What is the problem under consideration? Why is government intervention necessary?
The specific welfare requirement of wild animals may not be compatible with the unique operating environment of a travelling circus. At the request of interested parties the Government is seeking a proportionate solution that will ensure that these welfare needs are met. In addition, ensuring the proper care and adequate welfare of these animals provides an intrinsic societal benefit.

What are the policy objectives and the intended effects?
The policy objective is to raise the standards of welfare for wild animals in travelling circuses. The options could range from a complete ban on the use of wild animals to voluntary, self-regulation, but the effects of these options would be to ensure the welfare of wild animals in circuses.

What policy options have been considered? Please justify any preferred option.
Five options have been considered:
1) A total ban on all wild animals in travelling circuses
2) A partial, species specific ban on some wild animals in travelling circuses
3) A voluntary system of self regulation for wild animals in circuses.
4) A statutory regulatory system for wild animals in travelling circuses
5) Maintaining the status quo.
The options have been evaluated in relation to Option 5.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?
A review would take place 5 years after any regulation/ban came into force.

Ministerial Sign-off
For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

[Signature]
10.12.09 Date:
### Summary: Analysis & Evidence

**Policy Option:** 1  
**Description:** A complete ban on the use of wild animals in circuses

#### ANNUAL COSTS

<table>
<thead>
<tr>
<th>Description and scale of key monetised costs by ‘main affected groups’.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Animal Welfare Organisations:</strong> (a) One-off cost of re-homing/removing the animals from the travelling circuses - £0 - 19.1k. (b) Annual cost of caring for re-homed animals - £251 - 306k (p.a.)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>One-off (Transition)</th>
<th>Yrs</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>£0 - 19.1k</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Average Annual Cost (excluding one-off)</th>
<th>£251 – 306k</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Total Cost (PV)</th>
<th>£1.13m – 1.38m</th>
</tr>
</thead>
</table>

**Other key non-monetised costs by ‘main affected groups’** Potential impact upon wider film and television industry due to lack of appropriate animals available.

#### ANNUAL BENEFITS

<table>
<thead>
<tr>
<th>Description and scale of key monetised benefits by ‘main affected groups’.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Circuses:</strong> (a) Annual benefit from no longer having to pay for the care of wild animals in their circuses in the event of re-homing – £125 – 306k (p.a.)</td>
</tr>
<tr>
<td><strong>Animal welfare Organisations:</strong> (a) Annual benefit from reduced number of inspections - £3.84 – 11.5k (p.a.)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>One-off</th>
<th>Yrs</th>
<th>Benefit</th>
</tr>
</thead>
<tbody>
<tr>
<td>£0</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Average Annual Benefit (excluding one-off)</th>
<th>£129 – 318k</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Total Benefit (PV)</th>
<th>£583k - 1.44m</th>
</tr>
</thead>
</table>

**Other key non-monetised benefits by ‘main affected groups’** Animal welfare benefit due to no longer having to live in inappropriate conditions and travel long distances. Societal benefit due to ensuring proper care and adequate welfare of exotic animals.

#### Key Assumptions/Sensitivities/Risks

Costs and benefits have been generated under the assumption of full compliance. Various assumptions used to generate costs and benefit estimates – see evidence base for details. Time period of analysis 5 years to match review period; policy implementation date: 2010.

<table>
<thead>
<tr>
<th>Price Base Year</th>
<th>Time Period</th>
<th>Net Benefit Range (NPV)</th>
<th>NET BENEFIT (NPV Best estimate)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>Years 5</td>
<td>£(-)819k - 303k</td>
<td>£(-)258k</td>
</tr>
</tbody>
</table>

What is the geographic coverage of the policy/option?  
England

On what date will the policy be implemented?  
2010/2011

Which organisation(s) will enforce the policy?  
Local Authorities

What is the total annual cost of enforcement for these organisations?  
£ Nil

Does enforcement comply with Hampton principles?  
No

Will implementation go beyond minimum EU requirements?  
N/A

What is the value of the proposed offsetting measure per year?  
N/A

What is the value of changes in greenhouse gas emissions?  
Negligible

Will the proposal have a significant impact on competition?  
No

Annual cost (£-£) per organisation (excluding one-off)  
Micro | Small | Medium | Large |
|---|---|---|---|

Are any of these organisations exempt?  
No | No | N/A | N/A

#### Impact on Admin Burdens Baseline (2005 Prices)  
**(Increase - Decrease)**

<table>
<thead>
<tr>
<th>Increase</th>
<th>£</th>
<th>Not yet known</th>
<th>Decrease</th>
<th>£</th>
<th>N/A</th>
<th>Net Impact</th>
<th>£</th>
<th>Not yet known</th>
</tr>
</thead>
</table>

**Key:**  
Annual costs and benefits: Constant Prices  
(Net) Present Value
<table>
<thead>
<tr>
<th>Policy Option: 3</th>
<th>Description: Voluntary self-regulation on the use of wild animals in circuses</th>
</tr>
</thead>
</table>

### ANNUAL COSTS

<table>
<thead>
<tr>
<th>Costs Type</th>
<th>Description</th>
<th>Scale</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-off (Transition)</td>
<td>One-off costs for training staff to bring the standard of welfare in line with the regulations £99k-158k.</td>
<td>£99k-158k</td>
</tr>
<tr>
<td></td>
<td>One-off costs for improvements in the facilities for wild animals to bring the standard of welfare in line with the regulations £30k-32k.</td>
<td>£30k-32k</td>
</tr>
</tbody>
</table>

**Total Cost (PV)**: £130 - 190k

### ANNUAL BENEFITS

<table>
<thead>
<tr>
<th>Benefits Type</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-off</td>
<td></td>
</tr>
</tbody>
</table>

**Total Benefit (PV)**

### OTHER COSTS

- **One-off Costs**: £130 – 190k (1 yr)
- **Average Annual Cost**: £

### OTHER BENEFITS

- **One-off Benefits**: £
- **Average Annual Benefit**: £

**Total Benefit (PV)**

### Key Assumptions/Sensitivities/Risks

- Costs and benefits have been generated under the assumption of full compliance. Various assumptions used to generate costs and benefit estimates – see evidence base for details.
- Time period of analysis 5 years to match review period; policy implementation date: 2010.

