on a program of routine preventive maintenance.
- g. Only a licensed veterinarian performs surgery, using standard operating procedures. (Note: A veterinary technician appropriately trained by a veterinarian in states or provinces where such action is permitted by veterinary practice acts can perform surgical first aid.)
- h. The veterinarian uses aseptic surgical procedures whenever applicable.
- i. Veterinarians and support personnel are compassionate and knowledgeable about the humane aspects of bear treatment, including the proper use of anesthetics, analgesics, and tranquilizers.
- j. Surgical incisions are observed daily, or as frequently as possible while minimizing stress to the bears, for signs of dehiscence or infection. Analgesics are administered post-operatively when appropriate.

### **Treatment**

- k. Medications are maintained and used in accordance with local, state/province, and national laws and regulations and are administered in accordance with the state veterinary practice act, or equivalent outside the US.
- l. The sanctuary has a pharmacy on-site where routinely used drugs, such as emergency resuscitative medications, antibiotics, anthelmintics, fluids, anesthetics, analgesics, tranquilizers, etc. are maintained.
- m. All medications are purchased, prescribed and administered under the guidance of the veterinarian.
- n. When distributed to bear caregivers, medications are properly labeled and packaged, with the contents identified and instructions for the amount, frequency and duration of administration as well as the name and identification of the animal to receive the medication, the expiration date of the medication, prescribing doctor and number of refills if any.
- o. All medical treatments and drug prescriptions are documented in the bear's medical record.
- p. Basic physical capture and restraint equipment to facilitate medical treatment is available at the sanctuary.

### **Necropsy**

- q. Whenever possible, there is an isolated area on the grounds for performing necropsies, or appropriate storage facilities until the deceased bear can be transported to a facility for a postmortem



examination, as soon as possible, understanding that necropsies performed longer than 24 hours after death be of limited value due to autolysis. (Note: Any refrigerated area for holding dead bears is physically separate from live bear holding, treatment, and surgery areas and from food supply storage or preparation areas.)

- r. Disposition of dead bears and their parts meet all legal restrictions.
- s. Dead specimens not used are incinerated or disposed of as deemed suitable by the veterinarian in accordance with local, state/province and national regulations.

## **V-5. Quarantine and Isolation of Bears**

**Appropriate quarantine and isolation policies and accommodations are in place and utilized.**

- a. Upon arrival, all bears undergo quarantine for a minimum of 30 days or according to the protocol established by the attending veterinarian, or for a greater period if required by applicable law. The quarantine period should be longer (at least 60-90 days) for those bears that have received minimal screening prior to arrival, such as animals from the wild. Bears previously housed together may be quarantined together.
- b. If the sanctuary does not have an adequate quarantine facility, steps should be taken to have bears undergo quarantine under these guidelines prior to their arrival.
- c. Local, state/province, or national regulations regarding quarantine of newly arrived bears are followed.
- d. All utensils and outer clothing used in quarantine are restricted to that area.
- e. Protective clothing, boots and footbaths are used by all staff entering the quarantine area or areas containing quarantined animals. Quarantine clothing is not removed from the quarantine area, except in a sealed container for cleaning.
- f. Caregivers wear protective gloves and masks when cleaning or handling anything with which the quarantine bears come into contact.
- g. Where possible, staff working in quarantine areas does not work with other sanctuary animals. If this is not possible, work is done in the quarantine areas last.
- h. Quarantine staff cares for newly admitted bears in their quarantine area before caring for sick animals, which are housed in separate isolation enclosures.
- i. The quarantine area allows for daily cleaning and sanitation, either with removable catch trays or a drainage system that allows fecal matter to flush into a septic system; waste is otherwise removed and disposed of properly.
- j. In enclosures housing animals carrying infectious or transmissible diseases, to the extent possible, all surfaces of the enclosure are properly sanitized.
- k. Quarantine areas have adequate ventilation, heat and air conditioning, which are used to ensure optimum conditions, particularly in the case of young, elderly or sick bears who may be more sensitive to environmental changes.
- l. Quarantine animal waste is handled separately from all other manure or compost at the facility. Because of the risk of disease transmission, quarantine waste is not spread on pastures or composted.



## **V-6. Medical Records and Controlled Substances**

**Complete medical records are maintained, appropriate statistics maintained, bears have permanent identification, and controlled substances are prescribed and stored legally.**

### **Medical Records**

- a. Complete medical records are maintained on all bears.
- b. Medical records are dated, legible and indicate examination findings, treatments (types of medication, dosage, duration), surgical procedures, anesthetic procedures (type of agent, dosage, effect), results of all laboratory tests (parasitologic, hematologic, bacteriologic, etc.) pathology reports, plus immunization records with all relevant dates, bear identification and nutrition/diet information, and, where applicable, necropsy reports.
- c. Copies of medical records accompany any bear who is transferred to another sanctuary.
- d. Medical records are maintained under the direction of the veterinarian or trained bear caregiver. Where possible, duplicate record sets are stored at another site, or in a fire proof or theft proof safe on site or an online storage system.
- e. Statistics are tabulated regularly on the rates and nature of illness and mortality in the sanctuary.

### **Controlled Substances**

- f. Only a licensed veterinarian prescribes controlled substances used at the sanctuary, and all such substances are secured in accordance with any applicable laws.
- g. The sanctuary maintains appropriate records and logs for all controlled drugs used. All drug logs are kept up to date and comply with any national or other legal requirements (such as the Drug Enforcement Agency in the U.S.).
- h. Expired drugs are marked as such and stored separately.
- i. When disposing of drugs, they are discarded in accordance with applicable national, state, and local law and regulations (such as the USDA and DEA in the United States).

## **V-7. Breeding/Contraception**

**No intentional propagation of bears occurs, and sound practices are in place and implemented to prevent propagation and to properly care for infants born at the sanctuary.**

- a. No intentional bear breeding occurs, and sound practices are in place to prevent propagation. An exception may be made for rehabilitation and release centers engaged in a bona fide breeding-for-release-program with available release sites within the state/province, conducted with specific conservation goals, in accordance with local, state/province, national, and international law and regulations.
- b. The sanctuary has bear-appropriate contraceptive programs in place with the method of contraception used based on current best practice and attending veterinarian recommendations. (See Appendix 1 for further information on contraception methods for bears.)



- c. If females arrive at the facility pregnant, the sanctuary provides necessary care and the female is allowed to deliver unless there are valid health reasons for terminating the pregnancy, or unless the attending veterinarian feels the pregnancy is in such an early stage that aborting the fetus is an option, if so desired by the sanctuary. After delivery, reproductive control methods are applied after allowing adequate time for weaning as appropriate for that bear, provided there is no further opportunity for breeding during this period of time.
- d. Infants born at the sanctuary remain with the mother as appropriate for natural rearing, provided there is no further opportunity for breeding during this period of time. Infants are only removed from females for hand-rearing if there is a threat to the life of the infant or the mother.

## **V-8. Zoonotic Disease Program**

**The staff and sanctuary veterinarian are knowledgeable about zoonotic diseases that may affect bears at the sanctuary, and implement appropriate policies and procedures as needed to mitigate risk and deal with any exposures that occur.**

- a. The sanctuary's veterinarian is knowledgeable about zoonotic diseases that may affect bears at the sanctuary. All potential or emerging diseases have emergency procedures and a defined process to avoid transmission of diseases through bites, scratches, body fluids, direct contact with bears and other means. (Note: Additional precautions may be necessary for staff classified as increased risk of disease, including those who are immune-compromised.)
- b. A physician with expertise in infectious diseases is consulted whenever an employee contracts an unusual illness or is exposed to a bear diagnosed with a zoonotic disease.
- c. When a reportable disease is identified, all appropriate local, state/province, and national regulatory officials are contacted.
- d. All areas in which the staff has direct contact with bears have hand-washing facilities available in the immediate vicinity (or an equivalent; e.g., bactericidal hand-wipes)
- e. Human food consumption by the staff does not occur in the immediate area of bear contact.
- f. Rabies testing and vaccination protocols vary by location. Federal, state or province and local rabies prevention protocols supersede recommendations made in this document.
- g. See also Standard S-8 (" First Aid and Zoonotic Disease Training, and Staff First Aid ").

## **Well-Being and Handling of Bears**

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### **W-1. Physical Well-Being**

**All bears are routinely monitored to ensure their physical well-being. All aspects of husbandry, including veterinary care, environmental enrichment and diet are designed to optimize the bears' physical well-being.**

- a. The welfare of each individual bear is the overriding consideration in all sanctuary actions.
- b. Bears are able to enjoy lives that are as close as possible to that of their wild counterparts as regards stimulation and interest. This is achieved by adopting husbandry and management procedures, including appropriate housing and enclosure design, environmental enrichment programs, positive reinforcement training programs and a balanced diet to meet nutritional requirements.



- c. Bears are provided with species appropriate opportunities to dig, climb, bathe, forage for food, and play by providing species-appropriate climbing structures, baskets/hammocks, dens/burrowing/digging areas, water features, a variety of plants, logs and substrates and other enclosure enhancements and there are places to hide and rest in comfort.
- d. Regular assessments are performed in an effort to quantify and measure the welfare of individual animals through monitoring of nutritional, physical and social conditions. Qualified personnel conduct daily observations of each bear to monitor for signs of physical abnormalities. Any unusual activities are recorded in a log at each inspection. Sudden changes in food consumption and other behaviors are immediately brought to the attention of supervisory staff. Note: In open space enclosures, it may not be possible to observe each animal on a daily basis. In such habitats, it is important to get an accurate count and to spend time observing all bears on a weekly basis.
- e. Where possible and appropriate, records of individual bears are kept to provide both behavioral and veterinary history.
- f. Where possible and appropriate, each bear is weighed annually, either during a routine physical or through the use of a built-in scale, to monitor for signs of illness and to determine dosages for chemical anesthetics.
- g. Positive reinforcement training may be appropriate for bears who enjoy interacting with people, to provide additional enrichment, to reduce the need for chemical immobilization and to reduce stress during medical intervention.

