Primates as pets in England
Consultation document

December 2020
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Introduction

- We are launching this consultation to seek your views on whether the Government should bring forward legislation to tackle the keeping of primates as pets in England. A primate\(^1\) is any member of the biological order Primates; this includes all the species commonly referred to as lemurs, monkeys and apes.

- In October 2019 Defra launched a Call for Evidence on the Welfare of Primates as Pets, which closed in January 2020. The Call for Evidence sought evidence about the number of primates kept as pets and their welfare, how they are acquired, and how any new restrictions might apply. Defra received over 200 responses to the Call for Evidence. The summary of responses document is published alongside this consultation.

- The Call for Evidence provided evidence of poor welfare among many primates kept as pets in England. Many respondents stated that existing legislation does not adequately protect the welfare of primates kept as pets. We received evidence of primates kept in bird cages and fed junk food, and the physical and psychological harm that this causes. The Call for Evidence revealed strong support for reform in order to improve the welfare of primates as pets.

- In response to the views expressed in the Call for Evidence, we are proposing the introduction of a new prohibition on keeping primates in England, backed by civil penalties, which will restrict breeding, acquiring, buying, gifting, selling, or otherwise transferring primates, apart from to persons licensed to keep primates to zoo standards.

- Such persons include, but are not limited to, zoo licence holders (a zoo licence is required if the premises are open to the public for seven days or more in a twelve-month period). Some primates may also be being kept in comparable conditions to those provided by zoo licence holders, but not in premises that are open to the public for this amount of time. We consider that the new prohibition should not apply to these individuals as long as they are indeed applying zoo-level standards. In order to establish and be reassured that this is so, we propose introducing a new ‘specialist private primate keeper’ licence, and suggest that the new prohibition would only not apply to primate keepers if they hold one of these new licences (or a zoo licence). The new licence would be introduced under new legislation and would only be available to primate keepers who provide for their primates’ standards of welfare equivalent to those required of zoo licence holders.

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1 “Primate” also includes humans but for the purposes of this consultation we are only concerned about non-human primates.
• We anticipate that a large number of primates are likely to be subject to the new prohibition (because they are not kept to standards that would enable the keeper to qualify for a zoo licence or for the ‘specialist primate keeper licence’). Given this and the limited capacity of primate rescue centres to cater for all such primates, we need to consider carefully how the prohibition will affect them.

• We propose that all primates not kept by licensed zoos or by persons holding the new form of licence should be registered with the relevant Local Authority and should have an initial Local Authority visit to determine the appropriate course of action for that individual primate. Some primates may be found to be living in conditions which meet their basic welfare needs but which fall short of zoo standards, or their basic needs could be met pursuant to a Local Authority improvement notice (issued under the Animal Welfare Act 2006). We suggest that, given the absence of other alternatives, these primates may continue to stay where they are for the rest of their lives or until they can be rehomed, subject to an annual vet visit (and associated Local Authority improvement notice where necessary). Their keepers would also continue to be prohibited from other activities (such as breeding, buying and acquiring new primates).

• Where a primate is experiencing suffering and cruelty, in ways which cannot be rectified with an improvement notice, it would need to be removed, with all efforts made to rehome it where feasible. It is possible that some of these primates may be in such a poor condition and have such limited chances of improvement that they cannot be kept any longer. Separate existing criminal offences under the Animal Welfare Act 2006 would apply where basic welfare needs are not being met, and where cruelty or suffering is found.

• These proposals do not affect the protections and other requirements and arrangements which already apply to persons holding a zoo licence under the Zoo Licensing Act 1981 or holding a Home Office ‘animals (scientific procedures) licence’ under the Animals (Scientific Procedures) Act 1986. Where ‘primate keepers’ or ‘primate keeping’ are referred to in this consultation document, the term does not include those keeping primates under either of these existing licensing regimes.

• Local Authorities would be responsible for applying and enforcing the new ‘specialist private primate keeper’ licence scheme for primates kept to zoo-level standards, and the new registration scheme for other primates, as is the case with much of the existing animal welfare legislation. We will be working with Local Authorities to determine how enforcement will be carried out and we will provide funding for any net additional costs.