### Price Base

- **Year**: 2009
- **Time Period**: Years 5

### Net Benefit Range (NPV)

- **Left**: (-)190
- **Right**: (-)130k

### NET BENEFIT (NPV Best estimate)

- **Left**: (-)160k

### Impact on Admin Burdens Baseline (2005 Prices)

- **Increase of**: £ Not yet known
- **Decrease of**: £N/A
- **Net Impact**: £ Not yet known

**Key**: Annual costs and benefits: Constant Prices  (Net) Present Value
### Summary: Analysis & Evidence

<table>
<thead>
<tr>
<th>Policy Option: 4</th>
<th>Description: Statutory regulation on the use of wild animals in circuses</th>
<th></th>
</tr>
</thead>
</table>

#### ANNUAL COSTS

**One-off (Transition) Yrs**: £ 130k – 190k

**Average Annual Cost (excluding one-off)**: £ 15.3k – 26.9k

**Total Cost (PV)**: £ 164k - 242k

**Other key non-monetised costs by ‘main affected groups’**

- One off cost to regulatory body of training an inspector to be qualified to undertake inspections, not possible to monetise at present – further details in evidence base.

#### BENEFITS

**One-off Yrs**: £

**Average Annual Benefit (excluding one-off)**: £

**Total Benefit (PV)**: £

**Other key non-monetised benefits by ‘main affected groups’**

- Animal welfare benefit from appropriate care and living conditions. Societal benefit of ensuring the proper care of wild animals.

### Key Assumptions/Sensitivities/Risks

Costs and benefits have been generated under the assumption of full compliance. Various assumptions used to generate costs and benefit estimates – see evidence base for details.

**Time period of analysis**: 5 years to match review period; policy implementation date: 2010.

**Price Base Year**: 2009

**Net Benefit Range (NPV)**: £ (-)242k – (-)164k

**NET BENEFIT (NPV Best estimate)**: £ (-)203k

### What is the geographic coverage of the policy/option?

England

### On what date will the policy be implemented?

2010

### Which organisation(s) will enforce the policy?

Not yet known

### What is the total annual cost of enforcement for these organisations?

To be assessed

### Does enforcement comply with Hampton principles?

No

### Will implementation go beyond minimum EU requirements?

N/A

### What is the value of the proposed offsetting measure per year?

£ 0

### What is the value of changes in greenhouse gas emissions?

£ 0

### Will the proposal have a significant impact on competition?

No

### Annual cost (£-£) per organisation (excluding one-off)

<table>
<thead>
<tr>
<th>Micro</th>
<th>Small</th>
<th>Medium</th>
<th>Large</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>No</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### Are any of these organisations exempt?

No

### Impact on Admin Burdens Baseline (2005 Prices)

<table>
<thead>
<tr>
<th>Increase of</th>
<th>£ Not yet known</th>
<th>Decrease of</th>
<th>£N/A</th>
<th>Net Impact</th>
<th>£ Not yet known</th>
</tr>
</thead>
</table>

**Key:**

- **Annual costs and benefits:** Constant Prices
- **(Net) Present Value**
Summary:

1. Concerns have been raised by both MPs and animal welfare organisations (including the RSPCA, the Born Free Foundation, Captive Animal Protection Society and Animal Defenders International) over the standards of welfare of wild animals performing in travelling circuses (this does not include; zoos, safari parks, static circuses or private keepers). In the summer season 2009 there were 39 wild animals being used by four circuses in the United Kingdom. In the last three years there have been no more than 47 wild animals used in travelling circus performances. Existing law makes it an offence for owners/keepers to fail to provide for the needs of their animals. It is also an offence to cause unnecessary suffering to an animal. However, living conditions provided by travelling circuses are likely to be unpredictable; it is thought Government intervention is therefore required to raise the standards of welfare to a consistently acceptable standard.

2. We have considered five options for raising the minimum standard of welfare for wild animals in travelling circuses; 1) a complete ban on the use of wild animals in travelling circuses 2) a partial ban for the use of wild animals 3) voluntary regulation of the use of wild animals in circuses 4) statutory regulations of the use of wild animals in circuses and 5) maintaining the status quo.

3. Option 2) a partial ban on the use of wild animals in circuses was considered, so as to exclude the animals most unsuited to travelling circuses (possibly elephants and big cats). This option was dismissed after consideration as it was thought that this would be both extremely costly to establish and maintain and would not necessarily raise the welfare standards of all wild animals in circuses. Likewise, in imposing a species specific ban there was also the concern that other animals, including those less suited to circus life, would be imported and used in order to circumvent the ban. Animal welfare organisations were also concerned that animals such as the camel, which are domesticated in other countries but are listed in the Dangerous Wild Animals Act, would be allowed to continue performing in circuses when they are one of the species that, in their view, is subject to sub-standard welfare. The industry side also made it clear that drawing up a list of the permitted and not permitted animals would be unfeasible.

4. It was agreed by all parties that option 5) maintaining the status quo was not a suitable option in raising and safeguarding the standard of welfare for wild animals in circuses. “Business as usual” was not seen as a suitable option as it would not address the concerns raised by both the circus industry and animal welfare organisations over the welfare standards of wild animals in travelling circuses. Therefore the remaining three options to be considered are; 1) a complete ban 3) voluntary regulation and 4) statutory regulations. An assessment of these three options has been included in this Impact Assessment. All three options have been assessed in relation to a baseline of Option 5, maintain the current status quo. A summary of the costs of the three options is provided here.

