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**REPORT ON INVESTIGATION INTO ALLEGATIONS
OF ELEPHANT ABUSE AT THE SAN FRANCISCO ZOO**

Prepared from information obtained by

Micheal Knapp
SF/SPCA Field Officer Supervisor

Kimberly Karr-Warner
SF/SPCA Animal Protection Services Assistant Director

Presented by

San Francisco Society for the Prevention of Cruelty to Animals

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The San Francisco Society for the Prevention of Cruelty to Animals

The San Francisco SPCA is an animal protection organization with a mission "to act as an advocate on behalf of animals and an enforcer of their rights, to provide for the well-being of our community's animals who are abandoned, injured or otherwise in need, to cultivate in the people of our community an awareness of the animals, and to instill respect for and appreciation of all living things."

The San Francisco SPCA is incorporated by the State of California as a "society for the prevention of cruelty to animals" and is empowered to investigate alleged cases of animal abuse.

November 21, 1988

INTRODUCTION

On October 1, 1988, two San Francisco Zoo employees were injured while treating an abcess in the mouth of the Zoo's 22-year old, 7,000 pound, female Asian elephant named Tinkerbelle (see Appendix A for a brief profile). Veterinary Technician Gail Hedberg suffered a crushed pelvis when Tinkerbelle knocked her down and did a headstand on her. Zookeeper David Bocian, who was with Hedberg in the Elephant House, was knocked unconscious when the elephant tossed him into the dry moat.

That night, at about 8 p.m., SF/SPCA Officer Estes received a telephone call from Sandra Keller of Citizens for a Better Zoo. Ms. Keller explained that she had spoken to a zoo employee who claimed to have witnessed the Head Elephant Keeper and the Assistant Elephant Keeper violently beating on Tinkerbelle following the incident with Hedberg and Bocian. Ms. Keller went on to say that this witness, who asked to remain anonymous, feared that Tinkerbelle would receive another beating at 10 a.m. the following morning. The complainant also believed that the elephants were receiving beatings on a routine basis. [NOTE: The Society's investigators later interpreted the term "beating" in this case to mean hitting the elephant with an ankus, a tool used in elephant management.] Additionally, the witness thought there was a puncture wound on Tinkerbelle's face which may have been caused by the metal point of an ankus.

At approximately 9 a.m. the following day, October 2, 1988, SF/SPCA Assistant Director of Animal Protection Services Kimberly Karr-Warner spoke with Ms. Keller to follow up on the previous night's call. Ms. Warner requested that

Ms. Keller have the anonymous zoo employee contact The San Francisco SPCA directly so we could obtain a firsthand report on these allegations of abuse. In the meantime, SF/SPCA Officer Hart was dispatched to the zoo to check on the elephants and find out what information she could.

Officer Hart arrived at the zoo at 10 a.m. and spent some time observing the elephants in their outdoor yard. Their demeanor appeared calm. After checking around for a while, Officer Hart was told that she would not be able to speak with the elephant keepers at that time. She then left the zoo, but returned at 1 p.m. to attend the press conference held by Zoo Director Saul Kitchener.

At the press conference, Director Kitchener described how the keepers control the Asian elephants. He defended the use of the metal hook and hot shot, stating, "We have to use elephant hooks and other methods that may appear abusive because we are not dealing with puppy dogs and pussy cats."

On October 3, 1988, the anonymous complainant contacted Ms. Warner at the Society and repeated the information Ms. Keller had previously reported. This person described entering the Elephant House following the October 1 personnel injury incident after hearing the elephants roaring and screaming. The complainant claimed to have witnessed the Head Elephant Keeper and the Assistant Elephant Keeper repeatedly strike Tinkerbelle with an ankus and a stick. After a few minutes of observing this treatment, the complainant left. [NOTE: The Society's investigators later identified the "stick" to be a hot shot.]