## **W-2. Social Housing**

**Bears are grouped appropriately with the safety of animals and staff in mind.**

### **General**

- a. Bears housed together are compatible and all bears have ample space to retreat and hide as needed while social tensions are resolved.
- b. Bears are not housed near animals that interfere with their health or cause them physical or psychological discomfort.
- c. Habitats are of sufficient size to allow appropriate space between individuals in social groupings and to allow for temporary isolation from conspecifics.
- d. Bears are housed so that no individual endures constant harassment or suffers physical injury, and so social behaviors do not prevent any individual from maintaining proper nutrition and hydration.
- e. Close attention is paid to bears in social housing, with age, species, and sex of animals housed together taken into account.

### **Species-appropriate Housing**

- f. Black and brown bears are typically solitary in the wild but come together when resources are abundant.
- g. Compatible castrated male brown bears may be housed together. Intact males, if compatible, may be housed together provided female bears are not housed nearby.
- h. Female bears may be housed with castrated males and compatible females.
  - Pregnant females are separated to give birth and sows with cubs are housed separately from other bears.
- i. Individual bears may have differing social tolerances and time of year and amount of space provided influence bear compatibility.



### **Solitary Housing**

- j. Is generally temporary and reserved for situations including but not limited to quarantine, medical assessment or care, lack of appropriate social partners, or social tension resulting in disruption to the main group/pack or physical aggression leading to injuries.
- As possible and appropriate, bears housed alone temporarily are given visual, olfactory and auditory contact with their social group.
  - Solitary species may be housed alone provided they are regularly monitored for behavioral issues.
  - For some bears, solitary housing may be appropriate for a portion of the year, with social housing more appropriate during late fall and winter.

### **Mixed Species Housing**

- k. American and Asiatic black bears have been successfully housed in mixed species settings which have included macaques, sloth bears and peacocks.

## **W-3. Introduction of Unfamiliar Individuals**

**Introduction of any new bear to a social group is done according to techniques appropriate for each species, with staff safety ensured.**

### **General**

- a. Introduction of unfamiliar bears is carefully considered. Professionals with experience in social introductions, if not on staff, are consulted whenever possible during these considerations.
- b. Reintroduction of bears separated due to seasonal aggression is generally treated as a new introduction, unless the bears have been housed in close proximity.
- c. When attempting to form a group of 3 or more bears, introductions are done one to one before bringing all bears together.
- d. Where adequate space is available, the bear being introduced may be housed in an enclosure within the main enclosure, allowing existing group members to accept the new bear and the new bear to adjust to the surroundings.
- e. Bear introductions are monitored closely for several days for tension, aggression, etc.
- f. Food and water consumption is monitored carefully to ensure that all bears are able to access food/water. Staff ensures bears are not hiding, unable to approach/access food and water.
- g. Bears have access to separate shelter, ample room to move away from each other and no opportunities for an animal to be cornered.
- h. As needed and possible, information listed below is gathered for the introduction planning process:
- A list of individual animals to be introduced, including all that the sanctuary ultimately hopes to integrate into a group.
  - Background of each individual, including but not limited to: age and gender; social experience with other bears; rearing history (hand-reared, parent reared, time spent with mother and siblings).
- i. As appropriate or needed, benchmarks or desired outcomes are identified for each step in the process. Examples include:
- physical location of animals during initial contact period;



- behavioral goals of initial contact period;
  - benchmarks for proceeding to physical introduction;
  - space and enclosures to be used for physical introduction;
  - reasons location selected: neutral space, ample run around, visual barriers, doors that can be closed to protect animals in trouble etc.;
  - set-up for physical introduction, enrichment etc.;
  - emergency equipment that might be needed;
  - time frame necessary to acclimate animals to presence of equipment;
  - criteria for separating animals if physical introduction does not proceed safely;
  - post introduction management and husbandry protocols.
- j. The plan is developed with involvement of all staff involved with care of the species and details a series of steps that will be taken to integrate the individual animals involved. Necessary modifications to enclosures are identified and completed prior to beginning the process.
- k. The plan establishes behavioral goals for introductions and is not driven by schedules, and is open to modification as introduction/integration develops and evolves.
- l. Only normally scheduled caregivers and animal managers are present to directly observe. Individuals who are not routinely present in the animal area, including veterinary and management staff, observe via remote video or receive reports from staff.
- m. All caregivers have a clear understanding of the plan including contingencies for problems that might occur, and are empowered to take appropriate action in the event of perceived emergency.
- n. If the introduction is not successful, no attempt is made to reunite the individuals until housing or social circumstances can be changed or other factors that may have contributed to the problems, such as breeding season, have been resolved.

#### **W-4. Behavioral/Psychological Well-Being**

**The behavioral/psychological well-being of each bear is evaluated and addressed, and a welfare plan and report is part of each bear's file.**

##### **General**

- a. There is a formal, written enrichment program that promotes species-appropriate behavioral opportunities and ensures the captive bears' psychological well-being. A complete environmental enrichment program includes the following:
- Structural enrichment - Enclosure design and furniture that add complexity to the environment and promote species-specific behavior.
  - Object enrichment – Objects that encourage inspection, manipulation and problem solving, and promote species-specific behavior.
  - Food enrichment - Varying food choices and food presentation.
  - Social enrichment - Affiliative interactions between caregivers and bears may be appropriate in some instances. The decision to include social enrichment with caregivers should be made on an individual basis, considering only the social needs of the animal, such as solitary animals, particularly those hand reared by humans with no conspecific contact or neonatal and juvenile animals in situations where appropriate.





- b. All bear care staff are trained to recognize abnormal behavior and clinical signs of illness. Measures of well-being that are assessed include:
  - species appropriate behavior and interaction with other animals;
  - the animal's ability to respond appropriately to variable environmental conditions, physiological states, developmental stages, and social situations as well as adverse stimuli.
- c. Stereotypic behavior, self-injurious behavior, and inappropriate responses to various stimuli not previously documented or witnessed may be evidence of compromised well-being and are investigated. A welfare plan to address the concerns is developed.
- d. Where possible and appropriate, a behavioral/psychological profile is maintained for each individual bear and updated annually and a copy is kept in the bear's permanent file.

## **W-5. Bear-Caregiver Relationships**

**Positive relationships between bears and caregivers are maintained. Bears are not fearful or aggressive in response to human presence or routine care procedures.**

### **General**

- a. Bears arrive at sanctuaries with a variety of previous experience with caregivers, which caregivers take into account in their interactions with these species.
- b. Facility design plays a key role in caregiver-bear safety and the ability to maintain a positive relationship.
- c. A protocol for introducing bears to new caregiver staff has been developed. Where possible, new caregivers accompany a trusted caregiver until the bears become comfortable with the new individual.
- d. A positive relationship between the bears and regular caregivers, animal managers and veterinary staff is one in which the bears are given the freedom to integrate with their conspecific social group with minimal human interference or to interact regularly with caregivers if they choose.
- e. Where possible and appropriate, animals become familiar with the veterinary staff, allowing close observation. Individual bear preference for interaction with caregivers, animal managers and veterinary staff is taken into account.
- f. The animals do not become fearful or overly aggressive in response to human presence or routine care procedures.
- g. Interactions with bears do not cause overheating, excessive cooling, physical harm, or unnecessary discomfort, and minimizes physical and psychological stress or trauma as much as possible.
- h. Negative interactions are avoided. However, when they occur, efforts are made to recover trust and a positive relationship if the bear enjoys regular interaction with people
- i. Physical abuse, deprivation of food or water, aversive spraying with a hose, and other forms of negative reinforcement or punishment-based training are never used to train, shift or otherwise handle bears. Note: This does not preclude the use of hoses or other watering devices in caring for the bears who enjoy this form of enrichment.





## **W-6. Handling and Restraint**

**Any necessary handling and restraint is done safely and appropriately, with minimal distress to bears, and staff are trained in bear-specific safe handling techniques/practices.**

### **General**

- a. In general, humans do not enter enclosures with bears. Direct physical interaction is limited to protected forms of contact, by experienced personnel, to minimize the risk of injury.
- b. Handling for veterinary care is done as expeditiously and carefully as possible in a manner that does not cause trauma, overheating, excessive cooling, physical harm, or unnecessary discomfort, and minimizes physical and psychological stress as much as possible.
- c. In general, manual capture and restraint of adult animals is not used on bears and is not attempted when multiple animals are present in an enclosure.
- d. Where possible and appropriate, Positive Reinforcement Training is used to minimize the need for chemical immobilization and to reduce stress during procedures.
  - With appropriate training, many procedures can be performed cooperatively and without anesthesia, such as examination of body parts, treatment of superficial injury, heart rate monitoring, injection administration, etc.
  - Many bears can be conditioned to enter a squeeze cage or lockout area. Where this method of restraint is used, attachments for crates and squeeze cages are included in facility design or modifications.
- e. If physical restraint or drug delivery systems must be used, the lightest and least stressful methods that are appropriate are chosen, bearing in mind the safety of staff and animal.
- f. Bears are chemically immobilized by qualified personnel when direct handling is necessary (i.e., physical exams). Chemical immobilization is performed only by a licensed veterinarian or by trained staff under the guidance of a licensed veterinarian, or other qualified individuals authorized by the sanctuary director or veterinarian, following the laws and regulations of country where the animals are housed. Specific anesthetic protocols, including record-keeping, are followed.
- g. Chemical restraint is not used when multiple animals are in an enclosure except in an emergency situation. In such cases, all possible precautions are taken to prevent threats to the handlers and the animal being sedated.
- h. Multiple staff members are trained to use a dart gun and other restraint equipment, and to employ safe capture techniques. The staff, and volunteers where appropriate, are aware of who is trained and authorized to use restraint equipment.
- i. As part of their training, staff members are instructed to report any medical conditions or physical limitations that may hinder their ability to employ safe capture techniques.



