

From,

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02. THE PRINCIPAL SECRETARY

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03. THE PRINCIPAL SECRETARY,

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Subject: Request seeking formulation and implementation of specific safety, risk assessment, and operational guidelines for Zoo Keepers, and Veterinary Staff in Zoos across India, in light of the absence of such protocols and recurring fatal incidents

I, Bhuvan M, a wildlife conservationist, researcher and member of various distinguished organisations dedicated to the preservation and safeguarding of wildlife and the environment in Karnataka, India and across the globe. I filed an application under the Right to Information Act, 2005, bearing Registration No. CZAUT/R/E/26/00013 before the Central Zoo Authority ("CZA") seeking certified copies of the safety protocol document, risk assessment and Standard Operating Procedures (SOPs) for staffs/, Veterinary, / Zookeeper to enter the animal enclosure for treatment, feeding or any other necessary reason.

In response, the Central Public Information Officer, CZA, *vide* communication dated 20-04-2026, has categorically stated that:

"No safety protocol document, risk assessment and SOP for staffs/Veterinary/Zookeeper to enter the animal enclosure for treatment, feeding or any other necessary reason is issued by this public authority."

The applicant was merely directed to refer to general guidelines available on the website of the CZA titled '*Guidelines for grant of approval by the Central Zoo Authority for establishment of new zoo under section 38H (1A) of the Wild Life (Protection) Act, 1972*' ("**Guidelines**"), which do not address the specific concerns raised.

This official admission unequivocally establishes that there exists no dedicated regulatory framework governing occupational safety, hazard mitigation, or risk management for zoo personnel, despite the inherently

hazardous nature of their duties involving close interaction with wild and potentially dangerous animals.

1) Repeated Fatal Incidents Demonstrating Absence of Safety Protocols:

At the outset, the absence of specific safety protocols, risk assessment frameworks, and Standard Operating Procedures (SOPs) for zoo keepers and veterinary personnel is not merely a regulatory omission but has resulted in repeated fatal incidents across zoos in India.

A review of publicly reported incidents clearly demonstrates a pattern of zoo personnel entering enclosures without proper safeguards, lack of supervision and protocol-based clearance, absence of animal isolation mechanisms prior to entry and inadequate training and emergency preparedness. These incidents are not isolated but indicative of a systemic and nationwide failure to institutionalise safety standards.

Table: Illustrative Incidents of Death/Injury of Zoo Personnel

State	Karnataka		
Sl. No.	Year	Location	Nature of Incident
1.	2012	Dr. Shivaram Karanth Pilikula Nisargadhama, Mangaluru	An animal keeper was hacked to death by a Tiger, when visited to inspect its health at night.
2.	2015	Bannerghatta Biological Park, Bengaluru	An animal keeper suffered serious injuries after two safari lions attacked him while he was on duty to assist in their vaccination.
3.	2017	Bannerghatta Biological Park, Bengaluru	Two white tiger cubs have mauled their keeper to death.

4.	2018	Sri Chamarajendra Zoological Gardens, Mysuru	A zookeeper lost two toes on his right leg after a crocodile attacked him while he was cleaning the water tank.
5.	2020	Sri Chamarajendra Zoological Gardens, Mysuru	An animal caretaker died after he was trampled and injured by a tusker, which he was taking care of during an unprovoked attack
6.	2026	Bannerghatta Biological Park, Bengaluru	A contract employee who has served at the park's rescue centre for over two decades, while shifting the leopard to an adjacent makeshift cage before entering the enclosure to begin cleaning when the animal suddenly thrust its paw through the iron mesh and clawed him on the cheek and neck.
7.	2026	Tyavarekoppa Tiger and Lion Safari, Shivamogga zoo	A trainee veterinarian died in a hippopotamus attack
State	New Delhi		
8.	2019	National Zoological park, New Delhi	An animal keeper was attacked by a Bengal tiger in the Delhi Zoo when he went to fill the water bowl of the feline.
State	Andhra Pradesh		
9.	2023	Nehru Zoological Park, Hyderabad	An animal keeper while cleaning the cage was killed