SCOPE OF INVESTIGATION

In order to get an understanding of the current practices and protocols for handling the Asian elephants at the San Francisco Zoo, Society investigators interviewed 18 individuals who are either presently employed or involved at the zoo, or who have worked at the zoo in the past. These people have varying degrees of familiarity or involvement with the elephants (see Appendix B for a partial list).

Additionally, SF/SPCA Officer Knapp was able to observe the two primary elephant keepers at work during a morning routine in the Elephant House. At that time, he was also given the opportunity to visually examine Tinkerbelle close up to check for any physical signs of abuse.

To further assist the Society's investigation, eight outside elephant management professionals (see Appendix C for list) were consulted by our investigators. These individuals were interviewed for their opinions of what they consider to be appropriate and humane methods of caring for and handling Asian elephants in captivity.

Each of the individuals were helpful in providing us with information, answering our questions, allowing us to view their facilities and programs, and providing us with manuals and publications.

This report's findings, conclusion and recommendations are based on the information compiled by the Society's investigators during their five-week investigation.

BACKGROUND AND DEFINITIONS

According to the experts, captive elephants are the most dangerous animals in zoos and responsible for the greatest number of keeper deaths. From the professionals' viewpoint, elephants at many zoos do not get the resource commitment necessary to provide for their appropriate care. Yet most zoos want to have elephants to attract the public into their parks.

It is generally believed by the experts that, in order to effectively manage captive elephants, a keeper must establish **dominance** over them, thereby achieving a **tractability** of these large animals to the keeper's orders and commands.

A common tool used in elephant management programs for training and discipline is the **ankus**, or bull hook. The ankus is a stick or pole about 3 feet long with a sharp metal hook at one end and a wooden or metal handle at the other end. The metal hook end is supposed to be used to guide or direct an elephant's movements. For example, by gently hooking the back of an elephant's leg with an ankus, a keeper can get the animal to move forward. The hook is never to be used in such a manner as to puncture the elephant's skin.

According to the experts, the handle of an ankus is to be used to hit an elephant to enforce a verbal command that has not been obeyed. They believe that, in disciplining an elephant's errant behavior, a blow with the ankus handle to a specific area of the elephant's forehead where the skull is 6 inches thick and covered by about 2 inches of skin is least likely to cause injury to an elephant.

The **hot shot** is a much more controversial tool in elephant management. Similar to a cattle prod, a hot shot is a battery-operated, 2 to 2 1/2 foot long metal bar with two small prongs on one end which emit an electric shock. The professionals informed Society investigators that some, but not all, elephant handlers carry a hot shot. It was emphasized by the experts that a hot shot is only to be used in emergency situations where there is imminent danger that the elephant will harm itself, other animals or a person.

In the professionals' opinion, **chaining** an elephant's feet is another method used to control the animal. Captive elephants are oftentimes chained for safety reasons, particularly when they are being disciplined, undergoing medical treatment or receiving routine foot care. The elephants at the San Francisco Zoo are cross-chained with one front leg and the opposite rear leg tethered to the ground. The chains are long enough so that the animal still has some room to move and lie down.

INTERVIEWS WITH ELEPHANT KEEPERS

Society investigators first interviewed the Head Elephant Keeper on October 6 and the Assistant Elephant Keeper on October 8 in order to get their accounts of what transpired on October 1 during the incident in which Hedberg and Bocian were injured, and on how they subsequently disciplined Tinkerbelle.

The Head Keeper reported that she has worked with these Asian elephants for nine years, serving as Head Keeper for the last five years. She described her training as consisting of "hands on" learning from the previous trainers as well as attendance at four elephant management training seminars which are held for 2 or 3 days

each year at various zoos across the country. She also spent a month in Thailand studying their traditional methods of working with Asian elephants. Additionally, she stays in contact with other elephant trainers and keepers for consultation when she has problems.

She explained that there was not much written information readily available to her on the subject of elephant training or discipline. She thought there might be a kind of manual at the zoo that mentions elephants, but she had not seen it for years. She told Society investigators that, if there was such a document, she would not be able to locate it for them.

