

The Animals (Low-Welfare Activities Abroad) Act 2023

Evidence for low welfare activities for inclusion in the Act

Information for this report was contributed by numerous organisations, including the following, and many other interested parties:

- Action for Dolphins
 - Animal Aid
 - Animals Asia Foundation
 - Born Free Foundation
 - Borneo Orangutan Survival UK
 - Borneo Orangutan Survival USA
 - Catholic Concern for Animals
 - Charleston Carriage Horse Advocates
 - Compassion Unlimited Plus Action
 - CompassionWorks International
 - Conservative Animal Welfare Foundation
 - Earth Island Institute Asia Pacific
 - FOUR PAWS UK
 - Freedom for Animals
 - Humane Society International/UK
 - Kerulos Center for Non-Violence
 - League Against Cruel Sports
 - Marine Connection
 - National Council of SPCAs – NSPCA
 - North American Primate Sanctuary Alliance
 - Pan African Sanctuary Alliance
 - Partido Animalista Con el Medio Ambiente (PACMA)
 - PEACE Japan (Put an End to Animal Cruelty and Exploitation)
 - People for the Ethical Treatment of Animals
 - RSPCA
 - Save The Asian Elephants (STAE)
 - The FOAL Group
 - UK Centre for Animal Law
 - Whale and Dolphin Conservation
 - Wild Welfare
 - Wildlife Rescue and Rehabilitation Centre
 - World Animal Justice (WAJ)
 - World Animal Protection
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This report is a combination of information provided by the listed organisations and other interested parties. Contributing parties have limited their input to those areas within their professional expertise and competence.

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Introduction

On 18 September 2023 His Majesty the King granted Royal Assent to the landmark Animals (Low-Welfare Activities Abroad) Act following the Bill's passage through both Houses of Parliament without opposition or amendment at any stage, either on the floor of either House or in Committee.

The measures contained in the law are a world-first for Britain. They command enormous support in the country and from all major political parties.

It is and remains incumbent on Steve Barclay, the Secretary of State at DEFRA, to take steps to develop and implement "activity regulations" to give effect to the broad principles of the law. Despite the passage of several months, no such steps have yet been evident despite multiple enquiries and requests of the Minister and his officials including numerous written and oral Parliamentary Questions in both Houses.

In the absence of any government activity, a large number of animal protection organisations and individuals have collaborated to produce this document. It represents the collective expertise of those parties across many disciplines and animal species, operating in the UK and in the range states of many of the species referred to in the following pages. The purpose of the document is to assist the Secretary of State in making a rapid start on the development of "activity regulations", to engage with the process as he is constitutionally required to do, and to consult with the animal welfare sector and other stakeholders in the hope that the process leading to implementation of activity regulations can commence without further delay.

The submissions and evidence contained in this document are substantial and detailed. They represent the expert and specialist views of several dozen leading animal protection organisations and individuals in the UK and beyond. They are not exhaustive. However, in the absence of any guidance or directions from government they are intended as a start. They will be added to as needed as the process develops, supported by contributions as required from the substantial libraries of images both still and moving maintained by many contributors.

This document should be read in conjunction with a preliminary list of suggested proscribed activities which was sent to Mr Barclay and his officials on behalf of the Low-Welfare Act Coalition of organisations on 12 February 2024. We are hoping this will soon be acknowledged.

We now look to the Secretary of State to act without delay. Numerous species - many endangered and all highly vulnerable – rely upon his swift action.

Duncan McNair - CEO, Save The Asian Elephants

Dr Mark Jones - Head of Policy, Born Free Foundation

for the Low-Welfare Act Coalition

Categories of activities that should be proscribed

1 Animal encounters

1.1 General wild animal interactions

1.1.1 *Description of activities that should be proscribed*

Encounters with wild animals which involve various interactions including (a) touching or handling, or (b) selfies/photo opportunities where there is no barrier or adequate distance between the human and animal subject or where animals have no choice of terminating the interaction or moving away, or (c) wild animal cafes, or (d) picking up, or (e) feeding by hand, where the animal is available for such tourism because it has been captured, managed or treated in such a way as to cause it suffering contrary to the Animal Welfare Act 2006 (AWA). May include visiting self-styled “orphanages”, “sanctuaries” and “havens” in which such activities occur.

1.1.2 *Species*

May include but not limited to: primates, big cats, bears, pandas, dolphins, elephants, camels, donkeys, horses, ponies, sloths and lorises, koalas, anteaters, wolves, civets, binturongs, penguins, sea lions, walrus, various birds and reptile species.

1.1.3 *Some types of unnatural interactions*

- Poached/bred: many animals are specifically bred and hand-reared to enable them to be used as living props for photos and selfies with people. Those bred-for-purpose are typically removed from their parents at a very young age. Some animals may be captured from the wild, often illegally, including endangered and threatened species. Younger animals are typically targeted for ‘cuteness’ and ease of handling disrupting the remaining family groups, and sometimes necessitating the killing of parents and other close relatives, Methods of killing can be very cruel and result in lengthy suffering e.g. snare traps which can restrain an animal for days before it dies a painful death. In addition, the impact on wild populations can be devastating, leading to social disruption, decreased genetic diversity and overall habitat loss/degradation.¹
- Transit/trade: once captured, animals are often transported long distances. Many animals will suffer and die in inadequate transit conditions.²
- Training/taming: this is often delivered through a combination of cruelty, punishment and negative reinforcement – usually through the use of pain and/or fear. In some cases the animals are difficult to tame, and drugs are used, mainly sedatives, to make the animal more amenable.³
- Close constraint and exploitation: once the animal has been trained to perform or interact with humans, they are typically subjected to regular constraint, punishment, exposure to humans (and their diseases), loud noises, and are often fed an inadequate diet. They suffer immensely in confinement, under constant fear of physical harm. Many suffer mentally and develop clear stereotypies as a result of prolonged stress e.g., head tossing, rocking or pacing, and some may self-mutilate.
- Restricted and poor-quality environments: each species is different, but animals are often kept in inappropriate conditions, in confined spaces without adequate

¹ <https://study.com/academy/lesson/poaching-history-effects-examples.html>

² https://www.huffingtonpost.co.uk/mike-baker/illegal-wildlife-trade_b_6288836.html

³ <https://www.bornfree.org.uk/animals-entertainment/>

sanitation, access to open space and natural features and are unable to express their natural behaviour. Some of these animals have large home ranges and suffer as a result of being kept in small and inappropriate cages/enclosures, or in isolation if these are generally social animals. Individuals may be forced to live in unnatural social groupings with conspecifics or other species, or in social isolation, leading to aggressive interactions and prolonged stress. They may develop stereotypies due to lack of stimulation and physical issues including broken teeth from metal bar biting, and malnutrition. Non-satiation is common due to food restrictions, imposed to ensure individuals are hungry and will behave as required for food rewards during photo sessions. Stress is commonplace due to high noise levels within public areas, and proximity to tourists during interactive sessions. Other problems include physical and mental abuse inflicted by trainers, including chains and restraints used to keep animals under control. Untreated or inappropriately treated injuries and illnesses can lead to long term suffering and death.

- ‘Sanctuaries’, ‘Orphanages’ and ‘Havens’: true sanctuaries do not generally allow public contact with the animals they house. Venues advertising interactions or photo sessions with animals are unlikely to be operating as genuine sanctuaries.⁴
- Adulthood: once animals become too large or unsafe to manage in a small captive environment, if they are not destined for breeding, they may be abandoned in which case they will be unlikely to survive in the wild or killed.
- Risks to humans: encouraging close contact between humans and wild animals presents a risk of injury and zoonotic pathogen transmission. Examples include rabies, TB, salmonellosis, Ebola, Herpes-B virus, and coronaviruses.⁵

1.1.4 Reason for inclusion as proscribed activities

The use of animals for encounters or as photo props frequently involves many cruel or low welfare practices, including animals being manipulated by being dressed up, chained, tethered or sedated by drugs often concealed in feeding bottles. The venue concerned is sometimes disguised as an orphanage, sanctuary or haven. Animals are typically exposed to fear and distress caused by constant handling, noise, sun exposure, camera flashes and crowds of people. Animals may be mutilated e.g. declawed or defanged. Wild animals are allowed to be handled by multiple untrained people and often given no option for retreat.⁶ The processes of obtaining animals for these purposes and ensuring their compliance typically involves abuse, cruelty and negative reinforcement.

1.1.5 Reason the above activities constitute an offence under the appropriate national legislation

AWA s.2(b) Animals used for encounters with humans are typically “*under the control of man*” and are thus “*protected animals*” for the purposes of the Act.

Using wild animals for the types of encounters described would be an offence of causing unnecessary suffering under section 4, either by the person causing the animal to suffer or by the person responsible for the animal, or both:

Under Section 4(1), “*a person commits an offence if (a) an act of his, or a failure of his to act, causes an animal to suffer, (b) he knew, or ought reasonably to have*

⁴ <https://www.four-paws.org.uk/campaigns-topics/topics/barely-wild>

⁵ <https://www.worldwildlife.org/initiatives/reducing-zoonotic-disease-risk-from-wildlife-trade>

⁶ For further information, see <https://www.bornfree.org.uk/animal-encounters/>

known, that the act, or failure to act, would have that effect or be likely to do so, (c) the animal is a protected animal, and (d) the suffering is unnecessary.”

Under section 4(2) “A person commits an offence if— (a) he is responsible for an animal, (b) an act, or failure to act, of another person causes the animal to suffer, (c) he permitted that to happen or failed to take such steps (whether by way of supervising the other person or otherwise) as were reasonable in all the circumstances to prevent that happening, and (d) the suffering is unnecessary.”

