

Online Safety Bill: Animal cruelty & wildlife trafficking content Briefing for Lords committee stage

This briefing is on behalf of nature and animal welfare coalition Wildlife and Countryside Link ([Link](#)), with support from other animal welfare and anti-trafficking organisations, ahead of Lords committee stage of the Online Safety Bill ([due](#) to run from 19 April to 11 May). It sets out the case for a tabled amendment to schedule 7 of the Bill, proposed by Lord Stevenson of Balmacara and the Lord Bishop of St Albans, which would include content showing animal cruelty within the scope of the Bill. It also proposes the addition of wildlife trafficking offences to schedule 7.

Online animal cruelty: A growing problem

The growth of social media sites over recent years has provided opportunities for people who hurt animals to share footage of animal cruelty, and to monetise it.

The Social Media Animal Cruelty Coalition (SMACC) compile regular reports¹ on the prevalence of animal cruelty content on social media². Their database comprises over 13,000 social media links showing animal abuse, collected since March 2021. Their latest analysis shows from 3251 links, 1,703 remain live as of 22.02.2023.³ The content posted ranges from dressing animals up in clothes and making them perform, to the deliberate torture and killing of animals.

70% of the content features primates, including some of the most violent material. Action for Primates research has found social media channels offering viewers the chance to have 'their' monkey tortured to their specifications, with provision of the resulting video to the paying viewer.⁴ Dogs and cats feature in 8.2% of footage reported to SMACC. Case studies from SMACC can be found in the appendix to this briefing.

SMACC have found that social media platforms often fail to remove animal cruelty videos when reported, despite clear contravention of platform policies - less than 50% of links reported by the coalition since 30 August 2021 have been removed (47%).

As a result of this combination of monetised content and lax moderation, SMACC warn of a 'rapid proliferation' of animal cruelty footage over the years ahead. This analysis is supported by separate data

¹ See published SMACC reports here:

<https://www.smaccoalition.com/smacc-report>

<https://www.smaccoalition.com/wild-pets-report>

<https://www.smaccoalition.com/teasing-report>

² SMACC define animal cruelty as:

"a range of human behaviours, performed intentionally or unintentionally, that cause animals harm or suffering which may be immediate or long-term, physical or psychological."

³ https://docs.google.com/document/d/1niHh_zpkIR4uvWS7lnNU02D3hNGoMUKIZdpCb3WH1dQ/edit

⁴ https://actionforprimates.org/public/afp_social_media.php

from the RSPCA, who received 756 reports of animal cruelty on social media in 2021, compared to 431 in 2020 and 157 in 2019.⁵

Online animal cruelty: An omission from the Online Safety Bill

The primary aim of the Online Safety Bill is to protect children from harmful online content. Animal cruelty content causes harm to the animals involved and crucially to the people who view it – especially children.

Polling commissioned by the RSPCA in 2018 found that 23% of 10–18-year-olds had seen animal cruelty on social media sites⁶, a proportion that is likely to have subsequently increased given the prevalence animal abuse videos in recent years. Such viewing acts of cruelty towards animals can cause psychological harm to children. A study published in 2017, found that *“there is emerging evidence that childhood exposure to maltreatment of companion animals is associated with psychopathology in childhood and adulthood”*.⁷

Viewing animal abuse at a young age can also lead to imitative behaviour. 2018 research suggests that children who witness animal cruelty are 3–8 times more likely to abuse animals themselves.⁸ In the words of an earlier study (2006), *“witnessing animal abuse normalizes the behaviour for the observer, potentially translating to a perception that such acts are socially acceptable”*.⁹ In addition, there is growing evidence from the Canadian Centre for Child Protection, an organization which tracks the spread of child sex abuse material (CSAM) online, that young people who view animal abuse on social media often graduate to viewing CSAM.¹⁰

Children who witness animal abuse are at greater risk of becoming abusers themselves¹¹, harming animals and ruining lives.

As such, the omission of animal cruelty from the list of content areas online providers are required to protect children from, as part of the illegal content duties conferred by the Bill, is hard to justify.

Over recent months, the Government has added a considerable number of content areas to the Bill, from content associated with the proceeds of crime, to content that assists illegal immigration. Whilst the case for these additions does not concern this briefing, it is difficult to argue that animal cruelty content causes less harm to those who view it.

