

BVA, BSAVA and BVZS response to Defra Consultation: Licensing of specialist private primate keepers in England

18 July 2023

Who we are

- 1) The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
- 2) The British Small Animal Veterinary Association (BSAVA) exists to promote excellence in small animal practice through education and science and is the largest specialist division of BVA representing nearly 10,000 members.
- 3) The British Veterinary Zoological Society (BVZS) is the specialist division of BVA dealing with exotic pets, free-ranging wildlife and zoo animals, and has over 400 active members. The membership includes registered veterinary surgeons and veterinary nurses working with these species at all levels, from those in general practice providing a service for herpetologists, aviculturists, aquarists and the owners of exotic pets including primates, to those working in animal sanctuaries, wildlife parks, bird gardens, zoos and aquaria, and with free-living wild animals.

Introduction

- 4) We welcome the opportunity to contribute to this consultation on the introduction of a specialist private primate keeper licensing regime in England, through regulations made under the Animal Welfare Act 2006. We hope these standards could become a model for the other devolved nations.
- 5) Our 2022 Voice of the Veterinary Profession survey found that over eight in ten vets (81%) were concerned that the welfare needs of non-traditional companion animals (NTCAs) were not being met, with the most cited welfare issues being 'irresponsible animal ownership' (82%), 'irresponsible breeding or sourcing' (11%), and 'lack of specialist veterinary care' (10%). Vets who treat NTCAs report that over half (58%) of the NTCAs they see do not have their five welfare needs met which are: the need for a suitable environment, the need for a suitable diet, to be able to exhibit normal behaviour patterns, to be housed with, or apart, from other animals, and to be protected from pain, suffering, injury and disease. Of those vets, around nine in ten (92%) said that the 'need for a suitable environment' was often not being met and over four in five (85%) felt that a suitable diet was often not provided. These findings suggest there is a need for more stringent standards for keeping non-traditional companion animals. However, these standards must be consistently enforced otherwise these issues and concerns are likely to continue.
- 6) Within the NTCAs group, primates are considered to have some of the most challenging needs to meet. They are long-lived, intelligent, socially complex animals and must be kept in appropriate social groups. Their needs are so specialised they can rarely be met in a domestic environment. We believe there should be a robust licensing system in place for private primate ownership to ensure their needs are met. These proposals are a step in the right direction. However, we urge the Government to continually engage with veterinary and zoological organisations and relevant NGOs to ensure the welfare and protection of these animals is at the forefront of any legislation relating to them.

Licensing standards and other requirements –

- Question 8: Do you consider that at least one inspection should take place every 3 years for a licensed premises?
- 7) We agree that at least one detailed and comprehensive full inspection should take place every 3 years for a licensed premises. It is important to note that any licensing regime involving more inspections may mean that some local authorities cannot comply whether by choice or by circumstance dependent on limited resources. Given this is also an England-specific set of standards, unless there are immediate plans to implement this in the devolved nations, then there

is nothing to stop keepers relocating to avoid the measures. Our suggested inspection timeframes consist of a “full inspection” every 3 years, with an appointed suitably qualified or competent external inspector in addition to the local authority, as well as an annual check or “interim inspection” which will be a quick review by the local authority for compliance and any notable changes which could then be escalated to a full inspection. This would be in-line with zoo licensing inspections, and we feel would enable the management of animal welfare issues whilst still being manageable for local authorities to meaningfully carry out.

- 8) For these standards to be adhered to for any inspection requirements put in place, it is important to ensure that there is veterinary capacity or a sufficiently trained or competent inspectorate to meet the increased demands. We would also suggest that given the term ‘specialist’ carries a specific meaning within the veterinary profession, using terminology other than ‘specialist’ to describe the individual/role mentioned is necessary to avoid confusion.
- 9) To assess the existing and required veterinary capacity to undertake inspections of kept “pet” primates, BVZS in conjunction with BVA undertook a veterinary survey in early 2022. The survey was completed by 106 respondents. 19 held “specialist in zoological medicine” level status, representing about half of current recognised RCVS specialists in the field in the UK. 58% of all respondents had, or were currently studying towards, some form of post-graduate veterinary qualification. Only 72% of respondents had actually treated a primate in any context (zoo, sanctuary, or pet) within the last 5 years, yet 90% of respondents felt confident and competent to be able to perform pet primate inspections should this be required in future; although 42 of those said this would be the case only if training was provided. 92% felt mandatory training was a good idea, however only 77% of these were interested in pursuing further training to inspect pet primates. It is important that any set of standards develops mechanisms to allow vets outside private practice with relevant expertise to contribute to the inspection process (i.e. contracting with zoos, which could have an added benefit of associating private owners with professional ones).
- 10) Respondents were asked several questions on how many times they have seen a pet primate in the last 5 year period. The findings are included in the table below:

