Environment, Climate Change and Land Reform Committee

Wild Animals in Travelling Circuses (Scotland) Bill

Written submission from Animal Consultants and Trainers Association (ACTA)

RESPONSE to the Call for Evidence by the Environment, Climate Change and Land Reform Committee of the Scottish Parliament in respect of Wild Animals in Travelling Circuses.

1. This response is provided on behalf of the Animal Consultants and Trainers Association (ACTA). ACTA is the principal trade organization of animal handlers and trainers and independent supervising veterinary surgeons dedicated to high ethical, welfare and performance standards in the use of animals in entertainment, principally in television and film.

2. ACTA holds no specific brief for animals in circuses although some members do have historical connections to circuses. However, many members and a large overall portion of the work of ACTA members is connected to Scotland, so we feel we have a stake in the proposed bill to ban wild animals in travelling circuses.

3. Furthermore, ACTA believes that a significant driver of the move to a ban stems from individuals and focus groups which are fundamentally opposed to captive animals in any circumstances and to the use of any animal in any form of entertainment.

4. It is ACTA’s contention, therefore, that this initiative is but one step in the drive by those minority individuals and groups to ban the use of animals in entertainment in general and, as such, should be firmly resisted.

5. With a large percentage of our membership being represented by veterinary surgeons and many of our membership actively involved with animal care education, we present a strong stance on Animal Welfare and Ethical issues.

6. ACTA is strongly in favour of appropriate regulation when animals are used for the public good or for entertainment.

7. However, this letter is written in opposition to the proposals for an outright ban. Our reasons for opposing the bill are as follows:

   a) Two independent scientific reports on wild animals in circuses have been conducted between 1989 and 2006 (the RSPCA commissioned report by Dr Marthe Kiley Worthington and the government commissioned Radford Report respectively), and the conclusion in both instances have been that there are no scientific grounds to ban travelling circuses with wild animals.

   b) IN 2015 the Welsh Assembly commissioned a review (The Welfare of Wild Animals in Travelling Circuses; Harris, Dorning, Pickett; 2016) as part of its own legislative procedures. ACTA believes [REDACTED TEXT] and that the review was convened to legitimise a decision already taken in principle
by the Welsh Government to attempt to ban wild animals in travelling circuses. ACTA asks this committee to be cautious in the amount of weight given to this evidence.

c) Despite the findings of this review, the Welsh Assembly instead decided to adopt the regulations England have been using since 2012.

d) There have been robust and regular regulations in place in England for wild animals in travelling circuses since 2012. Multiple inspections have been conducted on the two circuses that carry wild animals each year and the circuses have proven they can meet the animal welfare requirements.

e) The inspections are paid for by the circuses that are being inspected, so there is little to no impact on tax-payers.

f) The proposed ban is supposedly supported by evidence yielded from an opinion poll sent out to 5.3 million Scottish people. Of the 5.3 million Scots only 2,043 (0.04%) engaged with the consultation. 1,000 of the Scots who responded are not resident in Scotland. 40 of those who responded were against the ban. In short, 1,003 resident Scots (0.02%) were in favour of the ban. We do not believe this poll demonstrates anything other than the ability of Animal Rights groups to coordinate their supporters.

g) The fact that these unfunded touring circuses, which have to meet a large number of overheads, are still earning enough from audiences whilst still charging affordable prices should demonstrate a serious flaw in the results of the public opinion poll. This flaw was dramatically demonstrated at the recent meeting on 19th May when [REDACTED TEXT] was able to prove that over 1,000 people located in middle and north Aberdeenshire had approved of a circus-style performance of his lions and tigers in November 2016.

h) We believe that the word “ethic” is being used to indicate a clear prejudice against the concept of travelling circus rather than present any credible argument against Animal Welfare. Indeed, the UK Government of 2012 made it clear that it could not ban wild animals on scientific grounds and therefore decided to pursue the ban on ethical grounds.

i) Circus, being a minority industry in the UK today, does not have the time or resources to wage a successful PR battle against its opponents. Nevertheless, it still remains a popular attraction.

j) There is no reason to suppose that the ethics of the many who attend circus performances are any less legitimate than those of the small minority who have campaigned persistently for a ban.

k) As an industry we can see the knock-on effect of this ban. This is down to the problem in defining, *inter alia*, a “travelling circus”. The aforementioned Welsh review acknowledged this point, which is why, ACTA believes, they suggested a ban on mobile zoos as well as their original brief of reporting on circuses. This is also a regular target of the Animal Rights movement,
as are other live events featuring animals in general and wild animals in particular, such as exhibitions in agricultural shows, at educational establishments, at shopping centres, art festivals and various private functions. If any of these events involve moving animals from one venue to another it could be argued that it is a travelling circus in principle. The minority groups that have pushed for this ban have made it clear that they intend to go after non-wild animal circuses and all animal entertainment/education businesses.

8. In conclusion, we have grave concerns about any proposal to ban something purely on ethical grounds. We believe that a total ban is not a view supported by the general public who should be relied upon to consider their own ethical standards and to act accordingly. Rather, ACTA believes, it is the view of a minority of people, with an agenda for animal apartheid, seeking to impose their views on the rest of the population. Furthermore, we consider that the failure of adequate definitions within the bill can only lead to greater confusion in the wider context.

9. With this in mind, we believe a ban would ultimately affect the whole of the entertainment industry.

References relevant to point 7(b) above

[REDACTED TEXT]