

Title: Ending the use of wild animals in travelling circuses IA No: Defra 1488 Lead department or agency: Department for Environment, Food and Rural Affairs Other departments or agencies:	Impact Assessment (IA)		
	Date: 19/12/2012		
	Stage: Consultation		
	Source of intervention: Domestic		
	Type of measure: Primary legislation		
Contact for enquiries: circusanimals@defra.gsi.gov.uk			
Summary: Intervention and Options			RPC Opinion: RPC Opinion Status

Cost of Preferred (or more likely) Option			
Total Net Present Value	Business Net Present Value	Net cost to business per year (EANCB on 2009 prices)	In scope of One-In, Measure qualifies as One-Out?
£-1.674m	£0m	£0m	Yes Zero Net Cost

What is the problem under consideration? Why is government intervention necessary?

There has long been public concern regarding the use of wild animals in travelling circuses. While much of this concern has centred on the perceived inability of travelling circuses to be able to provide for the welfare needs of wild animals, there is a lack of scientific evidence that there are irredeemable welfare problems within a travelling circus environment. However, there remains a deep seated opposition, in Parliament and among large numbers of the public, to the use of wild animals in circuses. Therefore, measures are required which address specifically their concerns.

What are the policy objectives and the intended effects?

Wild animals' wild nature means they are not naturally suited to the artificial circus environment and cannot fulfil their natural behaviour – their intrinsic nature should instead be respected. Their use offers no unique conservational or educational benefits and, furthermore, is not necessary for one to experience the circus. The primary policy objective is the resolution of these concerns. As in the Welfare of Wild Animals in Travelling Circuses (England) Regulations 2012 (the Welfare Regulations), a 'wild animal' means an animal that is a member of a species not normally domesticated in Great Britain.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Option 0: Maintaining the status quo: 'do nothing'. This is the counterfactual against which all other options have been assessed.

Option 1 (preferred option): A non-welfare based ban with a grace period. An outright ban resolves the problem under consideration, and the non-welfare grounds will enable it to stand up to legal challenge. Such a ban can take various forms; we intend to introduce a ban with a grace period, allowing time for affected circuses to adapt.

Option 2: A non-welfare based ban without a grace period.

Will the policy be reviewed? It will/will not be reviewed. If applicable, set review date: Month/Year					
Does implementation go beyond minimum EU requirements?			Yes / No / N/A		
Are any of these organisations in scope? If Micros not exempted set out reason in Evidence Base.	Micro Yes/No	< 20 Yes/No	Small Yes/No	Medium Yes/No	Large Yes/No
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)			Traded:		Non-traded:

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

Signed by the responsible Minister: _____ Lord De Mauley _____ Date: _____ 16/04/2013 _____

Summary: Analysis & Evidence

Policy Option 1

Description: Non welfare based ban on use of wild animals in circuses, with a grace period

FULL ECONOMIC ASSESSMENT

Price Base Year 2013	PV Base Year 2013	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: Optional	High: Optional	Best Estimate: -1.674

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate		0.624	3.562

Description and scale of key monetised costs by 'main affected groups'

Costs would be borne by private animal collections that take over responsibility for the care of the wild animals no longer needed by circuses and the circuses suffer an assumed loss of gate revenue. Legislation introduced in 2013 would become effective in 2016 after a grace period. The average annual costs (over a seven-year period) would be about £304k for the animal collections and £320k for the circuses

Other key non-monetised costs by 'main affected groups'

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate		0.330	1.884

Description and scale of key monetised benefits by 'main affected groups'

Circuses would benefit from a cost reduction as they no longer need to feed and maintain the animals or pay for a circus licence (saving £320k a year). The government would benefit from not having to undertake unfounded visits to inspect circuses (£10k a year).

Other key non-monetised benefits by 'main affected groups'

The public good benefit afforded by this option has not been monetised.

Key assumptions/sensitivities/risks	Discount rate (%)	3.5
The loss of revenue suffered by circuses is equal to the cost of feeding and maintaining the animals that are banned.		
There is a risk that a ban would encourage 'last chance to see' tours, possibly including travelling circuses or wild animals from Europe, which might temporarily increase the number of wild animals used.		

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:	In scope of OIOO?	Measure qualifies as
Costs: 0.320	Yes	Zero net cost
Benefits: 0.320		
Net: 0		

Summary: Analysis & Evidence

Policy Option 2

Description: Non-welfare based ban on use of wild animals in travelling circuses, without a grace period.

FULL ECONOMIC ASSESSMENT

Price Base Year 2013	PV Base Year 2013	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: Optional	High: Optional	Best Estimate: -2.237

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate		0.624	4.747

Description and scale of key monetised costs by 'main affected groups'

Costs would be borne by private animal collections that take over responsibility for the care of the wild animals no longer needed by circuses and the circuses suffer an assumed loss of gate revenue. Legislation introduced in 2013 would become effective in 2014 without a grace period. The average annual costs (over a nine-year period) would be about £304k for the animal collections and £320k for the circuses.

Other key non-monetised costs by 'main affected groups'

As there is no grace period it is highly likely that there would be transition costs arising from the need for immediate disposal of animals, the loss of acts, and the subsequent disruption of circuses' programming. This has not been monetised and may lead to a claim for compensation from Government which, if successful, would transfer this cost from circuses to taxpayers.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate		0.330	2.970

Description and scale of key monetised benefits by 'main affected groups'

Circuses would benefit from a cost reduction as they no longer need to feed and maintain the animals or pay for a circus licence (saving £320k a year). The government would benefit from not having to undertake unfounded visits to inspect circuses (£10k a year), which is a cost it is currently liable to under the Welfare Regulations.

Other key non-monetised benefits by 'main affected groups'

The public good benefit afforded by this option has not been monetised.

Key assumptions/sensitivities/risks	Discount rate (%)	3.5
The loss of revenue suffered by circuses is equal to the cost of feeding and maintaining the animals that are banned.		

BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:			In scope of OIOO?	Measure qualifies as
Costs: 0.320	Benefits: 0.300	Net: 0	Yes	Zero net cost

Evidence Base

1. Rationale for Intervention

1.1 Since the 1920s there has been concern about use of wild animals in travelling circuses. The Government has recently introduced Regulations under the Animal Welfare Act 2006, requiring operators of travelling circuses with wild animals to acquire licences and maintain good welfare standards. These Regulations fill a gap in animal welfare legislation, which hitherto has specifically excluded circus animals, and they will come into force on 20 January 2013. Notwithstanding the welfare standards required by the Regulations, Government's position remains that the use of wild animals in travelling circuses is no longer necessary and should cease. The current Impact Assessment therefore addresses the options for putting an end to the use of wild animals in travelling circuses.

1.2 It is important to note that using wild animals in travelling circuses, and indeed adding such animals to circus troupes, remains legal. People who do so are not committing an offence, as long as they act in accordance with the Regulations, and they face no censure save the voicing of public concern. However, opposition to the use of wild animals in travelling circuses has been increasing. 95% of respondents to a public consultation in 2009 supported a full ban on the use of wild animals in travelling circuses. This response undoubtedly reflects a deep-rooted opposition to the practice amongst those replying to that consultation. A June 2011 Backbench business debate in the House of Commons also agreed on a motion directing the Government to introduce a ban on the use of wild animals in circuses.

1.3 In line with changing public perceptions, the number of travelling circuses using wild animals has greatly declined in recent years. According to one welfare group, in 1997 there were 124 'exotic' or wild animals in the UK¹ in some 20 circuses²; at the time of writing there remains an estimated 40 animals in 3 circuses.

1.4 There is insufficient scientific evidence to show that a ban is needed on welfare grounds, following the publication in 2007 of the Report of the Chairman of the Circus Working Group (commonly known as the 'Radford Report'). However, the Government holds the opinion that wild animals in travelling circuses have no place in our society today. On 1 March 2012, the Government set out its approach to the use of wild animals in travelling circuses in England. It confirmed that it intended to pursue a ban on their use and expected to be able to publish draft legislation for pre-legislative scrutiny later this Session. That intention has been confirmed in subsequent Ministerial statements. On 12 July 2012, Defra laid Draft Regulations for Parliament's approval that will establish a licensing scheme to protect the welfare of wild animals in travelling circuses in the period before a ban can be brought into effect. Parliament approved the Regulations in November 2012.

1.5 The Regulations may dissuade some operators from using wild animals, but they will not restrict licences for circuses that follow good welfare practice. Where the aim is to end the presence of wild animals in travelling circuses, it is necessary that further measures are considered, including primary legislation. The Regulations may be superseded by any such new measures.

1.5 Notwithstanding the current considerations, the Government does not wish to see an end to all travelling circuses. Putting an end to the use of wild animals is likely to improve their public standing and may increase their future viability.

1.6 As in the Welfare Licensing Regulations, a "wild animal" means an animal that is a member of a species not normally domesticated in Great Britain.

2. Objectives for Intervention

2.1 The policy objective is to end the use of wild animals in travelling circuses.

¹ Animal Defenders International, "Animals in Travelling Circuses: The Science on Suffering" 2006.

² Animal Defenders International, "Animal Circuses and the Animal Welfare Bill", 2004.

3. Background of the Problem

3.1 Size of the industry and history of debate

3.1.1 The number of wild animal acts travelling with circuses in England has been in steady decline for several decades. At the time of writing, it is difficult to state exactly the numbers of wild animals and travelling circuses, due to the paucity of regulation requiring these figures to be kept. However, figures obtained for an earlier Impact Assessment (published in December 2009 as part of “Consultation on the use of wild animals in travelling circuses”) indicated that during the summer 2009 season there were four travelling circuses in the UK were using some 47 ‘wild animals’. Figures provided to Defra by PAWSI (Performing Animals Welfare Standards International) for the 2012 consultation “Welfare of Wild Animals in Travelling Circuses - A Consultation” suggested that no more than three circuses were still using wild animal acts and the numbers of such animals was below 40. During the 2012 consultation Defra was made aware that there might be another travelling circus still using a wild animal act. However, it is understood that the circus is unlikely to have maintained the act, partly because of licensing responsibilities under the new Welfare Licensing Regulations.

3.1.2 Without any previous statutory duty on circuses to report to Defra the numbers of wild animals being used, precise numbers are, at the time of writing, difficult to calculate. Circuses may have access to foreign wild animal acts, and may introduce new animals each season, from abroad or from existing livestock. Therefore the number of animals is likely to be no more than 50.

3.1.3 The use of wild animals in travelling circuses is therefore decreasing greatly. As recently as 1997 there were, according to one animal welfare group, some 124 ‘exotic’ or wild animals in the UK³ being used in some 20 circuses⁴. Once the Welfare Licensing Regulations come into force on 20 January 2013, which will require all travelling circuses with wild animals to be licensed, we will have a definitive number of circuses still using wild animals in England.

3.1.4 According to our stakeholder engagement, attendances for the three remaining travelling circuses using wild animals were approximately 153,000 for the 2011 season. These figures include a number of complimentary and discount tickets given out by circuses to special groups, etc. Ticket prices for circus performances vary (with different prices for different seats, for example). The most expensive tickets can range from £18 to £20 for ringside seats for adults, to cheaper tickets ranging from £7.50 to £11 for group bookings or concessions. Taking an average ticket price of £14.00 per attendee, and assuming that the approximate average annual attendance of 153,000 would consist of all paying customers, the maximum average annual ticket revenue for the industry would be some £2,142,000. However, since not all of the 153,000 attendees would pay an entry fee, we must assume that gate revenue is less than this figure. These figures would not include any additional revenue sources circuses may have.