Summary monetised costs and benefits for each option:

<table>
<thead>
<tr>
<th>Cost/benefit type</th>
<th>Item</th>
<th>Option 1</th>
<th>Option 2</th>
<th>Option 3</th>
<th>Paragraph Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>One-Off costs</td>
<td>Welfare organisations re-homing animals (if necessary)</td>
<td>£0-19.1k</td>
<td>£0</td>
<td>£0</td>
<td>21-24</td>
</tr>
<tr>
<td></td>
<td>Circuses training staff</td>
<td>£0</td>
<td>£99.6-158k</td>
<td>£99.6-158k</td>
<td>51-53</td>
</tr>
<tr>
<td></td>
<td>Circuses improving facilities</td>
<td>£0</td>
<td>£30–32k</td>
<td>£30–32k</td>
<td>54</td>
</tr>
<tr>
<td><strong>Total One-off Costs</strong></td>
<td></td>
<td><strong>£0-19.1k</strong></td>
<td><strong>£130-190k</strong></td>
<td><strong>£130-190k</strong></td>
<td></td>
</tr>
<tr>
<td>Annual costs</td>
<td>Welfare organisations caring for the re-homed animals (if re-homing necessary)</td>
<td>£251-306k</td>
<td>£0</td>
<td>£0</td>
<td>27</td>
</tr>
<tr>
<td></td>
<td>Competent authorities inspections to ensure regulation is being complied with</td>
<td>£0</td>
<td>£0</td>
<td>£7.68-15.3k</td>
<td>55-57</td>
</tr>
<tr>
<td><strong>Total Annual Costs</strong></td>
<td></td>
<td><strong>£251-306k</strong></td>
<td><strong>£0</strong></td>
<td><strong>£7.68-15.3k</strong></td>
<td></td>
</tr>
<tr>
<td>Annual benefits</td>
<td>Cost saving to circuses from no longer having to care for animals that are re-homed</td>
<td>£125–306k</td>
<td>£0</td>
<td>£0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Cost saving to welfare organisations of</td>
<td>£3.86-11.5k</td>
<td>£0</td>
<td>£0</td>
<td>28-29</td>
</tr>
</tbody>
</table>

1. Please see Annex I for list of circuses using wild animals and the animals being used.
<table>
<thead>
<tr>
<th></th>
<th>Total Annual Benefits</th>
<th>£0</th>
<th>£0</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net Annual Benefit</td>
<td>(-)£177k – 67.3k</td>
<td>£0</td>
<td>(-)£7.68 – (-)15.3k</td>
</tr>
</tbody>
</table>

Additional points:

5. The net annual benefit range of Option 1 shows that there could be an annual net benefit or an annual net cost of this policy option. This reflects the broad ranges we have estimated for the costs of caring for re-homed animals and the cost savings of no longer having to care for re-homed animals. This is something that we will seek to refine during the consultation process.

6. It must be stressed that the annual cost of caring for the re-homes animals would not remain at this level for many years and would depend on the lifetime of the animals. This cost is based on the assumption that all 38 animals were re-homed. As many of these animals are elderly, this cost would gradually reduce to zero as the animals died.

**Background and nature of the problem:**

7. There have been increasing concerns over the welfare standards of wild animals used in travelling circuses. During the passage of the Animal Welfare Bill in 2006 there was much discussion over the welfare standards of the wild animals that are used in travelling circuses. Currently there are 38 wild animals being used in four circuses. It was agreed during the debates of the Animal Welfare Act that the use of wild animals in travelling circuses would be banned, subject to there being sufficient robust scientific evidence.

8. It was agreed that since animal welfare is a scientific discipline, in order to ban wild animals, there would need to be suitably robust scientific evidence that the welfare of wild animals was compromised as a result of being part of a travelling circus. In 2007, an academic lawyer, Mike Radford, was appointed the Chairman of a Circus Working Group. The remit of the Circus Working Group was to provide, and consider, evidence relating to the transportation and housing needs of non-domesticated species. The report of the Circus Working Group (the Radford report) concluded that there was not sufficient scientific evidence to justify a ban on wild animals in travelling circuses.

9. Animal welfare organisations sought alternative legal opinions as to the outcome of the Radford report. These independent legal opinions argues that the Radford report was flawed and found that it was possible to ban the use of wild animals in travelling circuses on the basis of available evidence.

10. After the publication of the Radford report, a feasibility study was undertaken to assess the practicality of regulating the use of wild animals in circuses, as it is “agreed” by all interested groups that the use of wild animals in circuses cannot continue as it is now. As part of the feasibility study two members of the Zoo Licensing Inspectorate visited two of the circuses using wild animals. Inspectors from Animal Health also made a follow up visit. On the recommendations of the inspectors who conducted the visits, both circuses undertook improvements to their accommodation and travelling facilities, in order to raise the standard of welfare of the animals.

11. Having seen the final reports of the Zoo Licensing Inspectors who carried out the feasibility study and having had subsequent discussions with the industry side and welfare organisations, it is agreed that some form of action is long overdue to protect wild animals being used in circus performance.

12. Animal welfare organisations have many arguments as to why wild animals in circuses should be banned. One of which is that it is extremely difficult to build a case against circuses using the Animal Welfare Act 2006 because it is not easy to gather evidence when a circus is constantly on the move. We do not accept that this is necessarily the case, but we do believe that the uniqueness of the circus environment, including changing acts and personnel, means that they may pose risks that are not present in other areas where wild animals are kept.
Existing legislation:

13. The Animal Welfare Act 2006 (AWA). The AWA makes it a criminal offence for any person responsible for an animal (be they owners or keepers) to fail to provide for their animals welfare. Under Section 9 of the AWA, a person responsible for an animal has the duty to provide for an animal's needs, which include; its need for a suitable environment, its need for a suitable diet, its need to be able to exhibit normal behaviour patterns, and need it has to be housed with, or apart from, other animals and its need to be protected from any pain, suffering, injury and disease. The AWA also makes it a criminal offence to cause an animal any unnecessary pain or suffering.

14. The Dangerous Wild Animals Act 1976 (DWAA). The DWAA was reviewed in 2007. While the species list is valuable to discussion of the definition of a wild animal, the DWAA is primarily considered as legislation to protect the public. There are basic welfare requirements that must be met in order to obtain a license, but the DWAA does not apply to circuses.

15. The Zoo Licensing Act 1981. (ZLA) Travelling circuses have a specific exemption from the Zoo Licensing Act; however the Zoo Licensing Act provides a starting point from which to work when considering future regulations. For example, the current Zoo Licensing Act could be used as the standards for a travelling circus’s permanent quarters. Ben Bradshaw, Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs when the Animal Welfare Act was debated said “In drawing up proposals for secondary legislation we intend to ensure a clear read across between zoo licensing standards and those standards that we will require from permanent circus premises.” 2 The Circus Working Group also highlighted other areas of the ZLA that could be useful when drawing up future regulations.