• Animal welfare is a devolved issue and so these reforms would apply to England only. Defra is in the process of discussing with the Devolved Administrations whether they would be interested in introducing similar measures.
How and why we’re consulting

- The consultation sets out our core proposal and asks for views on whether it is the right approach. The consultation also asks for views on additional measures, and on suggestions relating to the practicalities of how new restrictions might apply.

- The findings of the consultation will help us determine which new measures to bring forward in legislation.

How to respond

- If you require a hard copy of this consultation, please address your request to:

  Consultation Coordinator, Defra
  2nd Floor, Foss House,
  Kings Pool,
  1-2 Peasholme Green,
  York,
  YO1 7PX

  Or email: consultation.coordinator@defra.gov.uk

- Please submit your consultation response using the online survey provided on Citizen Space (Citizen Space is an online consultation tool).

- Alternatively, please email your response to: AnimalWelfare.Consultations@defra.gov.uk

  or post your response to:
  Consultation Coordinator, Defra
  2nd Floor, Foss House,
  Kings Pool,
  1-2 Peasholme Green,
  York,
  YO1 7PX

- Responses should be received by 6th February 2020. This is an eight-week consultation.
Background

Existing laws relating to primates in England

- As with any kept vertebrate animal, the welfare of primates is protected by the provisions of the **Animal Welfare Act 2006** (AWA) which makes it an offence to cause any unnecessary suffering to a kept animal or to fail to provide for a kept animal's welfare needs. The maximum penalty for both of these offences is currently six months’ imprisonment\(^2\) and/or an unlimited fine. The Government is supporting legislation currently before Parliament that will increase the maximum sentence for causing unnecessary suffering to five years’ imprisonment.

- In addition, the statutory **Code of Practice for the Welfare of Privately Kept Non-Human Primates** (the Code), made under the AWA, provides keepers with information on how to meet the welfare needs of their primates, as required under the AWA. Whilst it is not an offence to breach the Code, a breach of the Code can be used as evidence in support of a prosecution brought under the AWA for breaching the AWA offences mentioned above, and compliance with the Code can be used to defend such a prosecution.

- Many primates are kept by persons holding a zoo licence under the **Zoo Licensing Act 1981** (the 1981 Zoo Act). The 1981 Zoo Act covers anyone keeping wild animals and exhibiting them to the public for seven days or more in a twelve-month period. Local Authorities are responsible for enforcing the zoo licensing scheme. Minimum welfare standards under the 1981 Zoo Act are provided under the Secretary of State’s Standards of Modern Zoo Practice.

- The **Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018** (the 2018 LAIA Regulations) require a Local Authority licence to be obtained for anyone wishing to exhibit a primate or other animal in England outside of premises holding a zoo licence, as well as anyone in the business of selling pet animals, including primates. The 2018 LAIA Regulations also require any businesses based in England which place adverts for pet animals to include their LAIA licence number in the advert, including online adverts.

- The **Dangerous Wild Animals Act 1976** (the 1976 DWA Act) regulates the keeping of certain non-domestic species of animals that are considered dangerous to keep in Great Britain. The 1976 DWA Act is mainly concerned with protecting people from dangerous animals, although there are some animal welfare requirements. Some but not all species of primates are listed under the 1976 DWA

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\(^{2}\) See s.32(5) of the 2006 Act
Act, and the full list of species covered is set out in the Schedule to the 1976 DWA Act. Owners of animals listed in the 1976 DWA Act must obtain a DWA licence from their Local Authority and must meet minimum safety and welfare standards.

- **The Animals (Scientific Procedures) Act 1986** regulates the use of animals in experimental or scientific purposes in the United Kingdom. Under the Act anyone using protected animals, including primates, for such purposes, and anyone keeping or breeding protected animals with a view to their use for such purposes, is required to hold a licence granted by the Home Secretary. These licences are referred to within this consultation as ‘animals (scientific procedures) licences’.