The suffering is unnecessary because it has no legitimate purpose:

Section 4(3) “The considerations to which it is relevant to have regard when determining for the purposes of this section whether suffering is unnecessary include... (c) whether the conduct which caused the suffering was for a legitimate purpose, such as (i) the purpose of benefiting the animal, or (ii) the purpose of protecting a person, property or another animal;’... (d) whether the suffering was proportionate to the purpose of the conduct concerned”.

Forcing wild animals to pose for selfies, handling opportunities and other interactions is plainly of no benefit to the animal for the reasons described above, neither does it protect a person, or another animal. As such it would likely constitute an offence. It might be argued that the legitimate purpose was the protection of economic interest, but under (d) the suffering experienced by the animal as set out above is disproportionate to such a purpose. It would therefore be unlawful to conduct such activities in the UK.

An offence may also be committed under Section 9 of the Act, the *“Duty of person responsible for animal to ensure welfare”*.

s.9(1) states, “A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice.”

s.9(2) “For the purposes of this Act, an animal’s needs shall be taken to include— (a) its need for a suitable environment, (b) its need for a suitable diet, (c) its need to be able to exhibit normal behaviour patterns, (d) any need it has to be housed with, or apart from, other animals, and (e) its need to be protected from pain, suffering, injury and disease.”

The activities described above indicate the commission of an offence under this section.

There may also be an offence under Section 5 Mutilation (1) *“A person commits an offence if (a) he carries out a prohibited procedure on a protected animal; (b) he causes such a procedure to be carried out on such an animal.”* Prohibited procedure includes those *“which involves interference with the sensitive tissues or bone structure of the animal, otherwise than for the purpose of its medical treatment.”* Defanging snakes or declawing reptiles or mammals would constitute an offence.

1.2 Big cat encounters

1.2.1 Description of activities that should be proscribed

Physical interactions with big cats including petting/feeding/selfies, tiger farms and 'walking with lions'.

1.2.2 *Species*

Big cats such as lions, tigers, leopards, cheetahs, pumas, jaguars.

1.2.3 *Reason for inclusion as proscribed activities*

- Big cats used for encounters are often bred for the purpose.
- Predator breeding facilities, particularly common in South Africa, breed lions, leopards, tigers and other predators in large numbers, often in inadequate conditions where the welfare of the animals is severely compromised. These 'farms' can house and breed hundreds of big cats in rows of barren and cramped enclosures in overcrowded conditions. Many of these 'farms' operate ostensibly as 'zoos' and offer petting and photo opportunities.
- Animals used in walk-with opportunities may be roughly handled or hit if they do not cooperate. Big cats are often mutilated (declawed/teeth extracted) and/or sedated to make them safer for staff/tourists, causing significant pain and psychological damage.
- Once they become too large and dangerous, many are sold into 'canned hunting' operations (see section '5.1 Canned hunting').⁷
- Others are killed so their body parts can be traded legally or illegally into international markets. This helps drive the demand for these wild animals, both dead and alive.⁸

1.2.4 *Reason the above activities constitute an offence under the appropriate national legislation*

See Section 1.1.5.

1.3 **Elephant encounters**

1.3.1 *Description of activities that should be proscribed*

Petting, unregulated feeding and bathing captive elephants.

1.3.2 *Species*

Elephants (Asian and African).

1.3.3 *Reason for inclusion as proscribed activities*

- Elephants are large, strong, highly intelligent, highly social, and unpredictable wild animals. Some elephants are taken from the wild for use in tourism. Others may be born in captivity generally following brutal forced breeding procedures. To tame an Asian elephant, its spirit or will is generally "broken" by violent and cruel means, usually starting when still a calf, by a process called "Pajan" or "Phajaan" (meaning the breaking of the spirits).
- In the wild, elephant mothers look after their offspring for the first 4-5 years and continue to supervise them for several years thereafter. Female offspring tend to remain with the herd for life, while male offspring may leave the herd between the ages of 10 and 15 years and join bachelor groups. In the tourism industry calves are typically forcibly separated from their mothers at around 2 years of age and restrained. Their mothers and/or other family members will be highly traumatised and

⁷ <https://www.four-paws.org/campaigns-topics/topics/help-for-big-cats/canned-trophy-hunting-is-the-killing-of-lions-for-pleasure>

⁸ <https://www.four-paws.org.za/campaigns-topics/campaigns/big-cat-scam/the-lionbonescam>

may even be killed, when trying to protect their calves.⁹ Calves are then chained up, beaten, starved, isolated and sleep-deprived until they become “broken” and submissive to the handler.¹⁰

- Once broken, the mahouts that accompany the elephants will often brandish and use bullhooks on sensitive body parts throughout the day to control the elephants through pain and fear of its repetition. During shows, rides and other close interactions with tourists, nails may be used to control both young and adult elephants. The brutality continues over the entire life of the elephant.
- In addition to violence, captive elephants suffer social deprivation with limited opportunity for interaction with family members or other elephants. Elephants are highly intelligent animals with the capacity for complex thoughts and emotions. Evidence of a wide range of cognitive abilities have been widely documented, as has their emotional reaction to distress and trauma. Elephants are some of the most socially-developed mammals in the world and live in complex social structures. They form multi-tiered societies, based on mother-calf units, bonded joint-family units and clans that coordinate their behaviour. In captivity they are forced to live with unnatural social groupings which can lead to aggression and prolonged stress.
- In the wild, elephants have a home range of between 30km² and 600km². In captivity, they are often subjected to very short chains that restrict their movements during the day and/or night, and a severe lack or complete absence of stimulation.
- They may also suffer from malnutrition. Asian elephants consume up to 300kg of food per day, foraging up to 10km through dense forest and self-regulating their nutrient intake. They are known to be very selective in what plants they eat and depend on the availability of between 20 to 75 different plant species in the wild. It is not possible to provide any such variety of nutrition in captivity.
- Captive elephants may also have limited or inadequate veterinary care to treat the wounds caused by this treatment which may turn septic, lead to long term suffering and may cause death.
- Bathing: bathing of elephants includes enforced and repeating scrubbing often with harsh instruments and being forced under water in tanks often by application of iron spikes forced into the head. They may be washed repeatedly over the course of the day, damaging skin and providing no additional hygiene benefits, while experiencing the stress of close proximity to the public, who pay to observe and/or participate in the process.
- Unregulated feeding and interaction: these activities often involve the elephants' movements being restricted or being restrained with ropes, wires or chains to keep them in one place and to limit injuries to people during feeding and petting activities, particularly where there is no barrier in place. Restrained animals have no option to retreat when they want to. Chaining and restraint frequently result in physical sores and chafing wounds. These are often left untreated, may become septic, and can be fatal. Allowing tourists to feed elephants should not be permitted where there is no authorised experienced personnel in charge, where the animal lacks autonomy over the interaction or other behaviours as a result of the imposed interaction, and where the restriction or control of food might be used as a means to control the animal.
- Captive elephants can often be seen displaying stereotypic, or repetitive behaviours, such as bobbing and swaying from side to side. This can be a sign that the animal is

⁹ Schmidt-Burbach, J. and Hartley-Backhouse, L. (2020) *Elephants. Not commodities*. World Animal Protection. Available at: https://www.worldanimalprotection.org.uk/siteassets/reports/taken-for-a-ride_2.pdf

¹⁰ World Animal Protection has footage of the training process which can be shared.

suffering from a stress disorder related to extreme boredom, fear and anxiety. A study in 2016 found that the majority of the 53 captive Asian elephants studied showed symptoms resembling PTSD in humans, concluding that the terror and pain experienced by elephants during violent forms of the *phajaan*, in addition to the psychophysiological damage caused by separation from mother, family and community, profoundly damages elephant minds, bodies, and society.¹¹

- All of these stresses can result in attacks from animals provoked by fear, including the deaths of mahouts and tourists. Save the Asian Elephants has evidence as at 20 January 2024 of some 726 human deaths from elephants provoked beyond their endurance to attack; and a further 938 serious or catastrophic injuries to humans.¹²

1.3.4 *Reason the above activities constitute an offence under the appropriate national legislation*

Breaking elephants and treating/managing them in the ways described above is incompatible with the AWA 2006 as set out above under Section 1.1.5.

1.4 **Captive shark and captive ray swim-withs**

1.4.1 *Description of activities that should be proscribed*

Swimming and interaction with captive sharks and rays.

1.4.2 *Species*

Captive sharks and captive rays.

1.4.3 *Reason for inclusion as proscribed activities*

Captive marine animals used for tourist swim-withs and interaction are typically held in tiny sea pens or pools that provide a tiny fraction of the space they would occupy in their natural range, often with poor water quality, preventing them from expressing natural behaviours or moving away from human participants. Some sharks and rays are lifted from the water for people to hold and photograph. Some rays may have their stingers removed to limit injury to swimmers. Multiple people may be in the pool/pens at the same time. Repeated exposure to human lotions and perfumes can be irritating to the animals' skin and damaging to their health.

1.4.4 *Reason the above activities constitute an offence under the appropriate national legislation*

While swimming with rays is permitted in the UK under licence, equivalent licensing requirements may not exist in other countries offering these experiences. Accordingly, the AWA would apply: Section 4 "*Unnecessary suffering*" and Section 9: "(1) A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice.(2) For the purposes of this Act, an animal's needs shall be taken to include - (a) its need for a suitable environment, (c) its need to be able to exhibit normal behaviour patterns, (e) its need to be protected from pain, suffering, injury and disease." Section 5 may also apply if the rays' stings are removed: "*Mutilation* (1) A person commits an offence if (a) he

¹¹ Rizzolo, J.B. and Bradshaw, G.A. (2016) 'Prevalence and Patterns of Complex PTSD in Asian Elephants (*Elephas maximus*)', in *International Conference on Asian Elephants in Culture & Nature*, pp. 291–297.

¹² E.g. <https://www.theguardian.com/uk/2000/apr/26/5>

carries out a prohibited procedure on a protected animal; (b) he causes such a procedure to be carried out on such an animal.”