## STAFFING

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### GENERAL STAFFING

#### S-1. General Staffing Considerations

**The sanctuary has a sufficient number of staff and volunteers, adequately supervised, to provide humane care, with clear job duties and equitable compensation.**

- a. The sanctuary employs or enlists a sufficient number of qualified employees or volunteers to provide the appropriate level of care for the bears and to ensure adequate supervision of all employees and volunteers. (Note: Staff-to-animal ratio will vary greatly given the nature of the facility and the type of bear and other animals at the sanctuary.)
- b. As described in Standard G-3 (Succession Planning), there is a written job description for the sanctuary director and other senior management positions at the sanctuary, providing a clear description of their duties and responsibilities.
- c. A list is maintained of all staff/volunteers authorized to work with bears, indicating lines of responsibility. Staff receives fair compensation commensurate with their skills. At a minimum, each salary complies with generally accepted standards of compensation for employees of the sanctuary.
- d. There is a clear management structure within the sanctuary, which is communicated to all employees, and to volunteers as appropriate.

#### S-2. Security and Emergency Coverage

**Staff is available at all times to respond to emergencies.**

- a. A qualified senior staff member or the sanctuary director should live on the sanctuary grounds. If no one lives on sanctuary grounds, then at least one trained and qualified staff member or trained volunteer is on the sanctuary grounds at all times, and a staff member is immediately reachable via telephone, radio or pager, 24 hours a day, 7 days a week.
- b. The director is generally available to the sanctuary on a full-time basis (40 hours per week); when the director is not available due to vacation or another reason, there is a designated back-up from among the senior staff. Staff has various means to contact the director at all times in case of emergency.
- c. A qualified veterinarian trained in the care of the bears housed is available in person or via phone at all times in case of emergency.



### **S-3. Volunteer and Internship Programs**

**Volunteers and Interns are appropriately supervised, and those playing an integral role in the sanctuary receive the manuals, training and safety protocols.**

- a. Any volunteers/interns and community workers have a specific employee/staff member assigned with directing their recruitment, training and supervision.
- b. Any volunteers/interns and community service workers allowed to work with or around bears do so only under the appropriate level of supervision of a fully trained bear caregiver.
- c. Volunteers/interns who play an integral role in the sanctuary are treated as an employee would be treated, regarding the provision of manuals, training, and safety.

### **S-4. Manuals**

**The sanctuary has a current employee manual, standard operating procedure manual, and, if applicable, manuals for volunteer and internship programs. Manuals are reviewed and updated regularly.**

- a. The sanctuary has a written employee manual that includes information pertaining to topics including: personnel practices, employee benefits, leave of absence, sick leave, personal appearance and conduct, environmental concerns, filing complaints, and performance evaluation. The employee manual is given to all new employees.
- b. A standard operating procedure (SOP) manual is available on the premises and in a location accessible to the staff at all times. The manual contains a detailed outline of all daily procedures, as well as emergency protocols and other policies relating to the care and safety of the bears.
- c. Care procedures for each bear species at the sanctuary, as well as other animals at the sanctuary, are written down (either in the SOP manual or elsewhere) and include detailed information specific to that species or individual.
- d. If the sanctuary has a volunteer and/or intern program, it has prepared manuals outlining volunteer and/or intern responsibilities. Copies of the manuals are given to all new volunteers and/or interns.
- e. All manuals are reviewed at least annually and updated as necessary, and employees, volunteers and interns are advised of any changes.

### **S-5. Employee Training and Continuing Education**

**Training and supervision are carried out in a manner to ensure the highest and safest level of care for the bears, including during unforeseen changes in personnel.**

- a. New employees participate in a probationary training period suitable to the species in question and under the strict supervision of a fully trained senior staff member before working directly with bears at the sanctuary.
- b. At least one staff member and backup are trained in all aspects of bear care for all species housed at the sanctuary to ensure that an experienced caregiver is always available to care for all bears in case of personnel changes; and that staff member and backup are noted in writing.



- c. The sanctuary Director ensures that plans for continuing education to improve bear care and management techniques are in place.
- d. Continuous in-house staff training and development (including availability of relevant literature) is offered to employees, and volunteers as appropriate, including such topics as: bear husbandry, bear welfare, health and safety, first aid, action in emergencies or escapes or illness, safety procedures, emergency euthanasia, basic sampling for health monitoring and diagnosis, food hygiene, disease prevention.

## **SAFETY POLICIES, PROTOCOLS AND TRAINING**

### **S-6. General Staff Safety**

**Bear caregivers have a thorough understanding of the potential risks of working with bears and are appropriately trained in safety procedures.**

- a. All sanctuaries housing bears have a thorough understanding of the potential risks of working with these species.
- b. Protocols involving potential risk (e.g., unlocking enclosures, shifting bears to previously unlocked areas) include redundancies to reduce the risk of equipment failure and human error.
- c. All staff working with or near bears maintain verbal contact. Radios, cell phones, etc. are used as needed to ensure safe contact is maintained.
- d. All slides, doors and gates in bear areas are kept closed and securely fastened at all times unless needed for bear access.
  - Ideally a double-gated system is in place with an escape route for staff in the event of a bear escape into human areas.
- e. Designated senior members of staff are responsible for holding keys to bear areas and supervising staff in those areas.
- f. Locks and the security of slides, gates and doors are double-checked after each use and inspected regularly to ensure proper functioning.
- g. Any areas where staff and bears are in close proximity have clear safe zones such as clearly delineated lines over which staff does not cross, or a protective barrier, such as lexan, plexiglas or fine mesh fencing.
- h. All personnel working with bears are trained to recognize and respond appropriately to threat displays and other behaviors that could signal an impending attack, scratch or bite.
- i. Appropriate protective equipment is used by all personnel working with bears.
- j. Caregivers have established a predictable protocol for servicing enclosures to minimize stress for the enclosure occupants. In as much as possible the cages are serviced from outside.
- k. Staff are encouraged to maintain their work clothes separate from their everyday clothing.



## **S-7. Communication System**

**The sanctuary has a reliable communication system in place.**

- a. A reliable communication system, with back ups such as pagers, 2-way radios, cell phones, intercoms, or other electronic devices is in place, with a back-up system.

## **S-8. Emergency Response Plans and Protocols**

**The sanctuary has appropriate written disaster preparedness plans in place, needed information is posted, and appropriate coordination takes place with community emergency services.**

- a. The sanctuary has a written disaster preparedness plan in place to cover emergency procedures in the event of a natural disaster, fire, injury, etc. The plan has taken into account all necessary bear handling under situations of extreme stress.
- b. The written plan is provided to staff and, where appropriate, volunteers.
- c. Emergency information is posted throughout the sanctuary indicating emergency contacts and phone numbers including the local police department, fire department, attending veterinarian, sanctuary director, supervising staff members, location of nearest hospital and other important information.
- d. A detailed outline of communication lines, procedures and locations of all exits and entrances to the sanctuary are clearly defined and known by the entire staff. This information is reviewed for needed updates periodically. Maps are posted throughout the sanctuary indicating the best evacuation route.
- e. All emergency plans are coordinated with local community emergency services as appropriate including fire, police, hospitals, and ambulance services. Appropriate community personnel and agencies are aware that bears are housed at the sanctuary.
- f. The location of the sanctuary does not pose any undue hazards and minimizes risk from natural disasters (e.g. flood zone, riverbed). If such risks are present, the sanctuary has addressed this in the written disaster plan.
- g. The sanctuary is located in an area that is removed from heavily developed areas to the extent possible. If the sanctuary is near heavily developed areas, it has taken steps to address problems this may cause for the surrounding community or the bears.
- h. A secure location is identified where bear records (i.e., acquisition, transport, medical, welfare assessment reports) are protected from fire, flood, and other hazards. (Note: Backed up offsite storage and web-based storage of electronic records is one method.) Governance documents, financial records, and permits and licenses are also stored securely.
- i. Provisions are made for long-term archiving in a secure format. A regularly backed-up copy should be stored in a separate location or online.



## **S-9. Escaped Bear Protocol**

**A detailed and appropriate written escaped bear protocol is in place and understood by staff and local emergency services; and any escapes are detailed in reports.**

- a. A detailed written escaped bear protocol is in place addressing situations in which bears escape from their enclosures, regardless of whether the bears have escaped sanctuary property, and is reviewed and understood by all staff, and volunteers as appropriate.
- b. The protocol is shared with local emergency services such as the fire and police departments.
- c. The protocol includes the following:
  - A clearly defined chain of command in an emergency situation;
  - A notification hierarchy, indicating who to contact first, second, third and so on in case of an escape;
  - Possible bear escapes occurring during off-hours, when staff may not be immediately available.
  - A communication system allowing for clear communication with sanctuary staff of all pertinent ape information including the type of escaped by species, age, sex and location;
- d. Clear plans and routes for personnel safety are plotted and displayed throughout the sanctuary.
- e. All escapes are recorded and detailed reports made.

## **S-10. Emergency Training**

**Staff participates in ongoing training for emergency response, and drills are conducted regularly.**

- a. All staff, and volunteers where appropriate, participates in ongoing training on all emergency, escape, and disaster preparedness procedures consistent with the sanctuary's written protocols, with drills held at a minimum of every 6 months.
- b. Records of training are maintained, including a list of those staff and volunteers who participated in training. Drills are evaluated to ensure that procedures are being followed, that the sanctuary's communication system is effective, that staff training is effective, and that improvements to protocols are made where appropriate.

