

## **Written evidence submitted by the Born Free Foundation (AAB0041)**

### **Environment, Food and Rural Affairs Committee Call for Evidence, Animals Abroad Bill**

Born Free is a UK-based international wildlife protection charity. We promote compassionate conservation to enhance the survival of threatened species in the wild and protect natural habitats while respecting the needs and safeguarding the welfare of individual animals. We work closely with local communities to engage, empower and enhance the lives of those who live alongside wildlife and, as a leading wildlife charity, we oppose the exploitation of wild animals in captivity and campaign to keep them where they belong – in the wild.

Born Free requests that the EFRA Committee gives due consideration to the following evidence submitted in response to its Call for Evidence on the Animals Abroad Bill, which we anticipate will be introduced into Parliament by Government in the near future.

#### Summary

- Born Free has an ethical objection to the hunting and exploitation of animals for sport. We also challenge claims by trophy hunting proponents that the activity makes a necessary or significant contribution to wildlife conservation – indeed we argue that in many cases the activity harms wildlife protection. We strongly support the Government's commitment to ban the import of hunting trophies from endangered species, which we believe will have a net conservation benefit, particularly when combined with the promotion of progressive, ethically focussed non-lethal mechanisms by which the value of nature and ecosystems services can be realised, and the needs of local communities provided for.
- Born Free also supports the proposed domestic ban on advertising and offering for sale overseas attractions, activities or experiences that involve the unacceptable treatment of animals. We urge Government to work with animal welfare experts and organisations, along with relevant tourism and travel companies and organisations, to develop and widely promote a Code of Practice, supported by legislation, that clearly defines and identifies unacceptable practices and provides clear guidance to travel company operators, advertisers, the public and other relevant stakeholders on what should and should not be considered acceptable, and what this means with respect to advertising and promotion.

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

Born Free has an ethical objection to the killing of any animal for pleasure or ‘sport’, a position that reflects the majority UK public opinion on this issue. We also strongly dispute the assertion made by proponents that ‘the science’ suggests trophy hunting provides net benefits for conservation or rural communities. On the contrary, there is a great deal of debate and differing opinion on this issue within the scientific community.

While we await details of the Government’s proposals on the export and import of hunting trophies, we have consistently promoted bans and greater restrictions on trophy imports and exports which we believe will help to reduce and, ultimately, eliminate the damaging impacts of trophy hunting on the populations and conservation of targeted species.

The economic, conservation and societal value of trophy hunting, and its sustainability, have been increasingly questioned.<sup>1,2,3,4,5</sup> Peer-reviewed studies have brought the purported conservation benefits of trophy hunting into question, specifically concerning African lions and leopards in Tanzania<sup>6</sup>, lions in Zimbabwe<sup>7</sup>, leopards in South Africa<sup>8</sup>, and elephants across parts of Southern Africa<sup>9</sup>, among others.

Trophy hunting is often unsustainable. A report prepared for the International Union for the Conservation of Nature (IUCN)/France Partnership in 2018 noted that 40% of the big game hunting zones in Zambia, and 72% in Tanzania, are now classified as “depleted”, because of overhunting and agricultural encroachment.<sup>10</sup>

Trophy hunting may also impact the survival of individual animals and selection of traits, effectively meddling with evolutionary processes.

Studies of bighorn sheep in Canada suggest that the targeting of rams with horns over a certain size may have artificially selected for reduced horn growth rates.<sup>11</sup>

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<sup>1</sup><http://www.ecolarge.com/work/the-200-million-question-how-much-does-trophy-hunting-really-contribute-to-african-communities/>

<sup>2</sup> Mkono 2019. “Neo-Colonialism and Greed: Africans’ views on Trophy Hunting in Social Media,” *Journal of Sustainable Tourism* 27, no. 5: 689–704. <https://doi.org/10.1080/09669582.2019.1604719>