Indeed, at previous stages of the Bill, Ministers provided assurances that they would closely consider the case for bringing animal cruelty content into scope. In response to a series of animal welfare

⁵ <https://www.rspca.org.uk/-/news-reports-of-animal-abuse-doubled>

⁶ https://www.rspca.org.uk/-/16_10_18_genkind

⁷ <https://www.sciencedirect.com/science/article/abs/pii/S0145213417303356?via%3Dihub>

⁸ https://www.researchgate.net/publication/329457813_Animal_cruelty_pet_abuse_violence_the_missed_dangerous_connection

⁹ <https://www.animalsandsociety.org/wp-content/uploads/2016/04/thompson.pdf>

¹⁰ <https://protectchildren.ca/en/resources-research/bestiality-in-case-law/>

¹¹ <https://www.animallaw.info/article/link-cruelty-animals-and-violence-towards-people>

amendments at Commons committee stage from Shadow Minister for Digital, Culture, Media and Sport, Alex Davies-Jones MP, then Bill Minister Chris Philp MP said:

“The shadow Minister raises important issues to do with animal cruelty. The whole House and our constituents feel extremely strongly about this issue, as we know...It is an area that I am sure is of concern to Members across the House, and now that the shadow Minister has raised the question, we will certainly give further thought to it.”¹²

Similar assurances were given at Commons committee stage, when then Bill Minister Damien Collins MP acknowledged that the inclusion of animal cruelty content in the Bill “deserves further consideration as the Bill progresses through its parliamentary stages”.¹³

The time for that further consideration is now. In the words of Alex Davies-Jones MP when presenting her amendments at Commons committee:

“Placing obligations on service providers to remove animal cruelty content should fall within both the spirit and the scope of the Bill. We all know that the scope of the Bill is to place duties on service providers to remove illegal and harmful content, placing particular emphasis on the exposure of children. Animal cruelty content is a depiction of illegality and also causes significant harm to children and adults.”

Addressing the omission: The Stevenson amendment

The amendment¹⁴, tabled by Lord Stevenson of Balmacara with support from the Lord Bishop of St Albans, would add offences under section 4 of the Animal Welfare Act 2006 (unnecessary suffering) and offences under section 1 of the Wild Mammals (Protection) Act 1996, to the list of priority offences set out in schedule 7.

This would have the effect of classifying the majority of animal cruelty footage as priority illegal content. The Bill requires user-to-user services (i.e. social media platforms) to take proportionate steps to prevent users, particularly children, from encountering this priority illegal content on their site.

This practical step to require social media platforms to do more to prevent UK children from encountering footage of animal cruelty is essential, given the failure of platforms to remove much of this content of their own volition, and the damage such footage can cause to children who view it (and to the animals involved). As compellingly argued by MPs in earlier parliamentary stages of the Bill, and highlighted by a recent piece in the Independent newspaper¹⁵, this content area is well within both the spirit and scope of the Bill.

¹² <https://publications.parliament.uk/pa/bills/cbill/58-03/0004/PBC004 OnlineSafety 1st17th Compilation 29 06 2022.pdf>

¹³ <https://hansard.parliament.uk/commons/2022-07-12/debates/942C54C4-D672-492E-BAD9-195E3BB63724/OnlineSafetyBill>

¹⁴ <https://bills.parliament.uk/publications/49991/documents/3259>

¹⁵ <https://www.independent.co.uk/news/uk/home-news/monkey-video-online-safety-bill-animal-cruelty-b2314809.html>

We urge members of the House of Lords to speak in favour of the Stevenson animal cruelty amendment at committee stage and to urge the Government to make this change to the Bill. By doing so, Ministers can address a significant source of online harm to children and help uphold the UK's reputation as a world-leader in animal welfare.

Wildlife trafficking online: Accelerating the Global Extinction Crisis

Today, amid a global extinction crisis that the UK government has pledged to reverse¹⁶, bustling markets for endangered wildlife products and exotic pets are to be found on the world's largest social media platforms, including Facebook, Instagram, Snapchat and WeChat.