16. The Performing Animals (Regulation) Act 1925. This states that anybody who wishes to have performing animals must be registered by their Local Authority and establishes power to enter premises. It does not address the welfare requirements of any performing animals.

Definitions and the scope of the consultation:

17. For the purposes of this consultation and ongoing discussion, the same definition of “wild animal” shall be used as for the work of the Circus Working Group, namely “a non-domesticated animal is a member of a species that is not normally domesticated in the British Islands; that is to say, a species whose collective behaviour, life cycle or physiology remains unaltered from the wild type despite their breeding and living conditions being under human control for multiple generations.” 3

18. The Zoo Licensing Act defines a circus as: “a place where animals are kept or introduced wholly or mainly for the purpose of performing tricks or manoeuvres at that place.” 4 The Dangerous Wild Animals Act uses a similar definition: a circus “includes any place where animals are kept or introduced wholly or mainly for the purpose of performing tricks or manoeuvres.” 5 The Performing Animals Welfare International (PAWSI) Circus Code of Welfare defines a circus as: “a group of animals under the same ownership or control and that is usually a mobile entity that primarily performs for public exhibition and may also be displayed for educational purposes.” 6 For the purpose of this consultation, the definition of travelling circus will be that used in the Zoo Licensing Act, in conjunction with the fact that in order to be a “travelling” circus, a circus must not have a fixed place of residence for over six months of the year.

19. It is important to note the difference between wild animals performing in a travelling circus and other performing wild animals. This consultation makes a clear distinction between the two and is not consulting on the banning or regulating on the use of wild animals in the audio-visual industry or in the keeping of wild animals by private collectors. Likewise, this consultation does not include any wild animal unless it is in the performance of a travelling circus. To clarify, in the debates on the Animal Welfare Act, Ben Bradshaw said: “The ban will apply to travelling circuses only – zoo

---

2 8th March 2006, col 60WS.
3 Wild Animals in Travelling Circuses; the Report of the Chairman of the Circus Working Group, Mike Radford, Section 2.2.
4 Zoo Licensing Act 1981, Section 21, Para 1.
5 Dangerous Wild Animals Act 1974, Section 7, Para 4.
performances, performances in the audio-visual industry and performances in static circuses will not be affected.” 7 For example, the use of reindeer that are owned by a static circus proprietor which take part in a Christmas parade are not part of the scope of this consultation, so long as they are based at permanent premises and are not included in the circus performance during the travelling season.

Consideration of each option (including costs):

Option 1) a complete ban on wild animals in circuses:

20. Section 12 of the Animal Welfare Act allows the Minister/Secretary of State to make such provisions as he thinks fit for the purpose of promoting the welfare of animals for which a person is responsible. Under this legislation a complete ban on wild animals in travelling circuses could be introduced. Alternatively, a ban could be secured through Primary Legislation.

21. Animal welfare organisations have made it clear and are in agreement that a complete ban on the use of wild animals in circuses is the only option they support. Welfare organisations have full time staff assigned to the work created by the use of wild animals in travelling circuses. However, in the event of a ban, welfare organisations have informed us that these staff would be assigned to another area within the organisation and would not lose their jobs.

22. Representatives from the circus industry are strongly opposed to a ban on the use of wild animals in circuses. They are in agreement that if wild animals were prohibited from being part of their circus performance that revenue would fall and employees would be forced to leave. Circus owners do not believe that it would be possible to find alternative work for employees within their circus.

Re-homing animals

23. In the event of a ban any wild animals in circuses would need to be removed from the circus and potentially re-homed. Circus owners have said that they would not want them to be re-homed to a sanctuary/zoo and would take responsibility of the re-homing themselves. However, if re-homing of animals were necessary, due to circuses no longer being able to afford to keep them for example, animal welfare organisations have agreed that they would provide re-homing facilities and would pay for the re-homing themselves, from dedicated fundraising activities.

24. We requested and received information from the RSPCA, the Born Free Foundation and Animal Defenders International on the financial and logistical implications of the re-homing and ongoing care of the banned animals. They believe that homes could be found for all the animals within the UK or Europe. The RSPCA envisaged that transport vehicles, manpower and provisions of animals during their journey to new homes in the UK would be provided by the circuses. On the basis that a journey by road to a location in the UK or Europe would take no more than two days one way, plus a maximum of one day travel within the UK, each return journey would cost approximately £1.47k. 8

25. The RSPCA recommends that animals from the same circuses be re-homed to the same location, to avoid separating companions. On the basis that there are currently 38 wild animals being used in circuses, 13 return journeys would be required, costing approximately £19.1k.

26. Whilst this is likely to be the cost for transporting some of the animals to new homes within Europe, it is likely to be an overestimate of the cost of re-homing all of the animals. As a result £19.1k has been set as an upper bound on these costs. To reflect our current uncertainty in these costs, £0 has been set a lower bound on the cost. Therefore, the total one-off cost to welfare organisations of transporting animals to new homes within Europe is between £0 and 19.1k.

27. In the unlikely event that no home was available in the UK or Europe and flights were required, there would be a cost to airlines or transporting animals (sponsorship deals with airlines have borne the cost of flights for all relocations undertaken by the BFF.) The costs incurred by animal welfare organisations would therefore be that of building suitable crates to transport the animals, which would not cost more than £2000. It should be stressed that it is extremely unlikely that animals would have to be re-homed outside Europe and is much more probably that most of the animals could be re-homed within the UK.

Caring for re-homed animals

---

7 8 March 2006, col 60WS.
8 For further details on this calculation, please see Annex III.
28. Any re-homed animal would also need to be cared for in their new homes. The costs of keeping wild animals vary depending on the species and location. However, the RSPCA and BFF were able to provide us with estimates for some species, and we have estimated the costs for other species. Table 1 sets out the costs of caring for re-homed animals. The total cost to welfare organisations is between £251k and £306k per annum.