<sup>3</sup> Jacquet and Delon, 2016. “The Values behind Calculating the Value of Trophy Hunting,” *Conservation Biology* 30, no. 4 (2016): 910–11. <https://doi.org/10.1111/cobi.12749>

<sup>4</sup> Batavia et al. 2019. “The Elephant (Head) in the Room: A Critical Look at Trophy Hunting,” *Conservation Letters* 12, no. 1. <https://doi.org/10.1111/conl.12565>

<sup>5</sup> Ripple et al. 2016. Does Trophy Hunting Support Biodiversity? A Response to Di Minin et Al. *Trends in Ecology and Evolution* 31, no. 7: 495–96. <https://doi.org/10.1016/j.tree.2016.03.011>

<sup>6</sup> <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0005941>

<sup>7</sup> <https://lovewildafrica.com/wp-content/uploads/2015/10/Loveridge-et-al-2007-impact-of-trophy-hunting-on-lion-population-dynamics-in-Hwange.pdf>

<sup>8</sup> <https://africageographic.com/blog/leopard-hunting-quota-was-issued-despite-official-report-showing-significant-population-declines/>

<sup>9</sup> <https://onlinelibrary.wiley.com/doi/pdf/10.1002/jwmg.641>

<sup>10</sup> Chardonnet, 2019. “Africa Is Changing: Should Its Protected Areas Evolve? Reconfiguring the Protected Areas in Africa. [https://conservationaction.co.za/wp-content/uploads/2019/03/etudesAP\\_configAP\\_EN.pdf](https://conservationaction.co.za/wp-content/uploads/2019/03/etudesAP_configAP_EN.pdf)

<sup>11</sup> Festa-Bianchet et al. 2014. Decrease in Horn Size and Increase in Age of Trophy Sheep in Alberta

There are impacts on behaviour, the transmissibility of social knowledge and reproduction. For instance, 'Big tusker' African elephants have declined precipitously as a result of targeting by trophy hunters and poachers, with the loss of accumulated social knowledge and experience, as well as genes that may be hugely important to herd health.<sup>12</sup> Older male elephants help to control younger males in bachelor groups<sup>13</sup>, who may become more aggressive when the older males are removed, with the resulting potential for increased conflict with people.<sup>14</sup> Also, male elephants increase their energy allocation into reproduction with age as the probability of reproductive success increases, and that man-made interference (such as trophy hunting and poaching) could drive fundamental changes in elephant reproductive tactics.<sup>15</sup> Removal of the biggest tuskers, who are prime targets for trophy hunters and poachers, effectively removes the most reproductively successful males, with inevitable consequences for future population health and viability.

Similarly, removing older male lions who control prides may lead to younger males killing the previous incumbent's cubs so as to be able to breed themselves, impacting the cubs themselves and the inclusive fitness of adult females who care for them.<sup>16</sup>

Far from removing surplus, decrepit or 'undesirable' animals as is often claimed, or restricting their targets according to established and proven conservation-related criteria, trophy hunters typically pursue the animals with the most impressive traits which make the best 'trophies'. This can have a disproportionate impact on the genetic and social integrity of family groups or populations, and serious adverse impacts on conservation outcomes.<sup>17,18</sup> Examination of advertised hunts and the awards conferred by major hunting organisations to the most successful and prolific hunters reveals a clear focus on the size and traits of trophies, with little evidence of any effort to encourage hunters to restrict themselves to identified problem or 'redundant' animals, or to adhere to conservation-focused criteria.<sup>19</sup>

The impacts of trophy hunting are not restricted to animals living in hunting blocks. Designated hunting areas often abut protected areas, so animals will naturally move or be lured out of protected areas into hunting areas, compromising their protection, as was reportedly the case with Cecil the lion who was killed by a trophy hunter in Zimbabwe in 2015<sup>20</sup> and, more recently, a lion called Mopane killed in very similar circumstances<sup>21</sup>.