1.5 Wild shark and wild ray swim-withs

1.5.1 Description of activities that should be proscribed

Experiences where sharks and/or rays are deliberately attracted/antagonised for the interaction as part of organised tourist activities.

1.5.2 Species

Wild sharks and wild rays.

1.5.3 Reason for inclusion as proscribed activities

Some shark species and rays may be lured with food to bring them closer and accustomise them to divers and snorkelers. This may change their natural behaviours over time, for example stingrays are solitary and naturally nocturnal feeders, but where they are hand-fed, they can gather in groups. Rays in particular are frequently lifted from the water for tourist handling and photo opportunities. There are reports of local stingrays having their stingers removed by the city authorities and then being released to make them safer for people to swim with.¹³

1.5.4 Reason the above activities constitute an offence under the appropriate national legislation

Mutilation to make the animals safer for human encounters would be illegal under Section 5 of the AWA. Intentionally or recklessly disturbing wild animals may also be illegal under other UK legislation.

1.6 Cultural activities involving animals

1.6.1 Description of activities that should be proscribed

Attending cultural events which include animals (a) standing at temples, or (b) taking part in festivals or (c) religious processions where the animals' needs are not being met, or (d) where animals are transported in unsuitable and dangerous conditions (such as elephants on flat back lorries at speed over long distances) to and from events, or forcibly walked at speed on busy roads over enormous distances.

1.6.2 Species

Elephants, camels, equids, bovids.

1.6.3 Reason for inclusion as proscribed activities

- Elephants used in cultural events are, as described above, separated from their mothers at a young age, subjected to rigorous training, forced to wear chains for their entire lives, exposed to fear, violence and malnutrition.
- Elephants are frequently held at religious Temples which typically do not provide an appropriate living environment. Temple sites are not designed to provide elephants with adequate freedom of movement and behaviour, or opportunities for social interaction with other elephants. Chaining elephants for long periods of time is common. They are prone to injuries such as sores or cuts caused by ropes, chains

¹³ E.g. <https://english.elpais.com/international/2023-04-07/mexican-city-removes-stingers-from-stingrays-to-keep-tourists-happy.html>

and tight wire binding that digs into the flesh, and the use of ankus/bullhook tools. Tourists are encouraged to take photos and give money.¹⁴

- The welfare of elephants used in processions or peraheras can be compromised in many ways. Peraheras and other similar events usually take place on paved roads, forcing the animals to stand and walk on tarmac, concrete or other hard surfaces for long periods of time leading to foot problems, and in dangerous conditions such as busy motorways. They may be transported to festivals at speed strapped on unstable flatback trucks, risking accident and injury. When elephants are in busy public areas, they inevitably have limited freedom of movement and behaviour and may be forced to stand still for extended periods. Access to appropriate food and water is also limited. They are usually ridden by a mahout and are prone to injuries such as sores or cuts caused by ropes/chains, and the use of ankus/bullhook tool. They are compelled to walk in processions amidst whip crackers, drummers, torch bearers, deafening music and PA systems and crowds, and are often exposed in great heat often weighed down with heavy paraphernalia.
- These stresses can result in attacks from animals provoked by fear, including catastrophic injuries and deaths of mahouts and tourists.¹⁵ Reports indicate that at least 1,000 people have been catastrophically injured and 800 killed by captive Asian elephants.¹⁶
- Cultural fairs can also expose other animals to low welfare treatment, for example camels in India, cattle and horses elsewhere.

1.6.4 Reason the above activities constitute an offence under the appropriate national legislation

See Section 1.1.5.

¹⁴ For further information, see <https://www.idausa.org/campaign/elephants/how-captive-elephants-suffer-in-asia-and-africa/>

¹⁵ E.g. <http://www.navrangindia.in/2019/05/the-case-of-rogue-temple-elephant.html>

¹⁶ Save The Asian Elephants data.

2 Walks, races, rides and carriages

2.1 Equid and camel riding

2.1.1 Description of activities that should be proscribed

Riding and carriage rides using all equids and camels where: (a) no adequate provision for food, water, shade and rest for the animals is made, or (b) conducted in very high temperatures, or (c) the rider or riders and equipment are an excessive weight for the animal being ridden, or (d) no adequate veterinary supervision is provided, or (e) ill-fitting equipment is used such that injuries occur, or (f) the animals are otherwise maltreated, or (g) mutilation is used.

2.1.2 Species

Donkeys, horses, mules and camels.

2.1.3 Reason for inclusion as proscribed activities

- Equids and camels used for tourist rides - whether riding or in carriages – can be subjected to very long hours of work, often in very hot conditions. Equipment and harnesses are rarely removed from an animal throughout the day and can cause suffering through injuries. Many have inadequate access to shade, shelter and water and are often in poor body condition due to inadequate access to nutritional food. Conditions while not working are often insufficient, preventing appropriate behaviour or social interaction due to insufficient space or tethering; many horses have no "turn-out," no grazing area, their feet never touch grass.
- Such animals are often treated exclusively as economic commodities. From an economic perspective, mass tourism is most profitable through mass breeding. Mass breeding drives down the price of equids, making it cheaper to work a horse or donkey to death over a short period of time (around 6 years old) and then replacing them, than to expend money to enable a horse or donkey to live out a natural and healthy life. The longer a horse or donkey lives, the more costs are incurred, and if a horse or donkey is allowed to live longer, but earns less through engaging in a reasonable amount of work that does not cause a decline in their health, the owner earns less, which is seen as "bad for business" irrespective of the impact on the equids. The mass tourism business model requires putting a horse or donkey to work as young as possible (with little regard for their bone and muscle development and health) and extracting as much economic value from them as possible while expending as few resources on them as possible. This results in equids beginning work before they have properly developed physically in order to bear their work without injury. Donkeys are often undersized for the loads they are required to bear.
- Owners often fail to provide adequate health care including leaving open wounds, broken limbs and callous injuries untreated, and continuing to force equids to work through severe lameness and injury, using ill-fitting gear causing abrasions and cuts and failing to allow adequate rest. They are often whipped excessively in order to force them to work beyond their physical limits. It is common for equids in mass tourism to be worked through severe injuries and at the point of collapse, being abandoned to die a slow and prolonged death. Often they will be dumped in a garbage heap to die a long and torturous death, sometimes suffocated to death under garbage and faeces, or abandoned in the desert with broken limbs, with no ability to access food, water or shelter.
- The equids in mass tourism may be under the operation and control of people lacking sufficient skill to provide adequate care.

- The use of working equids in heavy traffic risks panic and collisions, and exposes them to exhaust fumes from vehicles.¹⁷ Horses may become frightened and bolt without warning, often overturning their carriage or running into oncoming traffic.
- In addition to the above, camels used in tourism are also frequently mutilated – through the use of nose pegging. Some tour operators advertise/encourage two adults to ride one camel, which is likely to exceed the recommended maximum load of 15-20% of the animal’s weight, especially if they also have to carry metal or wooden apparatus on their backs featuring two seats. Some operators also restrict camel movement for the duration of the working day using chains and muzzles.¹⁸ The mass tourism business model requires severe brutality to permanently break the spirit of the camel in order to put them to work, as camels are extremely strong and powerful, and if untrained can be very dangerous. Once they have exhausted their use in mass tourism, they are sold for meat.¹⁹

2.1.4 Reason the above activities constitute an offence under the appropriate national legislation

- The use of equids and camels for riding in tourism may contravene sections 4 (“unnecessary suffering”) and 9 ((1) *A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (a) its need for a suitable environment, (c) its need to be able to exhibit normal behaviour patterns, (e) its need to be protected from pain, suffering, injury and disease*) of the AWA. Section 5 (“Mutilation (1) *A person commits an offence if (a) he carries out a prohibited procedure on a protected animal; (b) he causes such a procedure to be carried out on such an animal.*”) may also apply.
- For horses made to pull carriages: Horses forced to carry and pull weight that far exceeds their own: Section 9 (2) (e). Horses forced to endure the stress of city noise, pollution, and traffic: Section 9 (2) (e). Horses with lack of access to pasture: Section 9 (2) (a). Horses dropping dead from sheer exhaustion: Section 9 (2) (e). Horses put at risk of heat-stroke, colic, equine myoglobinuria, or azoturia (the last two being a result of the ‘stop/go’ pattern of work for horses who pull carriages): Section 9 (2) (e). Horses with very little access to food and water during the day: Section 9 (2) (b). Horses made to work gruelling hours: Section 9 (2) (c). Horses regularly chained to a carriage/railings during their ‘rest break’ often unable to lower their heads: Section 9 (2) (c) and (2) (e). Horses with uncertain futures when they can no longer pull carriages: Section 9 (2) (e).
- For horses made to carry people in ‘horse riding experiences’. Horses made to carry weight that far exceeds their own: Section 9 (2) (e). Horses who face exhaustion from being overworked: Section 9 (2) (e). Horses subject to abuse or neglect: Section 9 (2) (e) and Section 4 (1) (a). Horses who do not have access to veterinary or medical care: Section 9 (2) (e) and Section 4 (1) (a).
- For donkeys made to carry people in ‘donkey riding experiences’: Donkeys made to carry excessive loads and denied access to shade, water and rest: Section 9 (2) (b) (c) and (e). Poor quality saddles and bridles are often used: Section 9 (2) (e).

¹⁷ For further information, see <https://www.youtube.com/watch?v=86xPXMS9jEQ>

¹⁸ <https://investigations.peta.org/camel-rides-in-egypt/>

¹⁹ For further information, see <https://www.peta.org.uk/issues/animals-not-use-entertainment/animal-rides-on-holiday/>; <https://www.peta.org.uk/features/santorini-donkeys/>

Donkeys made to travel long distances in harsh climates and tough environments: Section 9 (2) (e) and Section 4 (1) (a).