Survey Questions	Number of respondents who said yes
Have you seen at least one pet primate in the last year?	43
Of those who have seen at least one primate in a year, have you seen more than 5 pet primates in a year?	8
Have you seen a pet primate in the last 5 years?	69
Have you seen a pet primate species aside from callitrichids?	19
Have you seen more than 10 species of pet primate in a year?	2

- 11) These survey results highlight that the pool of veterinary expertise dealing with primates in a pet-keeping environment in the UK is very limited, in comparison to more commonly kept exotic animal species. From these survey results it appears that very few pet primates are seen by vets annually, which is a serious concern for current pet primate health and welfare.
- 12) A further concern is that although pet primate husbandry requirements such as enclosures, diets and care may be elevated to “zoo standards” with the current proposals, as is currently the case with animals species kept under the Dangerous Wild Animals Act 1976, inspection and licencing of pet primates under the proposed standards may fail to include the more proactive animal welfare safeguards that are currently an integral part of the licensing application of the Zoo Licensing Act 1981.
These include:
 - regular ethics committee meetings and reviews
 - written animal welfare and ethics policies
 - detailed husbandry and behavioural records
 - regular proactive veterinary involvement
 - comprehensive preventative health programmes.

These encourage a proactive approach to positive animal welfare in primates kept in licenced zoos, versus the more reactive avoidance of negative welfare states afforded by application of the Animal

Enforcement and penalties –

- Question 9: Do you agree that local authorities should be supported by someone suitably qualified to assess primate welfare and keeping conditions?

13) We agree that local authorities should be supported by someone suitably qualified to assess primate welfare and keeping conditions. However, this does present a number of challenges. It needs to be made clear who will be the suitably qualified person. As demonstrated in the BVZS and BVA 2022 vet survey described above, it would be placing increased pressure on the veterinary profession if they had to undertake any additional work supporting local authorities to track or enforce the standards. While the survey makes it clear that there is currently insufficient veterinary capacity to support inspections, there is a willingness in the veterinary profession to undertake training to be able to do this. It needs to be agreed how these professionals will be trained and how this training and their role will be funded. There is a very limited pool of primate behaviourists and welfare scientists to draw on to help support this work, outside of those employed full-time in zoological collections, who would hence be unavailable for inspection work. It is also not clear what would count as suitable qualifications or selection criteria to appoint these individuals, as there are no formally recognised qualifications in place. While the Animal Behaviour and Training Council (ABTC) are developing a British and Irish Association of Zoos and Aquariums (BIAZA) training accreditation which may be helpful, this is likely to be too focused on animal training.

- Question 10: Who do you think is best placed to support local authorities in their inspections?

14) We would argue that ideally a suitably qualified or competent veterinary professional should support local authorities in their inspections such as those with a relevant certificate, who are an Advanced Practitioner holder, or a specialist or alternatively, where these have not been obtained, a vet who is competent and experienced. There are also certain para-professions who may have a degree of expertise when it comes to primates such as primate behaviourists and those who work with primates in a lab setting. However, vets holding an MRCVS receive a licence to operate by the RCVS which requires them to comply with mandatory CPD requirements. The expectation is that they comply with RCVS principles to engage in work only where they are competent to do so. We feel this demonstrates a workforce with prior experience subscribing to a set of legal standards representing a credible profession when it comes to supporting animal welfare. We do appreciate the additional pressures this may place on the veterinary profession and if this option is chosen then ideally dedicated training should be a mandated requirement to ensure those professionals that do carry out the inspections have an up to date and in depth understanding of supporting captive primates. In recognition of the limited pool of veterinary expertise available to carry out inspections and to manage resources, in instances where additional veterinary qualifications have not been obtained, the individual should be competent with up-to-date experience. The term 'competent' should be adequately defined to cover all options, for example as 'an individual who has relevant qualifications, training or experience'.

Penalties –

- Question 12: Do you feel that the proposed penalties for breaching a licence are proportionate?