Similar conditions to those fuelling the rise in animal cruelty content have driven explosive growth in online wildlife trafficking. A 2020 National Geographic article quoted U.S. wildlife officials describing the "dizzying" scale of the wildlife trade on social media.¹⁷ The UK's National Wildlife Crime Units say cyber-enabled wildlife crime has become their priority focus, since virtually all wildlife cases they now investigate have a cyber component to it, usually social media or eCommerce platforms.¹⁸

This growth has been driven by algorithmic recommendation tools that provide traffickers a cost-free mechanism for instantly reaching potential customers around the planet, in an environment that provides illegal actors a great deal of anonymity and even payment systems.¹⁹

In just a few clicks, it's easy to find pages, groups and postings selling wildlife products made from endangered species such as elephant ivory, rhino horn, pangolin scales and marine turtle shells, as well as big cats, reptiles, birds, primates, and insects for the exotic pet trade. The live trafficked animals are often displayed in pitiable conditions, showing clear signs of distress, as was on display in a 2022 BBC Click investigation about the online trade in endangered parrots.²⁰

This vast, unregulated trade in live animals and their parts is not only illegal, it exacerbates risk of another animal-human spillover event, such as the ones that caused Ebola, HIV and the COVID-19 pandemic.²¹

The 2022 BBC Click investigation revealed how wildlife traffickers weaponized social media to promote and facilitate the illegal trade in endangered parrots. Written evidence on the Online Safety Bill, submitted by the Alliance to Counter Crime Online and World Parrot Trust, highlights how social media platforms are failing to deal with such content. As stated in the evidence:

"ACCO published a 2020 report demonstrating that current moderation by Facebook is ineffective at capturing large amounts of wildlife trade content and is heavily biased towards English-language pages and groups (which are unlikely to represent the majority of wildlife trade content). In the study, 57% of pages and groups ACCO

¹⁶ <https://www.gov.uk/government/topical-events/london-conference-on-the-illegal-wildlife-trade-2018/about>

¹⁷ <https://www.nationalgeographic.com/animals/article/how-internet-fuels-illegal-wildlife-trade>

¹⁸ www.nwcu.police.uk/how-do-we-prioritise/priorities/cyber-enabled-wildlife-crime

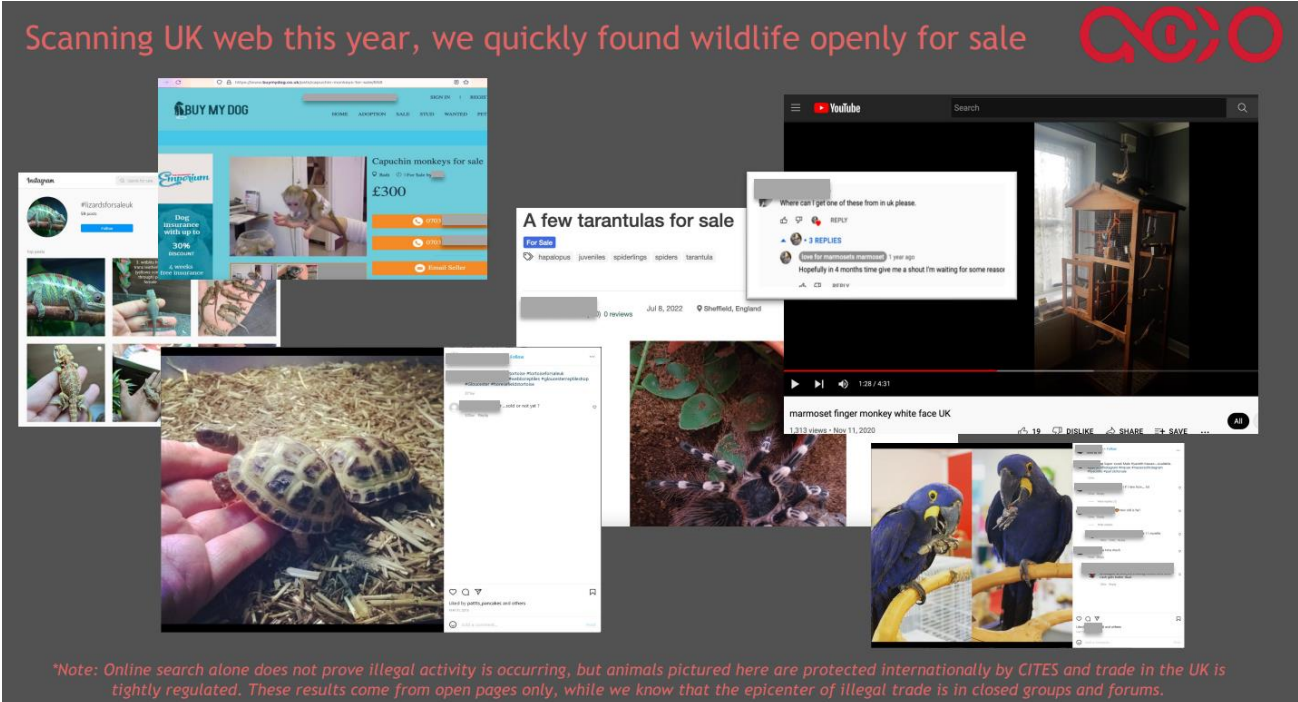
¹⁹ <https://www.counteringcrime.org/wildlife-fact-sheet>