The Head Keeper stated that, prior to the October 1 incident, the zoo had no written protocols or safety policies available to staff regarding the elephants. She also admitted that she, herself, kept no written records on the daily care and handling of the elephants although she said she "probably should." She added that the veterinarian kept medical records. [NOTE: According to Society investigators, written daily records are kept on many of the other zoo animals by their attending keepers.]

The Head Keeper explained that she has been unable to get the support she needs from the zoo management regarding problems she has with the elephants and the need for facility improvements. She expressed her concerns regarding the insufficient number of keepers trained to work with the Asian elephants. She told us that she must come in on her day off to let the elephants out or otherwise they remain chained and confined in their indoor enclosures all day and night. She also indicated that she would like to have a shelter structure in the outdoor yard to protect the elephants from harsh weather conditions.

The Head Keeper described Tinkerbelle as a difficult animal to control. She explained that this elephant has always been "testy and erratic" and will always look for a window of opportunity

to test a keeper. She emphasized that "you don't ever turn your back on her [Tinkerbelle]" as she can be very dangerous. In contrast, the Head Keeper noted that the other Asian elephant, Pennie, rarely needs to be disciplined.

The Head Keeper was not at the zoo when the October 1 personnel injuries occurred and stated that either she or the Assistant Elephant Keeper "should have been there" when Hedberg was treating Tinkerbelle's abcess.

When asked if Hedberg may have done something while administering the treatment to have caused Tinkerbelle to become aggressive, the Head Keeper replied, "No, I think it [Tinkerbelle's action] was very deliberate. She [Hedberg] was already done treating the abcess when Tinker knocked her down. Everyone is forgetting who the real victim is here. Tinkerbelle knew what she had done was wrong and she deserved it."

Before describing her October 1 discipline sessions with Tinkerbelle, the Head Keeper told the Society's investigators about how a keeper must obtain dominance over her elephant charges. She stated that discipline is an important aspect in handling elephants to achieve that dominance.

For example, she explained how a matriarch elephant in the wild establishes dominance in the herd by hitting other elephants with her trunk, poking them with her tusk, and pushing them with her body. She noted that, in captivity, it is the keeper who must be the dominant one in the herd.

The Head Keeper explained that the two Asian elephants at the zoo have been trained over the years to respond to verbal commands and that these commands are usually followed. She also commented that there are times when an elephant will test a keeper. At that point, the keeper must assert dominance by giving the elephant a quick rap on the forehead with the handle of an ankus.

On October 1, the Head Keeper arrived at the zoo after receiving a call from the Assistant Elephant Keeper who had discovered the injured Hedberg and Bocian in the Elephant House. [NOTE: The Society's investigators estimate that the Head Keeper arrived at the zoo at least 45 minutes or longer after Hedberg and Bocian were injured.] She described entering the Elephant House where Tinkerbelle, still chained, was "doing headstands and acting aggressive."

Feeling the need to re-establish her dominance over the elephant at that point, the Head Keeper ran Tinkerbelle through the behavior routines at a very fast pace. When the elephant did not respond to a verbal command, the Head Keeper told our investigators that she hit the elephant with the ankus and used the hot shot a couple of times. She could not recall how many times she hit the elephant but said that there were two 20 minute sessions where she worked with Tinkerbelle.

When asked if the lack of immediacy in administering discipline after the accident confused the elephant, the Head Keeper replied that "Tinkerbelle still knew she had done something wrong." She went on to say that the intent of her disciplinary actions on the elephant that day were to "stress the animal out." When asked to define what she meant by "stress the animal out", the Head Keeper stated, "to the point of urination and defecation."

Following up on the interview with the Head Keeper, Society investigators spoke with the Assistant Elephant Keeper. She informed them that she has worked with the elephants for the last 2 1/2 of her nine years of association with the zoo, six of which were as a volunteer. She described how, at the beginning of her training, Tinkerbelle had tested her on two separate occasions by tossing her up against the wall.