			after being thrown by a rogue elephant
10.	2024	Nehru Zoological Park, Hyderabad	An animal keeper escaped a gory fate in the nick of time while cleaning the lion enclosure.
11.	2023	Indira Gandhi Zoological Park (Vizag Zoo)	Animal keeper was mauled to death by a Himalayan black bear
State	Kerala		
12.	2021	Thiruvananthapuram Zoo, Keralam	A cleaner died after he was reportedly bitten by a king cobra.
State	Uttar Pradesh		
13.	2023	Lucknow Zoo	A zoo worker was killed and another employee injured after they were attacked by a hippopotamus while clearing its cage
State	Tamil Nadu		
14.	2023	Arignar Anna Zoological Park, Vandalur	A zoo keeper was grievously injured after being attacked by a hippopotamus
15.	2024	Kurumbapatti Zoological Park, Yercaud	A sambar deer gored an animal caretaker to death and another caretaker suffered injuries in the incident
State	Jharkhand		
16.	2024	Bhagwan Birsa Biological Park, Ormanjhi	A caretaker succumbed to his injuries suffered during an attack by a hippopotamus
State	Gujarat		
17.	2026	Greens Zoological Park (Vantara), Jamnagar	A veterinarian was found dead with a suspected head injury in the bathing pond meant for elephants

The above compilation is limited to incidents reported over the past decade and is

based solely on information available through media reports. It is likely that several similar incidents remain unreported or undocumented, thereby indicating that the actual extent of such occurrences may be significantly higher than what is presently reflected.

Although Rule 10, Sub-Rule (9) of the Guidelines requires every zoo to maintain a chart outlining the “duties and responsibilities” of staff at all levels, including their roles during emergencies, it falls short of prescribing scientific and preventive safety standards necessary to avoid such emergencies in the first place. Further, the provision does not lay down any structured procedures or protocols to be followed in the event of fatal or high-risk incidents. In the absence of a centralised and mandatory safety framework issued by the CZA, individual zoo operators are left to devise their own measures, often without adequate technical expertise. This results in inconsistent and inadequate safety practices, thereby exposing zoo personnel to significant risks arising from unpredictable animal behaviour.

2) Systemic Risks and Practical Problems Arising from Absence of Safety Protocols:

a) Unregulated Entry into Animal Enclosures

Currently, zoo personnel such as keepers, caretakers, and veterinarians are required to enter animal enclosures to perform essential tasks, including feeding, cleaning, and medical care, often within inherently dangerous environments. In most of these cases, these activities are carried out without standardised safety mechanisms that guarantee complete isolation of hazardous animals prior to human entry.

However, modern zoo safety systems, such as interlock mechanisms used in animal enclosures, demonstrate that such risks can be systematically controlled.

At Cheyenne Mountain Zoo in the United States, an innovative locking mechanism has been developed to eliminate errors in the locking and unlocking process by embedding safety directly into the system, ensuring that access is only possible when all conditions are met. Similarly, at Wildlands Adventure Zoo Emmen in the Netherlands, a trapped key interlock system is used in bear enclosures, where keys must be operated in a strict sequence so that one enclosure is fully secured before another can be accessed, preventing any overlap between keeper and animal presence. In addition, systems developed by Sensor Partners, also based in the Netherlands, are implemented across modern animal housing facilities, using sensors and interlocks to allow entry only after animals are securely isolated.

First, the animal is securely isolated in a separate enclosure, and only after the relevant door is fully closed and locked is the key released. This key is then transferred to another lock, allowing the next stage of access. Each step must be followed in order, and no stage can be skipped. The system ensures that keys are released only when locks are in the correct position, maintaining complete control over movement between spaces.

These examples demonstrate that safety can be effectively system-controlled, transforming high-risk manual tasks into secure and predictable operations through the implementation of an interlock system mechanism.

b) Absence of Risk Assessment and Hazard Classification

While Rule 10, Sub-Rule (26) of the Guidelines mandates daily record-keeping to track animal health and behaviour, these records serve

little practical purpose if they are not integrated into a safety protocol. Administrative tracking is insufficient if the personnel tasked with care are simultaneously exposed to high-risk animals without the protection of specialised equipment, adequate staffing, or standardised entry procedures. It is, therefore, pertinent to establish a mandatory risk-assessment framework and a suite of standardised protocols for various operational scenarios.

c) Working Conditions and Work Hours

It is submitted that the CZA has failed to discharge its statutory and regulatory responsibility by not prescribing any norms governing working conditions, duty hours, fatigue management, or shift regulation for zookeepers and veterinary personnel. This omission is particularly glaring in light of Chapter VII of the Occupational Safety, Health and Working Conditions Code, 2020, which explicitly recognises the critical importance of regulated working hours, rest intervals, weekly holidays, and leave as essential safeguards against workplace risk and human error.