3.1.5 Despite the relatively small numbers of wild animals used in circuses, the area has long been a source of debate. Between 1921 and 1922, a Parliamentary Select Committee looked at the issues surrounding the treatment of animals in training, accommodation, transportation, and performance in circuses and music halls. The findings of the Select Committee were the basis of the Performing Animals (Regulation) Act subsequently passed in 1925 (see paragraph 2.2.2 below). Despite the passing of the 1925 Act, several private Bills were introduced during the following decades which attempted to prohibit the training and exhibition in circuses of certain species of animals. Debates in Parliament on the use of animals in circuses have remained a common occurrence, for example a Backbench Business debate on 23 June 2011 where the House of Commons agreed on a motion ‘directing the Government to use its powers under section 12 of the Animal Welfare Act 2006 to introduce a regulation banning the use of all wild animals in circuses to take effect by 1 July 2012’.⁵

3.1.6 During debates on the Animal Welfare Bill in 2006 the previous Government agreed to look at the issue⁶; it agreed to bring forward a ban using delegated powers provided in the Animal Welfare Bill (now Act) on the use of certain non-domesticated species in travelling circuses, subject to there being sufficient scientific evidence. To this end, an academic lawyer, Mike Radford, was appointed the Chairman of a ‘Circus Working Group’, whose remit was to provide, and consider, evidence relating to the transportation and housing needs of non-domesticated species. However, the report of the Chairman

³ Animals in Travelling Circuses: the science on suffering ADI 2006

⁴ Animal Circuses and the Animal Welfare Bill ADI Nov 2004

⁵ Hansard 23 June 2011 Column 548

⁶ Hansard 8 March 2006 Column 60WS

of the Circus Working Group (the ‘Radford Report’⁷) concluded that, in terms of using the delegated powers in the Animal Welfare Act 2006 to introduce a ban, and after reviewing the available scientific evidence submitted, ‘there appear[ed] to be little evidence to demonstrate that the welfare of animals kept in travelling circuses [was] any better or worse than that of animals kept in other captive environments’. Therefore, in the absence of any compelling scientific evidence, any attempt to ban the use of an animal using the delegated powers provided by the Animal Welfare Act would fail the test of proportionality, and primary legislation would be needed to ‘have any realistic prospect of achieving a lawful ban’.

3.1.7 Following the findings of the Radford Report, a feasibility study was undertaken during 2008 to assess whether it would instead be practicable to regulate the use of wild animals in travelling circuses. The feasibility study involved two members of the Government’s Zoo Licensing inspectorate visiting two of the circuses still using wild animal acts. On the recommendations of the inspectors who conducted the visits both circuses undertook improvements to their accommodation and travelling facilities in order to raise the standard of welfare of the animals. The study concluded that a regulatory regime could be devised and implemented following much the same process as used for the Zoo Licensing Act 1981.

3.1.8 Following the feasibility study, and further discussions with the circus industry and animal welfare groups, the previous Government issued a public consultation in December 2009 on how best to protect the welfare of wild animals in travelling circuses⁸. The 2009/10 Consultation considered three basic options for raising the standard of welfare for wild animals: a complete ban; voluntary self regulation; or compulsory statutory regulation. The consultation ran for twelve weeks, receiving almost 13,000 responses. Approximately 95% of the respondents to that consultation expressed the view that a ban on the use of wild animals in travelling circuses was the best option to achieve better welfare standards for such animals.⁹

3.1.9 In May 2011, the current Government announced that it would be seeking to introduce a new licensing regime for wild animal acts in travelling circuses¹⁰. It did not rule out the introduction of a ban but made it clear that there were legal uncertainties that required resolution as they could have a bearing on the position in the UK. In particular, a legal challenge to a wild animal ban in circuses in Austria was, at that point, unresolved. The Government did not make any commitments to a ban at that time as it wanted to assess the outcome of that challenge. In December 2011, the judgment by the Austrian Constitutional Court did not, in the end, result in a referral to the CJEU, and the ban was upheld. It should be noted that this case has limited relevance to any ban in this country, as it represents the view of an Austrian court regarding the legality of a ban under the Austrian constitution.

3.1.10 With that case resolved, the Government stated on 1 March 2012 that it intended to pursue a ban on the use of wild animals in travelling circuses in England¹¹. Since a ban would have to be made via primary legislation, and would therefore take time, the Government decided to introduce a licensing scheme. This would, until the ban’s implementation, fill an anomalous gap in current law (see *Current legislation* below) using powers already available under the Animal Welfare Act 2006, to protect and promote the welfare of wild animals in travelling circuses in England. A public consultation on Defra’s detailed proposals for a licensing scheme was launched on 1 March¹². The consultation ran until 25 April and received some 236 responses.

3.2 Current legislation

3.2.1 There are currently three main pieces of legislation directly relevant to animals in travelling circuses: the Welfare of Wild Animals in Travelling Circuses (England) Regulations 2012; the Animal Welfare Act 2006, under which the above Regulations are made; and the Performing Animals (Regulation) Act 1925.

3.2.2 **The Welfare of Wild Animals in Travelling Circuses (England) Regulations 2012** (which will come into effect on 20 January 2013) require all operators of travelling circuses which use wild animals to be licensed. The circuses are required to receive regular inspections, to check compliance with strict

⁷ <http://archive.defra.gov.uk/foodfarm/farmanimal/welfare/documents/circus-report.pdf>

⁸ Defra: Consultation on the use of wild animals in travelling circuses: December 2009

⁹ <http://archive.defra.gov.uk/foodfarm/farmanimal/welfare/documents/responses.pdf>

¹⁰ “Tough new licensing regime for wild animals in circuses” Defra 13 May 2011

¹¹ Hansard 1 March 2012 Column 41WS

¹² <http://www.defra.gov.uk/consult/2012/03/01/circus-animals-1203/>

welfare standards. Anyone responsible for a travelling circus that uses wild animals will need to hold a valid licence; meet strict welfare standards; prepare and follow care plans for every animal; and have a retirement plan for each animal.

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

3.2.4 The Performing Animals (Regulation) Act 1925 requires anyone who trains or exhibits animals to register with a local authority, stating details of the animals involved. The Act also gives powers to local authorities to enter premises. However, the Act does not set down any particular welfare requirements for animals used in performance.

3.2.5 The welfare of animals during transportation is covered by **Council Regulation (EC) No 1/2005**. However, it is Defra’s view that the transport of circus animals is not within the scope of the Regulation when the animals can be described as travelling in their permanent housing. This position has been adopted in order to ensure consistency with Article 37 of the EC treaty, and has the active support of the European Commission. The transport of circus animals not travelling in what can be described as their permanent place of housing is, therefore, within the scope of the Regulation. Where circus animals fall outside the scope of the Regulation, protection under Article 4 of **The Welfare of Animals (Transport) (England) Order 2006** applies. The 2006 Act also applies while animals are being transported in England.