## **S-11. Firearm Policy**

**The sanctuary has a written firearm policy, including identified personnel, and covering proper care and storage of firearms.**

*(Note: Not applicable for sanctuaries that do not need or use firearms.)*

- a. A written firearm policy exists in compliance with all applicable laws; and personnel qualified to use firearms are identified and made known to sanctuary staff.



- b. Firearms, ammunition, where provided, are available for immediate use, used by licensed and trained operators only, cleaned and maintained and tested as recommended by the manufacturer, and kept securely under lock and key when not in use or under maintenance.

## **S-12. Firearm Training**

**If the sanctuary has firearms, appropriate staff are identified for weapons training, and receive documented and up-to-date training.**

*(Note: This standard may be waived when firearms are not needed or used at the sanctuary.)*

- a. All staff qualified and licensed to use firearms undergo training and periodic refresher training and practice, including a review of current sanctuary protocols and policies. Such training is recorded.

## **S-13. Chemical Restraint**

**The sanctuary has a written chemical restraint policy, which covers appropriate use, maintenance and storage of chemical restraint equipment and attendant drugs.**

- a. A written policy for the humane chemical restraint and safe capture of bears housed at the sanctuary is in place and in compliance with the Drug Enforcement Agency (or comparable agency outside the United States), to include:
  - Training and certification in the equipment, humane chemical restraint, immobilization process, and the use of drugs for veterinary purposes or emergencies;
  - Procedures listing at a minimum those persons authorized to administer animal drugs, situations in which they are to be utilized, location of animal drugs in a safe and secure place, and those persons with access to them, and an emergency procedure in the event of accidental human exposure.
- b. The sanctuary's policy provides for qualified personnel to partake in appropriate training programs on the safe and humane use of chemical restraint and immobilization equipment.
- c. All chemical restraint equipment is cleaned after each use, maintained in good working order and tested on a regular basis.

## **S-14. First Aid and Zoonotic Disease Training, and Staff First Aid**

**An appropriate written first-aid plan is in place, staff (and volunteers where appropriate) is informed when a zoonotic disease occurs at the sanctuary, and training is provided to staff and, as appropriate, volunteers.**

- a. The sanctuary has a written first-aid plan that is accessible to all staff on the premises, and to volunteers as appropriate.
- b. Staff, and volunteers as appropriate, are trained in basic first aid.
- c. Written instructions are provided for staff (and volunteers as appropriate) on the provision of emergency health care and the procedures to be followed in the event of an incident involving any bear and a visitor, volunteer or staff member, including (when appropriate) handouts with any special information that any attendant health care professional, on site or off, should know to help the victim



and/or keep health care attendants safe from potential zoonotic diseases. First-aid stations that are readily and easily accessible and are located throughout the sanctuary.

- d. Employees, and volunteers where appropriate, have adequate training to understand the potential risk of disease transmission, including potential sources of disease, modes of disease transmission, and clinical signs associated with disease. Each signs a form that clearly states that he/she has been fully trained in these procedures. Training and attendance are logged.
- e. All staff and active volunteers are informed when a zoonotic disease occurs at the sanctuary.
- f. See also Standard V-8, Zoonotic Disease Program.

## **GOVERNANCE AND FINANCE**

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### **GOVERNING AUTHORITY**

*Note: The term “Board of Directors” is used in this section to reference the governing authority for the sanctuary. In some instances, another term may be used (e.g., “Trustees”).*

#### **G-1. Nonprofit Status**

**The sanctuary and/or its governing organization has a national legal nonprofit status.**

- a. A sanctuary, or its governing organization (for example, if the sanctuary is a program of another organization), has obtained national nonprofit status in the country of governance or operation. For example, sanctuaries located in the United States or its territories have 501(c) 3 status, and sanctuaries located in or operated by organizations in the United Kingdom have registered charity status.
- b. An exception to this standard will be made if non-profit registration is not available in the country of governance or operation.

#### **G-2. Ownership of Sanctuary Property and Contingency Planning**

**Sustainability of the sanctuary is promoted by ownership of the sanctuary property or a proper written lease agreement.**

- a. All property on which the sanctuary sits is held in the name of the sanctuary (or its governing organization) as either owner or lessee.
- b. The sanctuary’s governing body has confirmed that the sanctuary is located on property for which it is allowable (by law or regulation, such as zoning laws) to operate the facility and the activities conducted by the organization.
- c. If the sanctuary is on another person’s property [e.g., housed in someone’s home or on their land, including government land], there needs to be a written lease agreement between the property owner and the sanctuary (or its governing organization).
- d. If property is leased, a long-term (ten years or longer) contractual lease is in place, with a termination clause requiring sufficient notice (a minimum of a year) to allow the sanctuary to relocate or transfer its animals to another appropriate facility that has committed to providing their lifetime care.





- e. If property is leased, the sanctuary should have a written contingency plan describing the steps to take to relocate or transfer its animals to another appropriate facility at the end of the lease, or upon an unexpected termination of the lease.

### **G-3. Succession Planning**

**The sanctuary has a written succession plan for its continuance should the director or other key management be unable to continue in their positions.**

- a. The sanctuary has a written plan outlining succession scenarios for key positions within the sanctuary, covering at a minimum the sanctuary director. Depending on the structure of the sanctuary management, this may also cover the assistant director, director of operations, director of finance, etc.
- b. For the director position as well as other key management, written job descriptions should exist outlining the primary functions and responsibilities of each position.
- c. The succession plan should include an emergency plan outlining who will carry out the key responsibilities in the event of a sudden and unexpected absence by the director or other key management in both short- and long-term scenarios.
- d. A succession plan should also define the role of the Board of Directors/Trustees in overseeing transition in the event of a planned departure of the sanctuary's director, including functions such as hiring and oversight of an interim director, determining salary ranges, re-assignment of responsibilities, and the appointment of a transition committee.

### **G-4. Board of Directors/Trustees**

**The Board of Directors/Trustees organizes itself and carries out its duties in an appropriate, legal and responsible manner, and has appropriate relationships with staff and volunteers.**

- a. A Board of Directors/Trustees is in place with a minimum of three (3) members, or a greater number if required by law, where at least one board member is not a family member.
- b. The Board of Directors/Trustees has organized itself in a manner that allows its duties to be carried out in a timely and responsible manner and in accordance with all relevant non-profit regulations.
- c. Bylaws, in accordance with applicable law, have been developed and adopted as the general policies and rules that govern the sanctuary and define the Board's composition and structure.
- d. The Board of Directors/Trustees has regularly scheduled meetings, and minutes are kept. The Board has a written position description describing the responsibilities of its members, and members are knowledgeable of their legal obligations and accept responsibility for self-regulation, accountability, ethical practice of the sanctuary, and sound financial management and oversight.
- e. The Board is supportive of the sanctuary abiding by GFAS standards.



## **G-5. Ethics and Grievance Procedures**

**The sanctuary's policies and actions of the Board and staff reflect adherence to a high code of professionalism and ethics.**

- a. Business and related activities, including outreach and interactions with other sanctuaries, are conducted in a professional manner, with honesty, integrity, compassion and commitment, realizing that an individual's behavior reflects on the sanctuary and greater humane communities as a whole. A code of ethics/conduct for the sanctuary has been adopted by the Board of Directors/Trustees.
  - The code of ethics/conduct addresses the core values of: integrity, openness, accountability, service and charity, and reinforces standards of professional behavior. (Note: In recognition that some animals are used for food, and sanctuaries are in the business of protecting animals, all sanctuaries should ensure that their sanctuary events are conducted in a manner that is consistent with their mission.)
  - All personnel associated with the sanctuary, including volunteers, have been provided with access to the code of ethics/conduct and have agreed to adhere to it.
- b. The sanctuary has a written Conflict of Interest policy prohibiting any Board member, Director, or key employee from approving or voting on a transaction in which he or she has a monetary or other interest. Members of the Board of Directors and the Director, as well as key employees as appropriate, are asked to sign written acknowledgements of receipt of the policy and have disclosed potential conflicts of interest.
- c. The sanctuary has a written anti-discrimination policy, specifically referring to any protected class under law.
- d. There is a written grievance process that is clearly communicated to the staff and volunteers to communicate the procedure for reporting a concern regarding workplace-related issues, including ethics complaints; includes an alternate pathway if the normal person to whom one should take concerns is non-responsive or the focus of the concern; and allows for fair, prompt and meaningful resolution.

## **G-6. Required Licenses and Permits**

**The Sanctuary has all legally required licenses and permits (or other necessary government approval) to operate as a sanctuary and to house each animal.**

- a. The sanctuary obtains and maintains all permits and licenses required under city, county, state/province, country and international laws and statutes for each animal housed at the sanctuary.

## **G-7. Strategic Planning**

**The sanctuary has at least a three-year strategic plan in writing, to provide a structure upon which to base the fundamental actions that guide and shape operations.**

- a. The sanctuary has a written strategic plan in place, developed by the Board of Directors and Director, with input from other sanctuary management and staff where appropriate, that provides a structure within which fundamental actions of the sanctuary are based to shape and guide sanctuary operation. The strategic plan addresses at a minimum three years.



## **FINANCIAL RECORDS AND STABILITY**

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### **F-1. Budget and Financial Plan**

**The sanctuary maintains an annual operating budget and a long-term financial plan.**

- a. An annual operating budget exists and reflects estimated future expenditures. The budget includes expenses related to staffing salaries and benefits, overhead expenses, supplies, capital improvements, ongoing maintenance, etc. The budget is approved by the Board of Directors/Trustees.
- b. Periodically during the year, the estimated budget is compared to the actual expenses of the sanctuary and where necessary, appropriate adjustments are reflected in future estimated expenditures.
- c. The sanctuary has a long-term (minimum of three years) financial plan that projects future revenue and expenses, consistent with priorities set out in the strategic plan. The plan builds in protection for the care of the animals (such as creating a “bare bones” budget; seeking endowments for lifetime care of animals; building up increased operating reserves; entering into written agreements with other facilities to take animals in the event of closure of the sanctuary; or other such “safety nets”) in the event that significant decreases in operating income occur.