- For camels made to carry people in 'camel treks': Camels with limited access to water and nutritionally rich food: Section 9 (2) (b). Camels subject to carry heavy weights across vast distances, often when very young: Section 9 (2) (c) and (2) (e). Camels tied up with no shelter: Section 9 (2) (a) and (2) (e). Camels subject to abuse such as being beaten: Section 9 (2) (e) and Section 4 (1) (a).
- For horses made to race in the Velká Pardubická race and similar races worldwide²⁰ (at least 28 horses have died trying to jump the perilous 'Taxis Ditch' fence): Section 9 (2) (e) and Section 4 (1) (a) and (1) (d). This and similar races are notorious for claiming horses' lives.

2.2 Elephant riding and trekking

2.2.1 Description of activities that should be proscribed

Trekking with or riding elephants.

2.2.2 Species

Elephants (particularly Asian).

2.2.3 Reason for inclusion as proscribed activities

- Riding elephants severely compromises their welfare by limiting natural behaviours and socialisation, and causes physical and psychological harm by requiring harsh, aversive training methodologies and equipment as described in section 1.3.3.
- Elephants used for rides and trekking are often severely overworked. They are prone to spinal damage, and sores or cuts caused by ropes/chains, howdah saddles, and the use of the ankus/bullhook tool. Forced walking (particularly when ill, infirm, elderly, exhausted) in extreme heat without access to water, such as on extremely hot tarmac roads, result in illness and exhaustion, and foot damage resulting in sepsis and other serious complications. Over time these wounds prove fatal if (as often is the case) left untreated.
- In Thailand, it has been estimated that approximately 2,800 tourist elephants gave 13 million rides in 2016.²¹
- Public 'walk with' activities involve captive elephants being led along a defined set route on demand. Many animals are kept in low welfare living conditions when not being used for interaction.
- Risks to human health and safety are also significant. For example, a Scottish tourist was killed by an elephant forced to give rides in 2016.²² The same elephant, after receiving a beating that lasted for hours as punishment, was giving rides to tourists a week later.²³ In 2000 an English tourist, Andrea Taylor, was killed, and her sister and father severely injured, by an abused Asian elephant at a resort in Thailand.²⁴
- See also section 1.3.3.

²⁰ E.g. <https://blog.racebets.com/top-5-most-dangerous-horse-races-in-the-world/>

²¹ <https://www.charitytoday.co.uk/animals-low-welfare-activities-abroad-bill-passed-second-reading-at-the-house-of-lords/>

²² <https://www.theguardian.com/world/2016/feb/01/british-tourist-killed-by-elephant-on-trek-in-thailand>

²³ For further information, see <https://www.peta.org.uk/blog/elephant-rides/>

²⁴ Save The Asian Elephant video, "The Elephants of Nong Nooch - A Modern Horror Story"
<https://vimeo.com/384543646>

2.2.4 *Reason the above activities constitute an offence under the appropriate national legislation*

These activities contravene sections 4 (“unnecessary suffering”) and 9 ((1) *A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal’s needs shall be taken to include - (a) its need for a suitable environment, (c) its need to be able to exhibit normal behaviour patterns, (d) any need it has to be housed with, or apart from, other animals, and (e) its need to be protected from pain, suffering, injury and disease.*”) of the AWA.

2.3 Ostrich riding

2.3.1 *Description of activities that should be proscribed*

Riding farmed or kept ostriches.

2.3.2 *Species*

Ostriches.

2.3.3 *Reason for inclusion as proscribed activities*

- Ostriches are caught using long hooked poles, a hessian hood is placed over the bird’s head. Riders’ legs hold down the bird’s wings.
- Ostrich skeletons are relatively weak and have not evolved to hold the weight of a human.²⁵ The stress of proximity to people, associated noise, capture, harness and riding of an animal not developed to undertake such tasks, can lead to physiological harm, disease and poor welfare.
- Ostriches used in this way may experience restricted and poor-quality living environments lacking natural features, or appropriate opportunities for individuals to express natural behaviour.
- They may also experience untreated or inappropriately treated injuries and illnesses leading to long term suffering and death.

2.3.4 *Reason the above activities constitute an offence under the appropriate national legislation*

These activities contravene sections 4 (“unnecessary suffering”) and 9 ((1) *A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal’s needs shall be taken to include – (a) its need for a suitable environment, (c) its need to be able to exhibit normal behaviour patterns, € its need to be protected from pain, suffering, injury and disease.*”) of the AWA.

2.4 Bull racing and other traditional events

2.4.1 *Description of activities that should be proscribed*

Running with bulls, attending Jallikattu festivals in India, bull racing with carts in India, attending rekla races and Kambala in India.

²⁵ For further information, see <https://www.sciencedirect.com/science/article/pii/S0032579119317717>; <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4807808/>

2.4.2 Species

Bovids (bulls).

2.4.3 Reason for inclusion as proscribed activities

- Bull runs such as that which takes place at the San Fermín festival in Pamplona, Spain, involve panicked animals being let loose in the streets amongst thousands of shouting spectators, resulting in fear, injury and exhaustion, and typically culminating in the deliberate wounding and killing of the animals once corralled into the ring.
- Other bull fiestas involve the tethering and taunting or goading of bulls by members of the public, in public spaces, some involving spears or sticks.
- At some events people mounted on horseback also chase after the bull.
- The El Toro Jubilo, held annually in the Spanish town of Medinaceli, involves a bull being tethered to a post in a public space during the hours of darkness where a contraption containing flammable materials is attached to his horns and lit, causing the animal to toss his head and try to flee the flames. The bull is goaded by the public and fireworks can also be set-off nearby.²⁶
- Jallikattu is a traditional event in Tamil Nadu, India, in which a bull is released into a crowd of people, and multiple human participants attempt to grab the large hump on the bull's back with both arms and hang on to it while the bull attempts to escape.
- Other practices include bull racing such as at Rekla. Screaming men riding in carts twist, pull, and bite bulls' tails in order to make them run faster, while other participants strike the panicked animals with rods and fists and jab sticks into their anuses. From start to finish, bulls are beaten, prodded, and attacked amidst shouting and chaos. Many are forced to race repeatedly in the searing heat on tar roads, and are subsequently denied water, food, shade, or rest.²⁷ Rekla races and Jallikattu were banned in 2014 by the Supreme Court because of animal cruelty concerns, but were reinstated on cultural grounds by the State legislature.²⁸

2.4.4 Reason the above activities constitute an offence under the appropriate national legislation

Such practices cause unnecessary suffering as was recognised by the Supreme Court of India.²⁹

These activities contravene sections 4 (“*unnecessary suffering*”) and 9 ((1) *A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include – € its need to be protected from pain, suffering, injury and disease.*”) of the AWA.

²⁶ https://www.hsi.org/news-resources/fire_bull_fiestas/

²⁷ <https://secure.petaindia.com/page/27967/action/1>

²⁸ For further information, see <https://www.peta.org.uk/living/what-happens-during-the-running-of-the-bulls-in-pamplona/>; <https://www.petaindia.com/features/jallikattu-investigation-2021-this-cruelty-must-end/>

²⁹ <https://timesofindia.indiatimes.com/india/supreme-court-turns-down-plea-to-allow-bull-taming-sport-jallikattu-before-pongal/articleshow/56494779.cms>

3 Animal shows and entertainment

3.1 Various circus-style performances

3.1.1 Description of activities that should be proscribed

Shows that involve captive wild animals performing circus-style tricks. These include, *inter alia*, animals mimicking playing sports and other human activities e.g. elephant football, basketball, polo, picture-painting, 'dancing', standing on their heads, orangutan boxing, macaques riding bicycles, bears spinning hoops. Elephants forced into unnatural positions such as headstands or standing on hind legs on command, standing balanced in a line with forelegs on the next elephant's back, balancing on tightropes or boxes, walking over humans who lie prone on the ground. Any performances or tourist interactions involving animals where training involves negative reinforcement, punishment, or food deprivation, causing the animal fear, injury or distress, or where the tasks are not based on normal behaviour.

3.1.2 Species

May include but not limited to: elephants, big cats, bears, great apes and other primates, crocodiles, snakes, hippos, seals, sea lions, walrus, parrots, macaws, cockatiels, cockatoos.

3.1.3 Reason for inclusion as proscribed activities

- Animals are typically trained using cruel methods, and forced to perform humanised, unnatural behaviours and actions on command, often dressed in clothes/costumes and using props.
- These animals have to be 'tamed' to enable close contact with trainers. Cruel training methods based on pain and fear are typically employed, such as use of the ankus and other sharp tools/negative stimuli on elephants or whips on big cats.
- Young individuals may be removed from their mothers and family groups to be trained for performances. Some may be captured from the wild, leading to stress of chase/capture, and being placed into environments that they have not evolved to cope within.
- Animals are frequently restrained or chained to limit movement when not performing to the public. Animals can suffer physical damage/injury as a result of performing unnatural behaviours and body positions, and from punishment by trainers/handlers. Untreated or inappropriately treated injuries and illnesses lead to long term suffering and death.
- Animals can also develop stereotypic behaviours due to lack of stimulation.
- Many animals are kept in low welfare living conditions when not performing, including restricted and poor-quality environments, void of natural features and appropriate opportunities for individuals to express natural and social behaviours. Unnatural social groupings with conspecifics or other species can lead to aggressive interactions and prolonged stress for individuals. Food is often restricted to ensure individuals are hungry and will perform for food rewards during training and shows.
- High noise levels within performance arenas, and proximity of members of the public, result in stress.
- Travelling circuses cause additional stress due to their transient nature and constant movement between venues.

