

Consultation on licensing of specialist private primate keepers in England

Wildlife and Countryside Link response: July 2023

Wildlife and Countryside Link (Link) is the largest environmental coalition in England, bringing together 75 organisations to use their joint voice for the protection of nature and animals.

Introduction

- In responding to this consultation, we would like to stress that no primates should be kept privately. The complex social, physical, behavioural, and environmental needs of primates means that they are wholly unsuited to be kept as pets. To do so causes unnecessary animal suffering.¹ We are opposed to the primate trade, whether licenced or not, as trade is complicit with breeding, exhibition and further trade for profit. A total ban on private possession of primates, with a grandfather clause for existing animals and exceptions for genuine sanctuaries looking after the remaining primates, is needed decisively end this harmful practice.
- However, in the absence of such a ban, the restriction of primate ownership to persons licensed to keep primates will represent a step forward, if licensing standards are ambitious enough to achieve significant improvements in kept primate welfare.
- Overall, we believe that these licensing standards consulted on will be sufficient to increase the welfare of privately kept primates.
- Given the delays that have held back this policy since 2019, and the withdrawal of the Kept Animals Bill, it is important that the new licensing system is swiftly implemented. Defra must adequately resource the rollout, enforcement and monitoring of the new licensing system in order to ensure its success.

Responses to consultation questions

Question 8: Do you consider that at least one inspection should take place every 3 years for a licensed premises?

We strongly agree. Ambitious standards will only improve the welfare of privately kept primates if they are properly enforced. Regular inspections are a pre-requisite for good enforcement.

Defra must ensure that local authorities are sufficiently resourced to carry out and properly record inspections. Sensible recommendations for resourcing similar licensing schemes can be found in the All Party Parliamentary Group for Animal Welfare's 2022 report "*Improving the Effectiveness of Animal Welfare Enforcement*".²

Question 11: If you agree that suitable support should be provided, how might this be identified?

Inspectors should be drawn from an identified pool of recognised, independent experts who are able to assess the welfare conditions of primates in captivity to a consistently high level.

¹<https://www.researchgate.net/publication/23689328> The Welfare and Suitability of Primates Kept as Pets

² <https://apgaw.org/wp-content/uploads/2022/08/Improving-Animal-Welfare-Enforcement-Report.pdf>

Local authorities do not have the necessary resources or expertise to identify such experts. As such a central list of experts should be compiled, maintained, and made available to local authorities by Defra. Members of Wildlife and Countryside Link would be happy to advise on experts who could feature on such a list.

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

We disagree.

Keeping a primate without a license following the introduction of the new system could result in unnecessary animal suffering. Significant penalties should be available to sanction this and deter further offending. The sentences contained within the Animal Welfare (Sentencing) Act 2022 should apply.

Question 16: As part of the identification details, should microchip identification be Required/Recommended/Not included.

Microchip identification should be required, but with the ability to grant exemptions on welfare grounds. Where it is deemed not to be in the best interest of the health or welfare of the animal in question, alternative agreed and defined identification methods should be implemented.

Microchipping should contribute to a nationwide primate database, to be maintained by Defra and accessible by all veterinarians. This will help to monitor the population of privately kept primates and allow information on the health of this captive population to be analysed.

All records, from microchipping to ownership information, relating to privately kept primates should be uploaded and stored on this centralised nationwide primate database. This will enable the Government and other stakeholders to monitor the scale and scope of species kept under license at any moment in time.

Question 17: Do you agree or disagree that the penalties under the AWA are suitable to enforce non-compliance with the licensing scheme and standards?

Primates can cost many thousands of pounds³, as such unlimited fines and custodial sentences are required to provide an adequate deterrent to sellers and keepers tempted not to comply with the new rules.

Question 18: Do you agree that standards should be set for the following aspects of managing privately kept primates?

We strongly agree. A comprehensive set of standards, covering all aspects of their captivity, are required to drive up the quality of life experienced by privately kept primates.

³ <https://www.rspca.org.uk/documents/1494939/7712578/Do+you+give+a+monkey%27s.pdf/6872c3ae-8bbd-9dd4-f26d-eb48fc8bbbee?t=1553169391718>

Question 22: Do you agree or disagree that minimum enclosure dimensions should be included within the standards?

We strongly agree. Space is an essential criterion for primate welfare and minimum enclosure dimensions are required to maximise welfare in captivity.

Question 23: Do agree or disagree that the proposed dimensions provide sufficient space for each species of privately kept primates?

During winter months, many primates will effectively be confined to their indoor enclosure. As such indoor enclosures should meet 100% of the total space requirement, rather than the 20-50% currently specified. The outdoor enclosure should also meet 100% of the total space requirement on its own account.

There is a further omission in this area. There is no mention of back-up/reserve enclosures, that should be available for mitigation in any conflict or harm scenarios. The guidance talks about separating individuals urgently in cases of conflict, but it is imperative that as part of the mentioned "mitigation plan" for this scenario, that adequate surplus housing is available if needed to allow separation to take place. Currently this is not addressed.

Question 26: Do you agree or disagree with the temperature requirements in the proposed standards?

We agree with the temperature requirements.

We would however propose one addition to the section on temperature requirements for New World Monkeys. The standard should specify that New World Monkeys in outdoor enclosures need heated areas when the ambient temperature falls below 15.6°C (adjusted for windchill).

Question 31: Do you agree or disagree that specialist keepers must be registered and obtain oversight from a specialist veterinarian?

We strongly agree. Defra should consider facilitating new training resources for veterinarians, to grow the pool of professionals with the right knowledge to advise on primate care. Demand for these skills will increase with the new licensing regime.

Question 38: Do you agree or disagree that hand-rearing by private keepers should only be permitted under exceptional circumstances?

We disagree. The captive breeding of privately kept primates will only perpetuate the current trade and keeping of primates and serves no conservation purpose. The new licensing system cannot give the green light for private primate keeping in perpetuity.

Any exception should only be justified on welfare grounds, where a full impact analysis has shown a welfare case for breeding in a particular instance.

Question 41: Do you agree or disagree that the proposed transportation standards adequately protect the welfare of kept primates?

We agree that the proposed transportation standards adequately protect the welfare of kept primates.

We would however stress that transport of primates should not be occurring unless for urgent veterinary care. By permitting regular transport it implies animals are being used for more than just private keeping, potentially for breeding or exhibition purposes. We see no need for animals to be transported other than for treatment. The standards should stress that transport should be limited to that required for urgent care.

This response is supported by the following Link members:

Born Free
FOUR PAWS UK
RSPCA
Whale and Dolphin Conservation

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18 July 2023