### **F-2. Financial Reports**

**The sanctuary keeps accurate and complete financial records.**

- a. Detailed, accurate periodic financial reports are kept on file. The sanctuary produces on a regular basis (at least annually) the following financial statements:
  - A Statement of Financial Position (also known as the Balance Sheet);
  - A Statement of Activities (also known as the Statement of Revenues and Expenses, or Operating Statement, or Income Statement, or Profit and Loss Statement); and
  - A Statement of Cash Flows.
- b. Other pertinent information, such as loan amortization schedules and lease commitments, are also maintained and updated at least annually.
- c. Copies of IRS Forms 990 (or comparable documents required to be filed to maintain non-profit status outside of the United States) and other tax documents, such as exempt status determination letters, are kept on file with other sanctuary documents and are available for public review, as required by law.

### **F-3. Financial Stability**

**The sanctuary has a strategy in place for securing and maintaining at least minimal financial reserves.**

- a. The sanctuary has a strategy in place, as reflected in strategic and financial plans, to maintain reserves equal to at least three months (or one month to achieve GFAS verification) of those operating costs essential to the proper care and welfare of the sanctuary animals.



- b. Consideration may also be given to cash equivalents as well as advance purchases of food, supplies, etc.
- c. See also Standard F-1(c).

#### **F-4. Banking Responsibilities and Financial Transactions**

**The sanctuary maintains a bank account, keeps personal and sanctuary business separate, and properly records all contributions, petty cash transactions, and loans to the sanctuary.**

- a. There is a checking account registered in the sanctuary's name that is used only for sanctuary financial transactions.
- b. Personal business is kept completely separate from the sanctuary's business (e.g., staff and Board members cannot use sanctuary funds to pay for personal expenses or take loans from sanctuary funds).
- c. If the sanctuary is being funded through personal loans, loan documents are signed and maintained in the accounting record. Repayment schedules are developed and followed.
- d. All contributions from donors are properly documented and promptly deposited. Donors are provided with receipts as required in accordance with applicable laws or regulations.
- e. If petty cash is kept on hand, transactions are documented and receipts are kept on file substantiating the related expenditures.

#### **F-5. Fundraising Activities and Disclosures**

**Fundraising is conducted in a legal, ethical and transparent manner.**

- a. Fundraising techniques conform to applicable tax regulations for maintaining non-profit status (e.g., sec. 501(c)(3) status in the United States) and conform to the spirit as well as the letter of all applicable laws and regulations.
- b. Fundraising activities are conducted with honesty and integrity, and put the charitable mission of the sanctuary above personal gain.
- c. All fundraising and soliciting materials are accurate, do not exaggerate financial needs nor incorrectly claim sole credit for joint efforts, correctly reflect the sanctuary's mission and use of solicited funds, and do not threaten to betray the mission by making misleading and unprofessional statements (e.g., claiming animals will have to be euthanized if donations are not received immediately).
- d. The sanctuary ensures proper stewardship of charitable contributions, including timely reports (e.g., tax filings, annual reports, reports required by funders) on the use and management of funds. Restricted funds are expended in accordance with donor's intentions. Explicit consent by the donor is obtained before altering restrictions or conditions of a gift.
- e. Fundraising expenses are reasonable, and total fundraising expense is disclosed on financial reports and any required tax filings.
- f. Fundraisers for the sanctuary ensure that all information provided to donors is accurate and complete. Any statements about the taxable nature of donations indicate that all or part of the donation may be tax deductible as a charitable contribution under applicable law.



## **F-6. Insurance and Waivers**

**The sanctuary has adequate insurance coverage and secures signed waivers from all who enter the sanctuary property.**

- a. Insurance policies, where available, are in place that protect the financial resources of the sanctuary and staff, as well as protect the community from harm that the sanctuary might cause. The amount of coverage is commensurate with the size of the sanctuary and the implied risk associated with the animals housed at the sanctuary. Where available, this includes General Liability insurance and a management liability policy (often called Directors & Officers or “D & O”).
- b. Visitors, volunteers, and employees sign waivers that acknowledge the potential risks of being on sanctuary property.

## **EDUCATION AND OUTREACH**

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### **E-1. Education Programs**

**Education programs are thoughtfully designed and overseen to promote a humane ethic, with careful respect and protection of all aspects of the individual welfare of the bears involved, and ensuring public safety.**

*(Note: Not applicable for sanctuaries that do not have an education program.)*

- a. Any education program is designed to promote awareness, empathy, and respect for all life through education and advocacy insofar as resources permit, and portray the issues surrounding why individual bears reside at the sanctuary, the bears’ natural history and conservation status, and how the highest welfare of each individual bear is ensured.
- b. An education program is conducted in accordance with a written Education and Outreach Policy that articulates and evaluates program benefits, under the direction of qualified staff and/or volunteers.
- c. The education program is evaluated periodically for effectiveness and content, ideally on an annual basis, by the Director.
- d. Bears are not taken out of enclosures/habitats or off the grounds of the sanctuary for incorporation into the education program. Bears may be incorporated into education programs utilizing non-invasive educational methods/tools, such as audio-visual presentations, webcasts, or other forms of multi-media. In such cases, they are treated in a respectful, safe manner that does not misrepresent or degrade them, does not cause them distress, and does not put bears or humans at risk.
- e. See also Standards P-8 and P-9.

### **E-2. Tours**

**Any tours are monitored and conducted in a careful manner that minimizes the impact on the bears and their environment, does not cause them stress, and gives them the ability to seek undisturbed privacy and quiet.**

- a. Non-guided tours are prohibited, and tour groups are of a size that allows for close monitoring and vary based on the size and staff of the sanctuary.



- b. Tours, if allowed, are for an educational purpose consistent with the sanctuary's education policy and not used for entertainment (see E-1).
- c. All tours are conducted to minimize the impact on the bears and their environment.
- d. Bears are confined within a secure environment and provided the opportunity to escape from public view. Bears are not in enclosures or habitats specifically designed to minimize their privacy and all wild bears have the ability to seek undisturbed privacy and quiet.
- e. Bears that are easily stressed are excluded from tours.
- f. All tours prohibit the public from any physical contact with the bears residing at the sanctuary.
- g. Members of the public cannot feed sanctuary bears during tours.

### **E-3. Outreach**

**Sanctuary staff are appropriate advocates for bear protection and welfare, and work cooperatively with other sanctuaries and the community.**

- a. The sanctuary works cooperatively with other sanctuaries as applicable, keeping the bears' welfare as the first priority. (For instance, best practices are shared, sanctuaries collaborate to arrange best placements for bears, etc.).
- b. Any community outreach is conducted in an ethical and professional manner.
- c. The sanctuary does not adopt policies in opposition to the welfare of bears (e.g., endorsing the use of bears for entertainment).

## **POLICIES**

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### **POLICIES: ACQUISITION AND DISPOSITION OF BEARS**

#### **P-1. Acquisition Ethics and Commercial Trade Prohibition**

**Acquisition of bears by the sanctuary is legal and ethical.**

- a. The sanctuary has relevant legal documentation (including any required permits and licenses) for, and is in legal possession of, all animals in its care.
- b. The sanctuary has a written policy governing its acquisition of bears, including the following provisions:
  - Bears are only accepted if the sanctuary has the financial resources to provide appropriate professional care.
  - Bears are only accepted if they will not jeopardize the health, quality of care or maintenance of bears currently housed at the sanctuary.
  - All acquisitions of animals by the sanctuary are consistent with its mission and in the best interest of the individual animals.
  - Acquisition of bears occurs through donation or rescue. No commercial trade in sanctuary animals occurs (included, but not limited to, the sale of animals, animal parts, by-products, or



offspring), and the sanctuary does not knowingly engage a third party to purchase a bear on its behalf. (Note: if animals have been purchased, or if the sanctuary has a policy in place that allows purchase under certain circumstances, the sanctuary must provide GFAS with this information, indicating why such purchases are consistent with the sanctuary's mission and why they do not sustain or promote the commercial exploitation of the species.)

- No acquisition results from the intentional breeding of animals for or at the sanctuary. An exception may be made for rehabilitation and release centers engaged in a bona fide breeding-for-release-program of endangered species with available release sites within the state/province, conducted with specific conservation goals, in accordance with local, state/province, national, and international law and regulations.
- c. Safe and humane transport is used for all acquisitions.

## **P-2. Acquisition Recordkeeping and Monetary Exchange**

**Acquisition contracts are clear, with ultimate responsibility for acquisitions clearly defined.**

- a. An acquisition contract is in place that clearly identifies the sanctuary as the "responsible party" for the bears and when such responsibility takes effect; whenever possible, the contract includes information on the "surrendering party" as well as any intermediary parties (rescue groups, zoos, etc.). This written contract is kept as part of the permanent record for each bear entering and housed at the sanctuary.
- b. Financial expenses associated with acquisition of a bear may be received in order to enable the sanctuary to be able to responsibly take in the bear and may include medical testing, behavioral assessment, crate construction costs, quarantine costs, shipping and transport costs. Lifetime care costs may be factored in as appropriate.