Table 1: Cost to welfare organisations of caring for re-homed animals per annum

<table>
<thead>
<tr>
<th>Animal species</th>
<th>Cost per animal</th>
<th>Number of animals</th>
<th>Total cost per species</th>
</tr>
</thead>
<tbody>
<tr>
<td>Big Cat</td>
<td>£3,794$</td>
<td>13</td>
<td>£49.3k</td>
</tr>
<tr>
<td>Elephant</td>
<td>£37,657$</td>
<td>4</td>
<td>£134k</td>
</tr>
<tr>
<td>Zebra</td>
<td>£4,415 - £6,500</td>
<td>5</td>
<td>£22.1 - 32.5k</td>
</tr>
<tr>
<td>Snake</td>
<td>£214$</td>
<td>6</td>
<td>£1.28k</td>
</tr>
<tr>
<td>Ankole</td>
<td>£2,899 - £12,461</td>
<td>1</td>
<td>£2.90 - 12.5k</td>
</tr>
<tr>
<td>Crocodile</td>
<td>£2,899 - £12,461</td>
<td>2</td>
<td>£5.80 – 24.9k</td>
</tr>
<tr>
<td>Camel</td>
<td>£4,415 - £6,500</td>
<td>8</td>
<td>£35.3 - 52.0k</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>39</strong></td>
<td><strong>£251 - 306k</strong></td>
</tr>
</tbody>
</table>

29. In the event of re-homing animals, there would be a cost saving for circuses that no longer have the cost of caring for wild animals in their circuses. At this stage, we do not know the scale of this cost saving for circuses so we have estimated it from the costs to welfare organisations of caring for re-homed animals, Table 1. Assuming that the cost saving to circuses is between 50 and 100% of the costs incurred by animal welfare organisations, this represents a benefit to circuses of between £125 and 306k per annum.

**Fewer inspections by animal welfare organisations**

30. In the event of a ban, it would be necessary to continue inspecting circuses on an ad hoc basis, to ensure that the ban was being adhered to. It is expected that if a wild animal was performing animal welfare groups and Defra would be made aware of it, but it would still be appropriate for animal welfare organisations to undertake an annual inspection. Given that welfare organisations currently inspect each circus 2-4 times per annum, we expect that in the event of a ban the annual number of inspections would decrease by 1-3 per circus per annum. There are four circuses that currently have wild animals, so in total there would be 4-12 fewer inspections per annum.

31. As an estimate, a veterinary officer from Animal Health trained to conduct inspections costs £120 per hour. On the basis that each inspection would have used a whole day of an inspector’s time, the cost saving would be £960 for each inspection no longer needed. This represents a total benefit to welfare organisation of a reduction in ad hoc inspection would be between £3.86 and 11.5k per annum.

**Possible costs to circuses**

32. As mentioned previously, if a ban were to be imposed, there would be job losses within the circus industry, which would represent a cost. Likewise, circuses would have the cost of removing

---

$^9$ Estimated from the annual cost per animal at Shamwari Sanctuary, South Africa, and accounting for the difference between cost of living between South Africa and England.

$^{10}$ AZA Elephant Manager’s Meeting, Orlando, Florida, 10-21 January 2005. Costs averaged $57,900, which is approximately £33,468 (using the exchange rate from the time of the meeting in 2005). Adjusting for inflation, using the CPI, this is approximately £37,657 in current prices (October 2009)

$^{11}$ For both zebras and camel, costs are not readily available. So the estimated cost of caring for a domestic horse in a private household per year has been used as a proxy

$^{12}$ Insurance = £150, food = £5.30/month = £63.50

$^{13}$ For both anoles and crocodiles, costs are not readily available. A range has been calculated, using the interquartile range of the annual costs of caring for the other animal species; it is extremely unlikely that the costs of caring for anoles and crocodiles will fall outside this range.
equipment/travelling facilities/accommodation that was no longer necessary. It is not possible to calculate the potential costs of this at this time, but these would be monetised for the final impact assessment.

33. At this stage, we do not know what the impact of a ban on the use of wild animals in travelling circuses would have on circus revenues. This will depend upon the effect of the ban on the number of visitors to circuses and the effect on ticket prices. This is something that we will try to monetise for the final impact assessment.

Potential effect of a ban on the wider entertainment industry:

34. There have been concerns raised by the circus industry that if wild animals were to be completely banned from circuses this would have an adverse effect upon the wider film and television industry. Industry argues that animals in circuses are able to do “close work” that other animals would have to be trained to do. Information regarding the use of circus animals in the audio-visual industry has been requested and received, but we are awaiting more detailed evidence of the use of the animals in the last five years. 14

35. In discussions with DCMS, officials do not oppose a ban on the use of wild animals in travelling circuses, so long as a distinct and clear line is drawn between wild animals in travelling circuses and wild animals kept by static circuses or private keepers.

36. The argument that a ban on wild animals in circuses would have a substantial impact on the wider entertainment industry has been largely dismissed by animal welfare groups, reasoning that there are static animal suppliers that would be able to supplement any animals that were no longer available from circuses.

37. Likewise, it is our understanding from the circus industry that some, if not all, of the affected circuses would consider being static suppliers of wild animals to the film and television industry. We understand that there are two static suppliers already in existence. It must be stressed, as already mentioned in paragraphs 16 and 29 that animals kept by static suppliers and used in the audiovisual industry would be outside the scope of this consultation and would not be affected by a ban on wild animals in circuses.

“Break even” benefits

38. Although the benefits of improved animal welfare have as yet not been monetised, it is possible to broadly estimate the magnitude of annual benefit per animal that would have to occur for this option to be cost benefit neutral. Using the costs and benefits that we have been able to monetise so far, it is possible to calculate what the public value would need to be to make Option 1 cost-benefit neutral. As the costs and benefits of this option differ across species, different species will require different “break even” benefits. The annual “break even” benefits required to make this policy worthwhile are as follows Using the simplified assumption where the one-off costs are spread evenly over the 5 year period under consideration, and then by adding this to the annual net costs, we can calculate the annual “break even” benefits required to make this policy worthwhile:

<table>
<thead>
<tr>
<th>Animal species</th>
<th>“Break even” benefit required per animal per annum</th>
</tr>
</thead>
<tbody>
<tr>
<td>Big Cat</td>
<td>£800</td>
</tr>
<tr>
<td>Elephant</td>
<td>£8,220</td>
</tr>
<tr>
<td>Zebra</td>
<td>£956</td>
</tr>
<tr>
<td>Snake</td>
<td>£94.6(a)</td>
</tr>
<tr>
<td>Ankole</td>
<td>£577</td>
</tr>
<tr>
<td>Crocodile</td>
<td>£577</td>
</tr>
<tr>
<td>Camel</td>
<td>£955</td>
</tr>
</tbody>
</table>

14 Officials from DCMS have provided evidence that in the last ten years American films using animals that have been made in Britain have had a combined UK spend of approximately £1.8 billion. However, it should be pointed out that this figure does not differentiate between wild animals and domesticated animals and applies to animals from all sources – not just circuses.
Average Benefit required £1,710

(a) This represents a small cost required, due to the comparatively low costs of caring for snakes being offset by the larger cost savings to animal welfare organisations.