In some cases animals are captured in protected areas and sold to hunting concessions so they can be targeted. *Restrictions on the trade in trophies may, therefore, help to increase security for animals within protected areas.*

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Over 37 Years. *J. Wildlife Management* 78 (1), 133-138.

<sup>12</sup> <http://news.nationalgeographic.com/2015/10/151017-zimbabwe-elephant-tusker-trophy-hunting-poaching-conservation-africa-ivory-trade/>

<sup>13</sup> Bradshaw *et al.* 2005. Elephant breakdown. *Nature* 433, 807. <https://doi.org/10.1038/433807a>

<sup>14</sup> Wang *et al.* 2000. Older bull elephants control young males. *Nature* 408: 425-426.

<sup>15</sup> Taylor *et al.* 2019. Movement reveals reproductive tactics in male elephants. *Journal of Animal Ecology*. 10.1111/1365-2656.13035.

<sup>16</sup> Loveridge *et al.* 2016. Conservation of large predator populations: Demographic and spatial responses of African lions to the intensity of trophy hunting. *Biological Conservation* 204 (B); 247–254 <https://doi.org/10.1016/j.biocon.2016.10.024>

<sup>17</sup> <https://link.springer.com/article/10.1007/s12686-018-0983-6>

<sup>18</sup> <https://royalsocietypublishing.org/doi/10.1098/rspb.2017.1788>

<sup>19</sup> <https://safariclub.org/world-hunting-awards/>

<sup>20</sup> <https://www.nature.com/articles/nature.2015.18101>

<sup>21</sup> <https://www.bornfree.org.uk/news/mopane-the-lion>

While trophy hunters may claim to be motivated by the alleged benefits to wildlife conservation and/or local communities they claim may result from their activities, it is more likely they are driven by certain personality traits such as narcissism, Machiavellianism and psychopathy.<sup>22</sup> As such, the acquisition of a trophy from the animal they have killed, and their ability to utilise the trophy as a signal of wealth and a demonstration of their prowess and skill to their peers, forms a vital component of their motivation. *Restrictions on trade in hunting trophies can therefore dis-incentivise hunters from targeting animals in countries that allow trophy hunting, if they cannot bring their trophies home.*

Trophy hunting is not a necessary tool for successful wildlife conservation. According to Professor Judi Wakhungu, Kenya's former Cabinet Secretary of Environment, Water and Natural Resources, since the hunting moratorium in 1977 Kenya's elephant population has been growing steadily following previous decades of decline, the country has pursued a successful rhino breeding programme, and has reported significant increases in its lion population. Kenya, like many other African countries, faces serious challenges in protecting its natural resources in the face of pressure from human population growth; nevertheless it has championed some of the most progressive and successful conservation initiatives in Africa.

Strong positive population effects were also noted following the moratorium on lion hunting around Zambia's South Luangwa National Park, with survival increasing by 17% and 14% in sub-adult and adult males respectively. Smaller effects on adult female survival and positive effects on cub survival were also detected.<sup>23</sup> Local communities in Zambia recently acted to prevent animals being captured from the South Luangwa National Park in order to be sold to hunting concessions, because of a lack of opportunity for them to have a say in the issue.<sup>24</sup>

Born Free strongly aligns itself with the conclusion of the 2017 report by the IUCN's World Commission on Environmental Law (WCEL) Ethics Specialist Group, that *Trophy hunting is not consistent with "sustainable use"*<sup>25</sup>. We also endorse the statement made recently by Claudio Sillero, Professor of Conservation Biology at the University of Oxford, that: *"Not only is trophy hunting a cruel and immoral pursuit but, overall, it is counter-productive to conservation efforts as it blurs the boundary by setting a seriously adverse expectation that wildlife should be monetarised ('if it pays, it stays') above the many other benefits we gain from nature."*

For further information, see Born Free's report entitled *"Trophy Hunting – Busting the Myths and Exposing the Cruelty"*.<sup>26</sup>

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<sup>22</sup> Beattie, G. 2019. *Trophy Hunting: A Psychological Perspective*. Routledge, 112 pages. <https://doi.org/10.4324/9780429297984>

