## The British Veterinary Zoological Society (BVZS) submission to the EFRA Inquiry into the keeping of primates as pets

## 1. Introduction

- 1.1 The British Veterinary Zoological Society (BVZS) is the specialist division of the British Veterinary Association (BVA) and has over 400 active members. The membership includes registered veterinary surgeons and veterinary nurses working with exotic species at all levels, from those in general practice providing a service for herpetologists, aviculturists, aquarists and the owners of exotic pets including primates, to those working in animal sanctuaries, wildlife parks, bird gardens, zoos and aquaria, and with free living wild animals.
- 1.2 An aim of the Society is to promote the advancement of knowledge in the maintenance of the health and welfare of non-domesticated animals to the veterinary profession and to exotic pet owners, so would appear well placed to provide a submission to the Committee.
- 1.3 This response has been prepared following a full consultation with the BVZS membership, including a debate on the subject of keeping primates as pets held at the BVZS spring conference held in Cambridge in 2013. The Society has also consulted with the British Veterinary Association (BVA).

## 2. BVZS Observations

- **2.1** Primates are not kept commonly as pets in the UK although the removal of several species from the Schedule of animals requiring a Dangerous Wild Animal licence in 2007 appears to have led to an increase in popularity in keeping captive primates.
- **2.2** The husbandry requirements for primate groups are complex requiring large enclosures to prevent hierarchical stress and need to be constructed robustly. In addition, most primate species have such specialised UV-B, temperature, humidity, lighting, behaviour and dietary requirements to be taken into account that BVZS considers it is extremely difficult to fulfil their basic welfare needs, as specified in the Animal Welfare Act 2006, if kept as pets.
- **2.3** The majority of the clinical conditions in all primates presented to veterinary practices in the UK are associated with a failure by the owner to meet basic husbandry requirements.
- **2.4** Primates are extremely intelligent and social animals. The BVZS therefore does not consider any primate species to be suitable to be kept as <u>solitary</u> (singleton) pets as their basic welfare needs cannot possibly be met, due to a fundamental requirement for the company of conspecifics.
- **2.5** Nevertheless, the BVZS recognises that there are individuals in the UK who maintain small privately owned collections of primates, not subject to inspection under the Zoo Licensing Act, but that meet the specialised requirements of the species. These animals are not kept as pets per se, but maintained in collections usually for conservation or educational reasons.
- **2.6** The definition of a 'pet' is typically accepted as the keeping of an animal as a companion to a person. Although the BVZS agree a solitary primate is not suitable as a companion to a human, the definition of 'pet' can also be interpreted as an animal that is kept for the

emotional benefit of a human. If a primate was kept appropriately in a collection, it could therefore still be consider as a 'pet' under this sense of the word, so BVZS believes great care is required in drafting any legislation in order to avoid inadvertently effecting stakeholders maintaining primate collections under the terms outlined in paragraph 2.5.

2.7 Given the recent evolution of European policy towards lists of exotic species with potential to be kept as pets or traded following an evidence-based risk assessment, BVZS considers there is considerable merit in keeping primate species within this overall regulatory framework, to ensure a consistent evidence-based approach, to reduce duplication of costs in creating separate legislation and to avoid marginalising particular stakeholder groups.

## 3 Summary of BVZS position

**3.1** BVZS acknowledge there should be regulation preventing the keeping of primates as solitary (singleton) pets, but proposes there should be dispensation for stakeholders to be able to keep groups of primates, assuming their welfare needs are entirely satisfied, perhaps either in partnership with an accredited zoo facility, or alternatively regulated through an inspection and licensing process that gives consideration to appropriate privately owned or charitable primate rescue, rehabilitation and breeding facilities that form part of recognised, global conservation efforts. The Society considers great care is required drafting any new legislation particularly in defining the term 'pet' and believes there are significant benefits provided by including primates within the framework of European policy presently evolving regarding exotic pet species, which would be expected to be evidence-based, rather than creating separate regulation for one taxonomic group.

In addition, if there is to be an outright ban on privately owned primates either in Europe or the UK, BVZS believes it is important consideration is given to the difficulty privately owned collections would face disposing of their animals.

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