BVA, BSAVA and BVZS response to Defra Consultation: Licensing of specialist private

inspection timeframes or competent external

will be a quick review by the local authority for compliance and any notable changes which could then be escalated to a full inspection. This would be in-line with zoo licensing inspections, and we feel would enable the management of animal welfare issues whilst still being manageable for local authorities to meaningfully carry out.

8) For these standards to be adhered to for any inspection requirements put in place, it is important to ensure that there is veterin





rescued, that have flexibility to ensure ites that have an

attachment to humans and will need to have some form of social contact with them to maintain their wellbeing.

- Question 23: Do agree or disagree that the proposed dimensions provide sufficient space for each species of privately kept primates?
- 33) Many of the dimensions proposed again have no evidence basis or are not currently in other established standards for captive primates. There are well established Callitrichid best practice husbandry guidelines published by the European Association of Zoos and Aquaria (EAZA), yet this document preferentially uses recommendations for enclosures from more obscure sources.
  - Question 25: Do you agree or disagree that the proposed standards ensure that kept primates will have appropriate access to nest boxes, resting sites and platforms to support essential behaviours?

34)

Question 28: Do you agree or disagree that the proposed standards ensure that specialist keepers provide primates with appropriate lighting within their enclosure to best promote optimal welfare?

- Question 29: Do you agree or disagree that the needs of nocturnal species are adequately met?
- 36) It is not clear why it says exceptions can be made for nocturnal species in terms of outdoor enclosures. We presume this is to enable nocturnal species to be maintained on a reverse light cycle to ease monitoring, feeding and assess for any signs of illness. If this is the case then this should be clarified. However, we believe that even where nocturnal species are maintained on a reverse light cycle, outside access should be provided.
  - Question 30: Do you agree or disagree that the standards will ensure specialist keepers maintain a hygienic and safe environment for captive primates?
- 37) The husbandry requirements for primate groups are complex, requiring enclosures large enough to

se and only work with

46) nphasis on the

## **Breeding**

Question 38: Do you agree or disagree that hand-rearing by private keepers should only be permitted under exceptional circumstances?

47) We agree. As previously mentioned we believe the requirements to keep primates make it very , and so the additional

complexities of rearing primates, by hand or by supporting the mother, is something that would