<sup>23</sup> Mweetwa et al. 2018. Quantifying lion (*Panthera leo*) demographic response following a three-year moratorium on trophy hunting. *Plos One*. <https://doi.org/10.1371/journal.pone.0197030>

<sup>24</sup> <https://www.bornfree.org.uk/news/captures-zambia>

<sup>25</sup> <https://www.iucn.org/news/world-commission-environmental-law/201909/compatibility-trophy-hunting-a-form-sustainable-use-iucns-objectives>

<sup>26</sup> <https://www.bornfree.org.uk/publications/busting-the-myths>

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

No.

As detailed in our previous response, it is our strongly held view that trophy hunting, as well as being ethically indefensible, risks having significant negative impacts on wildlife populations and their conservation, regardless of the setting in which it takes place.

The Global Assessment Report on Biodiversity and Ecosystem Services, published by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) in 2019, described nature's decline as 'unprecedented', indicated that as many as a million species are at risk of extinction, and that changes to land and sea use, and exploitation of organisms (which would include trophy hunting), are key drivers of these declines. It described the current global response as 'insufficient', called for 'transformative changes' to restore and protect nature, and stated that opposition from vested interests can be overcome for public good.<sup>27</sup>

While trophy hunting may have negative impacts across all target species, there is specific evidence for such impacts on certain species, particularly in relation to the targeting of specific animals with specific trophy traits and the potential for 'reverse selection'.<sup>28</sup>

The breeding by game farmers in South Africa of lions, cheetahs, rhinos, buffalos and several antelope species, is cause for concern, since it risks irreversible genetic pollution. This is so because such breeding practices are often designed to provide desirable trophy animals with particular (and often unnatural) traits. These practices risk introducing a novel, genetic pollution threat to South Africa's indigenous wildlife that will be virtually impossible to reverse.<sup>29</sup>

The conservation value of trophy hunting and wildlife farming was recently questioned, with the authors suggesting that a more zoocentric, rights-based approach to international wildlife law could yield better conservation results than the current utilitarian species-focused approach.<sup>30</sup>

In our view, trophy hunting is a cruel relic of a colonial era, practiced predominantly by a global elite, that results in intense animal suffering and disruption of wildlife populations, while contributing little or nothing to local economies or wildlife conservation. It is also wracked by corruption and greed. If we are to end this activity we must find alternative ways of investing in the management and protection of habitats that benefit both wildlife and the local communities that live alongside it.

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

Hunting proponents claim that by restricting trophy imports, the maintenance of significant areas of land currently managed for trophy hunting purposes across Africa and other parts of the world might

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<sup>27</sup> <https://ipbes.net/news/Media-Release-Global-Assessment>

<sup>28</sup> Knell R.J. & Martínez-Ruiz C. 2017. Selective harvest focused on sexual signal traits can lead to extinction under directional environmental change. Proc. Royal Soc. B. 284 (1868). <https://doi.org/10.1098/rspb.2017.1788>

<sup>29</sup> Somers et al. 2020. The implications of the reclassification of South African wildlife species as farm animals. Afr J Sci;116(1/2), Art. #7724, 2 pages. <https://doi.org/10.17159/sajs.2020/7724>

<sup>30</sup> <https://www.tandfonline.com/doi/full/10.1080/13880292.2020.1866236>

be disincentivised, and that land currently reserved for wildlife might therefore be lost to agriculture or other commercial activities.

Local communities are clearly key stakeholders, and we need to explore and implement mechanisms that enable those communities to see and realise the benefit of protecting wildlife and biodiversity, and the ecosystem services they provide, for their own sake, and for the sake of all life on this planet. We are increasingly seeing quantitative studies stressing the value of keeping wild animals in the wild, for example the ecotourism value of individual elephants over their lifetime<sup>31</sup>.