3.2.6 There are two pieces of legislation that do set down standards or conditions for keeping ‘wild animals’ – the **Zoo Licensing Act 1981** and the **Dangerous Wild Animals Act 1976**. However, both Acts specifically exempt circuses from their remit.

3.3 Previous views of the public, animal welfare organisations and the Circus industry

3.3.1 As indicated above, 95% of the 13,000 people who responded to the 2009/10 consultation on circus animals expressed a preference for a complete ban on welfare grounds. The outcome of that consultation can only be regarded as representative of the opinion of people who were interested enough in the subject area to respond, and is not necessarily representative of the views of the wider general public. Nonetheless, it can be taken from the consultation, from the correspondence Defra regularly receives, and from occasional relevant opinion polls that, where expressed, public opinion would support a ban on the use of wild animals in circuses¹³.

3.3.2 Figures provided to Defra in 2007 estimated that attendances at the four travelling circuses still using wild animal acts during that season were approximately 320,000. For 2010, attendances for the three remain travelling circuses using wild animals was estimated to be 121,000 and for 2011 153,000; these figures include complimentary tickets given out by circuses.

3.3.3 Animal welfare groups and at least one veterinary organisation support a ban on the use of wild animal acts in circuses. Arguments put forward by these groups are varied, and while they mainly centre on the difficulty of a circus environment ever being able to provide for the complex welfare needs of wild animals, ethical arguments are also sometimes used.

3.4 Legal issues

3.4.1 The Government has consistently maintained the position, set out by the 2007 Radford Report (paragraph 3.1.6 above), that without new evidence of irredeemable welfare problems any ban on welfare grounds on the use of wild animals performing in travelling circuses is likely to be found to be disproportionate. In its Written Ministerial Statement of 1 March 2012 the Government set out its

¹³ for example, one conducted by Ipsos MORI on behalf of the RSPCA in October 2006 found 63% of people agreed that the use of wild animals in circuses should be banned, including 43% who agreed strongly - <http://www.ipsos-mori.com/researchpublications/researcharchive/2549/Public-views-on-the-use-of-wild-animals-in-circuses-in-England.aspx>

intended approach for minimising the risks of a successful challenge by pursuing a non-welfare based ban on the use of such animals. Such a ban will need to be introduced by primary legislation.

3.5 *Film and Television*

3.5.1 The focus of these proposals is on wild animals performing in travelling circuses, and not other performing wild animals that may be used by the audio-visual industry (films, television and advertising). While it is known that some wild animals used by circuses have also been used by the audio-visual industry, this usage will not be significantly affected by the proposed ban.

3.5.2 There is also no overriding public concern: the 2009/10 consultation specifically asked about the use of circus wild animals in other industries, and whether there would be an impact on other industries if wild animals in circuses were banned. The results of the consultation showed that some 70% of respondents felt that wild animals in travelling circuses did not have skills that made them more suitable than other animals for work in the audio-visual industry. A similar number felt that a ban would not have an impact on other industries. Some respondents did argue that circus animals are more suitable for work in the audio-visual industry, as they are trained to interact with people, and are used to music, lights, cameras, and travelling. However, Defra is satisfied that the film industry has a sufficient supply of non-circus animals and other options (such as CGI animations) that legislation on wild animals in travelling circuses would not significantly affect that industry. Defra is not aware of any special public concerns regarding wild animals used generally in films, television or adverts.

4. Options Considered

4.1 This Impact Assessment examines two options, beyond 'do nothing', in detail. The options are:

0. Maintaining the status quo: 'do nothing'
1. A ban on non-welfare grounds with a grace period
2. A ban on non-welfare grounds without a grace period

Five further possibilities were rejected without detailed examination. These are:

3. A ban on non-welfare grounds that is phased in
4. A ban on non-welfare grounds that is species-specific
5. A ban on welfare grounds on wild animals in travelling circuses
6. A behaviour change campaign directed at travelling circus operators
7. A voluntary system of self regulation for travelling circus operators

4.2 '**Do nothing**' is not a viable option.

4.2.1 Doing nothing is not in line with Government commitments to introduce a ban. However, this option is the counterfactual against which all other options have been assessed.

4.3 **A ban on non-welfare grounds** is an option. It could take various forms, some of which represent a viable option.

4.3.1 Such a ban would resolve the concerns at the heart of the current issue by banning the use of wild animals in travelling circuses. This would be a proportionate response to the issue of a practice which the Government believes is not necessary in our society today.

4.3.2 A ban may supersede the Welfare Licensing Regulations. Any animals which they had previously covered would remain covered by the Animal Welfare Act 2006. If they entered private collections (including staying in the ownership of operators of travelling circuses which previously used wild animals) their owners may also need to be registered under the Dangerous Wild Animals Act 1976. If the animals entered zoos, they would be protected under the Zoo Licensing Act 1981.

4.3.3 One concern with this option is the dearth of previous primary legislation based of this kind. This could lead to difficulties in public perception of the ban and in passing it through Parliament. A ban would significantly affect the acts of travelling circuses which use wild animals, potentially resulting in loss of

revenue. Depending on the manner of implementation, Defra might need to consider offering compensation to circuses.

4.3.4 Various European countries have introduced bans or partial bans. These include Austria, where a ban was challenged in the Constitutional Court; the legality of the ban was upheld. However, this case has limited relevance to a potential ban in this country, as it represents the view of an Austrian court regarding the legality of a ban under the Austrian constitution.

4.3.5 A ban could take various forms. See Table 1, below, for more detail.

The first two **are** viable options:

- The preferred option: **With a grace period** up to December 2015 (whereby a ban would not become statutory until after Royal Assent), to allow circuses time to adapt to the ban. [N.B. the final length of any grace period would be for Parliament to decide.]
- **Without a grace period**, i.e. immediately on Royal Assent.