The absence of prescribed limits on working hours, mandatory supervision protocols, or structured shift systems has created conditions where zoo personnel may be compelled to undertake high-risk tasks while fatigued, understaffed, or unsupervised. Such unchecked discretion inevitably leads to arbitrary and exploitative practices, placing personnel in situations where even a minor lapse can result in catastrophic consequences, including loss of life.

d) Special Provisions for the Safety of Women Personnel

The regulatory framework governing zoos fails to account for the specific safety requirements of women personnel, despite clear statutory safeguards under the Occupational Safety, Health and Working Conditions Code, 2020. Sections 43 and 44 of the said Code expressly provide that women may be employed in all establishments, including during hours

before 6 a.m. and beyond 7 p.m., only subject to conditions ensuring their safety, regulated working hours, and other protective measures. Additionally, it mandates that where employment involves hazardous or dangerous operations, the appropriate Government may require employers to put in place adequate safeguards prior to such employment.

However, in the context of zoo operations, which inherently involve high-risk interaction with wild and potentially dangerous animals, CZA has not prescribed any gender-sensitive safety protocols or safeguards. There are no guidelines addressing issues such as deployment of women personnel during high-risk hours, mandatory supervision, restricted solo entry into enclosures, or additional protective measures in hazardous environments. This omission is particularly concerning given that zoo duties often require close physical proximity to animals and may be carried out during early morning or late evening hours.

e) Absence of Emergency Response Mechanisms

There exists a complete absence of any mandated emergency response framework within the regulatory structure governing zoos. There are no central prescribed systems ensuring immediate medical response in the event of animal attacks or injuries, nor is there any requirement for the availability of tranquillisers, specialised rescue equipment, or trained backup teams to handle crisis situations. Equally, while Rule 10, Sub-Rule (9) and (10) of the Guidelines make a general reference to the requirement of a chain of command within zoos, the same is left entirely to the discretion of individual zoo authorities without prescribing any standardised incident management structure or operational framework for emergency coordination.

Further, the present framework does not mandate even basic infrastructural and operational safeguards necessary for emergency preparedness, such as:

- a) Installation and monitoring of full-time CCTV surveillance systems across enclosures and sensitive zones to enable real-time situational awareness and rapid response;
- b) Ensuring availability of trained personnel during night hours, including veterinary staff, response teams, and security, for immediate intervention in emergencies occurring outside regular working hours;
- c) Maintenance of on-site emergency equipment, including tranquilliser guns, immobilisation agents, protective gear, stretchers, and first-aid facilities;
- d) Deployment of protective measures for veterinary personnel, such as use of barriers, restraint mechanisms, sedation protocols, and supervised entry procedures before undertaking treatment inside enclosures;
- e) Clear protocols to address sudden animal aggression or attacks, including immediate isolation of animals, rapid deployment of response teams, and coordinated evacuation or rescue measures;
- f) Regular conduct of mock drills, simulation exercises, and emergency preparedness training to ensure that all personnel are aware of their roles and responsibilities during crisis situations; and
- g) Establishment of real-time communication systems and control rooms for coordinated response and monitoring.

Monitoring of zoo personnel and veterinary staff is equally critical as that of the animals, in order to ensure that human life is not exposed to danger or placed at undue risk in the course of zoo operations.

3) Strengthening Incident Reporting and Accountability:

CZA must establish a mandatory, centralised incident reporting system to ensure that all cases of injury, near-miss, and death involving zoo

personnel are systematically recorded and monitored. Such a system should take the form of a National Zoo Incident Registry, requiring all recognised zoos to report incidents within a prescribed time frame, supported by a standardised format for classification and documentation.

The CZA must prescribe a uniform investigation protocol to be followed in the event of serious incidents. This should include mandatory post-incident inquiries, root cause analysis, and identification of systemic lapses, conducted either by independent committees or designated authorities. The findings of such inquiries must not remain confined to individual zoos but should be documented, compiled, and disseminated across all recognised zoos.

The establishment of such a structured framework would ensure the creation of a reliable national database, foster accountability, and enable informed policy-making, while also preventing the recurrence of similar incidents.

In light of recurring fatalities and serious injuries involving zookeepers and veterinarians, it is imperative that every such incident is subjected to a time-bound, structured, and transparent inquiry, backed by uniform standards framed and enforced by the CZA. There should be preventive, remedial, and punitive mechanisms embedded within zoo governance.