²⁰ <https://www.bbc.co.uk/news/technology-60247540>

²¹ <https://www.counteringcrime.org/online-crimes/online-wildlife-markets-are-wiping-out-animals>

researchers found selling wildlife had terms 'for sale' 'sell' or 'buy' in their title. Many groups and pages had existed for years without being removed, with the oldest being uninterrupted for over a decade. This content is hiding in plain sight, since platforms have no legal incentive to remove it."²²

The below screenshots, collected over recent months by the Alliance to Counter Crime Online, show social media platforms and British-based eCommerce platforms being used to illegally trade wildlife inside the UK, to the detriment of multiple threatened species:



**Note: Online search alone does not prove illegal activity is occurring, but animals pictured here are protected internationally by CITES and trade in the UK is tightly regulated. These results come from open pages only, while we know that the epicenter of illegal trade is in closed groups and forums.*

The lack of action on the part of social media platforms to address this requires action in response.

In addition to accepting the animal welfare amendment tabled by Lord Stevenson, the Government should add Offences under the Control of Trade in Endangered Species Regulations 2018 (COTES) to Schedule 7 of the Online Safety Bill. This would help limit the role of social media platforms in enabling wildlife trafficking, helping to uphold the UK's commitments to tackle global wildlife crime.²³

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 70 organisations to use their joint voice for the protection of the natural world and animals.

For questions or further information please contact:

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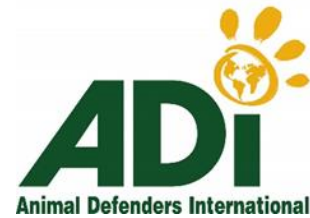
E: matt@wcl.org.uk

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²² <https://bills.parliament.uk/publications/46531/documents/1803>; <https://www.counterincrimingcrime.org/wildlife-sales-on-facebook>

²³ <https://www.gov.uk/government/news/fight-against-international-wildlife-crime-stepped-up>

The following animal welfare and anti-trafficking organisations have inputted into this briefing and support the animal cruelty content amendment (and proposals to also add wildlife trafficking into the scope of the Bill):



Appendix – case studies of animal cruelty content from SMACC

WARNING – DISTRESSING CONTENT

Case study 1

A persistent Facebook user repeatedly creates new pages and groups to share extremely violent content, showing macaque monkeys being intentionally abused and killed.

It is unclear which country this person is based, however many of the regular followers of these pages appear to be from many countries around the world, according to the information accessible on their profiles, including the UK. Many of the followers seem to be seeking out such content, and write comments inciting for further violence and stating their pleasure at viewing the content. Some other commenters are deeply disturbed by the content and commenting as such, some stating that Facebook should not allow such content.

Similar content has been located on YouTube and Twitter previously.

Examples of violence to macaques:

- tied to a fan which is then turned on and the monkey is spun around and around;
- having their fingers and other parts of their body clamped with pliers;
- tied to trees struggling to escape as they are burnt with cigarettes;
- being whipped by their captors;
- being chopped to pieces with a knife whilst still alive;
- being burnt alive;
- mutilated with a knife and left to slowly die;

SMACC first located these pages in December 2022 and flagged them with Meta directly. Some have been removed but as of 26/02/2023, many of these pages are still live with dozens of videos showing abuses such as the above.

This content clearly breaches Meta's Community Guidance on:

- Violent and Graphic content
- Coordinating harm and promoting crime
- Harm against animals

Case study 2

A live dog is lifted from the ground by their back legs and repeatedly slammed against the ground. The person doing this is a young boy raising concerns that this could influence other young children to commit similar acts.

This video is still live on YouTube and has been since 18th July 2015.

YouTube's current Community Guidelines prohibits content which depicts cruelty to animals, summarised as violent, injurious acts (with some exceptions):

"Animal abuse content:

Content where animals are encouraged or coerced to fight by humans.

Content that includes a human maliciously causing an animal to experience suffering when not for traditional or standard purposes such as hunting or food preparation.

Content featuring animal rescue that has been staged and places the animal in harmful scenarios."