The other two **are not** viable options:

- **A phased-in ban**, with an immediate ban on the addition to circuses of any new wild animals, with any existing animals being allowed to remain until their deaths, or for a specific period of time. This is not a viable option, as circuses could purchase new young animals before a ban, by which it would be greatly undermined.
- **A species-specific ban**, with a finite list of species that would have to be excluded from circuses. This is not a viable option, as new species could well be introduced, or bred, that circumvented the ban.

4.3.6 These options are appraised in detail in Table 1, below

Table 1 – Matrix of ways in which to implement a non-welfare based ban.

Option	Comments
VIABLE OPTIONS	
Option 1: A ban with a grace period	<p><u>Benefit:</u> It would allow circuses time to adapt their output, before they lose wild animal acts which may represent a substantial part of their performances, and which may be a major audience draw; and to arrange alternative care for the animals. This would offer protection to these small and micro-businesses.</p> <p><u>Benefit:</u> It would reduce the likelihood of the Government needing to pay compensation to the circuses. Circuses might be entitled to claim reimbursement if they were not given a grace period in which to adapt as described above.</p> <p><u>Benefit:</u> It would allow more time for the negotiation of circus animals' retirement plans, which might involve a range of stakeholders.</p> <p><u>Disadvantage:</u> A grace period would mean sanctioning the temporary continuation of a practice deemed no longer necessary.</p>
Option 2: A ban without a grace period	<p><u>Benefit:</u> A more immediately consistent position, as a practice deemed no longer necessary would be stopped with minimal delay.</p>

	<p><u>Disadvantage:</u> Defra would need to consider whether any compensation should be paid to cover losses of earnings and extra costs to circus-owners. It may risk the short-term welfare of affected animals, as well as significantly disrupting operators' business models.</p>
NON-VIABLE OPTIONS	
A phased-in ban	<p><u>Benefit:</u> It would allow circuses time to adapt their output, before they lose wild animal acts which may represent a substantial part of their performances and which may be a major audience draw; and to arrange alternative care for the animals. This would offer protection to these small and micro-businesses.</p>
	<p><u>Benefit:</u> It would reduce the likelihood of the Government needing to pay compensation to the circuses. Circuses might be entitled to claim reimbursement if they were not given a grace period in which to adapt as described above.</p>
	<p><u>Disadvantage:</u> A phased-in ban could contravene EU law as it would make it impossible for circuses from other EU states to perform here with wild animal acts, despite UK travelling circuses being allowed to continue doing so.</p>
	<p><u>Disadvantage:</u> A phased-in ban would mean sanctioning for some animals the continuation of a practice deemed no longer necessary.</p>
	<p><u>Disadvantage:</u> Before the introduction of a phased-in ban, circuses might purchase young animals, which could then continue performing for years. This would undermine a ban greatly, and for this reason this option can be discounted.</p>
A species-specific ban	<p><u>Disadvantage:</u> It would allow the continued use of some wild animals in travelling circuses. The issue being addressed is not the number of wild animals used in travelling circuses, nor their species, but the fact that they are used at all. The issue of use would not therefore be resolved by this option, and for this reason it can be discounted immediately.</p>
	<p><u>Disadvantage:</u> A species-specific ban would be hard to enforce, as new species could very easily be introduced, or bred, that circumvented the ban.</p>

4.4 A ban with a legal basis in animal welfare is not a viable option.

4.4.1 The Radford Report found that there was insufficient evidence of poor wild animal welfare in travelling circuses. Any ban with a legal basis in animal welfare would be vulnerable to a legal challenge.

4.5 A **behaviour change campaign** is **not** a viable option.

4.5.1 It would not be defensible to introduce a 'nudge campaign' against a practice to which the Government has stated it no longer believes is necessary.

4.5.2 Furthermore, a behaviour change campaign is unlikely to be effective. Travelling circus operators know of opposition to their practices and would not cease them simply because of a formalised Government campaign in addition to welfare groups' more vigorous campaigns. It would be inappropriate to target a campaign at audiences; this would, in effect, involve discouraging members of the public from patronising legally operated businesses.

4.5.3 In any case, a behaviour change campaign would be unlikely to achieve any more than the Government's published stance.

4.6 **Self-regulation**, in the form of a pledge or code to which circuses are encouraged to sign up, is **not** a viable option.

4.6.1 A small number of circuses have continued to use wild animals in the face of the practice's decreasing public profile and popularity, and would be highly unlikely to cease because of a voluntary pledge. Moreover, such a scheme would not be a definitive response to a practice that the Government sees as no longer necessary. A pledge among English circuses would also have no bearing on visiting circuses.

4.6.2 It is also unlikely that such a system would be effective. It is highly unlikely that a self-regulatory system could demonstrate to welfare groups that it was open, auditable, and effective, whilst remaining affordable and accepted by the industry. In other areas of animal welfare, UKAS (United Kingdom Accreditation Service) has certified that self-regulatory systems are open, auditable and effective; however, there is no existing body that could easily be adapted to act as a UKAS-accredited regulatory body for the wild animal circus industry. The establishment and maintenance of such a body would furthermore be prohibitively expensive for such a small industry.

5. Monetised and Non-Monetised Costs and Benefits

5.1 Two possible options are here considered in more detail. These are:

5.1.1 A ban on non-welfare grounds **with a grace period** up to December 2015 (whereby a ban would not become statutory until after Royal Assent), to allow circuses time to adapt to the ban. [N.B. the final length of any grace period would be for Parliament to decide.]

5.1.2 A ban on non-welfare grounds **without a grace period**, i.e. immediately on Royal Assent.

5.2 A ban with a grace period

5.2.1 Benefits

5.2.1.1 The primary benefit of a ban on wild animals in travelling circuses would be non-monetary. According to the arguments for a ban, the practice does not have a place in the 21st century. A ban will be perceived as bringing the country into line with modern standards and reinforcing this country's position as a leading protector of animals.

5.2.1.2 According to the 2009-10 consultation on circus animals 95% of the 13,000 people who responded expressed a preference for a ban (albeit one on welfare grounds). A ban would be a public good although we do not know how much the public would be 'willing to pay' (the monetised benefit in economic terms) to see such a ban.

