



## RSPCA response to the Defra consultation questionnaire

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The answers below are the opinion of the RSPCA. You must answer the survey according to your own opinion. However, you may wish to refer to the answers below for guidance on some of the issues.

**1. Do you think that there are any species of wild animal which it is acceptable to use in travelling circuses? If so, which and why?**

No

**2. Do you think that a ban on the use of wild animals in travelling circuses is the best option to achieve consistently better welfare standards for such animals?**

Yes

**3. If a complete ban were introduced, how much time do you think travelling circuses should be given to stop using their wild animals?**

6 months

*Given the low number of animals involved and the various offers of help from animal welfare NGOs to help rehome them, the RSPCA believes that it is fair to allow travelling circuses six months to stop using wild animals.*

**4. If a complete ban were introduced, what do you think should happen to the animals at the time the ban becomes effective?**

Animals should be re-homed (for example, to a zoo or sanctuary).

*The RSPCA is committed, along with other animal welfare NGOs, to help circuses rehome wild animals to establishments that can provide a suitably high level of care. If circuses are not required to rehome prohibited animals, they may choose to simply keep them in their permanent premises (winter quarters) where conditions are a concern. Further, the government's original commitment included dealing with circuses' winter quarters as well as circuses on tour. Requiring circuses to rehome their wild animals would go a long way towards fulfilling this commitment*

**5. Do you think that travelling circuses should be prevented from obtaining any further wild animals?**

Yes

**6. If a complete ban were introduced, how often do you think travelling circuses should be inspected to ensure compliance?**

Every 3 months.

*Circuses should be inspected (unannounced) at least twice each season to ensure compliance, so every three months.*

**7. How do you think a complete ban on wild animals might affect the revenue of the travelling circuses affected?**

No change.

*The number of animals in travelling circuses in the UK has diminished over the years with no statutory restriction. Circuses could actually benefit financially by not using wild animals by appealing to a wider audience - polls have consistently shown that the majority of people believe the use of wild animals in circuses is unacceptable. Circus costs would also reduce in the event of a ban and animal-keeping staff could be moved to attend to domestic species, which would not be affected by a ban.*



**8. Do you think that wild animals from travelling circuses have skills which make them more suitable than other animals for work in the audiovisual industry?**

**Why?**

No.

*The RSPCA believes that animals held in circuses are not fundamentally different to animals of the same species in the wild or other captive situations. Other animal suppliers already provide wild animals, and of a much wider range of species, to the audiovisual industry. Furthermore, the industry has acknowledged circus animals are trained differently to those used in films.*

**9. Do you think that a complete ban on wild animals in travelling circuses could have an impact on other industries?**

No.

*The RSPCA has no reason to believe that a ban on the use of wild animals in circuses will negatively impact circuses or any other industry.*

**10. Do you think that travelling circus employees undergoing training would be an appropriate measure to help raise the standard of welfare of wild animals in circuses?**

No.

*The major problems faced by wild animals in circuses are due to the inability of a travelling circus to meet wild animals' animal welfare needs. Appropriate training would involve learning modern approaches to animal behaviour and animal welfare science. The RSPCA believes this would inevitably lead to a view that circuses are not able to fully meet the welfare needs of wild animals.*

**11. Do you think that travelling circus owners should have to produce , on demand, veterinary records for the wild animals performing in their circus?**

Yes

**12. Do you think that visits from an appropriately trained inspector would safeguard the welfare for wild animals in travelling circuses?**

No.

*Wild animals are likely to suffer in travelling circuses because they cannot cope with the social and physical environment the travelling circus provides. Therefore inspectors, trained or otherwise, cannot safeguard welfare.*

**13. If visits were required, what should be the minimum circus inspection frequency per year? Why?**

Every location.

*No amount of inspection will safeguard wild animal welfare in travelling circuses. If the government's preferred option involves inspection, then inspections must be at every location because each one is different. The situation is analogous to a zoo being erected every week, and yet zoos have to undergo meticulous scrutiny before they even go into business, and are then subject to inspection and licensing under the Zoo Licensing Act 1981.*

**14. Do you think that inspectors should undertake unannounced inspections of travelling circuses?**

Yes



**15. Do you think that a code of practice for keeping wild animals in travelling circuses could effectively safeguard their welfare? If yes, who do you think should write it?**

Other (please specify):

No code of practice could effectively safeguard the welfare of wild animals in travelling circuses unless it reduced travel to the essential purposes put forward by zoos and required circuses to meet husbandry, indoor and outdoor facility standards equivalent to those for zoos.

**16. Do you think that the hours and the environment in which animals travel should be restricted? If yes, what should these restrictions be?**

Yes (please specify):

The hours for and environment in which wild circus animals travel should meet zoo standards, and should be only for the same reasons given by zoos.

**17. Do you think that circuses themselves are best placed to regulate welfare standards for wild animals in travelling circuses?**

No.

**18. If self-regulation is supported, should a regulatory body be accredited by the United Kingdom Accreditation Service or an equivalent body (please state)?**

United Kingdom Accreditation Service

**19. Do you think the use of no more than 50 wild animals in travelling circuses merits action? If yes, what action?**

Yes (please specify):

The only action that can protect circus wild animal welfare is a ban on wild animals in travelling circuses.

**20. Do you think that there is an existing body that is appropriate to enforce any regulations on the use of wild animals in circuses? If so, which and why?**

Yes (please specify which and why):

Only one existing body appears appropriate to enforce any regulations on the use of wild animals in travelling circuses; the Zoo Licensing Inspectorate.