The International Monetary Fund calculated the value of carbon sequestration attributable to great whales (\$2 million per whale) and forest elephants (\$1.75 million per elephant) when they are allowed to live out their lives in their natural habitats<sup>32</sup>. These studies strongly suggest that there are innovative ways this value might be realised through payments for ecosystem services payable to local communities so they are incentivised to protect such keystone species in their natural habitats.

Born Free is advocating for radical changes in the way nature, biodiversity and wildlife is valued, protected, and funded. To this end, we published our Global Nature Recovery Investment Initiative in 2020.<sup>33</sup> We are also supportive of measures proposed in the UNDP Biodiversity Financing Initiative,<sup>34</sup> and in the Dasgupta Review of the Economics of Biodiversity, commissioned by the UK Treasury<sup>35</sup>. We urge the UK Government to prioritise and promote alternative and innovative funding mechanisms aimed at protecting wildlife and serving the needs of local communities, that do not involve the killing of animals.

As regards the import of animal trophies pre-dating legislation, we would advocate for a ban on the trade in such specimens, akin to the measures introduced in the UK's Ivory Act, in order to ensure any restrictions on the import or export of 'new' trophies cannot be undermined by the laundering of such items as 'pre-legislation' or 'antique'.

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

It is our strong opinion that current measures regulating the trade in hunting trophies are failing to prevent the activity from having negative impacts on wildlife populations and their conservation.

Animal populations are often manipulated and quotas set to maximise profits, recommended age-based and area-based limitations are frequently ignored, hunting levels often exceed quotas<sup>36</sup>. Much of the funding generated from trophy hunting ends up in the hands of a small minority with the inevitable result that corrupt hunting concession operators, officials, and foreign companies also benefit<sup>37</sup>.

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<sup>31</sup> <https://focusingonwildlife.com/news/elephants-worth-much-much-more-alive-than-dead-says-new-report/>

<sup>32</sup> <https://www.imf.org/external/pubs/ft/fandd/2020/09/how-african-elephants-fight-climate-change-ralph-chami.htm>

<sup>33</sup> <https://www.bornfree.org.uk/news/investment-initiative-launch>

<sup>34</sup> <https://www.biofin.org/>

<sup>35</sup> <https://www.gov.uk/government/collections/the-economics-of-biodiversity-the-dasgupta-review>

<sup>36</sup> [http://cmsdata.iucn.org/downloads/iucn\\_informingdecisionsontrophyhuntingv1.pdf](http://cmsdata.iucn.org/downloads/iucn_informingdecisionsontrophyhuntingv1.pdf)

<sup>37</sup> [http://www.wildlife-baldus.com/download/influence\\_of\\_corruption\\_on\\_hunting.pdf](http://www.wildlife-baldus.com/download/influence_of_corruption_on_hunting.pdf)

The report *Missing the Mark* by the United States Democratic staff of the House Committee on Natural Resources, examined the trophy hunting of African elephants, black and southern white rhinoceros, leopards and lions in Zimbabwe, Tanzania, South Africa and Namibia. It found “many troubling examples of funds either being diverted from their purpose or not being dedicated to conservation on the first place,” and concluded that “corruption within governments or organizations can prevent trophy hunting revenues from funding conservation activities and can even lead to the mismanagement of hunted populations”.<sup>38</sup>

Because hunters value rarity, threatened species in need of most protection may be disproportionately targeted, increasing the pressure on already vulnerable populations and potentially pushing them towards extinction.<sup>39</sup> A 2012 study suggested that although a protective IUCN Red List status lowers the exploitation of moderately threatened species, hunting pressure on the most threatened species increases, resulting in an “anthropogenic Allee effect (AAE)” with the implication that the highly profitable exploitation of rare species could have harmful consequences, unless appropriate management actions and protection rules are enforced.<sup>40</sup>

A peer-reviewed scientific report noted that “*Trophy hunting has had negative effects on lion populations throughout Africa*”, and that “*Hunting resulted in population declines over a 25-year period for all continuous harvest strategies, with large declines for quotas greater than 1 lion/concession (~0.5 lion/1000 km<sup>2</sup>) and hunting of males younger than 7 years*”. The authors concluded that “*Age-restricted harvesting [ostensibly designed to prevent conservation harms]... is probably not sufficient to yield sustainability.*”<sup>41</sup> The widely-referenced minimum age for lion trophies is 6 years.