15) Penalties should be proportionate to the offence and act as a suitable deterrent for those who might breach the legislation so protecting animal welfare. If FPNs were to be introduced, we would not wish them to be mis-used as a quick and easy approach that inadequately addresses breaches that seriously compromise animal welfare standards. Therefore, they should be accompanied by appropriate guidance regarding their application.

Record keeping –

- Question 14: Are there any additional records which should be kept, in addition to those listed above and those in the draft standards?

16) We agree that full details of the record keeping requirements for licensees proposed (as copied below) should form part of the licensing conditions to be laid out in secondary legislation, and that the keeper is required to keep an up-to-date register of all the animals kept under the licence. This

must record, for each primate: -

- Name, identification details (for example colour, markings, microchip number), species, sex, date of birth.
- Date of acquisition and source, with full address details (unless born on site).
- Date of rehoming and full details (name and address) of the keeper and location primate was moved to (if different), including details of the licence held by the new keeper (where relevant).
- Date of death (where relevant).

17) We would also suggest that that 'markings' are defined as including tattoos and that a record is maintained of the veterinary practice which the primate is currently registered with and any other practice with which the primate was previously registered. In addition, consideration should be given to animals having a written health care plan developed with the vet nominated for the care of their animals.

- Question 15: Is a 4 year record keeping requirement....?
Answer Options - (Too long, Just right, Too short)

18) If a 3 year inspection period was to be accepted, then 6 years of records (two inspection cycles) would be a logical period for record keeping.

- Question 16: As part of the identification details, should microchip identification be...?
Answer Options – (Required, Recommended, Not included)

19) We support microchipping as a safe, effective and permanent way to identify individual animals, ensuring the traceability of any primates kept under the new licensing scheme. However, microchipping would need to be carried out by a vet with adequate expertise in primate health and welfare to ensure appropriate handling, as well as to check for any existing microchip and ensure satisfactory placement of the microchip at insertion. Many zoo primates are anaesthetised for microchipping to facilitate safe placement and reduce stress so we would recommend this for pet primates also.

20) It is paramount that vets are not required to scan for microchips in primates at every presentation because doing so may cause additional stress for primates by requiring unnecessary physical handling, or possibly an x-ray to locate the microchip if it has moved.

21) It would be best practice for a vet to scan for a microchip on first presentation at the practice to make sure that the animal is correctly identified. However, as each case will be different, it is essential that vets are allowed to exercise their own professional judgement in these situations in order to safeguard animal welfare and public safety.

22) If the veterinary profession were required to play a role in enforcing primate keepers' compliance with microchipping requirements this may cause negative unintended consequences for animal welfare by compromising the vet-owner relationship. This crucial relationship is based on trust and confidentiality and if compromised could act as a disincentive to accessing veterinary advice and care, ultimately impeding the profession's primary responsibility to protect animal health and welfare.

23) We disagree with point 2 that details should be available to "all stakeholders". This information should only be made available to local authorities and their appointed inspectors, the keeper's veterinary surgeon, and other legal enforcement agencies. Otherwise, there is a risk of theft or persecution if subject to freedom of information act requests or similar.

Standards for privately kept primates

- Question 18: Do you agree that standards should be set for the following aspects of managing privately kept primates? • Nutrition • Environment • Veterinary care • Behaviours • Breeding • Handling and restraint • Transportation

24) We strongly agree.

Nutrition (Questions 19 & 21)

- Question 19: Do you agree or disagree that the standards ensure that specialist keepers provide captive primates with a diet that meets their physical and psychological needs?

25) Although we agree with most of the standards here, we do believe they have to be more flexible to reflect the broad range of primates and their specific needs. For example, the nutrition standards

outlined in this document would be very hard to transfer to zoo inspection standards. Under these requirements it would take several days to inspect primates in a medium to large size zoo. Monthly weighing of each individual is likely to be impossible in some circumstances, for example in a large troop of baboons, even in the best zoos, if those animals have not been trained for regular weighing. For example, if a squirrel monkey does not comply with being weighed on any assigned day for monthly weighing, these standards could be taken to imply the owner must catch the animal to weigh it, which is not in the animal's best welfare interests. It will also be hard to implement the recommendations for animals with specific dietary needs for medication. Elderly rescued animals may also not be able to cope with the mandated "best diet" after a lifetime of habituation to another diet, and being forced onto the diet could result in mental distress and even suffering, causing an offense under AWA if forced to comply with the standards, making this unenforceable. Primates may need an altered diet on veterinary recommendation for specific conditions, so there needs to be flexibility for these considerations.