5.2.2 Disadvantages

5.2.2.1 Such arguments are more subject to personal opinion than empirically observed arguments.

5.2.3 Costs

5.2.3.1 The potential costs and benefits of a total ban on welfare grounds were examined in detail in the 2009/10 Consultation Impact Assessment¹⁴, and those figures were also used for the Impact Assessment for the Welfare Licensing Regulations. No evidence was submitted during the previous consultation to suggest that the costs and benefits set out in that previous impact assessment were substantially incorrect, and so these figures are partially re-produced here, updated to allow for inflation.

5.2.3.2 The estimates set out in Table 2 below provide an indication of the costs and benefits of banning wild animal acts, with a grace period, according to where those costs and benefits fall: private animal collectors licensed under the Dangerous Wild Animals Act 1976; travelling circuses which previously used wild animals; and Government.

5.2.3.3 We no longer make the assumption (used in previous Impact Assessments) that circus operators would pass care of their wild animals to animal welfare charities. Responses from circus operators to previous consultations strongly suggest that this is highly unlikely, and they would not necessarily want to give up the ownership of their animals. Instead, **we assume for the purpose of our calculations that circus operators will keep their wild animals in private collections** (not as part of the circus business). Based on our knowledge of the circus operators this seems the most likely possibility. Depending on the species of animals, this may need to be done in accordance with the Dangerous Wild Animals Act 1976 and will incur a small licence fee per animal collection.

5.2.3.4 Several responses to the 2012 consultation, again mainly from circuses and circus interests, did suggest that our costs of keeping animals were not accurate but did not suggest any alternative figures (although it is acknowledged that the focus of the 2012 consultation was on our proposals for licensing Regulations and not on our proposals to introduce a ban).

Table 2 – Option 1 summary of annual monetised costs and benefits of a possible ban with a grace period on the use of wild animal acts in travelling circuses (at 2012/13 prices)

Payer	Item	£000s (1) Range	£000s (1) Central Est
Private collectors under Dangerous Wild Animals Act 1976	Licence costs under DWAA	-0.3 to -1.2	-0.7
	Cost of feeding etc	-273 to -333	-303
Travelling circuses previously using wild animals	Saving of feeding etc. costs	273 to 333	303
	Saving of licensing costs under Welfare Regulations	17	
	Loss of revenue (2)	-290 to -350	-320
Government	Saving of costs of unfounded welfare inspection visits	7 to 14	10
Total net impact of ban		-259 to -327	-294

- (1) Costs are shown as negative sums, benefits are shown as positive sums.
- (2) The loss of revenue from not having animal acts is assumed to equal the costs of keeping animals including the licence; see discussion below.

¹⁴ <http://webarchive.nationalarchives.gov.uk/20100713150655/www.defra.gov.uk/corporate/consult/circus-wild-animals/impact-assessment.pdf>

Table 3: Option 1 Summary of Costs and Benefits (£000s, central estimate) (1)

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
Costs											
Private animal collectors	-	-	-	304	304	304	304	304	304	304	2,128
Circuses	-	-	-	320	320	320	320	320	320	320	2,240
Total Costs	-	-	-	624	624	624	624	624	624	624	4,368
Present Value	-	-	-	563	544	525	506	490	474	458	3,562
Benefits	-	-	-								
Circuses	-	-	-	320	320	320	320	320	320	320	2,240
Govt	-	-	-	10	10	10	10	10	10	10	70
Total Benefit	-	-	-	330	330	330	330	330	330	330	2,310
Present Value	-	-	-	298	288	278	268	259	251	242	1,884
Total Net Cost				294	294	294	294	294	294	294	2,058
Present Value				265	256	247	239	231	223	216	1,674

(1) Measured in real prices except present values where shown. A 10 year time horizon has been assumed. Some animals may die during this period reducing feeding etc costs to animal collections but also, by assumption, reducing the benefits to circuses by an equal amount.

5.2.3.5 It is impossible to say how circus revenue will be affected by the ban on wild animal acts; much will depend on how circuses respond to the challenge to develop their businesses in other directions. However, it should be noted that ticket prices of travelling circuses which use wild animals do **not** appear to include a 'premium' justified by those animals. Figures in the 2011 Impact Assessment showed that the highest ticket prices were £18.00 to £20.00 for ringside seats for adults, and the cheapest seats were £7.50 to £11.00 for group bookings or concessions, not including special offers. Prices in 2012 at travelling circuses without wild animals ranged from £5.99 (Russell's International Circus) to £29.00 (Moscow State Circus). Other circuses charging over £20.00 included Zippo's Circus, where the most expensive ticket was £21.00. This wider range of prices partly reflects the fact the majority of travelling circuses do not use wild animals. However, it also suggests that opportunities exist to develop businesses and that revenues may not necessarily fall as a result of ceasing to use wild animal acts.

5.2.3.6 As in the previous Impact Assessment on the Welfare Licensing Regulations, we have made a neutral assumption in Table 2 above that the decline in entrance revenue equals the cost saving that arises from not having to house, transport and feed the animals and hold a licence to use wild animals. In any case, however, the impacts are likely to be small, as there are likely to be only two or three circuses affected, which are thought to be small or even micro-businesses (when part-time and seasonal working is taken into account). Should adverse impacts arise (e.g. redundancies, or even closure of a circus) these are expected to be relatively short-term, as spare or unemployed resources will gradually find alternative employment in other circuses or activities.

5.2.3.7 There is a possible loss of revenue to circuses, if some audience members visit circuses exclusively because of their wild animal acts; total visitor numbers to these circuses could decrease following a ban. Conversely, animal welfare groups suggest that visitor numbers have increased for circuses which have voluntarily given up using wild animals in the past. Therefore, audience sizes, and therefore revenues, may increase, if visitors who have previously stayed away due to their opposition to the use of wild animals now return. It should be noted that the majority of England's travelling circuses, which number approximately 20, operate without the use of wild animals. Presuming that they come through a period of adaptation, those circuses which do still use wild animals ought, on current evidence, to be able to continue operating. Increasing the number of circuses without wild animal acts ought to increase competition, but travelling circuses in fact tend to act like local monopolies i.e. there is at most one circus available to each consumer at any one time.