On October 1, 1988, the Assistant Elephant Keeper had been taken out of the Elephant House to be

trained in the Lion House. She just happened to be walking through the Elephant House afterwards when she discovered Hedberg and Bocian. After getting help for her two injured coworkers, the Assistant Elephant Keeper called the Head Keeper at home.

The Assistant Keeper joined the Head Keeper in the Elephant House to help in disciplining Tinkerbelle. Her description of the discipline was vague. She stated, "We moved around her [Tinkerbelle] real fast, screaming and hitting her." She added that the hot shot had been used on Tinkerbelle at that time because "we were trying to scare her and stress her out."

A Society investigator later contacted the Senior Keeper of the Elephant House who declined to meet to discuss his management of the elephant program and his relationship with the two primary elephant keepers. In a brief telephone conversation, however, he stated that he has "no elephant background" and "cannot comment on what goes on at the Elephant House." He said that he does not meet with either the Head or Assistant Elephant Keepers, and his role is only to make sure that the elephants are handled by trained keepers.

MORNING ROUTINE AT THE ELEPHANT HOUSE

The interviews with the primary elephant keepers were followed up with a visit to the Elephant House to view the daily routine. The Head Keeper and Assistant Keeper were both present.

As soon as the doors to the Elephant House opened, the elephants began trumpeting loudly. As the two elephant keepers entered, the elephants began making low rumbling sounds which were described as happy sounds. At no time did

the elephants flinch or shy away from their keepers.

The elephant keepers spoke to the animals frequently, giving them pats on their legs and sides while having them line up so that the old bedding and waste could be removed. The elephants obeyed the verbal commands. The only correction that occurred during this session was a rap on Tinkerbelle's trunk to reinforce the "trunk up" command. The Head Keeper explained that she has the elephants keep their trunks up for safety reasons while the keepers are working around them.

The elephant keepers allowed SF/SPCA Officer Knapp to enter the enclosure that Tinkerbelle and Pennie were in. The elephants were then commanded to lay down so that Officer Knapp could examine them from head to toe.

Officer Knapp did not find any signs of puncture holes on Tinkerbelle's face although there was a tuft of hair just below a facial gland which, at a distance, could have appeared to be a hole or puncture. The officer could not see any evidence of physical abuse.

Officer Knapp also observed the elephant keepers as they flushed out Tinkerbelle's draining abcess with peroxide. [NOTE: This mouth abcess was the one which Veterinary Technician Hedberg was treating when she was injured.]

When asked how Tinkerbelle could have gotten the abcess in her mouth the elephant keepers said they did not know but guessed that it might have been caused by an acacia branch which the elephants are fed on occasion. [NOTE: When Zoo veterinarian Craig Machado was later asked about the abcess, he said that it could have come from anything in the elephants' yard. He noted that the abcess was not in an area where the ankus hook is normally applied.]

The elephant keepers bathed the elephants and then led them out to their yard. Officer Knapp was given a demonstration of the routine the elephants perform for zoo patrons on the weekends. The elephant keepers felt that these public demonstrations help in reinforcing behaviors which are necessary when the elephants receive examinations and blood tests, and general maintenance and treatment for foot care. The Head Keeper also expressed the desire to expand the elephants' routine to include demonstrations of traditional harnessing and hauling techniques. [Note: The Society's investigators felt that training the Asian elephants for harnessing and hauling demonstrations seemed unnecessary as these behaviors were not required for the administration of basic health care to these animals.]

INTERVIEWS WITH OTHER ZOO PERSONNEL

The Society's investigators spoke with other San Francisco Zoo employees and volunteers, present and past, who provided additional information regarding the handling of the Asian elephants (see Appendix B for a partial list).

During the course of these interviews, different people shared with the Society's investigators their specific concerns and opinions about the Asian elephant program.