Trophy hunting may also result in parts and products derived from hunted animals being made available for international trade, which may stimulate demand and have negative consequences for individuals and populations. The increasing international trade in lion bones, identified as an emerging threat to the species has, to a significant extent, been fuelled by the supply of skeletal products from lions that have been killed in trophy hunts.<sup>42</sup>

The trophy hunting industry has also been implicated in the trafficking of wildlife through so-called ‘pseudo-hunting’, where trophy hunting has been used as a ‘front’ to facilitate the acquisition and export of valuable parts of protected animals for illegal commercial trade. The relationship between rhinoceros trophy hunting and the illegal international trade in rhinoceros horn is well-documented.<sup>43</sup> In January 2018, the Natural Resources and Tourism Minister of Tanzania accused hunting operators of being involved in poaching and illegal exports of ivory.<sup>44</sup> Such associations undermine existing measures aimed at regulating the trade in hunting trophies, further undermine the credibility of the

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<sup>38</sup> “Missing the Mark: African trophy hunting fails to show consistent conservation benefits”, A report by the Democratic staff of the House Committee on Natural Resources, 2016

<sup>39</sup> Palazy, L. *et al.* 2011. Cat Dilemma: Too Protected To Escape Trophy Hunting? PLoS ONE 6 (7): e22424. doi:10.1371

<sup>40</sup> Palazy, L. *et al.* 2012. On the use of the IUCN status for the management of trophy hunting. Wildlife Research 39 (8), 711-720. doi: 10.1071/WR12121

<sup>41</sup> Creel *et al.* 2016. Assessing the sustainability of African lion trophy hunting, with recommendations for policy. Ecological Applications. doi: 10.1002/eap.1377

<sup>42</sup> <https://cites.org/sites/default/files/eng/com/sc/70/E-SC70-54-001.pdf>

<sup>43</sup> [https://www.traffic.org/site/assets/files/2662/south\\_africa\\_vietnam\\_rhino\\_horn\\_nexus.pdf](https://www.traffic.org/site/assets/files/2662/south_africa_vietnam_rhino_horn_nexus.pdf)

<sup>44</sup> <https://allafrica.com/stories/201801260119.html>

trophy hunting industry's conservation claims, and place vulnerable wildlife populations at increased risk.

Current measures relating to the trade in trophies are clearly failing to prevent the damaging impacts of trophy hunting on wildlife populations.

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?

The proposed domestic ban on advertising and offering for sale overseas attractions, activities or experiences that involve unacceptable treatment of animals, will serve a number of purposes.

- It will help to inform and educate travellers from the UK about such unacceptable practices, and disincentivise them from engaging in such activities;
- It will reduce impulse bookings from travellers who have not planned to do such activities and may not be aware of the unacceptable practices and animal welfare implications involved;
- It will reduce demand for such activities among British tourists which, in turn, will help to reduce their profitability and bring them to an end;
- It will send a clear message to legislators, policy-makers, tourism attraction owners and others overseas that the UK Government discourages such activities and practices, which will in turn help to disincentivise them.

As a member organisation of the Dolphinarium-free Europe (BFE) coalition, we fully endorse its stated support for the inclusion of a ban on advertising and offering for sale “swimming with dolphins” and other activities at facilities that maintain cetaceans and other marine mammals in captivity. The continued advertising of such activities creates and sustains the market for the captive cetacean industry, in spite of the irrefutable scientific evidence highlighting the associated welfare harms associated with the keeping of marine mammals in captivity.<sup>45,46</sup> Reducing demand for such attractions is key to achieving the phasing-out of this unacceptable industry.