## **P-3. Disposition Ethics and Responsibility**

**The sanctuary assumes lifelong responsibility for the sanctuary bears, with some noted exceptions, with ultimate responsibility for dispositions clearly defined.**

- a. The sanctuary assumes lifelong responsibility for the bears acquired and only in very rare circumstances does a bear permanently or semi-permanently leave the sanctuary, with the exception of releasable wildlife reintroduction.
- b. Acceptable reasons for disposition, when movement of bears to another sanctuary does not compromise the welfare of that individual or the other bear(s) with which s/he will be housed, include:
  - health concerns that cannot be adequately addressed by the sanctuary, where another accredited sanctuary or comparable facility is better equipped to provide care for the bear.
  - another accredited sanctuary or comparable sanctuary can provide a better long-term environment (such as creating a suitable social group of conspecifics).
- c. Other reasons for disposition include: financial insolvency or closure of the sanctuary, or death of the bear.
- d. Detailed records of bear disposition are logged and maintained, including the details of all body parts.



#### **P-4. Disposition of Live Bears**

**Responsible steps are taken to ensure that any disposition of a live bear is in the life-long best interests of that bear.**

- a. The sanctuary has a written disposition policy that adopts substantially the language of this standard.
- b. Bears are not transferred to individuals, nor are they transferred to sanctuaries that lack the appropriate expertise and/or resources and/or facilities to care for them appropriately. Before transfers, the sanctuary is convinced that the recipient has the expertise, records management capabilities, financial stability and facilities required to properly care for the bears. Bears are not “loaned” to other facilities.
- c. Bears are not disposed of at auctions or to breeders, dealers, brokers, “kill buyers”, slaughterhouses or private pet owners.
- d. For sanctuaries engaged in rescue, rehabilitation and release of bears, subject to all pertinent regulations and laws, bears are released within native ranges, in accordance with local, state, national and international regulations.
- e. If a bear, especially one housed individually (to be avoided whenever possible except for naturally solitary species), shows signs of self-mutilation and/or apathy, is uncontrollable, has a highly aggressive disposition, and/or is suffering physically or psychologically, and if the sanctuary cannot remedy the situation, then, if possible, the bear is transferred to another accredited sanctuary or other appropriate facility, if it appears that environment will better suit the bear.
- f. See also Standard P-5 “Euthanasia” below.

#### **P-5. Euthanasia**

**Euthanasia is governed by an ethical humane euthanasia policy, and deceased bears are handled appropriately.**

- a. The sanctuary has and maintains a written humane euthanasia policy (as part of the disposition policy) for bears and other animals at the sanctuary, administered under the strict supervision of a licensed veterinarian.
- b. Euthanasia is only be used as a final option. Euthanasia is not used as management tool (such as a means to create space for more animals).
- c. Examples of cases where euthanasia may be accepted are:
  - Incurable disease/injury that is likely to cause unmanageable pain or suffering;
  - Disease/injury where treatment is likely to cause unreasonable pain or suffering;
  - Disease/injury where treatment will not be effective in restoring the bear to an acceptable quality of life;
  - Disease/injury where treatment is beyond the normal community standards of monetary expenditure and would cause an excessive burden on the sanctuary resources, and no other sanctuary can step in, after reasonable efforts to locate such a sanctuary;
  - The process of aging has resulted in an unacceptable quality of life;





- In the event of presenting an infectious disease risk to some or all of the residents.
- d. A licensed veterinarian or his/her authorized representative, who is knowledgeable and skilled in performing euthanasia in a compassionate and professional manner and ideally with an established relationship with the sanctuary and the bear, recommends and performs humane euthanasia. However, in extreme circumstances of bear suffering when a veterinarian is unable to reach the sanctuary in a timely manner, a method such as the use of a firearm to euthanize a bear may be required and is performed by a trained and qualified staff member when no other humane option is available.
- e. Euthanasia is performed so that it avoids distress to the bear, and unless impossible, is performed out of view of other bears.
- f. With regard to deceased bears:
  - Personnel conduct themselves in such a manner that is respectful during disposition activities;
  - Body parts are never sold, traded or donated (see exception at Standard P-11 “Ethics in Research”);
  - Disposition of deceased bears meets the requirements of all acceptable practices along with applicable local, state, national, and international regulations and laws.
- g. The species and ecosystems are carefully considered during disposition activities.

## **POLICIES: PUBLIC CONTACT AND RESTRICTIONS ON USE AND HANDLING OF BEARS**

### **P-6. Public Contact**

**Contact between bears and the public is not allowed or is restricted appropriately.**

- a. No unescorted public visitation occurs. This is not to exclude discrete, nonintrusive observation by a carefully evaluated person, such as a wildlife student, as allowed by the appropriate decision-making body of the sanctuary.
- b. No direct contact between the public and bears occurs.
- c. See also Standard E-3 “Tours.”

### **P-7. Removal from Sanctuary or Enclosures/Habitats for Non-Medical Reasons**

**Bears at the sanctuary are not removed from the sanctuary or enclosures/habitats for non-medical reasons.**

- a. Bears are not taken from the sanctuary or enclosures/habitats for exhibition, education, or research purposes.



## **P-8. Public Viewing of Human/Bear Interaction**

**The sanctuary does not allow unprotected human/bear contact to occur within public view.**

- a. Any unprotected contact with bears (e.g., for purposes of providing medical care) is performed out of public view, except in cases of emergency.

## **P-9. Non-Portrayal of Bears as Tractable**

**With few exceptions, the sanctuary rarely portrays bears as tractable in text, photos, video, or other media.**

- a. The sanctuary rarely publishes material that portrays bears as tractable. This includes but is not limited to: photos in which staff or others are shown holding or petting bears and bears on leashes or dressed in human clothing. In situations where text, photos, video or other media are published portraying the above, steps should be taken to add text to the publication (website, brochure, etc.) that explains the reason for the contact and discouraging the idea that the animals would make suitable pets.

## **P-10. Non-Harmful, Non-Exploitive Fundraising**

**Fundraising activities are not distressing or negatively disruptive to bears, nor do the activities involve improper use of bears.**

- a. Fundraising activities approved by an appropriate decision-making body of your sanctuary are allowed provided the following:
  - The activities do not violate any of the other GFAS Standards, including those regarding contact with the public, handling of bears, and removal from the sanctuary or enclosures/habitats;
  - The activities are deemed to not be distressing or in any way negatively disruptive to the bears and their normal routine, nor are normal routines designed specifically for fundraising needs;
  - Bears are not in enclosures or habitats specifically designed to minimize their privacy, and all bears have the ability to seek undisturbed privacy and quiet;
  - Bears are not being used as entertainment, which includes the performance of “tricks” for public display;
  - Bears are not raffled or sold.



## **P-11. Ethics in Research**

**Any research conducted is devoted to benefiting the health and welfare of the individual bear involved, and does not cause pain or distress.**

- a. No resident bears are made available for participation in research studies unless the studies are strictly observational and do not interfere with the normal daily activities of the individual animals. Interventions that cause pain or distress are not acceptable.
- b. An exception may be made, with approval of an appropriate decision-making body of the sanctuary, if:
  - It is determined that the health and welfare interests of the individual bear are best served by participating in a new treatment study;
  - There is reason to believe that outcome of the study will be a tangible benefit for the individual bear involved;
  - The study does not prevent normal activities of daily living.
- c. An exception may also be made for research involving biological sampling if it will have a demonstrable health, conservation, or genetic benefit to captive bear management and/or wild bear population conservation. In such cases, samples are only to be taken during routine examinations of the bear (which are otherwise needed for the welfare of the individual) or routine cleanings of enclosures, or during a necropsy that does not violate any other GFAS standards. Sanctuaries should ensure that any biological samples are used ethically by the receiving institution or laboratory, and that any applicable CITES regulations are followed.

## **BEARS BEING RELEASED TO THE WILD**

GFAS strongly supports the efforts of wildlife rehabilitators and sanctuary managers to return wildlife to its natural environment, provided appropriate steps are taken to ensure that the animals released are likely to survive in the wild.

Facilities releasing bears to the wild must also make every effort to reduce risk of their having a damaging impact on ecological resources, including other animal species, found naturally in the release area. Examples of risk factors include but are not limited to:

- Displacement of indigenous animals;
- Transmission of novel pathogens;
- Disruption of local human communities, including damage to dwellings and injury to local inhabitants;
- Alterations to the environment that disrupt the ecological niche of other species.

For a more detailed discussion of the potential risks, as well as time and financial commitment involved in creating a quality re-introduction project, see the International Union for the Conservation of Nature Species Survival Commission (IUCN/SSC) Reintroduction Specialist Group's "Guidelines for Re-Introductions".



## **R-1. General Considerations**

**The sanctuary has policies, agreements and plans in place to optimize the chances for successful re-introduction of bears into the natural environment.**

- a. The facility has a written policy regarding the handling of any potential problems involving released animals. The policy should include but is not limited to:
  - a plan to minimize the risk to human life and property in the area of release;
  - a plan for compensation for or mitigation of damages incurred by the released animals;
  - a deterrent plan to discourage inappropriate activities, i.e., spending time around human habitation.
  - a plan for management or removal of animals who fail to integrate appropriately or who become habitual 'problem animals.'
- b. In as much as possible, using the latest available information on potential health concerns regarding other species found in the area of release, animals are tested and treated for pathogens that might pose a threat to other wildlife.
- c. The facility has agreements in place with any and all appropriate authorities to allow the release process to proceed as smoothly as possible.
- d. Ideally, permissions, any necessary documentation, site determination, etc. begin as soon as it is determined that there are animals in care that are likely to be suitable for release.
  - In particular, facilities obtain any permits or other forms of authorization needed to proceed with the release.
  - Potential release sites are identified and evaluated as early in this process as possible.
- e. Cooperative agreements are in place prior to animals being released which may include, but are not limited to:
  - veterinary and scientific involvement in post-release monitoring;
  - community acceptance of the project and involvement in habitat protection and awareness raising;
  - landowner agreements enabling release, including the addressing of specific permissions and permits;
  - involvement of NGOs with similar or conflicting interests that may impact (positively or negatively) the project.