**Options 3) and 4) Voluntary self regulation and statutory regulation:**

39. In the case of voluntary self regulation the circus industry would be setting their own welfare standards which they would be responsible for enforcing and controlling. In the case of statutory regulation, we wish to consult on who/what would be an appropriate body/organisation to create and enforce any regulations.

40. There have been concerns raised that in the event of regulation some circuses may cease operating in the UK and may relocate to Europe. It is our understanding that none of the four circuses that currently use wild animals in their performances have any intention of relocating outside of the UK. As mentioned in paragraph 37, officials understand that in the event of a ban and possibly under regulations, some, if not all of the affected circuses would instead consider moving into the static animal supplier industry.

**Self regulation:**

41. Voluntary arrangements avoid Government and judicial involvement, as they do not require establishing official enforcement arrangements and new statutory sanctions. An organisation such as PAWSI (Performing Animals Welfare Standards International) is set up to provide such a system; however there are issues as to why PAWSI may not be an appropriate regulator. In the case of any regulation of wild animals in circuses, there would need to be a clear distinction between performing circus animals and animals in the wider performance industry. At present PAWSI is a group which represents not only circuses, but also members of the audiovisual industry. To be a credible body for regulation, PAWSI would have to be restructured so as to clearly separate the circus and audiovisual industry.

42. Our understanding is that PAWSI would not want to regulate and do not believe it feasible to regulate circuses alone, but would wish to regulate a wider spectrum that took in the film and television industry.

43. UKAS accreditation (United Kingdom Accreditation Service) would help to provide assurance to interested parties, including animal welfare organisations that self-regulation arrangements are open, clear and transparent and that decisions are made objectively. In order to demonstrate that a self-regulatory system was open and auditable, officials would recommend obtaining UKAS accreditation. Whether it is financially practical to obtain UKAS accreditation for the regulation of only 38 animals is unclear and would be for a potential self regulator to decide.

44. A self-regulatory system would also need to demonstrate an ability to work with animal welfare organisations, such as the RSPCA. Current indications are that animal welfare organisations would not feel comfortable working with any self-regulatory body as their preferred option is a complete ban.

45. Preliminary discussions with some members of the circus industry indicate that there are differing views on the potential success of any self-regulatory system. Those not in favour of self-regulation see it as an ‘easy way out’ and not having the motivation to constructively improve the welfare of wild animals in circuses.

46. The preferred option of these members of the industry is for the establishment of a new circus licensing authority which would have similarities with the zoo licensing procedure by be operated completely separately and with standards appropriate to circuses and not necessarily appropriate to zoos. This body could comprise of representatives from the circus industry, zoological veterinarians, representatives from Defra and also from animals welfare organisations.

47. These representatives from the circus industry wish to see a robust system of regulations incorporating required standards of animal welfare enforced by an independent inspection regime that will stand up to public and parliamentary scrutiny. Regulations would also need to be drawn up in consultation with specialist vets and would need to be specific to circuses within the United Kingdom. They do not believe a self regulatory system could provide this.
Options for statutory regulation:

48. The Animal Welfare Act allows the Secretary of State to make a code of practice to be made (approved by parliament) for the purpose of providing practical guidance in respect of any provision made by or under the 2006 Act including section 9 (duty of any person responsible to for an animal to ensure welfare). Regulations could be introduced in this way.

49. During discussions with LACORS (Local Authorities Coordinators of Regulatory Services) the possibility of using Local Authorities as the body which could regulate circuses was discussed. However, it became clear that this option would not be feasible. The travelling nature of circuses would make it difficult to a single local authority to inspect them, with an inspector having to travel to each location across the country. The alternative would be to create a system of sharing information and costs between the local authorities in which the circuses performed. However, this is an expensive and burdensome option for only four circuses. Therefore, any regulatory body which were to enforce statutory regulations would have to be a nationwide organisation, such as Animal Health. Likewise, if each circus were to be inspected and regulated by the local authority in which its permanent premises were, this would result in each relevant authority having to have an inspector that was trained and sufficiently experienced in dealing with wild animals. Considering there are only four circuses with wild animals it would potentially require substantial amount of training for very few actual inspections.

50. The possibilities of regulation were also discussed with LBRO (Local Better Regulation Office). LBRO agreed that it was not practical for local authorities to act as the regulatory body, due to the travelling nature of circuses and the need to share information on the circuses between local authorities. However the LBRO were able to suggest the use of a Primary Authority system as an alternative. This scheme could potentially overcome the issues that would be faced by regulation simply through a single local authority.

51. Under the Primary Authority scheme, each circus could form a relationship with one local authority that would then be responsible for providing the circuses with advice and guidance and for the issuing of a license, subject to whatever inspections were in place. The primary authority could then liaise with other local authorities and could provide guidance when it came to carrying out any spot checks on circuses premises while travelling. In addition the cost of local authorities undertaking these inspections could be recovered under the Primary Authority agreement between the primary authority and the circus.

52. LBRO also hosts a secure Primary Authority database to which all local authorities have access. This could provide the system in which information on the circuses could be stored and would provide the means of transferring information between authorities. This would allow a consistent approach to the enforcement of any regulations.

53. The Primary Authority scheme was launched in April 2009 so is a relatively new initiative. There are areas of the scheme that have not necessarily been tested, however officials from the LBRO are confident that it could provide a system of regulation/licensing for circuses and would be happy to work with officials and circus owners to create such a system.