3.1.4 Reason the above activities constitute an offence under the appropriate national legislation

The use of wild animals in circuses and for circus-type shows in most contexts is incompatible with the AWA. In the UK, wild animals have been banned from travelling circuses since 2020. Licences can be obtained for animals undertaking entertainment, under The Animal Welfare (Licensing of Activities Involving Animals) (England) Regulations 2018, but these can only be granted subject to inspection and animal welfare rules apply. These licence requirements do not apply at the majority of circuses and venues around the world. As such these activities contravene sections 4 (“unnecessary suffering”) and 9 (“(1) A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal’s needs shall be taken to include – (a) its need for a suitable environment, (c) its need to be able to exhibit normal behaviour patterns, € its need to be protected from pain, suffering, injury and disease.”) of the AWA.

3.2 Dolphinarium

3.2.1 Description of activities that should be proscribed

Attending dolphinarium where cetaceans are held in cramped conditions, forced to perform activities, or used for ‘swim-with’, photographic and other interactions with members of the public, that would not meet UK welfare requirements.

3.2.2 Species

Whales, dolphins and porpoises, e.g., orca, beluga whale, bottlenose dolphin, false killer whale, beluga whale, finless porpoise, Indo-Pacific humpbacked dolphin, pacific white-sided dolphin, pantropical spotted dolphin, Risso’s dolphin, short-finned pilot whale, rough-toothed dolphin, spinner dolphin, striped dolphin, melon headed whale.

3.2.3 Reason for inclusion as proscribed activities

- Dolphins, whales, and porpoises (cetaceans) are highly intelligent and sentient animals with complex physical, psychological, behavioural and social needs which cannot be met in captivity. There are no universally accepted welfare standards for the management of captive cetaceans and the overwhelming majority of experts agree that cetaceans fare badly in captivity.
- The cetaceans typically held in captivity, such as bottlenose dolphins and orcas, are wide-ranging, fast-moving, deep-diving predators. In the wild they travel between 35 and 150 miles in a day, reach speeds as high as 30 miles an hour, and dive to depths of up to 1,000 m. They form close social bonds in pods of varying size, and can form groups consisting of hundreds of individuals.
- Captive cetaceans are kept in restricted, unnatural, and poor-quality environments, in pools or tanks that offer little by way of comparison to their wild environments often without refuge opportunities away from public view or appropriate opportunities for individuals to express natural behaviour. Sea pens close to shore may appear more natural, but they often contain only very shallow water, which can get very hot in the sun and in which animals are prevented from diving more than a metre or two under the surface. Tidal flow is often insufficient to clean sea pens and dolphins may live in stagnant, contaminated water. Captive cetaceans can develop repetitive stereotypic behaviours due to lack of stimulation. They do not have free choice as to how to occupy their time and with whom they do or do not associate. Conflicts and injuries commonly occur among captive cetaceans. Physical issues can also include broken

teeth from bar or tank edge biting, damaged eyes due to chemical use, and malnutrition through poor animal management.

- The sourcing of captive cetaceans involves immense suffering. Individuals may be taken from the wild, following stressful chase/capture and resulting in their removal from family groups. Some marine parks housing captive dolphins are also linked to the annual Taiji dolphin slaughter in Japan, where thousands of dolphins are rounded up and killed with some individuals taken alive for the captive industry. Unnatural and forced captive breeding can involve early impregnation and calf-separation, often leading to high levels of infant mortality.
- Cetaceans used in performances are trained to demonstrate entirely unnatural conditioned behaviours. The repetitive nature of conditioned behaviours differs fundamentally from the spontaneous expression of behaviours in nature, where the animals choose what they do and when. Presentations or shows may take place several times a day and are typically accompanied by loud music, to which the animals are trained to perform a repertoire of circus-style tricks on command such as jumps, back-flips and summersaults, tail walks, balancing and playing with balls, hoops, and other objects.
- Trainers may also enter the water with cetaceans in which they are forced to perform activities such as dorsal pulls and rostrum pushes on command. Beaching, where the animals are trained to propel themselves out of the water onto a stage and spin on their sides, and tourist interactions where visitors can touch, kiss or hug dolphins, are also common. These activities result in stress due to high noise levels and music within performance arenas, and proximity of members of the public during interaction sessions. Animals may be deprived of food to ensure individuals are hungry and will perform for food rewards during training and shows.
- Swim-with activities involve visitors/tourists entering the pool with captive cetaceans which are forced to perform various trained activities, such as dorsal fin pulls, foot pushes, clapping, hugging, and kissing. A number of people may be in the pool at any one same time. Cetaceans have delicate skin and can be injured by human fingernails and jewellery. Not all facilities require participants to remove their make-up and suntan lotion before entering the pool, which may contaminate water and irritate the dolphins' skin and eyes.
- Captive cetaceans may also be used as 'props' for souvenir selfies, where they are forced to pose with people for photographs. This frequently involves the animals having to beach themselves out of the water. Swim-withs also involve risks of injury to both humans and dolphins.³⁰

³⁰ For further information, see Hartman, K.L., Visser, F. and Hendriks, A.J.E. (2008) 'Social Structure of Risso's dolphins (*Grampus griseus*) at the Azores: A stratified community based on highly associated social units', *Canadian Journal of Zoology*, 86(4), pp. 294–306; Hawkins, E.R. and Gartside, D.F. (2008) 'Social and behavioural characteristics of Indo-Pacific bottlenose dolphins (*Tursiops aduncus*) in northern New South Wales, Australia', *Australian Mammalogy*, 30(2), p. 71; Hastie, G.D., Wilson, B. and Thompson, P.M. (2006) 'Diving deep in a foraging hotspot: Acoustic insights into bottlenose dolphin dive depths and feeding behaviour', *Marine Biology*, 148(5), pp. 1181–1188; Klatsky, L.J., Wells, R.S. and Sweeney, J.C. (2007) 'Offshore bottlenose dolphins (*Tursiops truncatus*): Movement and dive behavior near the Bermuda Pedestal', *Journal of Mammalogy*, 88(1), pp. 59–66; Matthews, C.J. *et al.* (2011) 'Satellite tracking of a killer whale (*Orcinus orca*) in the Eastern Canadian arctic documents ice avoidance and rapid, long-distance movement into the North Atlantic', *Polar Biology*, 34(7), pp. 1091–1096; Rose, N.A., Soller, A.S. and Parsons, E.C.M. (2023). *The Case Against Marine Mammals in Captivity*, 6th edition

3.2.4 *Reason the above activities constitute an offence under the appropriate national legislation*

These activities contravene sections 4 (“*unnecessary suffering*”) and 9 (“*Duty of person responsible for animal to ensure welfare*”) of the AWA.

Research clearly demonstrates that the welfare needs of cetaceans cannot be met in captivity. Dolphinariums have not existed in the UK for 30 years following the introduction of Annex G of the Secretary of State’s Standards of Modern Zoo Practice in 1990, which, along with changes to public acceptability, resulted in the remaining operators to shut down. This guidance contains standards incompatible with dolphinariums and dolphin entertainment as practiced abroad today.

On 26th February 2024, Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs Rebecca Pow MP stated: “The Zoo Licensing Act 1981 and the Animal Welfare Act 2006 require high standards for the welfare of kept animals. We consider these protections sufficient to ensure cetaceans are not displayed or otherwise kept in captivity in this country”. Minister Pow’s response supports the inclusion of captive cetacean entertainments as a low welfare activity under the Animals (Low-Welfare Activities Abroad) Act 2023.³¹

3.3 **Swim-withs and interaction in the wild**

3.3.1 *Description of activities that should be proscribed*

Commercial swim-with activities are organised trips promoting in-water interactions with aquatic mammals living in the wild and put the public within close proximity of animals who have their resting or foraging environment disturbed, sometimes being enticed with food or corralled into tight spaces for photo opportunities.

3.3.2 *Species*

Manatees, whales, dolphins, seals, sea lions.

3.3.3 *Reason for inclusion as proscribed activities*

- There is evidence for disturbance of marine mammal species resulting from in-water activities.³²
- These activities allow opportunities for physical interaction, leading to health and safety concerns for people and animals.
- During the cold months between November and March, thousands of wild manatees congregate in warm spring-fed waters. Manatees rely on these warm-water refuges

(Washington, DC: Animal Welfare Institute and World Animal Protection), 186 pp.; RSPCA Australia (2021) *The welfare of dolphins in captivity*. Available at: <https://kb.rspca.org.au/wp-content/uploads/2021/04/The-Welfare-of-Dolphins-in-Captivity-RSPCA-Australia-Research-Report-April-2021.pdf>; Sanino, G.P. *et al.* (2005) ‘A preliminary note on population structure in eastern South Pacific common bottlenose dolphins, *Tursiops truncatus*’, *Journal of Cetacean Research and Management*, 7(1), pp. 65–70; Schmidt-Burbach, J. and Hartley-Backhouse, L. (2019) ‘Behind the Smile – the multi-billion dollar dolphin entertainment industry’. World Animal Protection.

³¹ <https://www.theyworkforyou.com/wrans/?id=2024-02-16.13998.h&s>

³² For further information, see https://www.cms.int/sites/default/files/document/cms_cop12_inf.13_in-water-interactions_e.pdf; <https://friendsofmanatees.com/>; <https://uk.whales.org/our-goals/end-captivity/swimming-with-dolphins/>; https://www.annamartinez.info/download/Swimming_With_Sealions_Summary.pdf

to survive the winter, but visitors/tourists can disturb or block access to the springs when manatees are most vulnerable. These animals are often disturbed by tour boats that carry people close so that they can enter the water to swim up to/with the manatees.

- Many swim-tour operators drop clients in the water close to whales or dolphins, disturbing their everyday lives and routine. This can be particularly harmful to mothers with calves, and can present a risk of animals being struck by boats or propellers. Dolphins are often enticed with food and corralled into tight spaces for photo opportunities, causing stress.
- The exposure of sea lions to persistent disturbances from boats and swimmers can have detrimental effects on their behaviour and ecology.³³
- These activities disrupt natural behaviours and encourage a potentially dangerous familiarity with people.

