

Written evidence submitted by Countryside Alliance (AAB0014)

COUNTRYSIDE ALLIANCE WRITTEN EVIDENCE

ENVIRONMENT, FOOD, AND RURAL AFFAIRS COMMITTEE INQUIRY

Animals Abroad Bill

September 2021

Introduction

- The Countryside Alliance is a membership-based organisation that works for everyone who loves the countryside and the rural way of life. We reflect the views and interests of 100,000 members and supporters who come from all walks of life and every part the United Kingdom. The Countryside Alliance welcomes the EFRA Committee's Inquiry into the Government's Animal Welfare (Sentience) Bill.
- The Countryside Alliance is fully supportive of the Government's desire to use its influence to improve animal welfare standards abroad, and to ensure that UK citizens have the knowledge necessary to avoid supporting enterprises that involve poor animal welfare. However, we are concerned that the approach to hunting trophies is disproportionate, misplaced and overly simplistic. Just because an activity involves animals, including the culling of animals, does not necessarily mean that there is an animal welfare issue. All activities involving animals can either be done well, according to best practice and to the highest welfare standards, or done poorly with negative welfare consequences. There is no reason to assume that given the right circumstances, riding either an elephant or camel is worse than riding a horse, whether in the UK or elsewhere. What matters is how those elephants, camels or horses, are treated wherever they are. The Government's position seems to assume that going abroad and riding either an elephant or a camel is somehow worse than coming to the UK and riding a horse. There is no logic to this position. If elephants and camels abroad are well cared for, and horses in the UK are well cared for, then both should be acceptable. Simply banning the advertising of experiences involving elephant rides or camel safaris will not stop people travelling to places where these can be undertaken. If the Government is going to drive up welfare standards abroad then enterprises that use animals and derive money from tourism from the UK need to see that it is in their interest, as well as that of the animals involved, to operate to the highest welfare standards. The challenge the Government faces is how to assess enterprises involving animals abroad and also whether the UK is prepared to undergo similar scrutiny from abroad. Moreover, if trophies cannot be imported from outside the UK, even under CITES rules, then why can other countries not ban trophies from the UK? There is a danger that these proposals, unless sufficiently nuanced, harm the interests of the UK and its communities and wildlife, as well as communities abroad and the wildlife they are intended to protect.

Inquiry Questions

1. Will the Government's proposals on the export and import of hunting trophies effectively support the conservation of endangered species?

- As the Alliance noted in its response to the Defra consultation on the question of trophy hunting last year, we are not convinced that there is a need to ban the import and export of trophies, as these are already subject to the strict, internationally agreed rules under CITES. Moreover, a ban could harm those conservation efforts and projects around the world, especially in relation to endangered species. If the intention of the Government's proposals is to help the conservation of endangered species, it is far from clear that a ban, as currently proposed, would help achieve that objective and could actually have the reverse effect. It could also impact on deer stalking in the UK, which would undermine the management of deer across the country. If the policy is driven by a dislike of large game hunting, rather than the evidence around conservation, then the Government should say so, although we do not believe simply disliking something is a sufficient basis for legislation, especially when there is already a system of regulation in place and the benefits of hunting, of which trophies are simply the by-product, are recognised by conservationists worldwide and supported by peer reviewed research on the subject.
- We would also ask why should other countries tolerate the import of trophies from legitimate hunting activity in the UK, such as deer stalking, if we impose an arbitrary ban on trophies coming into the UK? What matters is whether the trophy is the by-product of responsible, sustainable hunting which does not endanger species, regardless of which species are involved or where the hunting takes place. The international laws in this area are well established and understood.
- What will really make a difference is better enforcement and more resources for those agencies responsible for the enforcement of existing CITES laws. Passing an Act of Parliament is not the same as actually making a difference to the welfare of animals abroad. Indeed, it could result in less income for vital conservation projects, which rightly recognise the role that hunting can play in the conservation and management of species that are both endangered and non-endangered.

2. Should there be different rules for the trade in animal trophies depending on the setting in which the animal was hunted?

- Clearly, there is a difference between regulated hunting, which is integrated with proper wildlife conservation, and unregulated hunting. Trophies are a by-product of hunting and simply banning the import of trophies will not help tackle illegal trade. It will merely penalise legal, regulated activity, which can play an important role in conservation by contributing economically to local communities and projects that manage and sustain species that are both endangered and non-endangered.

3. What are the possible unintended consequences of the proposals, for example in relation to animal trophies that pre-date the legislation?