Four of the keepers who had previously worked with the Asian elephants stated that they had witnessed the Head Keeper beat the elephants routinely. [NOTE: The Society's investigators interpreted the term "beat" to mean hitting the elephants with the ankus.] Another zoo employee who works near the Asian elephant exhibit was concerned for the animals' welfare because of hearing the elephants "roaring and screaming".

These keepers expressed concern that the Head Keeper was inconsistent in her handling of the elephants. [NOTE: The Society's investigators were unable to substantiate the charge of inconsistent treatment.]

Several of the keepers told the Society's investigators that they felt strongly that some of the routines the elephants are required to perform are inappropriate for zoo animals and the elephants should not be required to perform their behavioral routines for the public on the weekends. Most of the keepers who had previous experience working with the Asian elephants felt they had achieved enough control over these animals without having to force them to perform for the public's entertainment. [NOTE: The Society's investigators felt that only one of the demonstrated behaviors seemed unnecessary for basic elephant management purposes. This behavior consists of commanding the elephant to lift one front leg and its opposite rear leg simultaneously.]

Another area of concern to some of the zoo personnel with whom Society investigators spoke involved the chaining and confinement of the Asian elephants in their indoor enclosure for 16 hours or more each day. It was the general consensus among these people that the elephants could be left unchained in the Elephant House at night with chains only used during daily health checks. They did not accept the Head Keeper's explanation that the indoor chaining was necessary to prevent the elephants from falling into the dry moat. [NOTE: The Society's investigators were informed by the experts that, in their opinion, there are numerous reasons relating to safety and health that justify the chaining of elephants when they are confined indoors. The length of confinement, however, was of some concern to these experts.]

Some of the keepers interviewed felt that the elephants should not be deprived of water while indoors, since they are chained and confined for

16 hours or more. They believed that water was being used as "a reward in the morning to make them [the elephants] go out."

INTERVIEWS WITH OUTSIDE PROFESSIONALS

In addition to their interviews with the Head Elephant Keeper, the Assistant Elephant Keeper, the Senior Keeper of the Elephant House, and other zoo personnel, the Society's investigators consulted with eight elephant management professionals from around the country for their opinions and perceptions of the San Francisco Zoo's elephant management program and the specific concerns that had been expressed during the course of the Society's investigation (see Appendix C for list).

The experts stated that the goal of successful elephant management is to develop a mutual trust and understanding between the keeper and the elephant. This is developed through consistency in managing their behavior which is obtained through the keepers maintaining a long term, quality relationship with their elephants.

These professionals universally agreed that dominance of the keeper over the elephants is necessary to obtain the animals' tractability which allows foot care and medical treatment to be easily administered, helping to enable elephants to live long lives in captivity.

Discipline was considered by the experts to be an important aspect of a keeper's establishing and maintaining dominance over the elephants, although opinions varied as to the type and degree of discipline necessary to achieve tractability. They each stressed that the kind of and amount of discipline necessary to achieve this is based on the individual elephant and the

circumstances in which it is required to live.

All the professionals agreed that an ankus is standard elephant management equipment but that it must be used properly. They felt that using the hook end for direction and the handle for hitting the forehead or other specific areas on the elephant's body was warranted on those occasions where verbal commands need to be reinforced when they have not been obeyed.

The experts emphasized that keepers should be consistent in handling their animals, in administering both positive reinforcement as well as discipline when necessary. They admitted that there is no nationally established standard in elephant management for how many times or for how long a time an elephant should be disciplined. It was stated that, to be effective, discipline must be administered immediately after the animal has demonstrated aggression or misbehavior. [NOTE: The experts did not consider disciplining Tinkerbelle more than 45 minutes after the October 1 incident to be immediate.]

The professionals' opinions varied regarding the use of hot shots in elephant management. Some experts found a hot shot to be an easy tool to abuse since it is difficult to know how much electric shock is too much for the animal. A few of the experts felt that a hot shot has the potential to overexcite and confuse an elephant. Some experts stated that they do not use a hot shot at all, and those that do carry hot shots believe they should only be used in emergency situations when the keeper or another animal or person, or the elephant itself is in danger.