### Call for Evidence

- A Call for Evidence on the Welfare of Primates as Pets was published in October 2019 and closed in January 2020. The Call for Evidence sought evidence on the number of primates kept as pets; how they are acquired; the welfare of the animals; the effects of any restrictions and how they might apply, and; the potential impact of any restrictions on primate rescue centres and zoos. We received 215 responses to the Call for Evidence from a range of different groups and respondents. The summary of responses to the Call for Evidence is being published in full alongside this consultation.

- The Call for Evidence found that the number of primates kept privately (i.e. not subject to the 1981 Zoo Act and not subject to the 1986 Animals (Scientific Procedures) Act) is highly uncertain but most estimated figures are within the range 1,000-5,000.

- We received substantial evidence that some primates are being kept in domestic settings, akin to that of more traditional pets (such as cats or dogs), and that these conditions are often unsuited to the complex welfare needs of a primate and therefore detrimental to their health and wellbeing. We received evidence of primates kept in bird cages, fed inappropriate diets, and not provided with sufficient heat and light. We also received information relating to the physical and psychological harm that being kept in these conditions can cause, for example, bone disease, malnourishment and self-injurious behaviour.

- The majority of respondents to the Call for Evidence expressed support for reform, with the favoured option being restrictions on the private keeping of primates. Many respondents stated that existing legislation does not adequately protect the welfare of primates kept privately. There was also support for restrictions relating to sales and breeding.

- A ‘grandfather policy’ for primates currently kept privately was suggested by many respondents, as the number of such primates significantly exceeds the relatively small capacity across the primate rescue sector to take in additional animals. The
existing primate rescue centres already have waiting lists and are unlikely to be able to absorb all pet primates being kept below zoo standards. Some respondents felt that without a ‘grandfather policy’ (i.e. permission for current primates to be kept where they are, subject to particular conditions), it is difficult to imagine where else some current privately kept primates would go, or what might happen to them, if the requirements relating to privately kept primates are tightened.

- A number of responses highlighted the existence of private collections of primates kept by ‘specialist keepers’, with individuals keeping primates to a high standard of welfare. Some respondents argued that keepers who provide a high standard of care for primates should not be prevented from keeping primates, provided that the primates’ welfare needs are well met.
Consultation

Confidentiality

- A summary of responses to this consultation will be published on the Government website at: www.gov.uk/defra. An annex to the consultation summary will list all organisations that responded but will not include personal names, addresses or other contact details.

- Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details (e.g. home address, email address, etc).

- If you click on ‘Yes’ in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

- If you click on ‘No’ in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we won't make your personal name and private contact details publicly available.

- There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.

- This consultation is being conducted in line with the Cabinet Office “Consultation Principles” and be found at: https://www.gov.uk/government/publications/consultation-principles-guidance.
If you have any comments or complaints about the consultation process, please address them to:

Consultation Coordinator, Defra
2nd Floor, Foss House,
Kings Pool,
1-2 Peasholme Green,
York,
YO1 7PX

Or email: consultation.coordinator@defra.gov.uk

**Question 1: Would you like your response to be confidential?**

- Yes
- No

If you answered Yes to this question, please give your reason

**About you**

**Question 2: What is your name?**

**Question 3: What is your email address?**

**Question 4: Are you responding as an individual or on behalf of an organisation?**

- Individual
- Organisation

**Question 5: Which of the following best describes you or your organisation?**

Organisations

- Government organisation
- Animal welfare group
- Conservation group
- Primate rescue centre
- Primate breeder
- Zoo
- Veterinary
- University
- Membership organisation (please describe)

Individuals

- Academic
- Veterinarian
- Zookeeper
- Primate keeper
- Member of the public
- Other (please describe)

Banning primates as pets

- In this consultation the term ‘privately-kept primates’ refers to all primates not covered by the 1981 Zoo Act and not covered by the 1986 Animals (Scientific Procedures) Act.

- The Government proposes to introduce a new prohibition relating to privately kept primates in England, apart from those which are kept under licence to zoo-level standards. A separate section of this consultation covers exactly what is meant by keeping a primate to zoo-level standards.

- The new prohibition would apply to the stock of such privately-kept primates, i.e. to the activity of keeping a primate, and would also apply to flows into and out of the stock, i.e. to the activities of breeding, buying, acquiring, selling, gifting, or otherwise transferring primates (except to persons licensed to keep primates to zoo-level standards).