Accordingly, it is proposed that immediately upon any incident of death or grievous injury within a zoo:

(i) An independent, multidisciplinary inquiry committee be constituted within 24 hours, comprising wildlife veterinarians, animal behaviour experts, safety engineers, and administrative officials, thereby ensuring technical and legal scrutiny;

(ii) A designated nodal officer be appointed to supervise the investigation, ensuring that it is completed within a strict timeframe of 30–60 days, with periodic reporting obligations;

(iii) The inquiry must mandatorily assess compliance with safety protocols, including enclosure design, animal isolation procedures, staff training, emergency response mechanisms, and the presence or absence of safety systems that prevent unsafe human–animal interaction;

(iv) The findings must be publicly disclosed and submitted to the CZA, which should maintain a centralised national database of zoo incidents, enabling pattern recognition, risk mapping, and policy intervention;

(v) where negligence or systemic failure is identified, departmental and penal action must be initiated against the responsible, treating non-compliance with safety standards as a serious breach of duty;

Additionally, the CZA under Sections 38C and 38D of the Wildlife (Protection) Act should impose penalties, suspend recognition, or restrict the operations of zoos that fail to comply with these standards, thereby ensuring enforceability. Such a comprehensive, guideline-driven approach would transform incident response from a reactive exercise into a system of continuous accountability and prevention, aligning zoo administration with constitutional mandates of safety, dignity, and ensuring that avoidable tragedies are addressed through institutional reform rather than post-facto acknowledgement.

4) Provision for Insurance and Welfare Measures:

The zoo personnel, by the very nature of their duties, are engaged in inherently hazardous occupations, yet there exists no mandated framework ensuring their financial and psychological security. In this

regard, it is imperative that provisions be introduced to safeguard the welfare and dignity of such personnel, in line with principles of occupational safety and labour welfare.

Accordingly, it is imperative that a centralised and enforceable framework be instituted to safeguard the welfare of zoo personnel, ensuring that such protections are not left to the discretion of individual zoo operators. This must include uniform and mandatory provisions for comprehensive life and health insurance coverage, hazard pay or risk-based allowances commensurate with the nature of duties performed, and access to mental health support, counselling services, and trauma care, particularly in light of the high-risk conditions under which such personnel operate.

Regulatory silence creates scope for inconsistent implementation and potential exploitation, with zoo authorities either diluting or neglecting essential welfare measures. Ensuring their protection is therefore not merely a matter of policy but a statutory and constitutional obligation, particularly in environments where occupational risks are both inherent and foreseeable.

5) Need for Formulation of Dedicated Safety Guidelines and Standard Operating Procedures (SOPs):

While the present Guidelines touch upon general aspects of zoo management, they do not specifically recognise or regulate the safety of zoo keepers and veterinary staff, nor do they prescribe any clear, enforceable, and standardised Standard Operating Procedures (SOPs) for high-risk activities.

In particular, there is a complete absence of detailed protocols governing feeding, cleaning, and enclosure maintenance, including safe

entry procedures, animal isolation mechanisms, and supervisory requirements. Similarly, no structured SOPs exist for veterinary intervention and animal restraint or controlled handling procedures.

It is important to note that the Central Zoo Authority (CZA), in exercise of its functions under Section 38C, sub-sections (a), (j) and (k) of the Wildlife (Protection) Act, 1972, is entrusted with the responsibility to perform such functions as are necessary to carry out the purposes of the Act. These purposes cannot be narrowly construed as being limited to animal welfare alone, but must necessarily extend to ensuring the safe, regulated, and humane functioning of zoos, which inherently includes the protection and safety of zoo personnel who are directly responsible for the care, handling, and management of such animals.

There are serious concerns highlighted herein, including the RTI response dated 20-04-2026 of the Central Zoo Authority admitting that no safety protocols, risk assessment frameworks, or Standard Operating Procedures exist for zoo personnel. The continued inaction, despite repeated fatal incidents and evident risks faced by zoo keepers and veterinary personnel, reflects a failure to take cognisance of ongoing and subsisting lapses in zoo management practices across the country.

THEREFORE, in the interest of ensuring the safety, dignity, and protection of zoo personnel, who are required to work in inherently hazardous conditions, the Member Secretary, Central Zoo Authority and the Secretary, Ministry of Environment, Forest and Climate Change are hereby requested to kindly take cognisance of the aforesaid regulatory gaps and systemic failures, and to initiate appropriate action under the provisions of the Wildlife (Protection) Act, 1972, including Section 38C,

Recognition of Zoo Rules, 2009, National Zoo Policy, 1998 and other enabling provisions.

It is further requested that necessary directions be issued to frame and implement comprehensive and enforceable safety guidelines, Standard Operating Procedures, and welfare measures, including mechanisms for incident reporting, emergency response, and regulation of working conditions, so as to ensure uniform compliance across all recognised zoos and to prevent recurrence of such incidents.

The Central Zoo Authority is requested to take appropriate action in this regard and to communicate its response within a period of 15 days from the receipt of this representation, failing which appropriate legal remedies may be pursued before the competent forum.

Place: Mangaluru
06-05-2026

Sri. Bhuvan M.

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