## **R-2. Rescue Of Bears**

**The sanctuary has developed guidelines for rescue work, taking into account staff and animal safety, contingencies for caring for the animal once rescued, and any local, state or national regulations or agency cooperation required.**

- a. Facilities accepting bears from the illegal trade have policies and procedures (ideally in writing) in place with the appropriate authorities that allow for rapid transfer of the animals to the sanctuary or rescue center. These policies and procedures are designed to reduce the risk of:



- disease transmission;
  - habituation;
  - Inappropriate or inhumane treatment, due to lack of knowledge, by personnel involved in seizure of wildlife from the illegal trade.
- b. In as much as possible, while respecting local or national cultural/religious tenets, a euthanasia policy is in place to address situations where the animal's prognosis for survival is too low to warrant attempting treatment.
- In situations where field euthanasia is being considered, where possible and appropriate (e.g., the animal is reasonably safe from further human interference and the stress of capture would outweigh the benefit of humane euthanasia), the option of leaving the animal in situ may be considered.
  - See also Standard V-5, "Euthanasia."

### **R-3. Evaluation Of Suitability For Release**

**Bears admitted into sanctuary are evaluated for their potential suitability for release.**

- a. The sanctuary has a protocol in place (ideally in writing) to evaluate potential release candidates and to determine which bears are given priority for potential release.
- Animals who have spent little time in captivity and/or who have had little human contact are given priority for potential release.
  - Animals found to be free of diseases and/or parasites of potential concern to the health of the population, particularly in the intended release area, are given priority for potential release.
- b. All bears are treated as potential release candidates, particularly those who have not been kept long term as pets. If bears admitted into sanctuary are determined to be potential release candidates, every effort is made to protect them from exposure to human disease and to keep them as wild as possible.

### **R-4. Quarantine And Prerelease Housing**

**The sanctuary has appropriate quarantine facilities and prerelease housing for bears, with consideration given to sick and injured bears.**

*(See also Standards H-1 to H-9, "Bear Housing," and V-5, "Quarantine and Isolation of Bears")*

#### **General**

- a. Non-quarantine housing for bears being considered for release provides as close to natural a setting as possible. The space allows for foraging, digging, climbing, nesting/denning and other actions naturally performed in the wild.
- b. Quarantine facilities and prerelease housing for bears intended for release are situated a minimum of 66 ft. (20m), giving consideration to factors such as wind direction, from resident bear populations to protect them from exposure to pathogens present in the sanctuary population that could compromise their return to the wild. A wall surrounding the quarantine area reduces pathogen transfer risk and aids in restricting access to authorized personnel.



- Where this is not possible, sanctuary residents are screened for potential pathogens of concern, and pathogen-free animals are housed closest to the animals intended for release to the wild.
- c. Where possible and appropriate, sanctuaries follow National Wildlife Rehabilitators Association guidelines (<http://www.nrawildlife.org/content/minimum-standards>) in dividing housing into three types:
- Restricted activity/mobility – for the initial stages of rehabilitation where the illness or injury requires the animal be treated and/or prevented from activities that would slow the rehabilitation process. At a minimum, the animal is able to maintain normal upright/alert posture and to stretch the body.
  - Limited activity/mobility – for the recovery stage of rehabilitation where the animal is regaining mobility and building strength, and staff does not need access to the animal on a daily basis. The animal is able to move short distances and perform some climbing and perching activities.
  - Unlimited/Prerelease – the final stages of rehabilitation where the main concern is ensuring that the animal is fit for release. In this phase, the enclosure provides the bears with opportunities to demonstrate the skills necessary for survival in the wild.

#### **Quarantine Housing**

- d. Sick or injured wildlife is quarantined in such a way that the rehabilitation process is begun during the quarantine phase.
- e. Quarantine facilities have appropriate housing for the treatment of injured or ill bears.
- f. Quarantine facilities are designed to allow for monitoring and, as needed, modification of behavior of bears intended for release.
- g. Healthy bears admitted to quarantine have as large an enclosure as possible to help maintain natural locomotion and foraging behaviors.
- h. Upon arrival, bears are quarantined for an adequate number of days, ideally for a minimum of 60 days. In some situations a longer quarantine may be advisable.
- i. The attending veterinarian works closely with regional, national and international experts and authorities to determine appropriate quarantine timing based on health risks to which the newly admitted bears may have been exposed.
- j. Orphaned bears, particularly those who have been kept as pets and potentially exposed to human pathogens, are isolated until any potential health risks are evaluated.

#### **Initial Housing for Orphaned, Ill or Injured Bears**

- k. Animals admitted requiring treatment for illness or injury are housed in enclosures that allow for ease of care. These initial care enclosures can be smaller than that which is acceptable for long-term care.
  - Dependent on illness or injury, either Restricted or Limited activity/mobility housing may be utilized.
- l. Enclosures provide visual and acoustic barriers to minimize stress.
- m. Orphaned bears are housed in nursery units, preferably with conspecifics, as species appropriate.
  - Where human caregivers must act as surrogates they perform all duties in a manner that preserves the natural behaviors of wild bears as much as possible.

#### **Intermediate Housing for Orphaned Bears**

- n. As soon as the orphaned bears have been weaned, they are moved to intermediate housing, where human contact is decreased and interaction with conspecifics, as species appropriate, is increased. Where possible, the animals are moved to the release site and cared for in a soft release enclosure.



- o. Animals are provided with adequate opportunity for climbing, nesting, digging and foraging, as species appropriate.
- p. In as much as possible, conspecifics are used to teach natural behaviors, as species appropriate. Where appropriate releasable conspecifics are not available, and where possible, safe, and appropriate, resident animals with strong natural skills who do not present a disease risk to the wild population, may be used to teach these behaviors.

Intermediate housing is isolated from resident animal areas, ideally within a natural habitat which allows the orphans to adjust to a more wild environment.

#### **Intermediate and Prerelease Housing for Sick or Injured Bears**

***Note: Adult and independent subadult animals, dependent on their admitting condition, may not require intermediate housing.***

- q. Animals suffering from injuries that may affect their suitability for release are moved to intermediate housing while regaining strength. Animals are regularly evaluated to determine whether they are likely to be releasable. Once the bears are deemed fit, they are moved to prerelease housing.
- r. Independent animals brought in for rehabilitation who can be released back into the environment from which they came are returned as soon as it is determined that the animal has recovered sufficiently to resume its presence in its former area.
- s. Consideration is given to social and territorial issues that may affect safe return to the original habitat.
- t. Prerelease housing for adult and independent subadult animals is ideally situated at the intended release site, allowing the animals to acclimate to their new environment before release.
- u. In both intermediate and prerelease housing, sufficient vertical as well as horizontal space is provided, as species appropriate, to allow the bears to develop strength and display normal wild behaviors.

### **R-5. Diet, Nutrition And Foraging Skills**

**Bears are fed an appropriate diet that approximates that which will be found in the habitat to which they are released, and foraging behavior is encouraged.**

- a. As early in the rehabilitation process as possible, bears are exposed to the types of foods found naturally within the environment where they will be released and assessed for their ability to find appropriate foods and avoid inedible or poisonous foods.
  - Release candidates are fed in such a way as to encourage natural foraging behaviors.
- b. Rescued bears admitted in poor physical condition may require specialized diets to recover their health. Nutritional deficiencies are assessed and diets modified to address those deficiencies. Once the bears are back on a normal nutritional plane, any foods not found in their planned release area are no longer fed.

### **R-6. Husbandry And Health**

**All aspects of care, including caregiver-bear relationships, introduction to social groups and overall health evaluation, are focused on preparing the bears for return to the wild.**

- a. Once a bear has been evaluated as a potential release candidate, all aspects of care are focused on preparing the animal for the wild.



- Human activities and noises are minimized in areas housing bears being prepared for reintroduction.
  - Apart from dependent young with no suitable conspecific surrogates, human interaction with bears being prepared for release to the wild is restricted to those activities that will enhance the bears' ability to live in the wild.
- b. The animal is placed in an appropriate social group or paired with a compatible conspecific, depending on species. Where appropriate surrogate conspecifics are not available, dependent young may be reared by human caregivers using approved best practices for the species housed.
- Care is taken to balance the need to nurture these young animals with their need to develop appropriate survival skills as well as intraspecific social behaviors.
  - Animals are integrated into an appropriate social group, ideally comprised of other conspecifics intended for release, as quickly as possible.
- c. Introductions follow Standard W-3 "Introduction of Unfamiliar Individuals."
- d. Opportunities to explore, climb, dig, forage and learn skills in the natural environment are provided.
- e. Bears admitted into care from the wild at the stage where they are already independent, with recoverable illness or injury problems, are treated and released as quickly as possible, taking into account the potential for the animal not being accepted back into its previous social group or territory.
- f. Caregiver-bear relationships for animals intended for release to the wild, while ensuring the animals' psychological well-being is met, focus on:
- avoiding any types of interaction that may compromise the bears' chances for release;
  - encouraging the bears to develop appropriate relationships with conspecifics for their social needs.
- g. Veterinary staff evaluate overall health including:
- recovery from the initial cause for admission to the facility;
  - pathogen surveillance to ensure the animal does not present a risk to the wild population as a result of exposure during the rehabilitation process.
    - In as much as possible, using the latest available information from the OIE-World Organization for Animal Health ([www.oie.int](http://www.oie.int)) and the IUCN's Conservation Breeding Specialist Group (<http://www.cbsg.org>), animals are monitored for human pathogens not found in the wild population.
- h. Bears being cared for in sanctuary for later release back to the wild are managed in such a way as to optimize their chances for successful return to the natural environment.