- 26) In sections 16 and 17 it should be noted that dairy and meat products are not required as part of a primate diet. As well as the health risks associated with feeding meat, there is also the risk of disease transmission if raw or under cooked meat is fed. Some recommendations are simply based on other described diets that are not evidence-based.
- Question 21: Are additional species-specific requirements needed and if so, for which species?
- 27) Yes, in section 33 where some lemur species are susceptible to iron storage disease, as well as not providing iron supplements, it's also important to ensure that the range and combination of dietary ingredients (including pellet and produce) is carefully balanced for both iron and Vitamin C. Recommended daily levels can be found in relevant guidelines for these species.
- 28) Additionally, regarding section 9 where it says "Large pellets or rings are unsuitable for small species such as marmosets" this isn't necessarily true. Some zoos do feed large pellet rings to small primates because it gives them the opportunity to hold and manipulate the pellet, allows each individual within the group the chance to have their own share, and can help to prolong feeding time.
- 29) There needs to be further clarity in section 10 where it mentions the amount of fruit a primate needs to have per day. This has no scientific evidence basis, as although it is good to limit the quantity of fruit, fruit often isn't necessary to feed at all to most primates. Many zoos maintain their primates successfully on fruit-free diets. It can however be useful to include small quantities of selected fruits for training and medicating purposes, as stated in the standards. It may be more useful to say something along the lines of "fruit must not constitute more than X% of the total weekly diet" to prevent overfeeding of fruit which can result in serious welfare harms.

Environment

- Question 22: Do you agree or disagree that minimum enclosure dimensions should be included within the standards?
- 30) We do not agree that minimum enclosure dimensions should be included in the standards. Legally enforceable "musts" should be limited to overarching welfare needs and principles, rather than detailed specifications. Very specific recommendations such as enclosure sizes should only be "shoulds". Within these standards, enclosure size and design specifications are based on other documents or recommendations without any scientific basis for their establishment. They are also not consistent with the current housing and husbandry requirements for other situations such as the ASPA (Animals (Scientific Procedures) Act 1986) recommendations for laboratory primates. In section 119, many zoos do not have solid flooring in some of their outdoor enclosures and would therefore not meet these standards. We need more evidence of the clear positives that solid flooring would bring to primate welfare before supporting a standard that would require most primate keepers to make significant changes to their existing enclosures.
- 31) It is unclear in section 38 what house is being referred to when it says "enclosures must not be situated within the general shared living quarters of the house". If this is referring to the human keeper of the primate then it should be made more explicit.
- 32) In section 44 it says that the caregiver should only enter the enclosure when absolutely necessary. This appears wholly inconsistent with other recommendations elsewhere in the standards such as the need to weigh primates monthly – which would rely on regular training (far more frequently than monthly, ideally daily), and may require the keeper to be in an enclosure with the primate to operate and read scales, present a target or reinforcement item etc. This also

does not take into consideration those primates currently alive, or previously rescued, that have been hand-reared and have bonded to humans. There needs to be enough flexibility to ensure that these measures, when enforced, do take into consideration those primates that have an attachment to humans and will need to have some form of social contact with them to maintain their wellbeing.