- We received substantial evidence from the Call for Evidence that some primates are being kept in domestic settings akin to that of more traditional pets (such as cats or dogs). We also received evidence of the physical and psychological harm that being kept in these conditions causes, for example bone disease, malnourishment and self-injurious behaviour.

- We propose that application and enforcement of the new ban should be undertaken by Local Authorities, as is the case with much of the existing animal welfare legislation. We will be working with Local Authorities to determine how enforcement will be carried out and we will provide funding for any net additional costs.
Question 6: Do you agree that the Government should introduce a new prohibition on keeping primates privately in England, which also applies to breeding, acquiring, gifting, selling, or otherwise transferring primates, apart from to persons licensed to keep primates to zoo-level standards?

- Yes
- No
- Don’t know

Privately kept primates kept to zoo-level standards

- We propose that the new prohibition on privately kept primates (i.e. those not subject to the 1981 Zoo Act and not subject to the 1986 Animals (Scientific Procedures) Act) should not apply to such primates where they are kept under licence to zoo-level standards.

- In particular, we propose that keepers of privately-kept primates that are kept to zoo-level standard should apply for a licence under a proposed new licensing scheme for ‘specialist private primate keepers’. This will include an inspection regime to ensure zoo-level standards are maintained.

- We propose that this new licensing scheme should be comparable to the zoo licensing scheme which operates under the 1981 Zoo Act. In particular, this new licensing scheme for ‘specialist private primate keepers’ would be subject to regular rigorous inspections to monitor the primates’ welfare. The system of inspection and licensing would be applied and enforced by Local Authorities, as is the case with much of the existing animal welfare legislation. Inspections would be carried out by qualified inspectors on behalf of Local Authorities. We are proposing that Local Authorities would have discretion as to the length of a licence, with the maximum length of a licence limited to six years for those providing the highest welfare standards for their primates. All licensed specialist primate keepers would be subject to annual inspections.

- Holders of the new ‘specialist private primate keeper’ licence would be exempt from the proposed new prohibition applying to privately kept primates. Licence holders would be able to keep and breed their primates, as well as to buy, acquire, sell, gift or otherwise transfer them, but only to other persons who are licensed to keep primates to zoo-level standards.

- We are proposing to set the welfare standards of a new ‘specialist private primate keeper’ licensing scheme at the level required of licensed zoos. This means that anyone wishing to keep a primate would need to provide the same level of welfare as a licensed zoo.
Question 7: Do you agree that the Government should use zoo-level welfare standards as the basis for a new ‘specialist private primate keeper’ licensing scheme?

- Yes
- No
- Don't know

Question 8: Do you agree that licence conditions relating to specific standards setting out how primates must be kept should include a requirement for primates to be microchipped as a means of permanent identification?

- Yes
- No
- No, another means of permanent identification should be used (please state)
- Don't know

Question 9: Do you agree that a system of inspection should apply to ‘specialist private primate keeper’ licence holders?

- Yes
- No
- Don't know

Question 10: Do you agree that Local Authorities should apply and enforce the system of licensing and inspection for ‘specialist private primate keepers’?

- Yes
- No
- No, another enforcement body (please state)
- Don't know

Question 11: Do you agree that Local Authorities should have discretion as to the length of a ‘specialist private primate keeper’ licence?

- Yes
- Yes, with a maximum period of six years for a licence
- No
- Don't know

Question 12: Do you have any other comments or suggestions regarding a ‘specialist private primate keeper’ licensing scheme?
Ongoing arrangements for existing pet primates that are not eligible for the ‘specialist private primate keeper’s licence’

- We propose that anyone subject to the new prohibition should first register their primate with their Local Authority and apply for the new ‘specialist private primate keeper licence’ if they meet the required zoo-level standards. However, there are likely to be significant numbers of primate keepers that are not able to provide the zoo-level standards that this licence requires. These keepers would be subject to the new prohibition, unless we put a transitional arrangement in place for their existing primates.

- The Call for Evidence found that estimates of the number of privately kept primates in England range from between around 1,000-5,000. The Call for Evidence revealed that rehoming capacity across the primate rescue sector is relatively small. We expect that it would not be possible to rehome all current primates that would be subject to the new prohibition.