The experts defined disciplining an elephant as something done to maintain dominance. They felt that disciplining should be used to get the elephant to understand its submissive role but not to stress it out to the point of confusion. They explained that when an elephant is stressed and becomes confused, disciplinary actions serve no useful purpose because the animal is unable to

understand the commands.

The elephant professionals admitted that written management standards and protocols for handling elephants were lacking and that such information needed to be developed for use throughout the country.

The professionals felt that training elephants to accept being chained is a necessary and standard practice. Chaining helps to control an elephant when it needs to be examined for medical reasons or for routine foot care and bathing, or while being disciplined. In some cases, chaining is used for safety reasons to protect the elephant from physical harm in its environment or from other elephants. The experts did not object to the chaining of Tinkerbelle and Pennie in their indoor enclosure, although they admitted that 16 hours or more of chained confinement was less than desirable. They added that efforts should be made to decrease the chained confinement time.

Many of the experts felt strongly that access to water at night was not necessary. One expert described how "elephants in the wild go for days without water and sometimes travel up to 40 miles to get it." It was explained that elephants usually drink their required amount of water once a day but it was recommended that it be offered them at least twice a day. They felt that the San Francisco Zoo's watering program for the elephants was sufficient as it included a constant flow of fresh water into a wading pool in their outdoor yard which is scheduled to receive weekly cleanings. [NOTE: The Society's investigators were informed that, in addition to the available water in the wading pools, Tinkerbelle and Pennie are offered water at their twice daily feedings.]

The experts explained that providing water at night to the elephants was not a good idea because elephants play with the water getting their floor and bedding all wet which could contribute to foot rot problems .

FINDINGS

1. The San Francisco SPCA finds that the San Francisco Zoo has been derelict in its responsibility to provide an appropriately supervised, sufficiently staffed, adequately guided, properly supported, humane Asian Elephant Management Program.

The information obtained from our investigation has made it abundantly clear that there are serious deficiencies in the provision of management support for the Program. Such support is particularly lacking in the areas of supervision, resource commitment, and communication.

Also, there are only two primary elephant keepers and both have additional work to perform at the zoo each day outside of their elephant program responsibilities. The Asian elephants remain chained and confined indoors for 16 hours a day because of a lack of trained staff and staff scheduling problems. Sometimes, if the Head Elephant Keeper does not come in on her day off, the Asian elephants remain chained and confined indoors for what we consider to be intolerable periods of time (e.g., 40 hours).

Also, there are no written policies, protocols, procedures, or guidelines to assist the elephant keepers in implementing an established, humane program of Asian elephant care and handling. Additionally, zoo management does not require its elephant keepers to keep any written records or documentation which could assist in assuring that the Asian elephants receive consistent and fair treatment.

2. The San Francisco SPCA finds that the accident involving Hedberg and Bocian was predictable and could have been prevented.

Tinkerbelle's history of being a tempermental and difficult animal to handle was well known. According to the Head Elephant Keeper, this elephant continually challenges and tests those who administer to her needs. Yet despite this awareness of Tinkerbelle's behavior problems, there was no written rule which required that a primary, trained, experienced elephant keeper be present while another employee administered medical treatment to the elephant.

In our opinion, had such a safety rule been in place on October 1, a primary elephant keeper would have been present to control the situation and the personnel injuries could probably have been avoided. [NOTE: The San Francisco SPCA has been informed that some written safety rules were developed subsequent to the occurrence of the October 1 incident. We understand, though, that the requirement of having a primary elephant keeper present when an elephant is being treated was not included in these rules.]

3. The San Francisco SPCA finds that Tinkerbelle received inappropriate and excessive discipline on October 1 following the injuries to Hedberg and Bocian.