Costs:

Training circus staff

54. We recognise the valuable work done by PAWSI in setting up the City and Guilds NVQ in Animal Training and Management in Circus Education. This is run by Sparsholt Agricultural College in Hampshire and will soon change to Qualification Credit Framework. The cost of these courses varies between level of NVQ obtained, but is between £1,200 and £1,900 per applicant. 15

55. Similarly, the number of circus employees was taken from last count to be 35 at the Great British Circus, 25 at Jolly’s and 23 at Circus Mondeo. In total, at present, travelling circuses using wild animals employ 83 people. The total one-off cost of training is between £99.6k and £158k. It is our understanding that some members of circus staff have already begun to undertake these qualifications.

15 Information taken from the course guide, Animal Training and Management, Sparsholt College.
56. Whether or not it is decided to go down a statutory system of regulations or voluntary self-regulation, we consider that staff should be encouraged to increase their skills through following accredited courses, such as NVQ training.

**Improvements to the facilities for wild animals**

57. As regulations are unclear it is difficult to gauge how much it would cost, if anything, for circuses to bring the accommodation of their animals up to the required standard of welfare. However, using information from the feasibility study we know that one circus spent approximately £7,500 and another £8,000 on changes and improvements after the visits from the Zoo Licensing Inspectorate, in order to bring the accommodation of their wild animals up to standard. Using the assumption that it is unlikely that any regulation will require a higher standard of welfare than the Zoo Licensing Act, the cost to raise welfare standards sufficiently would be between £7,500 and £8,000. Considering there are four circuses that currently use wild animals, it could be calculated that in order for circuses to bring their accommodation up to the welfare standard required by regulation, either voluntary or statutory, would be between £30k and £32k.

**Inspections by the competent authority**

58. It has been agreed that under any form of regulation it would be necessary to inspect each circus both at the permanent premises and while on tour. It would also be appropriate to have a “spot check” inspection while the circus was on tour. As an estimate, a veterinary officer from Animal Health trained to conduct inspections costs £120 per hour. On the basis that each inspection would use a whole day of an inspector’s time, each inspection would cost £960. There are four circuses that currently have wild animals, and each would require 2-3 inspections per annum. The cost of regular inspection would be between £7.68k and £11.5k per annum.

59. In order for an inspector to undertake visits to circuses, they would need to be suitably experienced in inspecting wild animals and would have skills and experience equal to that of a Zoo Licensing Inspector. It is possible that in the event of statutory regulation there would be a need for a regulatory body/system to employ a suitable inspector, as they may not already be in place. Alternatively, a veterinary officer already in situ may require further experience/training in order to adequately inspect a circus premises.

60. Having contacted Animal Health, they were able to inform us of the training requirements/criteria which a veterinary officer wishing to be a Zoo Licensing inspector had to match (attached in annex II). There are no specific training courses; however, any new inspector would have to join an experienced inspector on three visits before inspecting alone. The expenses of these visits would be covered by Animal Health. In addition, Animal Health organise an annual training seminar for Zoo Licensing Inspectors, which delegates must pay to attend. At present inspectors are only encouraged to attend, however, Animal Health are considering making attendance mandatory for all inspectors. As the inspection needs of any potential regulatory system are not yet known, it is not possible to calculate a cost for providing new inspectors.

61. The RSPCA has indicated that they would wish to continue inspecting circus premises in the event of regulation being imposed. On the basis that they would wish to inspect as often as at present the RSPCA would incur no additional costs of inspecting circuses compared to option 5, maintaining the status quo.

**Admin burden for circuses**

62. In the event of any regulations, it is likely that a condition would be to include veterinary records of all animals owned or kept by the circus. Likewise there would be an increased admin burden due to the time spent by staff accompanying inspectors on visits and completing any qualifications. This would increase admin burdens, but it is not yet known by how much. The potential cost of the increase on admin burdens will be quantified in a final impact assessment.

**“Break even” benefits**

63. As with Option 1, although the benefits of improved animal welfare have as yet not been monetised, it is possible to broadly estimate the magnitude of the annual public value that would need to occur for these options to be cost benefit neutral. For Options 2 and 3, we anticipate that the costs and benefits are the same across all species. So using the simplified assumption where the one-off costs are spread evenly over the 5 year period under consideration, and then by adding this to the annual costs, we can calculate that the annualised overall net cost will be £31,930 for Option 2.
and £41,530 for Option 3. This makes the annual “break even” benefits required to make these policies as follows:

- Option 2: £819 per animal per annum
- Option 3: £1,065 per animal per annum

**Competition Assessment:**

64. In assessing the competition aspects of any proposed action, four key questions need to be addressed: whether the proposals directly limit the number or range of suppliers, whether they indirectly limit the number or range of suppliers, whether they limit the ability of suppliers to compete, and whether they limit suppliers’ incentives to compete vigorously.

**Limits the number or range of suppliers; or indirectly limits the number or range of suppliers**

65. In the event of a ban on all wild animals in travelling circuses (Option 1), if these circuses left the industry then the proposal would directly limit the number of circuses. If these circuses did not leave the industry, the range of travelling circuses would be limited to suppliers that do not use wild animals.

66. In the event of self-regulation or the regulation of the use of wild animals in circuses (Options 2 and 3), the proposal is unlikely to directly or indirectly limit the number or range of suppliers.

67. Furthermore, it is anticipated that all three options will affect existing circuses and potential entrants into the circus industry equally. Although it is possible that it could lead potential entrants into the circus industry to reconsider before entering the market.

**Limits the ability of suppliers to compete; or limits suppliers’ incentives to compete vigorously**

68. A ban on all wild animals in travelling circuses (Option 1) is likely to increase these circuses’ incentive to compete with travelling circuses that do not use wild animals. This is because circuses would no longer be able to use wild animals to differentiate themselves from other circuses.

69. Self-regulation or the regulation of the use of wild animals in circuses (Options 2 and 3), is unlikely to affect these circuses’ ability and incentive to compete with other travelling circuses.

70. The three options considered would affect all travelling circuses in the same way, and therefore would not affect their ability to compete within this sub-sector of the circus industry.

**Small firms impact test:**

71. These proposals will impact small businesses. All travelling circuses can be considered to be small firms. We have contacted all four circuses which currently have wild animals to discuss the impact of the proposals. One of the circuses and a representative from Performing Animals Welfare Standards International have been actively involved in these discussions. Furthermore we would welcome any input from circuses during the consultation process.