5.2.3.8 It is possible that, instead of keeping their animals in private collection, circus operators might seek to:

- set up zoos containing the animals with the public paying to visit;
- hire them out for use in film or television;
- sell them; or
- euthanize them.

5.2.3.9 However, we believe that **each of these options would have a lower long-term financial cost** than keeping the animals in private collections, as they would each either reduce care costs, or increase income. Even with additional costs, Option 1 would still be expected to cost well under £1m a year.

5.2.3.10 It should be noted that a ban would impact on small and micro-businesses: the three travelling circuses previously known to be using wild animal acts each employ approximately 20 to 30 people. (However, a large proportion of those employed are family members or seasonal employees, i.e. those who are not employed full time.) Because of the extremely small numbers of circuses being regulated, an exemption for small micro-businesses (or indeed any exemption) would render any legislation worthless. It will therefore be necessary to make applications to the Economic Affairs Committee and the Reducing Regulation Committee for waivers from the normal obligations to protect small and micro-businesses from regulation.

5.3 A ban **without** a grace period

5.3.1 It should be noted that an immediate ban, depending on its final form as decided by Parliament, would make part or all of the new Welfare Licensing Regulations redundant – very soon after their implementation.

5.3.2 The various financial implications to consider are much the same as for a ban with a grace period that takes longer to take effect. The most important difference is that the lack of a reasonable time to prepare for a ban may leave operators unable to recoup fully one-off costs of welfare licences, to arrange replacements, and thus to put on a complete show. This could lead to a failure to sell tickets and, in turn, to claims to the Government for compensation. It is not possible to predict the precise size and nature of claims, but they would need to be considered on a case-by-case basis, if they were to occur.

5.3.3 Extra benefit

5.3.3.1 The immediacy of this option is attractive; it would mean swift action being taken to end practices which are not supported by the Government.

5.3.3.2 It is reasonable to assume that travelling circuses previously using wild animals would – as businesses – make savings on costs associated with wild animals' welfare needs (such as feeding, housing, and healthcare); on training costs; on transportation; and on the costs of licences under the Welfare Licensing Regulations. These savings are reflected in Table 4 below. It is likely that a circus operator may, in a private capacity, themselves take on ownership of the animals concerned and associated costs (including licensing under the Dangerous Wild Animals Act 1976, although these are significantly lower than the cost of a licence under the Welfare Licensing Regulations). However, these costs would no longer fall on the business, but the burden on individuals is acknowledged.

5.3.4 Extra costs

5.3.4.1 It is assumed that a ban would lead to a direct loss of revenue, shown in Table 4, below. This is the same as the loss revenue of a ban with a grace period, above, and has been taken to be the same as the costs of the feeding etc. of wild animals, as it was in previous Impact Assessments.

5.3.4.2 However, a ban **without a grace period** would also introduce an **extra loss of revenue**: a sudden loss of acts could well make it impossible to put on performances, which would greatly reduce short-term income from ticket sales. Although circus operators may be aware in advance of the Government's intention to ban, this is not equivalent to their being given formal notice of an impending ban. They are unlikely to anticipate that the effect of the ban would be immediate. Such a ban would not therefore give travelling circuses a period, before coming into force, in which they might adapt their business models. Uncertainty may further impede efforts to adapt, and to find replacement acts, which may directly impact on the operators' ability to put on a show, to sell tickets, and thus to compete fairly. This would limit – or cut off – their short-term earning power, and put them at a competitive disadvantage.

5.3.4.3 Further extra costs may be incurred while the circus is touring if additional staff are employed to look after the banned animals which have to be left behind, e.g. at winter quarters. Previously they would have travelled with the circus and been looked after by staff there.

5.3.4.4 Furthermore, new non-animal acts would most likely be taken on at short notice following a ban to replace wild animal acts. Aside from the question of whether it is possible for circuses to make necessary arrangements in time, this might result in further extra costs. It is not possible to quantify the wages of different types of circus performers (due to a lack of data in the sector). Nonetheless, where animal trainers and performers had previously belonged to the family running the circus, replacing them with new hired staff could be more costly. If the overall number of staff had to increase, additional transport and accommodation would need to be acquired for the increased number of performers. (The overall number of staff might not, however, increase, as animal acts require numerous staff members, to care for, train, and appear alongside animals). Such costs may be balanced by the decrease in specialised transportation and other such provisions needed for wild animals. In any case, each individual business is different, and the precise costs and savings would depend on the animals being retired, and precise staffing requirements.

Table 4 – Option 2 summary of annual monetised costs and benefits of a possible ban without a grace period on the use of wild animal acts in travelling circuses (at 2012/13 prices)

Payer	Item	£000s (1) Range	£000s (1) Central Est
Private collectors under Dangerous Wild Animals Act 1976	Licence costs under DWAA	-0.3 to -1.2	-0.7
	Cost of feeding etc	-273 to -333	-303
Travelling circuses previously using wild animals	Saving of feeding etc. costs	273 to 333	303
	Saving of licensing costs under Welfare Regulations	17	17
	Loss of revenue (2)	-290 to -350	-320
	Losses due to ban being immediate	Unforeseeable	
Government	Saving of costs of unfounded welfare inspection visits	7 to 14	10
	Compensation payments	Unforeseeable (as above)	
Total net impact of ban		-259 to -327	-294

(1) Costs are shown as negative sums, benefits are shown as positive sums.

(2) The loss of revenue from not having animal acts is assumed to equal the costs of keeping animals including the licence; see discussion below.

Table 5: Option 2 Summary of Costs and Benefits (£000s, central estimate) (1)

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
Costs											
Private animal collectors	-	304	304	304	304	304	304	304	304	304	2,736
Circuses	-	320	320	320	320	320	320	320	320	320	2,880
Total Costs	-	624	624	624	624	624	624	624	624	624	5,616
Present Value	-	603	582	563	544	525	506	490	474	458	4,747
Benefits											
Circuses	-	320	320	320	320	320	320	320	320	320	2,880
Govt	-	10	10	10	10	10	10	10	10	10	90
Total Benefits	-	330	330	330	330	330	330	330	330	330	2,970
Present Value	-	319	308	298	288	278	268	259	251	242	2,511
Total Net Cost	-	294	294	294	294	294	294	294	294	294	2,646
Present Value	-	284	274	265	256	247	239	231	223	216	2,237

1) Measured in real prices except present values (PV) where shown. A 10 year time horizon has been assumed. Some animals may die during this period reducing feeding etc costs to animal collections but also, by assumption, reducing the benefits to circuses by an equal amount.