We are troubled that at least 45 minutes elapsed between the time of the incident involving Hedberg and Bocian and the time the primary elephant keepers entered the Elephant House with the intent of disciplining Tinkerbelle for her actions. The elephant experts we consulted with have told us that discipline, to be effective, must be administered immediately following an elephant's errant behavior. The hot shot was also used on Tinkerbelle during these discipline sessions in contradiction to the experts' consensus that such an electric shock device only be used in emergency situations to protect animals or people from imminent danger. It was

reported to us that the intent of the primary elephant keepers was to stress out Tinkerbelle for the behavior which caused the personnel injuries. We are upset with the use of this degree of force and disturbed that this may have caused Tinkerbelle to become confused which would negate the discipline serving any useful purpose.

CONCLUSION

The San Francisco SPCA concludes that the San Francisco Zoo's Asian Elephant Management Program reflects institutional neglect which has resulted in the inadequate care and the mistreatment of Tinkerbelle.

RECOMMENDATIONS

1. The San Francisco SPCA recommends that zoo management be required to develop an Asian Elephant Management Plan that includes long and short term goals for the humane care and handling of these special animals.

2. The San Francisco SPCA recommends that zoo management be required to develop and maintain detailed written policies, protocols, procedures and guidelines for their Asian Elephant Management Program with zoo management held strictly accountable for their implementation.

3. The San Francisco SPCA recommends that zoo management be required to immediately develop a comprehensive written safety program that includes rules and regulations to protect the elephants, zoo personnel and the public. And we recommend that this safety program include a requirement that a primary, trained and experienced elephant keeper be present when any type of direct care is administered to the elephants.

4. The San Francisco SPCA recommends that the elephant keepers be required to maintain daily records and documentation on the Asian elephants' care and handling to assist in assuring that these animals get consistent and fair treatment.

5. The San Francisco SPCA recommends that the zoo increase the number of primary trained elephant keepers in the Asian Elephant Program to ensure that enough time is given these animals to provide good care. Sufficient staffing for the care of the Asian elephants must take into consideration that a long term, quality relationship is needed between the keeper and the elephant to establish mutual trust.

6. The San Francisco SPCA recommends that the primary elephant keepers be required to receive more training and instruction than that which is received "on the job" and at a single 2 or 3 day seminar held once a year.

7. The San Francisco SPCA recommends that zoo management be required to provide far greater support for this important Asian Elephant Program and establish a clear delineation of responsibility and accountability for its operation.

8. The San Francisco SPCA recommends that the zoo immediately dedicate more resources to the Asian Elephant Program which would include furnishing the primary elephant keepers with expert consulting assistance to help them directly in correcting the problem behavior associated with Tinkerbelle's management.

9. The San Francisco SPCA recommends that the zoo take immediate steps to significantly decrease the amount of time that the elephants are chained and confined indoors and that a strict policy be established which requires that the elephants be left unchained and outdoors for at least ten hours a day.

10. The San Francisco SPCA recommends that a strict policy be enacted immediately which only allows a hot shot to be used in emergency situations where an elephant, a keeper or other animal or person is in imminent danger and which specifically prohibits a hot shot from being used to discipline an elephant.

11. The San Francisco SPCA recommends that senior zoo management be involved in immediate oversight of any discipline administered to the Asian elephants for aggressive behavior and that active, regular monitoring be required for the Asian elephants' discipline program.

12. The San Francisco SPCA recommends that the elephants only be required to learn and follow those behaviors which are necessary for administering to their medical and foot care needs.

13. The San Francisco SPCA recommends that the zoo provide an outdoor shelter in the elephant yard to protect the elephants from weather conditions as called for in the U.S. Department of Agriculture regulations.

14. The San Francisco SPCA recommends that the zoo not expand the Asian elephant herd until such time as the recommendations in this report are implemented.

15. The San Francisco SPCA recommends that the zoo, as a member of the American Association of Zoological Parks and Aquariums (AAZPA), request that this national professional accrediting organization set national standards for the humane care and handling of captive Asian elephants.

APPENDIX A

Tinkerbelle Profile

Tinkerbelle is a 22-year old female Asian elephant. She weighs approximately 6900 lbs. and stands 8 feet at the shoulders.