- Question 23: Do you agree or disagree that the proposed dimensions provide sufficient space for each species of privately kept primates?
- 33)** Many of the dimensions proposed again have no evidence basis or are not currently in other established standards for captive primates. There are well established Callitrichid best practice husbandry guidelines published by the European Association of Zoos and Aquaria (EAZA), yet this document preferentially uses recommendations for enclosures from more obscure sources.
- Question 25: Do you agree or disagree that the proposed standards ensure that kept primates will have appropriate access to nest boxes, resting sites and platforms to support essential behaviours?
- 34)** It should be noted that all of the resting platforms and shelves need to have good drainage to prevent urine burns and also that alopecia at the base of the tail can occur if primates sit on flat surfaces too much.
- Question 28: Do you agree or disagree that the proposed standards ensure that specialist keepers provide primates with appropriate lighting within their enclosure to best promote optimal welfare?
- 35)** We would agree that UV is a necessary requirement for a primate enclosure only for those primates who need artificial UV light. Additionally, the specifications of setting up the light 40cm from the basking spot and a radiation level of 3 is not applicable to all primate animals. It will have to depend upon the size of the primate using the basking spot and the seasonal variations in lighting that some species need. The radiation level will vary depending on the distance from the light. This section requires more information on safety and a consideration for the differing factors between primates, meaning that these measurements are too prescriptive. New world species may clearly have higher UV requirements, while other species with good sheltered outdoor enclosures may not require artificial UV provision.
- Question 29: Do you agree or disagree that the needs of nocturnal species are adequately met?
- 36)** It is not clear why it says exceptions can be made for nocturnal species in terms of outdoor enclosures. We presume this is to enable nocturnal species to be maintained on a reverse light cycle to ease monitoring, feeding and assess for any signs of illness. If this is the case then this should be clarified. However, we believe that even where nocturnal species are maintained on a reverse light cycle, outside access should be provided.
- Question 30: Do you agree or disagree that the standards will ensure specialist keepers maintain a hygienic and safe environment for captive primates?
- 37)** The husbandry requirements for primate groups are complex, requiring enclosures large enough to prevent hierarchical stress as well as ensure robust construction. In addition, most primate species have such specialised UV-B, temperature, humidity, lighting, behavioural and dietary requirements to be taken into account, that we consider it extremely difficult to fulfil their basic welfare needs when kept as pets.

Veterinary care –

- Question 31: Do you agree or disagree that specialist keepers must be registered and obtain oversight from a specialist veterinarian?
- 38)** We agree with the premise of this question however there are inconsistencies in describing requirements for “specialist” veterinarians, and in other places “suitably qualified” veterinarians. We recommend “suitably qualified veterinarians” is used in compliance with RCVS guidelines. This document cannot mandate “specialist” veterinary care, as this title is protected in the UK by the RCVS. It would need to be written as “suitably qualified veterinarians” or “suitably experienced or

competent veterinarians". Most experienced primate vets are not legally "specialists", while other recognised specialists in zoological medicine may have no primate expertise and only work with birds, for example.

- 39) As mentioned above, a BVA/BVZS survey of vets seeing primates found that only 27 of 106 saw any of their pet primate owners in a given year, and only 9 saw more than half of their primate owning clients in a given year, raising serious concerns for the current health and welfare of primates currently kept as pets in the UK. These standards would need to ensure that more (all primate owners) are being visited by their vet for regular check-ins for their primates.
- 40) Consideration might need to be given to veterinary surgeons in clinical practice who don't come under the suitably experienced title, and how they should manage a situation where they are presented with an animal for which they deem welfare standards to be poor. It would need to be clear whether a vet who is presented with an animal can make the decision themselves on the basis of first principles or whether they would need to seek the advice of a vet competent (as defined) in the area of primate welfare.

- Question 32: Do you agree or disagree that the proposed standards address the primary health concerns that face captive primates?

- 41) We agree that the proposed standards go some way to address the primary health concerns that face captive primates, however we have a number of recommended changes to make. While 170 mandates that twice daily check are needed, followed by a number of assessments, it does not detail how these checks are recorded to ensure compliance can be inspected. It is presumed that a daily record book must be maintained, or similar computer records, to demonstrate compliance by keepers. A lot of zoos send primate postmortems to specialist facilities due to higher zoonotic disease risk so in section 166 it should not necessarily be for the local vet to carry out, unless suitable facilities are available. We do not see the need for including the long list of positive and negative behaviours in the standards in section 4. These appear to be guidance for the animal keeper rather than for local authority inspection and enforcement, and so appear irrelevant for inspection purposes. Self-harm as a behavioural sign of ill health should be included in section 229. Further clarity is required in section 175 where it mentions using body conditioning score and weight range for recording the weight of kept primates. Using these two slightly differing metrics could lead to inconsistencies as an animal may be in its species' healthy weight range but be outside their ideal individual body condition score range. Marmoset Wasting Syndrome should be included in section 177. The information around assessing pain in section 185 should also include pain scores such as facial grimace scores and welfare assessments. Psychological stress or poor welfare should be included under part 'a' of section 188 as a circumstance, that does not have to just be a disease or pain, whereby a vet may consider euthanising a primate.