5.4 Sensitivity analysis: further decline in circus gate revenue

There is little evidence regarding how circuses may adapt their businesses following a ban on the use of wild animals, or the effect that this may have on gates and revenues of the small number of directly affected circuses. We have made the assumption above that the loss of gate revenue would be broadly equal to the costs associated with keeping and maintaining the wild animals (including the costs of licensing under the welfare regulations) so that the impact on the circus as a business is neutral. There are however other possible outcomes, and it possibly that revenue would fall by more than the reduction in costs. (At the very least, this eventuality is likely to form part of the thinking of those circus owners who continue to use wild animal acts.) Gate revenue for circuses using wild animal acts amounts to about £2m a year (see 3.1.4, above). If it fell by 30% (approximately £600k) following a ban on the use of wild animals and costs fell by about £320k (equal to the cost of maintaining wild animals in circuses), there would be a net cost to business of about £280k a year and a net cost overall of about £574k. It is unlikely that this shortfall of revenue over cost would persist for long before steps were taken to address it, for instance by circuses acquiring new (non-wild animal) acts. However, a shortfall might possibly continue for a year or two following the implementation of the ban.

6. Rationale and evidence that justify the level of analysis used in the IA (proportionality approach)

6.1 The number of wild animal acts used in travelling circuses is small. Nonetheless, this is a highly emotive area and it is clear to Government, based on both Parliament and public opinion, that there is demand for action to be taken. The Government believes that there is not enough evidence of insurmountable welfare problems to implement a ban on welfare grounds. However, its opposition to the use of wild animals in travelling circuses is based on the concerns raised with it.

6.2 Evidence for this Impact Assessment has been drawn from previous stakeholder engagement including previous consultations and Impact Assessments. It has not been possible to monetise with any degree of accuracy the loss of revenue associated with circuses losing the ability to deploy wild animal acts. The limited evidence on this that exists is not conclusive. For simplicity we have made the fairly neutral assumption that the loss of revenue experienced by circuses is equal to the cost of feeding and maintaining wild animal acts.

6.3 The public good benefit of licensing banning circuses has not been measured or monetised. For the small number of animals remaining undertaking such a measurement would not be proportionate. However, it is clear that there is significant public support for improving the position of animals

generally¹⁵. This Impact Assessment has confined itself to providing some estimates to illustrate the scale of public good benefits that would be required to offset the costs.

7. Risks and assumptions

7.1 The assumptions used to estimate the costs of the licensing scheme are set out in the text above.

7.2 There is a risk that an impending ban could encourage travelling circuses to put on 'last chance to see' tours – possibly including travelling circuses, or wild animals, from Europe – which would temporarily increase the number of wild animals used. This is undesirable inasmuch as this policy area assumes that the use of wild animals in travelling circuses is not necessary. However, this would only be a short-term risk, as the ban would put an end to it. In the meanwhile, the Welfare Licensing Regulations would ensure that wild animals enjoyed good welfare if and when they were part of any travelling circuses.

8. Direct costs and benefits to business calculations (following OIOO methodology)

8.1 The ban is within scope of one-in-one-out, but the evidence is unclear about what the precise impact on the businesses affected will be. We have made a neutral assumption above that the net impacts on business will be negligible, but there are arguments either way, and little hard evidence. Even if there were adverse impacts on the businesses concerned it is not expected they would be large or long-lasting.

8.2 In line with these assumptions, Table 6 below shows the total net impact of a ban with a grace period to business, i.e. to travelling circuses which previously used wild animals. It draws its data from Table 2, above.

Table 6 – Summary of annual monetised costs and benefits to business of a possible ban with a grace period on the use of wild animal acts in travelling circuses (at 2012/13 prices)

	Item	£000s (1)
Travelling circuses previously using wild animals	Saving of feeding etc. costs	273 to 333
	Saving of licensing costs under Welfare Regulations	17
	Loss of revenue (2)	-290 to -350
	Total net business impact of ban	-60 to 60 (3)

(1) Costs are shown as negative sums, benefits are shown as positive sums.

(2) The loss of revenue from not having animal acts is assumed to equal the costs of keeping animals including the licence; see previous discussion.

(3) The range of costs to businesses (circuses) is £-60k to £60k. The central estimate is therefore zero.

8.3 The travelling circuses affected include small and micro-businesses. Defra will therefore make applications to the Economic Affairs Committee and to the Reducing Regulation Sub-Committee for waivers from the normal obligations to protect small and micro-businesses from regulation.

¹⁵ <http://www.politicalanimal.org.uk/key-facts-and-figures/generic-indicators/the-proportion-of-people-interested-in-improving-animal-welfare>

9. Devolved Administrations

9.1 Any ban is currently expected to affect England only; the draft Bill is an England only Bill. However, the Devolved Administrations have been asked whether they wish for the territorial scope of the final Bill to be extended to their countries. The Final Stage Impact Assessment will be updated to reflect any changes.

10. Summary and preferred option with description of implementation plan

10.1 It is the opinion of the Government, Parliament, and the public, that the use of wild animals in travelling circuses is no longer necessary.

10.2 The preferred option for addressing this problem is the introduction of **a ban, on on-welfare grounds, with a grace period**. This will put a definitive end to the practice. It should have no more than a small impact on business, and fits within the Government's one-in-one-out methodology.

10.3 Evidence for this has been drawn from two public consultations, in-depth stakeholder engagement, and direct contact with the three travelling circuses that have recently used wild animals.

10.4 This Impact Assessment has been produced to accompany the draft 'Wild Animals in Circuses' Bill, which will be submitted to Parliament for Pre-legislative scrutiny. A Final Stage Impact Assessment will be produced for any Bill produced as a result of that process, and will set out how any final ban would be implemented.