- It will not always be possible to distinguish between trophies obtained before and after any ban. This will make enforcement more difficult. Moreover, if the UK bans the import of trophies then other countries will be entitled to do the same, potentially with a significant impact of deer stalking in the UK. What is the difference between importing a physical trophy and returning with photographs from the hunting undertaken? The animal in question has been culled and what happens to its remains is irrelevant in conservation terms, so long as the original hunting was legal, and sustainable. It would make much more sense to confirm the origin of a trophy, and ensure that all overseas hunting advertised in the UK is only undertaken with reputable companies and in areas where sustainable hunting is conducted, rather than to prohibit the import and export of trophies. Indeed, such an approach would provide UK hunters with the confidence that they were working with responsible companies, engaging in sustainable hunting, and contributing financially to reputable conservation enterprises.
- Trophies allowed for under CITES rules and which originate from a sustainable source should be permitted. Hunting opportunities advertised in the UK should meet international conservation standards, and by ensuring that the money spent on hunting is directed at sustainable enterprises would be more beneficial than simply prohibiting the import or export of part of an animal carcass.

4. How effective are current measures on the trade in trophies of hunting, including how they support conservation?

- We believe the current CITES rules and legislation are both efficient and effective. The very small number of hunting trophies legally imported into the UK each year pose no credible threat to wildlife populations abroad, nor is there any evidence that they encourage illegal wildlife trade. Conversely, the experience of our members is that overseas hunting trips provide considerable benefits to local communities; both from a conservation perspective, as well as socially, culturally, and economically. It is telling that almost every major conservation charity in the world, including the World Wide Fund for Nature (WWF), supports trophy hunting in certain circumstances as an effective method of conservation. For the UK, a ban on the export of trophies would have an enormous effect on the economic survival of a number of remote areas, such as the Scottish Highlands, that depend on the income of deer stalkers, many of which travel from abroad. A large proportion of travelling hunters visiting the UK wish to take the deer antlers home with them as a memory of their trip. Travelling hunters, usually taking either the old or infirm animals, are also essential to the ongoing management of the UK deer herd; keeping numbers under control and allowing woodland regeneration, as well as ensuring the health of the herd in the absence of natural predators.

5. What will be the impact of the proposed domestic ban on advertising and offering for sale overseas attractions, activities or experiences that involve the unacceptable treatment of animals?

- It rather depends on what is considered unacceptable? If donkey rides and pony trekking are acceptable in the UK then why is offering elephant rides or camel safaris unacceptable? There is no difference in principle from offering elephant rides and camel safaris abroad, and offering the riding of ponies, horses or donkeys in the UK. Is there evidence that horses, elephants and camels experience being ridden differently, such that

riding a horse is acceptable but riding either an elephant or camel is not? So long as any animal is treated well then there is no reason to allow one to be ridden and not the other.

- Will other countries respond in kind and prohibit the advertising of deer stalking, for example? People come to the UK to stalk deer and take home a trophy of that experience. These are animals that would have been culled anyway, indeed the need to cull/manage deer has never been greater, both for the health of the deer themselves and to reduce the damage they do to farming and forestry. The responsible management of deer is no different to the management of certain species abroad. To suggest what is acceptable in the UK is not acceptable abroad is both illogical and likely to be counterproductive both in terms of welfare and conservation.
- 6. Who should be responsible for ensuring attractions, activities or experiences overseas do not cause the unacceptable treatment of animals?**
- If the Government is to legislate then it is for the Government to be responsible for deciding which activities or experiences overseas do not involve the unacceptable treatment of animals. This may be unrelated to the nature of the activity itself, such as riding, but rather the way in which the animals are kept and managed. There is no reason why other countries should be treated differently to the UK. If there is a requirement for the providers of elephant rides and camel safaris to be approved, then so should horse riding establishments in Europe. Likewise donkey trekking holidays which are widespread in Europe. Is the Government proposing the establishment of a worldwide inspectorate to determine which foreign enterprises meet UK standards and can be advertised, and those that cannot? Will there be an approved list of farms, riding establishments, zoos, animal parks, safari parks and game reserves etc, outside the UK, which can be promoted in the UK, and will other countries impose the same conditions in relation to UK businesses involving animals?
 - Activities involving animals abroad that are advertised to UK citizens should have the highest welfare standards, and it will be for the Government to determine which meet UK standards, and which do not. All activities should be treated equally regardless of where they are in the world, and there should be no illogical discrimination made between those activities which involve animals native in other countries but not in the UK.