## **R-7. Health And Safety Of Caregivers Working With Releasable Bears**

**No caregiver begins work with releasable bears until routine testing has indicated he or she poses no risk to the bears' release to the wild.**

*(See also Standard V-8, "Zoonotic Disease Program")*

- a. Caregivers working with bears intended for release to the wild are routinely monitored for potential anthroponoses (diseases that have potential to be transmitted to the animals).
- b. Testing, vaccinations and fecal cultures for pathogens may be utilized, as appropriate for the region, to ensure the health of both the bears and their caregivers. New caregivers should not have contact with the bears for the first two weeks of employment.





- c. Provision of adequate nutrition for staff is considered as a possible contribution to the continued well-being of both staff and bears.

## **R-8. Assessment of Health and Skills**

**Bears are fully assessed for health and appropriate skills prior to release.**

- a. Bears who have completed the rehabilitation process and have been successfully integrated into a social group or pair, as is species appropriate, are further evaluated for release, with attention to health and the skills attained.
- b. Each animal's skills (e.g. foraging, nesting, appropriate interaction or avoidance behaviors in the presence of conspecifics, avoidance of dangers including poisonous foods or predators) are evaluated.
- c. A complete health assessment is performed including:
  - Overall fitness as relates to being able to survive in the wild, keep up with a conspecific group, avoid predators, etc.
  - Injuries and limitations that originally caused the animal to be brought into care are resolved, either completely, or to the extent that the bear has a reasonable chance for long-term survival.
- d. Bears have been tested, and found free of pathogens that have potential to harm the wild population in the planned release area, based on the latest current knowledge.
- e. Genetic assessment has been done to ensure that the bears being released are of an appropriate subspecies/population/subpopulation for the release site if their origin is not known.
- f. Bears are exposed to post-release monitoring equipment prior to release to allow them to acclimate to its presence.

## **R-9. Determining Appropriate Release Sites**

**Release sites are evaluated for health and other threats and for appropriateness for the species.**

- a. The potential release site is evaluated for the presence of appropriate and adequate food sources.
- b. The area is evaluated for potential health concerns.
- c. The potential release site is surveyed to ascertain whether any wild bears are present, either permanently or seasonally.
- d. The area is evaluated to establish carrying capacity for bears to be released. This includes taking into consideration others releases that may have already taken place and issues of territoriality. Animals are released in an appropriate habitat where carrying capacity for the species has not been reached.
- e. The area is evaluated for instances of potential human-wildlife conflict.
- f. IUCN guidelines are, in as much as possible, followed when determining release sites for rehabilitated bears.
- g. Animals are released away from areas where there is potential for or has been a history of human-animal conflict.



## **R-10. The Release Process And Post Release Monitoring**

**Bears are supported as needed to adapt in their new environment and are monitored post release.**

- a. A post-release monitoring program is in place to ensure the rehabilitation program is providing the animals with the skills necessary to survive, that the habitat is adequate and that, as is species appropriate, bears have integrated into the wild.
  - Once it is determined that the bears have the basic skills for foraging in their new environment, supplemental care is discontinued.
  - Use of radio and satellite telemetry is recommended whenever possible and appropriate.
- b. Ideally, bears are returned to the wild using a soft release process wherein they are housed in an enclosure within the release area or spend time with caregivers in the release area where supplemental food may be provided as needed and observation of their acclimatization may be observed.
- c. Post release monitoring, in conjunction with outside veterinary and scientific personnel, continues for a minimum of one year.
  - Level of monitoring may decrease over time as bears are determined to be acclimating to the environment.
  - Longer term monitoring of the animals and their impact on the habitat is preferred.
  - Practices used and results obtained, both positive and negative, are shared both within the facility and with others involved in bears reintroduction to aid in the continued improvement of the program.



## Appendix 1

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### **General**

Bears are powerful and inquisitive wanderers who require large spaces to accommodate their daily activities. In addition to appropriate size, bear enclosures must provide physical challenges and sufficient complexity to benefit the body and mind of the residents. Housing bears in inadequately sized enclosures can result in social stress between cage-mates and/or stress to individual animals unable to express natural behaviors, including the ability to retreat from disturbance.

Behavioral indicators of stress in bears can be seen all too often in small and/or stark environments. They include pacing, circling and other repetitive behaviors (See the work of Ames, Mason and others on the science of stress and stereotypic behavior in bears and other carnivores). Additionally, inadequate exercise facilities are a suggested factor in the development of muscular weakness and degenerative joint disease in captive ursids.

Dynamic enclosures, amply provisioned with enrichment challenges, can withstand the pressures of digging, chewing, climbing and exploring to save the site from becoming a moonscape dotted with craters and even preserve some vegetation, shade and other key components.

The social environment for bears is important in captivity and the seasonal shifts in relationships and temperament demand that caregivers invest time to observe understand and intervene to facilitate safe and appropriate care. Keeping abreast of the latest information on bear behavior and care will aid in providing best possible care for captive bears.

### **Diet**

Grapes/raisins have been implicated in renal disease in some bears.

Imaginative presentation of enrichment foods in puzzle feeders, ice-blocks or papier-mâché piñatas will enhance enrichment and foraging value. Items may also be buried, hung from trees or climbing structures or smeared onto toys or browse.

For bears shut inside for any reason, more frequent enrichment sessions are required and, at certain times of the years when bears are both hungrier and more active, the number of enrichment sessions in a day should be increased if possible.

### **Diet Changes, Increases or Decreases**

Seasonal weight targets for individual bear may be a desirable goal, based on size and behavior of individual bears, as well as information on seasonal variation in consumption patterns.

### **Seasonality of Food Consumption**

Food consumption can vary from 0% to 150% or more of the base diet during an annual cycle.

Brown bears and black bears will show significant increases in food consumption mid-year, depending on location, with a peak during early fall.

Consumption declines significantly when the bears become less active or inactive and increases as bears become active.

Seasonal consumption patterns will emerge after two full seasonal cycles of consumption if feed records are kept. The overall dietary goal is good physical and psychological health. Condition scoring may be a more appropriate assessment of health than weighing.

During periods of reduced activity and food consumption, best practice is to feed a volume of diet, such that a small portion is left after each feeding.



### **Shelter/Hibernation/Denning**

Concurrent access to outdoor enclosures and indoor areas is an effective means to provide shelter and environmental choice.

Underground tunnels made of concrete tubes angled for trapping air at various temperatures and preventing flooding may provide this protection in outdoor enclosures with no access to indoor areas.

Hibernation is never forced by restricting food or water access as this may result in disease or death through dehydration and starvation. Bears that are physiologically ready to hibernate will do so even when provided with an excess of food.

Hibernation, as species appropriate, is encouraged by provision of nesting materials and a seasonally appropriate diet.

### **Social Housing/Bear Introductions**

Bears are large and powerful animals who can be dangerously aggressive to other individuals of their species.

Time of year can influence success or failure of bears to 'get along'.

The amount of acreage (hectares) available can greatly influence the success or failure of bears to 'get along' (e.g., 15 bears on 15 acres [6.1 hectares], with plentiful food and dens).

Males may be aggressive during breeding season in the presence of females.

All individuals may be aggressive over food during mid to late summer as their appetite increases.

### **Contraception Information**

The following information is based on knowledge current at the time of the standard being reviewed. Sanctuaries are encouraged to work with their attending veterinarian to ensure that updated information on bear contraception is regularly available.

#### Females

- GnRH Agonists - Gonadotropin Releasing Hormone Agonists are considered the safest reversible contraceptives, but dosages and duration of efficacy are not well established for all species; side effects are generally similar to those associated with gonadectomy, especially the potential for weight gain unless diet is controlled. Suprelorin® (deslorelin) Implants (F or M) or Lupron® Depot Injection (F or M)
- Ovariohysterectomy or ovariectomy are safe methods and effective methods for preventing pregnancy if permanent sterilization is an option, but little data exists for carnivores.
- PZP vaccine Efficacy and safety have only been demonstrated in pinnipeds and bears among the carnivores. In other carnivores, there is mounting evidence that anti-PZP antibodies do not cross-react with the sperm receptor on the ovum, or may cause depletion of ovarian oocytes. PZP is contraindicated in species in which pseudopregnancy is common.

#### Males

- The recommended method for male contraception is vasectomy. Note that some concerns have been raised for use in mixed-sex-groups due to concerns over development of pyometra in females. It is not clear how much of a risk this is in practice.
- Castration is not an effective method of controlling aggressive behavior and is not performed for behavioral management purposes. Castrated males will continue to mount females.

#### Cautions



- For species with induced ovulation, vasectomy of males will not prevent potential adverse effects to females from prolonged, cyclic exposure to endogenous steroids associated with copulation-induced ovulation resulting in pseudo-pregnancy. (Castration, however, does not eliminate copulation.) Endogenous steroids and steroid contraceptives cause similar side effects.
- Progestin contraceptives may be associated in carnivores with progressive uterine growth that can result in infertility, infections, and sometimes uterine cancer; mammary tissue stimulation also can result in cancer. If a progestin is used, treatment is only short-term, because of the increased likelihood of side effects with prolonged exposure. If a progestin is used, treatment starts well BEFORE any signs of proestrus, since the elevated endogenous estrogen can exacerbate side effects of the progestin. Progestins are not used in pregnant animals, since they may suppress uterine contractions necessary for normal parturition. Thus, progestins are only administered to females CONFIRMED non-pregnant.
  - MGA Implant for 2 years, then remove for 1 pregnancy if possible; non-fertile ovulatory cycles do not substitute for pregnancy in reversing deleterious effects on the uterus; not recommended for more than a total of 4 years (F). Not recommended for sanctuaries, as no breeding is allowed.
  - Depo-Provera® injection (5 mg/kg body wt. every 2 months) (F).
  - Megestrol acetate for seasonal breeders, but for no more than 2 consecutive seasons (F). (No breeding at sanctuary, so not recommended.)