3.3.4 *Reason the above activities constitute an offence under the appropriate national legislation*

These activities potentially contravene Section 9 ((1) *A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (c) its need to be able to exhibit normal behaviour patterns, and (e) its need to be protected from pain, suffering, injury and disease.*) of the AWA.

In addition, under the Wildlife and Countryside Act 1981: *“if any person intentionally or recklessly disturbs any wild animal included in Schedule 5 as ... a dolphin ... he shall be guilty of an offence.”*

“a person is guilty of an offence if intentionally or recklessly... (b) he disturbs any such animal while it is occupying a structure or place which it uses for shelter or protection; or (c) he obstructs access to any structure or place which any such animal uses for shelter or protection.”

3.4 **Street performances and begging activities**

3.4.1 *Description of activities that should be proscribed*

Promoting a location by including animals used for begging as an attraction.

3.4.2 *Species*

Bears, snakes, primates, elephants.

3.4.3 *Reason for inclusion as proscribed activities*

- Animals are commonly used for begging activities at tourist hotspots. Tourists are often encouraged to buy food from the handler to feed to their animals, particularly elephants and primates. These animals are frequently tethered or chained to prevent escape, and spend many hours being dragged around busy city areas, resulting in exposure to traffic and crowds of people. They are commonly kept in poor conditions when not being used.

³³ Curtin, S. and Garrod, B. (2008) ‘Vulnerability of Marine Mammals to Diving Tourism Activities’, in *New frontiers in marine tourism: Diving experiences, sustainability, management*. Amsterdam: Elsevier.

- 'Dancing bears' can still be found in countries such as Pakistan. This 'traditional' form of entertainment involves the capture of young bears from the wild, who commonly have their claws and teeth removed, or filed down, and a ring inserted through a hole cut into the snout. These animals are trained using barbaric techniques (such as being forced to stand on hot metal plates) and are taught to respond to music by standing on their hind legs to seemingly 'dance' while the handler pulls a rope attached to a sensitive nose ring.
- Snake charming is often described in travel companies' itineraries as a 'cultural' or 'traditional' activity with no mention of animal welfare issues. The activity involves extreme cruelty with snake's fangs being removed or their mouth being sewn shut to prevent biting. Snakes are kept in conditions that do not meet their welfare needs and often die due to inappropriate care.
- Images of activities such as snake charming, and descriptions of activities involving animal cruelty as 'traditional and cultural' are frequently included in tour operator promotional materials and web-imagery.³⁴

3.4.4 *Reason the above activities constitute an offence under the appropriate national legislation*

These activities contravene sections 4 (“unnecessary suffering”) and 9 (“(1) A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (a) its need for a suitable environment, (e) its need to be protected from pain, suffering, injury and disease”) of the AWA. They may also contravene section 5 (“Mutilation (1) A person commits an offence if (a) he carries out a prohibited procedure on a protected animal; (b) he causes such a procedure to be carried out on such an animal”).

3.5 **Snake shows**

3.5.1 *Description of activities that should be proscribed*

Attending snake shows with venomous snakes in situations where snakes are exploited as tourist attractions.

3.5.2 *Species*

Various snakes.

3.5.3 *Reason for inclusion as proscribed activities*

Many snake and reptile farms originated as places that hold venomous animals for 'milking' to produce anti-venom, required to treat snake bites. Whilst some facilities still exist for predominantly scientific and research purposes, others have become tourist attractions. At such facilities, reptiles are handled and provoked as part of public presentations and used for souvenir photographs. Animals are often prodded

³⁴ For further information, see <https://www.jakartaanimalaid.com/2016/09/23/directly-help-dancing-monkeys/>; <https://www.tribuneindia.com/news/archive/jalandhar/news-detail-591619>; <https://egofelix.com/truth-behind-snake-charming/>; <https://www.worldanimalprotection.org.uk/latest/blogs/dancing-bear/>; <https://handluggageonly.co.uk/heres-a-really-important-thing-you-need-to-know-about-snake-charming/>

or hit to obtain a defensive reaction. Some animals may also be defanged using cruel or low welfare practices.

3.5.4 *Reason the above activities constitute an offence under the appropriate national legislation*

These activities contravene sections 4 (“unnecessary suffering”) and 9 (“(1) A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal’s needs shall be taken to include - (a) its need for a suitable environment, (c) its need to be able to exhibit normal behaviour patterns, (e) its need to be protected from pain, suffering, injury and disease”) of the AWA. They may also contravene section 5 (“Mutilation (1) A person commits an offence if (a) he carries out a prohibited procedure on a protected animal; (b) he causes such a procedure to be carried out on such an animal”).

3.6 Crocodile wrestling

3.6.1 *Description of activities that should be proscribed*

Attending shows involving crocodile wrestling and alligator wrangling.

3.6.2 *Species*

Crocodiles and alligators.

3.6.3 *Reason for inclusion as proscribed activities*

Crocodiles and alligators are frequently used in ‘wrestling’ shows to entertain the public (e.g. crocodiles in Thailand and alligators in USA), often on crocodile or alligator farms. The animals are physically handled and provoked, may be dragged by their tails and have people jump on them, are hit with sticks, and have their jaws pulled open. Members of the public are sometimes encouraged to touch or sit on the animals too.³⁵

3.6.4 *Reason the above activities constitute an offence under the appropriate national legislation*

These activities contravene Section 8 (fighting) of the AWA, and may also contravene Section 4 (“unnecessary suffering”).

3.7 Rodeos

3.7.1 *Description of activities that should be proscribed*

Attending rodeo events where live animals are deliberately antagonised or manhandled, for example bull-riding or horse 'bucking bronco' events, cattle wrangling, steer wrestling.

3.7.2 *Species*

Cattle and horses.

3.7.3 *Reason for inclusion as proscribed activities*

³⁵ For further information, see <https://www.peta.org/blog/alligators-exploited-restaurants-mini-golf/>

Rodeos include a range of activities such as calf-roping, bull wrestling, bull riding, and 'bucking bronco'. These activities cause distress and risk injury. Animals are frequently lassoed, thrown to the floor and their legs tied in front of large and noisy crowds. Techniques are used to aggravate and cause additional suffering such as 'flank straps': these apply pressure to the sensitive underbelly of a bull or horse causing discomfort and possibly pain in order to make animals buck more violently.^{36,37}

3.6.4 *Reason the above activities constitute an offence under the appropriate national legislation*

The Protection of Animals Act 1934 outlawed such rodeo activities in the UK, and would constitute an offence under Section 4 ("*unnecessary suffering*") of the AWA.

³⁶ Recent footage of such activities taking place at the Calgary Stampede can be watched here: <https://www.youtube.com/watch?v=sCgZlu9bEAM>

³⁷ For further information, see <https://www.peta.org/issues/animals-in-entertainment/cruel-sports/rodeos/>

4 Animal fighting

4.1 Bull fighting

4.1.1 Description of activities that should be proscribed

Bullfighting, including so-called 'bloodless bullfights'.

4.1.2 Species

Bovids (bulls).

4.1.3 Reason for inclusion as proscribed activities

- Bullfighting involves cruelty to animals as a spectator sport and would not be permitted in the UK. In Spain bullfights use various techniques to irritate the animals before the spectacle gets underway. These can range from blows to the kidneys to pricking the animals' genitalia with needles, administering medication, or applying grease in the eyes to cause disorientation. During the 'fight', the bull is often speared many times in the neck or flanks and is eventually killed by the 'coup de grace' ('blow of mercy') which may lead to the animal suffocating in its own blood. In standard bullfights, the bull is never allowed to survive.³⁸
- 'Bloodless bullfights' also take place in the USA, Portugal, France and Ecuador. These can include a performance where no blood is drawn, or a performance which includes injury of the bull but does not result in the bull's death. However, the performances are still intended to provoke the bull and result in stress and exhaustion.

4.1.4 Reason the above activities constitute an offence under the appropriate national legislation

Animal fighting is illegal under Section 8 of the AWA.

“(1) A person commits an offence if he— (a) causes an animal fight to take place, or attempts to do so; (b) knowingly receives money for admission to an animal fight; (c) knowingly publicises a proposed animal fight; (d) provides information about an animal fight to another with the intention of enabling or encouraging attendance at the fight; (e) makes or accepts a bet on the outcome of an animal fight or on the likelihood of anything occurring or not occurring in the course of an animal fight; (f) takes part in an animal fight; (g) has in his possession anything designed or adapted for use in connection with an animal fight with the intention of its being so used; (h) keeps or trains an animal for use for in connection with an animal fight; (i) keeps any premises for use for an animal fight.

“(2) A person commits an offence if, without lawful authority or reasonable excuse, he is present at an animal fight.”

Wounding and extended death of bulls during bull fighting would be illegal under Section 4 of the AWA due to the unnecessary suffering caused.

'Bloodless bullfights' may also cause unnecessary suffering, with the Act defining "suffering" as physical or mental suffering.

³⁸ For further information, see <https://www.peta.org/issues/animals-in-entertainment/cruel-sports/bullfighting/>

4.2 Buffalo fighting

4.2.1 Description of activities that should be proscribed

Watching buffaloes fight each other.

4.2.2 Species

Buffaloes.

4.2.3 Reason for inclusion as proscribed activities

- Buffaloes forced to fight for entertainment (in Vietnam, Thailand and elsewhere) experience stress, injury and death. High noise levels within fighting arenas, inability to escape, and proximity of members of the public during fighting sessions, are all potentially stressful for animals.
- Wounds inflicted during fights are often left untreated or inappropriately treated (surgical procedure without the application of pain relief) and consequent illness may lead to long term suffering and death.
- The animals may be forced to live in restricted and poor-quality environments - housing may be limited in size and devoid of natural features, and animals may be deprived of appropriate opportunities to express natural behaviours or engage in social interactions.