- We propose that anyone wishing to keep their primate and not licensed to do so is subject to a transitional registration scheme enforced by Local Authorities. Keepers who register their primates with the Local Authority within a given fixed timeframe would not be subject to a penalty for breaching the new prohibition. The keeping of any primate after this initial registration deadline would, however, be subject to a penalty for breaching the prohibition.

- We propose that an initial visit by the Local Authority would assess how well the welfare needs of the primate subject to the new prohibition were being met. This assessment could be informed by the current Defra statutory Code of Practice for the keeping of primates.

- Where the basic welfare needs of a primate are not being met, the Local Authority may decide to issue an improvement notice (using existing powers under Section 9 of the Animal Welfare Act 2006) to address any shortfalls. We propose that the primate may continue to stay where it is for the rest of its life, unless rehoming opportunities arise, as long as improvement notices are implemented effectively in line with their stated deadlines. As above, the keepers of these primates would not be allowed to acquire new primates in any way (breeding, acquiring, buying, gifting, selling, or otherwise transferring primates except to those keeping primates to zoo-level standards), and hence the stock of such primates should naturally end after a period of time.

- There may be other cases where primates subject to the new prohibition are in worse conditions, experiencing suffering and cruelty in ways which cannot be rectified by means of an immediate improvement notice. The Local Authority may decide to remove these primates (using existing powers under section 4 of the
Animal Welfare Act 2006). We propose that all efforts should be made to rehome these primates where feasible. If this is not possible, including because the primate is in such a poor condition and has such limited chances of improvement that it cannot be kept any longer, it may need to be euthanized.

- We propose that those primates which have been registered with the Local Authority, and which the Local Authority has decided can remain where they are, should also be registered by their keepers with a veterinary practice and should be neutered and microchipped (if not already). Keepers must provide their Local Authority with proof of this, as well as proof of annual vet checks and their findings. Keepers of pet primates would bear the costs of all vet checks and procedures. They must also notify the Local Authority upon the death of the primate.

**Question 13:** Do you agree that anyone subject to the new prohibition must register their primate with their Local Authority?

- Yes
- No
- Don’t know

**Question 14:** Do you agree that there should be a fixed time period to register all currently held primates which are subject to the new prohibition, beyond which a penalty would apply in relation to primates which are subject to the prohibition?

- Yes
- No
- Don’t know

**Question 15:** How long should this fixed time period be?

- 12 months
- 24 months
- Indefinitely
- Other (please specify)
Question 16: Do you agree that, following an initial visit and assessment by the Local Authority, primates not subject to the new ‘specialist private primate keeper’ licence (or to a zoo licence) may continue to live where they are if their basic welfare needs are being met, or will be met subject to an improvement notice?

- Yes
- No
- Don't know

Question 17: Do you agree that the keepers of primates should have their primates micro-chipped as a means of permanent identification?

- Yes
- No
- No, another means of permanent identification should be used (please state)
- Don't know

Question 18: Do you agree that the keepers of primates not subject to the new ‘specialist private primate keeper’ licence (or to a zoo licence) should have their primates neutered?

- Yes
- No
- Don't know

Question 19: Do you agree that the keepers of primates not subject to the new ‘specialist private primate keeper’ licence (or to a zoo licence) should be required to register their primate with a veterinary practice?

- Yes
- No
- Don't know

Question 20: Do you agree that the keepers of primates not subject to the new ‘specialist private primate keeper’ licence (or to a zoo licence) should be required to have their primates examined by a vet at least once a year, with confirmation of that examination and its findings provided to the Local Authority?

- Yes at least once a year
- Yes, but with another time period between examinations (please state)
- No
• Don’t know

Question 21: Do you have any other comments or suggestions regarding the proposed arrangements for primates not subject to the new ‘specialist private primate keeper’ licence (or a zoo licence)?

Penalties and enforcement

• We propose that enforcement of the new restrictions should be undertaken by Local Authorities.

• In order to ensure compliance and properly enforce the new restrictions it will be necessary to have penalties that are effective and proportionate.

