

Written evidence submitted by The Donkey Sanctuary (AAB0046)

QUESTIONS 1-4 ARE NOT APPLICABLE TO OUR CHARITABLE AIMS

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 impact of this legislation could be predicted by analysing current attractions, activities or experiences offered, estimating the subsequent use by UK tourists and most importantly how well enforced the ban will be. This data is crucial to be able to predict the impact of the legislation and therefore how it can be worded to make the best difference.

Whilst understanding why the government might consider a domestic ban on advertising activities that involve the unacceptable treatment of animals, this begs the question as to what constitutes that? Allowing holiday companies to advertise certain animal attractions could be a positive if they were required to only advertise those that meet the ABTA guidelines. This may be preferable as it has a recognised standard to be adhered to and can be explained to consumers who otherwise may seek out such attractions themselves with no guidance or information about welfare standards.

Notwithstanding the above there is a need to define 'unacceptable treatment of animals' – will the breed/species/status of the animal impact what constitutes unacceptable treatment? Many equids experience poor welfare as a consequence of their use in overseas attractions, activities or experiences including carriage rides and trekking. Equids are potentially less visible than the specifically mentioned elephants but it could be argued the overall level of poor welfare is actually likely to be greater as there are many more individuals affected.

The minimum acceptable welfare standards will also need to be determined and be enforceable for many different attractions, activities and experiences and for different species. There are global standards such as ones set out by the OIE, these could be used to ensure consistency between countries. Alternatively our own domestic legislation protects equids working in tourism in the UK. This includes time off, minimum welfare standards, maximum weight limits, minimum ages etc. Could this be used by the UK government to advocate for minimum standards internationally?

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

Ultimately the organisers of the attractions, activities or experiences overseas. However, the UK government should continue to work to reduce the use of attractions, activities or experiences where there is unacceptable treatment of animals. This will require education and advocacy to encourage UK citizens to make informed and ethical decisions thus only supporting high welfare attractions, activities and experiences. As stated in our previous answer the UK government should advocate for minimum standards internationally with appropriate legislation, regulation and enforcement.

We also implore the government to use evidence based policy making and continue to evaluate the legislation to be able to assess its' impact. We recommend the ABTA current welfare guidelines are used as one source of evidence. For The Donkey Sanctuary a good result would be regulation to implement the standards that have already been produced with the industry.

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