4.2.4 Reason the above activities constitute an offence under the appropriate national legislation

Animal fighting is illegal under Section 8 of the AWA. These activities may also constitute offences under Section 4 (*"unnecessary suffering"*).

4.3 Cockfighting

4.3.1 Description of activities that should be proscribed

Watching two or more cockerels fight each other.

4.3.2 Species

Chickens (cockerels).

4.3.3 Reason for inclusion as proscribed activities

Cockerels used for fighting typically live in restricted and poor-quality environments. Most live tied to a stake, or in barrels or small wooden huts. They are often injected with steroids and adrenaline boosting drugs and, for two to three weeks prior to a fight, are kept in a small dark box to isolate them from other animals and deprive them of stimuli. Regardless of how exhausted or injured they become during a fight, the birds cannot escape from the fighting pit. Common injuries include punctured lungs, broken bones and pierced eyes. The razor-sharp steel blades or "gaffs" (which resemble 3-inch-long, curved ice picks) tied to the birds' legs are so sharp and dangerous that cockfighters themselves have been killed when accidentally slashed by their own birds.³⁹

³⁹ For further information, see <https://www.humanesociety.org/resources/facts-about-cockfighting>; <https://www.peta.org/issues/animals-in-entertainment/cruel-sports/cockfighting/>

4.3.4 *Reason the above activities constitute an offence under the appropriate national legislation*

Animal fighting is illegal under Section 8 of the AWA. These activities may also constitute offences under Section 4 (“*unnecessary suffering*”).

5 Hunting

5.1 Canned hunting

5.1.1 Description of activities that should be proscribed

Canned hunting where (a) there are concerns about population level impacts on a particular species, or (b) methods are used to hunt which would be unlawful in the UK, or (c) the animals have been kept in inadequate conditions such as to cause them suffering.

5.1.2 Species

Lions and other large predators.

5.1.3 Reason for inclusion as proscribed activities

'Canned hunting' involves the killing of an animal within an enclosure from which it has no chance of escape. Such animals are often purpose bred in captive breeding facilities, such as lion and other predator breeding facilities in South Africa. The conditions in which the animals are reared are typically inadequate, they are unable to express their natural behaviours, are often given inappropriate nutrition, and the animals are habituated to the presence of people and often will not attempt escape. Additionally, they may be killed in a manner proscribed in the UK such as with crossbows.⁴⁰

5.1.4 Reason the above activities constitute an offence under the appropriate national legislation

These activities would be illegal under Section 4 (“*unnecessary suffering*”) and Section 9 (“(1) *A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (a) its need for a suitable environment, (b) its need for a suitable diet, (c) its need to be able to exhibit normal behaviour patterns, (d) any need it has to be housed with, or apart from, other animals, and (e) its need to be protected from pain, suffering, injury and disease*”) of the AWA.

⁴⁰ For further information, see <https://thinkwildlifefoundation.com/the-ugly-truth-about-canned-hunting/>; <https://www.peta.org/features/what-is-canned-hunting/>

6 Animal slaughter farms, festivals and experiences

6.1 Snake farms

6.1.1 Description of activities that should be proscribed

Visiting snake farms, attending slaughter/ eating/ snake heart consumption shows.

6.1.2 Species

Various snakes.

6.1.3 Reason for inclusion as proscribed activities

Snake farms typically keep snakes in captivity for extraction of venom or to be bred for skins. They may also be open to the public for various 'experiences'. Such snakes typically live in extremely restricted and poor-quality environments. Visits to snake farms may include opportunities to witness snakes being slaughtered without stunning, drink snake blood or bile, and consume body parts such as the heart. Some snakes are bred on farms, others are taken from the wild, potentially damaging species conservation. Snakes in 'farms' often have their venom gland removed without anaesthetic in a very painful procedure undertaken in unhygienic conditions which can lead to infection, suffering and death.⁴¹

6.1.4 Reason the above activities constitute an offence under the appropriate national legislation

These activities would be illegal under Section 4 (“*unnecessary suffering*”) and Section 9 (“(1) *A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (a) its need for a suitable environment, (e) its need to be protected from pain, suffering, injury and disease*”) of the AWA.

They may also violate Section 5 (“*mutilation*”), as well as other UK regulations concerning the welfare of animals at the time of killing.

6.2 Wild animal consumption

6.2.1 Description of activities that should be proscribed

Consuming wild animals bred/ illegally captured for consumption, such as shark fin soup, turtle soup, bush meat; eating animals that would be unlawful to sell for food in the UK such as whale and dolphin meat.

6.2.2 Species

Various wild animals including sharks and rays, guinea pigs, ostriches, turtles, alligators.

6.2.3 Reason for inclusion as proscribed activities

Poaching animals from the wild can be a serious threat to many wild species, particularly those protected in wildlife reserves or national parks. With many animal

⁴¹ For further information, see <https://www.animalsasia.org/intl/media/news/news-archive/western-tourists-risk-fuelling-animal-cruelty-in-vietnam.html>

species having a limited home range or being depleted in numbers, sometimes to the point of extinction, these additional pressures can drastically impact local populations of wild animals, and contribute to habitat loss and degradation.⁴² When animals are hunted or poached for consumption, the resulting 'bushmeat' poses a huge risk to human health, and can result in the transmission of several zoonotic viruses from animal hosts to humans. These animals endure a barbaric life through capture, transport, and inhumane slaughter.⁴³

6.2.4 *Reason the above activities constitute an offence under the appropriate national legislation*

Once caught, such animals fall under the protection of the AWA. Any mistreatment would potentially contravene section 4 (“unnecessary suffering”) and Section 9 (“(1) A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (a) its need for a suitable environment, (e) its need to be protected from pain, suffering, injury and disease”) of the AWA, as well as other relevant wildlife trade regulations such as the Shark Fins Act 2023.

6.3 Companion animal consumption

6.3.1 *Description of activities that should be proscribed*

Experience of eating companion animals.

6.3.2 *Species*

Dogs and cats.

6.3.3 *Reason for inclusion as proscribed activities*

The dog and cat meat trade results in horrific cruelty to an estimated 30 million animals per year, mainly across Asia. Many are stolen family pets or stray animals collected from the streets and rural villages. The dog and cat meat trade also poses a potential health risk to humans. Tourists visiting Asia can take part in eating dogs and cats, and articles suggest there is demand.⁴⁴ Many believe that dog meat markets are held to attract tourists.^{45,46}

6.3.4 *Reason the above activities constitute an offence under the appropriate national legislation*

These activities would be illegal under section 4 (“unnecessary suffering”) and section 9 (“(1) A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (a) its need for a

⁴² <https://www.britannica.com/topic/poaching-law>

⁴³ For further information, see <https://lionrecoveryfund.org/the-immense-suffering-caused-by-bushmeat-poaching/>; <https://www.npr.org/sections/goatsandsoda/2016/10/27/499429139/theres-another-side-to-bush-meat-that-doesnt-get-much-attention>

⁴⁴ <https://vietnamnet.vn/en/some-western-tourists-want-to-sample-dog-meat-tour-guides-803072.html>

⁴⁵ <https://chinadialogue.net/en/food/7099-dog-meat-festival-is-it-all-about-tourists/>

⁴⁶ For further information, see <https://www.four-paws.org/campaigns-topics/campaigns/end-the-dog-cat-meat-trade/the-truth/the-facts>

suitable environment, (e) its need to be protected from pain, suffering, injury and disease”) of the AWA. They may also violate regulations relating to the welfare of animals at the time of killing.

6.4 Live animal markets

6.4.1 Description of activities that should be proscribed

Experiences of (a) visits to markets with live animals, or (b) watching killing of animals at the market in conditions that would breach UK regulations or, (c) eating animals alive.

6.4.2 Species

Many species in live trade including monkeys, chickens, guineapigs, bats, civets, pangolins.

6.4.3 Reason for inclusion as proscribed activities

- Animals are typically held in cruel and unhygienic conditions in live animal markets, often with inadequate food and water, in excessive heat, exposed to loud noises and in close proximity to other species and to people. Stress and cross-species proximity increase the risk of emergence, proliferation, mutation and spillover of potentially zoonotic pathogens.⁴⁷
- Animals are not stunned before slaughter and the conditions of killing would not meet UK welfare standards.
- Includes eating animals alive at the market.⁴⁸

6.4.4 Reason the above activities constitute an offence under the appropriate national legislation

These activities would be illegal under section 4 (“*unnecessary suffering*”) and section 9 (“(1) *A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal’s needs shall be taken to include - (a) its need for a suitable environment, (e) its need to be protected from pain, suffering, injury and disease*”) of the AWA. They may also violate regulations relating to the welfare of animals at the time of killing.

6.5 Animal slaughter festivals

6.5.1 Description of activities that should be proscribed

Attending animal slaughter festivals.

6.5.2 Species

Pigs.

6.5.3 Reason for inclusion as proscribed activities

⁴⁷ For further information, see <https://ladyfreethinker.org/lft-investigates-animals-languishing-in-filth-at-cruel-u-s-live-markets/>; <https://secure.peta.org.uk/page/79457/action/1>; <https://investigations.peta.org/indonesia-thailand-wet-markets/>; <https://www.eco-business.com/news/indonesias-extreme-wildlife-market-in-pictures/>

⁴⁸ E.g. <https://www.youtube.com/watch?v=hYeKHzyZVE0>

Pigs are tied up and restrained from physical movement to be paraded publicly. This results in significant stress due to high noise levels during public parades, inability to escape and proximity of members of the public. They are then exposed to inhumane slaughter, with individuals being cut open with knives whilst fully conscious.