Existing powers

• Local Authorities have existing powers under the AWA to take action against those who (contrary to section 4 of AWA) cause unnecessary suffering to animals, and those who (contrary to section 9 of AWA) do not take reasonable steps to meet the needs of their animals to the extent required by good practice. Criminal offences apply to breaches of these requirements.

• Under existing legislation, Local Authorities may pursue prosecutions against offenders, and inspectors appointed by Local Authorities can issue an improvement notice with a deadline for compliance, prior to prosecution. These powers apply in relation to those responsible for any animal, including any primate, and would remain available. Post-conviction sanctions may include fines, disqualification from owning or keeping primates (and other animals), and/or a custodial sentence.

• Local Authorities could also rely on the existing powers available to their inspectors appointed under the AWA to take immediate steps if an animal was found to be suffering, and thereafter apply for a court order to take further steps, including the potential rehoming of the animal or euthanising of the animal in extreme circumstances.

Proposed new powers

• We propose that civil penalties should apply to people who are in breach of the proposed new prohibition applying to privately kept primates, including fines that reflect the seriousness of these offences.

• Given that many people currently keep primates privately and that doing so was not prohibited when they acquired their primates, we propose that, in relation to the activity
of ‘keeping’ a primate privately, civil penalties would not apply as long as the keeper registers their primate with their Local Authority within a fixed period of time, for example, within 12 months, and complies with the requirements related to registration.

- We propose that civil penalties, with fines, also apply to breaches of the proposed new ‘specialist private primate keeper’ licence.

- We propose to introduce a new power of entry that would allow Local Authorities and their appointed inspectors to enter a property, with a warrant, where they reasonably believe that an unlicensed primate was being kept without being registered with the Local Authority.

- We anticipate that the enhanced monitoring of primate-keeping set out in these proposals will result in improved visibility of the AWA requirements relating to primates, enabling appropriate action to be taken in cases of poor welfare that the Local Authority may not have otherwise been made aware of. We plan to work with Local Authorities so that they have clear guidance on what sanctions are available for dealing with those who are in breach of statutory requirements.

**Question 22:** Do you agree that a civil penalty is appropriate for breaches of the new prohibition applying to privately kept primates?

- Yes
- No
- Don’t know

**Question 23:** What is the maximum level of fine that you would consider appropriate for breaching the prohibition applying to privately kept primates?

- £1000
- £2500
- £5000
- Don’t know

**Question 24:** Do you agree that a civil penalty should apply to breaches of conditions of the new ‘specialist private primate keeper’ licence, together with the option of revoking the licence if the conditions are not met?

- Yes
- No
- Don’t know
Question 25: What is the maximum level of fine that you would consider appropriate for breaching conditions of the new ‘specialist private primate keeper’ licence?

- £1000
- £2500
- £5000
- Don’t know

Question 26: Do you think a new power of entry should be introduced to allow Local Authorities to enter a property, with a warrant, where they reasonably believe an unlicensed primate is being kept without having been registered with the Local Authority?

- Yes
- No
- Don’t know

Question 27: Should the requirement for a warrant to enter a property, where a Local Authority reasonably believes an unlicensed primate is being kept without having been registered, be limited to residential premises?

- Yes
- No
- Don’t know

Question 28: Do you have any other comments on penalties or enforcement?

Unintended consequences

- We would like to hear your views on whether there could be any unintended consequences of any of the measures being proposed or considered as part of this consultation.
Question 29: Do you have any comments on any potential unintended consequences that could arise as a result of any of the measures proposed in this consultation?

Evidence

- In order to ensure our policy making is effective, we need accurate and up-to-date information.

- We are constantly seeking to improve our understanding of the number of primates kept in England and the condition in which they are kept.

- We would welcome any additional quantitative information on primates kept in England that you are able to provide.

Question 30: Do you have any quantitative evidence on the number of primates kept outside of zoos and scientific contexts in England?

- Yes (Please provide data and detail how you know this)
- Don't know

Question 31: Do you have any quantitative evidence on the number of primate keepers in England and the average number of primates held by primate keepers?

- Yes (Please provide data and detail how you know this)
- Don't know