Behaviour –

- Question 34: Do you agree or disagree that the standards demonstrate the importance of positive and normal behaviours?
- 42) We fail to see the relevance to inspection by local authorities of including the lists of behaviours in the standards. These should be clear to informed keepers and their veterinary surgeons, as well as inspectors. The lists themselves do not provide any inspection criteria – is primate demonstrating abnormal behaviour a reason to remove a keepers' licence? Or may this be a learned behaviour and coping mechanism in a now well-managed but previously traumatised rescued animal with good enrichment, social grouping and care?
- Question 35: Do you agree or disagree that the standards address the importance of identifying and addressing negative behaviours?
- 43) No – please see as above.
- 44) We suggest adding 'and table 2' to section 192.
- Question 36: Do you agree or disagree that the standards meet the requirements for the social needs of captive primates, including solitary species?
- 45) There needs to be an individual bullet point for 'ethically approved research' in section 197.
- Question 37: Do you agree or disagree that the standards demonstrate the important role of enrichment, as well as the need for enrichment to be species-specific and to be

monitored and changed regularly?

- 46) The role of enrichment could be expanded in section 222 to include more emphasis on the importance of enrichment evaluation.

Breeding –

- Question 38: Do you agree or disagree that hand-rearing by private keepers should only be permitted under exceptional circumstances?
- 47) We agree. As previously mentioned we believe the requirements to keep primates make it very difficult for a private keeper to support the animal's wellbeing effectively, and so the additional complexities of rearing primates, by hand or by supporting the mother, is something that would certainly require exceptional circumstances or someone who is actively involved in, and supported by, a conservation breeding programme.
- 48) If the intention is to prevent breeding of primates in non-specialist environments, careful consideration must be given to the most appropriate method of neutering or contraception to avoid the disruption social hierarchies and prevent the need to separate males and females, which could lead to solitary animals.
- 49) It is therefore crucial that any intervention to prevent breeding is determined on a case-by-case basis by the clinical judgement of a vet with appropriate primate experience, based on their assessment of the individual primate and their social structure.
- Question 39: Do you agree or disagree that the proposed standards highlight the importance of natural breeding, birthing, and rearing to allow infants to learn essential species-specific behaviours?
- 50) It would be useful to highlight, under point 'h' in section 229, the need for a plan for animals to be housed separately if there is a group breakdown. This is an issue that may present itself at any point in the rearing of primates. It is also important to note that where contraception is used, the method of choice (including various surgical and non-surgical options) can disrupt group dynamics and this needs to be reflected in section 241 of the standards.

Handling and restraint –

- Question 40: Do you agree or disagree that the proposed handling and restraint standards adequately protect the welfare of kept primates?
- 51) We agree that the proposed handling and restraint standards will adequately protect the welfare of kept primate animals however section 252 would benefit from more detail that focuses on training for handling and restraint because this is a very important area of primate care.

Transportation –

- Question 41: Do you agree or disagree that the proposed transportation standards adequately protect the welfare of kept primates?
- 52) We agree with the proposed transportation standards, however some areas require further clarity and detail. In section 280 it is not specified who is meant to provide prompt first aid or vet treatment. We also think a requirement for crate training should be included in the standards which will increase the confidence of those handling the primates and help reduce stress on the animal whilst it is being transported.

Feedback on the standards as a whole –

- Question 42: Do you have any additional comments on any potential unintended consequences that could arise as a result of the proposed Statutory Instrument and Standards?
- 53) As there is no current indication of any similar statutory instrument planned for Scotland, it is possible that some, mainly private primate keepers with larger numbers of animals, will simply relocate their animals to Scotland, circumventing the aims of this legislation in improving the welfare these animals.
- Question 43: Do you have any additional comments to make about the proposed Statutory Instrument and Standards?
- 54) The BVA, BVZS and BSAVA strongly support the licencing and inspection of privately kept

primates. All three associations believe that primates, as highly intelligent and social species do not make suitable pets or companion animals. Primates kept privately need their welfare protected by suitable licencing requirements. However, a real limitation will be the availability of those with suitable expertise, and how this expertise is assessed, to be appointed to help local authorities to undertake inspections to ensure that the standards are consistently and correctly applied. We believe that training will be mandatory for veterinary and local authority inspectors to ensure this.

- 55) We also recommend a clear transition period for the implementation of the standards. Some of these proposed changes are relatively minor, however some of the enclosure changes will require time and careful management in order to not adversely affect the primate's health and wellbeing.
- 56) It needs to be made clear whether licences will be for individual animals, which are reviewed when new animals are added to the group, or there will be licenses held for groups of primates.