Tinkerbelle was born in Thailand in 1966 and was exported from Bangkok. She arrived at the San Francisco Zoo on September 23, 1968.

Tinkerbelle was initially trained by the San Francisco Zoological Society and spent one year at the San Francisco Children's Zoo. She was then moved to the San Francisco Zoo's Elephant House where she resides today.

APPENDIX B

The following is a partial list of present and former zoo personnel who were interviewed by Society investigators.

Tony Bila - animal keeper at SF Zoo for 16 years. Worked in Elephant House for 6 months. Currently the Assistant Head Keeper at SF Zoo.

David Bocian - animal keeper at SF Zoo for 4 years. Worked in Elephant House for 10 months.

Connie Channon - animal keeper at SF Zoo for 10 years. Assistant Elephant Keeper for 4 years. Currently the Head Elephant Keeper for the last 5 years.

Carol Cone - animal keeper at SF Zoo for 3 years. Worked in the Elephant House for 1 1/2 years.

Alan Fineberg - animal keeper at SF Zoo for 15 years. Senior keeper for 9 years. 4 years as Senior keeper of Elephant House.

Paul Hunter - animal keeper at SF Zoo for 9 years. Worked in the Elephant House for 2 years.

Dan Jackson - animal keeper at SF Zoo for 7 years. Worked in Elephant House for 1 year.

Pete McLaughlin - former SF zookeeper for 13 years. Worked in Elephant House for 6 months.

Vanna Peck - animal keeper at SF Zoo for 11 years. Worked with zoo's African elephants for 2 years.

Nancy Rumsey - animal keeper at SF Zoo for 3 years. Worked in Elephant House for 6 months.

Michelle Rudovsky - animal keeper at SF Zoo for 3 years. Assistant Elephant Keeper for last 2 1/2 years.

Joe Rusk - animal keeper at SF Zoo for 29 years. Worked Asian and African elephants for 5 years. Currently SF Zoo's Head Keeper.

Sylvia Stewart - former SF Zoo animal keeper for 4 years. Worked the Elephant House for 8 months.

Mike Sulak - SF Zoo Curator/Zoologist for 10 years.

Mike Wiler - animal keeper at SF Zoo for 23 years. Worked in Elephant House for 3 1/2 years. Worked with Zoo's African elephants for 1 year.

APPENDIX C

The following is a list of elephant management professionals consulted by Society investigators.

Dave Herbet - Captive Wildlife Specialist for the Humane Society of the United States. Head of HSUS Captive Wildlife Department. Degree in zoology from Colorado State University.

Loren Jackson - elephant keeper for 20 years at Oakland Zoo, Oakland, California.

Ken Kawata - Curator of Belle Isle Zoo in Detroit, Michigan. Zoo curator for over 25 years. Served on Ethics Board and on Animal Welfare Committee of the American Association of Zoological Parks and Aquariums (AAZPA).

Michael Keele - Assistant Curator of Washington Park Zoo, Portland, Oregon. Worked with that zoo's elephants for 5 years. Serves on AAZPA's Husbandry Standard Committee and on the Asian Elephant Propagation Group for the Species Survival Plan.

Don Meyers - Director of Jo Don Farms, Franksville, Wisconsin. Elephant trainer and keeper for 28 years. Elephant management consultant to zoos across the United States.

Alan Roocraft - Animal Training Supervisor at San Diego Wildlife Park for 6 years. Elephant keeper at Hagenbeck Animal Park in Hamburg, Germany for 10 years.

Dale Tuttle - Director of the Jacksonville Zoo. Chairman of AAZPA's Asian Elephant Species Survival Plan. Director of 3 other zoos over last 21 years. Worked directly with problem elephants for 16 years. Degree in zoology from Oklahoma University.

Ron Whitfield - elephant trainer for 18 years. Elephant/Cat trainer at Marine World Africa U.S.A. for 10 years.