1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 16,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and 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 BVA’s Welsh Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Wales. The Branch advises BVA on the consensus view of the Welsh members on Welsh and United Kingdom issues.

3) Our response has been formulated in close liaison with the British Veterinary Zoological Society (BVZS), the specialist division of BVA recognised as having responsibility for the care and welfare of exotic pets, zoo animals and wildlife, and the British Small Animal Veterinary Association (BSAVA), which exists to promote excellence in small animal practice through education and science and is the largest specialist division of BVA representing over 10,000 members, as well as with input from our Policy Committee.

4) We welcome the Welsh Government commitment to prioritising animal welfare and to considering and protecting the welfare needs of animals kept by Mobile Animal Exhibits (MAEs).

General

5) Definition of MAEs
We recognise that MAEs are diverse in nature making them difficult to tightly define. The proposed definition of MAEs as ‘Individuals, groups, or commercial enterprises that travel to exhibit domestic and/or wild animals, for entertainment, therapy, educational and/or other purposes’ is necessarily broad and appears to be a pragmatic approach to encompassing a wide range of activity where animal welfare needs should be protected. As the definition is so broad it may be that the suggested figure of 53 MAEs in Wales is an under-estimate of the true scale and further consideration should be given to practicalities of implementation. For clarity it may be useful for Welsh Government to specify ‘all animals’ to ensure that the definition is not seen as meaning mammals only and thereby allowing some MAEs, such as falconry displays, to side step requirements. It may also be necessary to clarify that animals travelling for the purpose of competing in a sporting event or competition, or for recreational purposes would not normally fall within the scope of this definition.

Within the context of MAEs the considerations for domestic and wild animals will be significantly different as domestic animals will normally be easier to house and transport in such a way that takes into account their welfare requirements, and their interactions with humans will normally be less problematic from a welfare, and probably safety, perspective than interactions between wild animals and humans. Some raptors, such as those used in falconry displays are likely to have requirements that fall somewhere in between animals recognised as traditionally ‘domestic’ or ‘wild’. There will also be additional considerations with regard to the
status of dangerous wild animals within MAEs, particularly with regard to containment and public safety. It may be that dangerous wild animals should not be permitted in MAEs under any circumstances as it is unlikely that the MAE would be able to fulfil the requirements under the Dangerous Wild Animals Act.

6) Impact on attitudes towards animals
Any potential impact that MAEs may have on attitudes towards animals can only be positive when the way in which the animals in question are exhibited is appropriate, and reflects the five welfare needs in line with the specific requirements for that species and individual(s). MAEs should not portray animals in contexts that are inappropriate, or performing inappropriate behaviours, even if cultural norms have previously permitted this, and consideration should be given to the development of supporting guidelines. Animal training should be based on the most up-to-date models of species appropriate positive reinforcement, and must never be punitive. For many, MAEs may represent the only exposure they will have to particular species and it is therefore essential that exposure exemplifies good welfare if it is to serve any educational purpose. The development of respectful and responsible attitudes towards animals is not limited to children and young people, with many adults potentially benefitting from exposure to MAEs where good welfare is represented.

7) Conservation
Whilst we support the mandatory requirement for licensed zoos to undertake conservation measures, we do not believe that this will always be a reasonable expectation of MAEs. The focus of the majority of MAEs will be education, and conservation activities such as long term sustainable breeding and reintroduction are not likely to be realistic, or even desirable. There is also a risk that the conservation argument could be used to justify rarity or unusualness of exhibit species for its own sake or for commercial gain. We believe there is a very limited role for endangered species in MAEs and consideration should be given to regulation based on Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) listing or International Union for Conservation of Nature (IUCN) status. It may even be appropriate to ban some categories of endangered species within MAEs.

8) Health and safety
In order to ensure the health and safety of the animals involved and the public who interact with the MAE, regular and appropriate veterinary consultation is essential. MAEs should be required to demonstrate that the animals are under the care of a vet with appropriate expertise for the species. The vet will be able to work with the MAE to ensure the health and welfare of the animals but also to carry out risk assessment with regard to zoonotic disease (such as salmonella\(^1\)) and appropriate mitigation measures. Although the vet can offer advice, it should be clear that ultimate responsibility for health and safety remains with the exhibitor.

Licensing / registration
9) We believe that all MAEs should be licensed, with licenses granted following assessment in line with guidelines which are appropriate to the nature of the MAE in question and the species involved. Assessment should be based on provision under the five welfare needs and should extend beyond the mobile environment and encompass the home environment/supporting collection. The licensing system should be self-funding, with the fee charged to the MAE covering the cost of inspection.

Wild animals in circuses

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10) We have consistently supported a ban on wild animals in travelling circuses across the UK. We consider that the welfare of these animals is emblematic of the way we treat all animals under the care of humans, and that the welfare needs of non-domesticated, wild animals cannot be met within a travelling circus environment, with regard to housing and the expression of normal behaviour. As such we support the proposed ban in Wales. We would welcome confirmation that ‘wild animal’ will be ‘any vertebrate animal of a kind which is not normally domesticated in Great Britain’\(^2\) and that hand-reared individuals will not be excluded.

Welsh language

11) Although the effects of a licensing system on the Welsh language are somewhat outwith our remit, as a matter of principle a bilingual approach should be adopted in order to ensure that language cannot be used as an excuse for misunderstanding or failing to comply with welfare and licensing requirements.

Conclusion

12) In conclusion, we support the proposals to regulate MAEs and call on the Welsh Government to ban the use of wild animals in travelling circuses and license all MAEs based on appropriate assessment under the five welfare needs.

October 2017

\(^2\) Defra draft Bill Wild Animals in Circuses https://www.gov.uk/government/publications/wild-animals-in-circuses