72. It is clear that all four circuses are concerned about the possibility of a ban. A ban would result in a loss of revenue and jobs, consequently, all the circuses are opposed to a ban. However, the circuses have all been unanimous in their wish to introduce regulations so as to show they are involved in a system that safeguards a higher standard of welfare for the wild animals in their shows.

73. Circuses would be willing and able to cover the cost of any inspections that were involved in a regulatory framework and are well experiences in being inspected by other bodies such as local authorities and the RSPCA.

74. An introduction of regulations which covered such subjects as animal medical records, feeding records or more training for their staff would create a higher administrative burden, but circuses are willing to undertake this than accept the alternative of a ban. We would welcome any further input from circuses during the consultation process.

**Legal Aid:**

75. These proposals will have no appreciable impact on the courts, tribunals or judges.

**Sustainable:**
76. Analysis of the “stretching the web” filter indicated a neutral effect of these proposals on sustainable development.

**Carbon Impact Assessment:**

77. These proposals may have an extremely minor effect on the emissions of greenhouse gases, due to preventing the repeated transport of large animals. However, the number of these animals is so small that the impact would be negligible; therefore a full carbon impact assessment has not been completed.

**Other Environmental Issues:**

78. No other environmental issues have been identified.

**Health Impact Assessment:**

79. As this proposal will not have any significant impact on human health, related lifestyle variables or demand on health and social care services a health impact assessment is not required (Department of Health – Screening Questions for health impact assessment).

**Race, Gender and Disability equality assessments:**

80. A screening of the proposals against a checklist of questions as part of the Equality Impact Assessment has revealed that there is no impact on equality issues.

**Human Rights:**

81. There are no human rights issues raised by these proposals.

**Rural Proofing:**

82. These proposals are unlikely to have a different or disproportionate impact in rural areas due to particular rural circumstances or needs.
Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

<table>
<thead>
<tr>
<th>Type of testing undertaken</th>
<th>Results in Evidence Base?</th>
<th>Results annexed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Competition Assessment</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Small Firms Impact Test</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Legal Aid</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Sustainable Development</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Carbon Assessment</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Other Environment</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Health Impact Assessment</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Race Equality</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Disability Equality</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Gender Equality</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Human Rights</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Rural Proofing</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>
Annex I:

List of wild animals used by UK circuses in the summer 2009 season:

Great British Circus:
- 5 lions
- 7 tigers
- 7 camels
- 1 zebra
- 3 elephants

Bobby Robert’s Super Circus:
- 1 elephant
- 1 camel

Circus Mondeo:
- 3 zebras

Peter Jolly’s Circus:
- 2 crocodiles
- 1 zebra
- 1 ankole
- 6 snakes
Annex II:

Criteria for inclusion on the Secretary of State’s list of zoo inspectors

This paper sets out the criteria to be met by all successful applicants to the Secretary of State’s list of zoo inspectors.

The Zoo Inspectorate

Section 8 of the Zoo Licensing Act 1981 provides for the establishment of the Secretary of State’s list of zoo inspectors and that the list should comprise two parts.

The first part (List 1) comprises:
Veterinary surgeons and practitioners with experience of animals of the kinds which are kept in zoos or which might be so kept, with competence to advise on implementation in zoos of the conservation measures required by the Act.

The second part (List 2) comprises:
Persons competent to inspect animals in zoos, to advise on their keeping and welfare, and to advise on implementation in zoos of the conservation measures in zoos required by the Act and to advise on management of zoos generally.

The standard criteria

The proposed standard criteria are set out below:

1. Applicants should be currently be engaged in the zoo field.
   • For inclusion on List 1, this effectively means a vet familiar with current practice in zoo medicine. Additionally for inclusion on List 1, applicants must be a registered member of the Royal College of Veterinary Surgeons.
   • For inclusion on List 2, this effectively means an experienced zoo curator or director.

2. Applicants should have significant direct experience in the field (expected to be a minimum of five years).

3. Applicants should possess the skills necessary to conduct a professional inspection, acting with courtesy and respect at all times, and complete a comprehensive report in a timely manner, without prejudice.

   The core competences to fulfil point 3 are:
   • Knowledge of the zoo licensing legislation, guidance and process.
   • Competence in the subject areas covered by the Zoo Licensing Act (animal husbandry and veterinary care, conservation and education measures in zoos, health and safety)
   • Active experience
   • Professional behaviour and conduct (see Annex 1 on Defra’s core values)
   • Communication skills, both oral and written
   • Timeliness
   • Teamworking

4. In accordance with section 9 of the Zoo Licensing Act 1981, successful applicants must be approved by Defra (on behalf of the Secretary of State) following consultation with representatives of the British Veterinary Association (BVA) and the British and Irish Association of Zoos and Aquariums (BIAZA).

Clearly the criteria set out in the legislation must be satisfied but, in exceptional circumstances, it may be necessary for Defra to waive certain of these expanded criteria, for example, to allow recruitment of specialists in minority fields where satisfactory candidates meeting all the criteria are unavailable. In such circumstances, Defra would consult with BVA and BIAZA as set out in criteria 4 above.

Other points

It is necessary to maintain a list with sufficient spread of expertise so recruitment may focus on particular areas of expertise, for example, in keeping of particular species groups.
It is also desirable to maintain a list with sufficient geographical spread around the country. The Inspectorate can function most effectively with the regulatory burden minimised if inspectors have a shorter distance to travel to inspections. Recruitment may therefore focus on particular regions of the country to ensure adequate geographical coverage.
Annex III: Further details of calculations:

Calculations for cost of transporting the re-homed animals:

- Fuel costs calculated on the running costs of an articulated lorry – fuel consumption = 1 litre/2 miles
- Distance travelled each day = 286 miles per day
- Cost of diesel per litre - £1.10 16
- Cost of travel for three days = 3 x [1.1 x (286/2)] = £471.90
- Cost of return journey = 943.80
- Return ferry journey for lorry, Dover to Calais = £521.70 17
- Total cost for round trip = £1465.50

---

16 Average cost of diesel on 18th November 2009 (www.petrolprices.com)
17 P&O ferries quote on 20th November 2009 for return trip, Dover-Calais, for vehicle length 10.51-12.50m = £444 + VAT = £521.70