



Protecting primates and habitats worldwide

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ANIMAL WELFARE (KEPT ANIMALS) BILL – PRIMATES AS PETS

Wild Futures is the primate welfare and conservation charity (reg.no.1102532) with an international reputation for its work with primates, especially at its Monkey Sanctuary (founded in 1964) in Cornwall. This is evidenced by the Sanctuary being the only one in Europe to be accredited by the Global Federation of Animal Sanctuaries. Wild Futures is a founder partner and board member of the European Alliance of Rescue Centres and Sanctuaries (EARS), a network that supports and represents rescue centres and sanctuaries across Europe, enabling them to work together to achieve mutual animal welfare and conservation goals. The Director of Wild Futures has over 37 years' experience working with primates, NGO's and governments in the UK and abroad. She is a member of the Primate Society of Great Britain (PSGB) Captive Care Working Party.

Wild Futures very much welcomes legislation to protect the welfare of privately owned primates. This Bill is important as it represents a general cross party consensus that primates should not be pets as represented in the 2019 manifestos of several political parties. In addressing animal welfare the government educates and recognises that as a society we have certain ethical principles of what is morally acceptable.

However, we have serious concerns that the proposed licensing system will not achieve the stated aim of the government to "ban the keeping and trading of primates as pets".

The underlying principle of the Secretary of State's Zoo Standards and licensing system is that we as a society do not approve the keeping and breeding of animals in captivity without a conservation and educational remit. Zoos cannot keep animals for entertainment or hobby purposes only. If privately owned primates are to be kept and traded under licence to a zoo welfare standard, then the accompanying principles should be the same. This is widely recognised in Europe; personal gain or hobby are not sufficient justifications for the welfare compromises of captivity on a wild animal. We do believe that there is a need for a licensing system for genuine rescue and sanctuary. This would require clear definition and criteria.

Our concerns can be summarised as follows:

- That this will not be a ban but a way to license the trade. A licensing system will legitimise the trade.

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The Monkey Sanctuary and the Monkey Sanctuary Trust are trading names of Wild Futures

- That commercial trade and breeding will not turn off the tap of primates being kept as pets. (We understand that BIAZA is in agreement on this point and that commercial trade is unnecessary in their cooperation with private breeders and keepers.)
- That “zoo standard welfare” is too vague a term that will enable wide ranging interpretation and result in sub-standard welfare. Species specific guidelines based on the Animal Welfare Act 2006 and associated Code of Practice for the Welfare of Privately Kept Non-Human Primates are required.
- The transition period (max 24 months from legislation being passed) or grandfather clause simply pushes the rehoming issue down the line and there will not be capacity to deal with this.
- Wording around vets should be “competent veterinary surgeons” to ensure adequate expertise.
- Central coordination is essential as DWA licensing shows that LA’s do not have the knowledge or capacity to cope effectively. (The compromise could be that initial registration is done by the LA and all information passed to the central authority thereafter. This will offer more consistency, the use of appropriate expertise and the only way of tracking welfare when animals are moved, traded or pass away. Centralising information is the only way to monitor who, how many and where individual primates are kept. This is essential for coordinating the transition or grandfather clause).
- Leaving LA’s to assess quality of care/welfare could result in primates in a garden shed and aviary instead of in the living room – so clearer wording around justification and assessment for licensing is necessary. All assessments should involve a competent veterinary surgeon.
- Wild Futures asks that if any private ownership that allows trade and breeding is legitimised in law, then it is essential that it is only as part of a non-commercial contract with a BIAZA recognised captive care programme. Such contracts should be assessed as part of the individual zoo licence inspection of the zoo that has contracted the private owner.

Wild Futures has provided details of our concerns in our evidence as provided over several consultations and the more recent Call for Evidence.

We also detailed our concerns in a collaborative letter to Lord Goldsmith which was signed by a number of relevant stakeholders and primate experts. We will submit a copy of this letter for your interest.

Our minimum ask is that the amendments suggested by the RSPCA should be incorporated into the current Bill.

With thanks and appreciation for taking an interest in primate welfare,



Rachel Hevesi

Director