6.5.4 Reason the above activities constitute an offence under the appropriate national legislation

These activities would be illegal under section 4 (“*unnecessary suffering*”) and section 9 (“(1) *A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (a) its need for a suitable environment, (e) its need to be protected from pain, suffering, injury and disease*”) of the AWA. They may also violate regulations relating to the welfare of animals at the time of killing.

7 Other

7.1 Civet coffee farms

7.1.1 Description of activities that should be proscribed

Visiting facilities farming civet cats to make coffee.

7.1.2 Species

Civets.

7.1.3 Reason for inclusion as proscribed activities

'Kopi luwak' plantations can be found across Indonesia and East Timor, where civet cats are kept in small cages and fed a diet almost exclusively consisting of coffee berries, causing health problems. They are typically held in restricted and poor-quality conditions.^{49,50}

7.1.4 Reason the above activities constitute an offence under the appropriate national legislation

These activities would be illegal under section 4 (*"unnecessary suffering"*) and section 9 (*"(1) A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (a) its need for a suitable environment, (b) its need for a suitable diet, (e) its need to be protected from pain, suffering, injury and disease"*) of the AWA.

7.2 Turtle hatcheries

7.2.1 Description of activities that should be proscribed

Visiting turtle hatcheries that retain hatchlings/adult turtles as a tourist interaction.

7.2.2 Species

Sea turtles.

7.2.3 Reason for inclusion as proscribed activities

Marine turtle hatcheries, which were originally conceived as a conservation mechanism, are now widely regarded as largely exploitative activities, where natural hatching behaviour is disrupted and turtles are held in inadequate facilities in order to attract tourists. Once hatched, the animals should be released immediately (i.e. not kept for display purposes).⁵¹

7.2.4 Reason the above activities constitute an offence under the appropriate national legislation

⁴⁹ <https://www.peta.org/features/civets-suffering-cruel-coffee/>

⁵⁰ For further information, see <https://ladyfreethinker.org/civet-cats-are-suffering-for-the-worlds-cruellest-coffee/>

⁵¹ <https://www.worldanimalprotection.org.au/news/turtle-sanctuaries-misleading-bali-travellers/>

These activities would be illegal under section 4 (*“unnecessary suffering”*) and section 9 (*“(1) A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. (2) For the purposes of this Act, an animal's needs shall be taken to include - (e) its need to be protected from pain, suffering, injury and disease”*) of the AWA.

Evidence that activities are currently being advertised and/or for sale in England and/or Northern Ireland

Activity	Link to webpage
1 Animal encounters	
1.1 General wild animal interactions	Alligator interactions, USA, Experience Kissimmee Sea lion interactions, Lanzarote, TUI
1.2 Big cat encounters	Tiger encounters, Thailand, Tripadvisor Tiger encounters, Thailand, Travools Tiger encounters, Thailand, Tripadvisor Tiger feeding, Thailand, Bangkok Day Tours Tiger encounters, Thailand, Trip.com Walking with lions, South Africa, Tripadvisor Walking with lions and cheetah, Zambia, Tripadvisor Walking with lions, Senegal, Viator
1.3 Elephant encounters ⁵²	Various elephant interactions, Thailand, GetYourGuide Elephant bathing, Thailand, Musement Elephant training, Thailand, Bangkok Day Tours Elephant riding and bathing, Indonesia, Trip.com Elephant bathing, Nepal, GetYourGuide Elephant bathing, Thailand, TUI Elephant bathing, Thailand, TUI Elephant bathing, Thailand, TUI Elephant bathing, Thailand, Trip.com Elephant bathing, Thailand, GetYourGuide Elephant photo opportunities, Thailand, GetYourGuide
1.4 Captive shark and captive ray swim-withs	Stingray interactions, Jamaica, TUI Stingray and shark interactions, Dominican Republic, Tripadvisor
1.5 Wild shark and wild ray swim-withs	Shark and stingray encounters, Dominican Republic, Viator Shark encounters, Bahamas, Viator Shark and stingray encounters, Dominican Republic, Trip.com Swimming with sharks, Mexico, Viator Swimming with sharks, USA, Tripadvisor Swimming with sharks, Belize, Tripadvisor Swimming with sharks, Bahamas, Viator
1.6 Cultural activities involving animals	Surin Elephant Festival, Thailand, Tell Tale Travel Surin Elephant Festival, Thailand, Rough Guides Elephant processions, Sri Lanka, Viator Elephant temples and 'orphanages', Sri Lanka, GetYourGuide
2 Walks, races, rides and carriages	
2.1 Equid and camel riding	Camel racing, UAE, Tripadvisor Camel riding, UAE, Viator Camel riding, Lanzarote, Excursions Lanzarote Camel riding, Lanzarote, GetYourGuide Camel riding, Lanzarote, TUI Camel riding, Gran Canaria, Viator Camel and horse riding, Egypt, Tripadvisor Camel riding, Tenerife, Viator

⁵² Save The Asian Elephants records (2024) show over 1,200 travel businesses advertising in the UK some 277 venues where Asian elephants are abused through over 2,800 advertisements.

	Horse tour, Egypt, GetYourGuide Camel and horse riding, Egypt, EgyptExcursions.co.uk Camel riding, Egypt, Egypt Tours Portal Camel and equid riding, Egypt, Tripadvisor Horse carriage ride, Spain, Alsherry Experiences
2.2 Elephant riding and trekking	Elephant riding, Indonesia, Tripadvisor Elephant riding, Thailand, Tripadvisor Elephant riding, India, GetYourGuide Walking with elephants, South Africa, Viator Elephant riding, Thailand, Trip.com
2.3 Ostrich riding	Ostrich riding, Malaysia, Trip.com Ostrich riding, Kenya, Trip.com Ostrich riding, Vietnam, Tripadvisor Ostrich riding, South Africa, SA-Venues.com
2.4 Bull racing and other traditional events	Bull running, Spain, Stoke Travel Bull running, Spain, Pamplona Bullrun Tickets Bull running, Spain, Insight Guides
3 Animal shows and entertainment	
3.1 Various circus-style performances	Performing elephants 'playing football', Thailand, Expedia Performing monkeys dressed in clothes and riding bikes, Vietnam, Trip.com Performing animals, including orangutan boxing, Thailand, Tripadvisor Performing animals in a circus, including bear riding bicycle, Russia, Trip.com Performing wild animals in a circus, China, Trip.com Performing animals, including orangutan boxing, Cambodia, Tripadvisor Performing monkeys riding bicycles, Thailand, Trip.com Performing animals, including orangutan boxing and elephant picture-painting, Thailand, Traveloka
3.2 Dolphinarium	Dolphin shows, Bulgaria, Tripadvisor Dolphin and orca shows, USA, TUI Dolphin and orca shows, USA, Trip.com Dolphin, orca and beluga shows, China, Trip.com Dolphin shows, Thailand, Trip.com Dolphin and orca shows, Tenerife, TUI Dolphin shows, Thailand, Ticket2Attraction Dolphin swim-withs, USA, Travel Republic Dolphin shows and swim-withs, Mexico, Tripadvisor Dolphin swim-withs, Mexico, TUI Dolphin shows and swim-withs, Thailand, Trip.com Dolphin swim-withs, Jamaica, GetYourGuide Dolphin swim-withs, Jamaica, GetYourGuide Dolphin swim-withs, USA, Netflights Dolphin shows and swim-withs, Egypt, GetYourGuide
3.3. Swim-withs and interaction in the wild	Wild manatee swim-withs, USA, TUI Wild manatee swim-withs, USA, TUI Wild river dolphin swim-withs, Brazil, GetYourGuide Wild sea lion swim-withs, Peru, Viator Wild dolphin swim-withs, Mexico, Viator Wild dolphin swim-withs, New Zealand, Viator

3.4. Street performances and begging activities	Snake charming, Morocco, Viator Snake charming, Morocco, Trip.com Snake charming, Morocco, StudentUniverse
3.5. Snake shows	Snake show, Thailand, Trip.com Snake show, Thailand, Trip.com Snake show, Thailand, Tripadvisor
3.6 Crocodile wrestling	Crocodile wrestling, Thailand, Ticket2Attraction Alligator wrangling, USA, American Attractions Crocodile wrestling, Malaysia, Viator
3.7 Rodeos	Rodeo, USA, Tauck Calgary Stampede Rodeo, Canada, Audley Travel Calgary Stampede Rodeo, Canada, My Canada Trips Calgary Stampede Rodeo, Canada, Viagogo Rodeo, USA, Vivid Seats
4 Animal fighting	
4.1 Bull fighting	Bullfighting, Spain, Rough Guides Bullfighting, France, Tauck Bullfighting, Spain, Viagogo Bullfighting, USA, Viagogo Bullfighting, Spain, Pamplona Bullrun Tickets Bullfighting, Spain, The Stag and Hen Experience
4.2 Buffalo fighting	Buffalo fighting, Vietnam, Vivutravel Buffalo fighting, Thailand, YouMe Holiday
4.3 Cockfighting	Cockfighting, Vietnam, Hanoi Journey
5 Hunting	
5.1 Canned hunting	
6 Animal slaughter farms, festivals and experiences	
6.1 Snake farms	Snake farm, Vietnam, Saigon Top Tours Snake farm, Thailand, Trip.com Snake farm and eating, Vietnam, Viator Snake farm and eating, Vietnam, Trip.com
6.2 Wild animal consumption	
6.3 Companion animal consumption	
6.4 Live animal markets	Eating live baby octopus, South Korea, Michelin Guide
6.5 Animal slaughter festivals	Pig-Chopping Festival, Vietnam, Rove.me
7 Other	
7.1 Civet coffee farms	Civet coffee farm visit, Indonesia, Tripadvisor
7.2 Turtle hatcheries	Turtle hatchery and handling, Sri Lanka, Tripadvisor Turtle hatchery, Cayman Islands, GetYourGuide Turtle hatchery and handling, Sri Lanka, Viator