In 2019, The Association of British Travel Agents (ABTA) produced a set of guidelines for the use of ‘Animals in Tourism’<sup>47</sup>. However, in May 2021 ABTA withdrew its dolphin guidelines<sup>48</sup>, effectively, leaving its members to decide whether to continue to advertise and sell products that negatively

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<sup>45</sup> Williamson C., Bailey R. & Stansfield L. (2011). EU Zoo Inquiry, DOLPHINARIA. A review of the keeping of whales and dolphins in captivity in the European Union and EC Directive 1999/22, relating to the keeping of wild animals in zoos. Whale and Dolphin Conservation Society, Born Free Foundation, ENDCAP. 40 pp.

<sup>46</sup> Marino L., Rose N.A., Visser I.N., Rally H.D., Ferdowsian H.R. & Slootsky V. 2019. The harmful effects of captivity and chronic stress on the well-being of orcas (*Orcinus orca*). Journal of Veterinary Behavior. 35:69-82; Rose N.A. & Parsons E.C.M. 2019. The case against marine mammals in captivity. Animal Welfare Institute and World Animal Protection, Washington, DC. 160 pp.

<sup>47</sup> <https://www.abta.com/sites/default/files/media/document/uploads/Global%20Welfare%20Guidance%20for%20Animals%20in%20Tourism%202019%20version.pdf>

<sup>48</sup> <https://www.abta.com/news/abtas-work-animal-welfare-and-dolphins>

impact animal welfare. Regulations from Government are clearly needed to disincentivise tourism experiences overseas that involve cruelty to animals.

The UK has some of the strictest animal welfare laws in Europe, yet by allowing the advertising and selling of activities and experiences that compromise animal welfare (including captive cetacean exhibits), the UK is effectively incentivising cruel practices that take place elsewhere – in other words, British companies are profiting from cruelty. The proposed domestic ban on advertising and offering for sale overseas attractions, activities or experiences that involve the unacceptable treatment of animals would go some way towards fulfilling the Prime Minister’s stated ambition to promote the welfare of animals, and the Secretary of State’s commitment in DEFRA’s Action Plan for Animal Welfare “to solidify and enhance our position as global leaders in this field by promoting high animal welfare standards across the world”.

6. Who should be responsible for ensuring attractions, activities or experiences overseas do not cause the unacceptable treatment of animals?

The Government should, as a minimum, base its proposed ban on activities that would be illegal under UK legislation. Relevant legislation might include The Animal Welfare Act 2006, and The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, as well as associated guidance.

The travel association ABTA has already developed a set of guidelines for its members concerning unacceptable practices involving animals in tourism activities, developed in consultation with a range of ‘NGOs, academia, and industry’. However, the implementation of these guidelines is voluntary and they may need further improvement to reflect current thinking. They are also not available to the wider public to enable them to make better choices when travelling overseas.

The Government should work with animal welfare experts and organisations, along with relevant tourism and travel companies and organisations, to develop and widely promote a Code of Practice, supported by legislation, that clearly defines and identifies unacceptable practices and provides clear guidance to travel company operators, advertisers, the public and other relevant stakeholders on what should and should not be considered acceptable, and what this means with respect to advertising and promotion. The Advertising Standards Agency may also have a role in examining associated advertising and investigating complaints.

In this, the UN Decade for Ecosystem Restoration, the Government should also support the new economic paradigm<sup>49</sup> that values living nature and pays for the ecosystem services it provides to all humanity. This presents the best way of tackling the twin crises of climate change and biodiversity loss which is already leading to ecosystem breakdown.

We thank the EFRA Committee for the opportunity to submit comments, and anticipate a strong piece of legislation that will represent the interests and moral stance of the British public with regard to our relationship with animals.

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<sup>49</sup> Chami, R. *et al* 2020 On Valuing Nature with applications to whales and elephants: [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3686168](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3686168)

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