



A **GUIDE** and **TOOL** by **SATSA**  
The Southern Africa Tourism Services Association

# Evaluating Captive Wildlife Attractions & Activities

Helping you make good choices





Click each section to learn more or scroll to follow consecutively

## About

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Covers who this Guide is for, the local context & background it's born from and the complexity of the problem posed. Moves on to its 10 guiding principles, purpose & scope.

## A Line in the Sand

p11



Identifies tourism's tolerance limit, where and why to draw a line in the sand and its position in 2019. Looks at how that line will advance & the associated results.

## Ethical Framework

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Details how this Guide is pinned on a specific, locally-developed ethical approach and is rooted in African philosophy and law thus securing impartial consistency.

## Application

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Applies the 8 questions derived out of the Integrative Approach to evaluate animal attractions, the categories they result in and what's classified as "unacceptable".

## THE TOOL

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The crux of the study and Guide is a practical, decision-making tree to determine which attractions and activities to support and avoid according to the 2019 Line in the Sand and the Integrative Approach.

## Wrap up. Way Forward...

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Concludes SATSA's mandate and its position, and where it places accountability for taking the work forward.

## Resources

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Provides definitions as applied in this study and Guide. Acronyms and Abbreviations. List of references the user may find additionally useful.

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## This Guide is Useful To:

### Visitors

Foreign tourists or local visitors interested in going to an Animal Attraction with the drawcard being captive wildlife and related activity offerings.

#### Why?

It gives direction from an objective and reliable source as to what facilities and activities are acceptable practice AND a quick decision-making tool to help you make your choices.

### Owners

Those who own the captive wildlife and/or the businesses, operations or facilities that allow engagement with those animals to visitors.

#### Why?

You realise you could lose business, tourist support and your reputation in the face of radically changing public sentiment and need to understand why and what to do about it.

### Buyers

DMC's\*, Tour Operators (local and international), Agents and assorted Travel Companies.

#### Why?

You want to know, quickly, what facilities & activities are acceptable to support (buy) and confidently send your clients to, either because you genuinely want to do the right thing, or you worry about your reputation in an enlightened marketplace, or you don't want to flout internal policy but need help making accurate assessments.

### Representatives

Industry associations, national, provincial and local government departments and national, provincial and local tourism marketing agencies

#### Why?

You need to position Brand South Africa positively in the animal tourism space and redeem its reputation and position amongst competitor tourism destinations. You need to stop mixed messaging, speak with a unified voice backed by a sound study and guide to the industry.

\*See Acronyms →

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# This Guide is Born Locally

It is SATSA's response to a mandate from the industry facing radical movement against "animals in captivity for human enjoyment"

Having followed the growing trend against tourism "animal interactions", SATSA highlighted the issue and members actively sought SATSA's assistance with:

- navigating this minefield
- understanding their customer base and market and its reformation
- providing guidance as to how to operate in this space

Sector consultation pointed out:

- 1 Southern Africa's Attractions and Activities are born out of very particular local context (e.g. the type of endemic animals, environmental justice issues, land issues, human-animal conflict issues, economic challenges, conservation challenges, competition for resources, unemployment etc.)
- 2 Guidelines can only hold water or be useful in this context if they are based on broad and deep consultation – as is the African way.
- 3 The tourism industry in Southern Africa is in a set of circumstances that needs its own tailored guidelines.

There are guidelines for the global tourism industry already available, but they are focused heavily on animal welfare and not broader captive wildlife concerns, and have not proven to be authoritative in Southern Africa.

This Guide is the result of a 12-month study and investigation to reach un-preconceived guidelines for the industry by widely consulting THEM, combined with broader research, benchmarking and consultation.

**The public participation and research process incorporated industry's and partners' contributions so that:**

- 1 The industry can't find fault in the process even though not everyone will find the outcomes to their liking
- 2 The guidelines are owned by the industry and stand a high chance of being adopted by industry practice

**No other destination Association has engaged in such work on behalf of its members. This will stand Southern Africa in good stead when competing for tourists against other highly attractive destinations.**

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## This is a Complex Problem

Captive wildlife in tourist attractions and activities is a polarized and polarizing issue that you cannot solve at once, only improve the situation of. This Guide doesn't aim to provide an immediate "silver bullet" remedy, once-off at one point in time.

The position taken is to look at where it is hoped the industry will be in this regard in 10, 20...50 years' time and make this Guide a consequential force in moving the conversation forward in that direction and taking as many people as possible along in the process.

The means to achieve this is framed by this original question:

**Could SATSA, in this very noisy, dichotomized space, produce not only an Africa-centric guide but also a tool that:**

- would be of high utility
- could identify which captive animal facilities and activities to support and which to avoid
- would be broadly adopted and practically applicable?

## In a Complex Situation

**Africa leverages its appeal of wildlife in order to build a robust tourism industry because tourism is a major economic sector across countries that offers:**

- ▶ a way out of poverty
- ▶ organic upskilling
- ▶ many other much-needed advantages to communities and economies
- ▶ viable economic growth
- ▶ broad access to benefits

**The travel industry and tourists are seeking answers to the impact of their choices on animal welfare and conservation.**

These two forces influence the manner in which Africa's wildlife tourism is harnessed, which defines countries' commitment to conservation and environmental justice and thereby the longevity of the industry OR it will tarnish its reputation beyond repair.



## There is a Bigger (African) Narrative



Wildlife tourism is the bedrock of Southern Africa's tourism industry. SATSA believes that places where visitors can still access and connect with a wilderness where nature and ecosystems can be appreciated and enjoyed in their original and natural state, will become increasingly attractive in contrast to a world where such nature and wilderness is getting scarcer. The draw is the natural state in an increasingly unnatural world.



Animals in captivity for human enjoyment is not investing in this long term USP (Unique Selling Point) of Africa; it is perverting it to satisfy the instant gratification, thrill-seeking nature of visitors and the time pressures of the world they come from. In an ideal scenario, SATSA would like to see a growth in true conservation/preservation animal facilities and a decline in the bastardized version of this - captive and interactive animal attractions.



However, in the non-ideal, real world of Africa, many captive wild animals are "left-overs" and by-products of human-animal conflicts, habitat encroachment and other threats to biodiversity invariably caused by

humans. Such injured, starving, vulnerable (abandoned) or assaulted (by poison, snares, traffic, etc.) animals find their way into the care of rehabilitators or protectors or care-givers. The sheer scale, geographical extent and the range of African wildlife, means there are many animal facilities by this stage which could have had their origin in many well-intentioned forms. Whether conceived in this way or others, a plethora of captive animal facilities now exist and have morphed into tourist attractions (if not started as such to begin with). Some argue this is necessary to be financially viable to look after the animals; others argue it's because it is commercially lucrative.



Competition between operators of these attractions for tourist spend, and the push from tourists themselves as they seek to experience something "unique", memorable, sensory and experiential – and something that adds to their social capital or kudos on social media – has led to a constantly evolving range and extent of offerings, including retaining animals in captivity (instead of re-wilding them as possibly intended) to provide these experiences.



The situation has created an industry that strives to satisfy human interests over the interests of animals in general and individual animals in particular. Although the human desire to see and potentially interact with and touch animals is not new, our understanding of animal sentience and knowledge of animal behaviour has advanced significantly over time. With this new knowledge comes an increased understanding of how the misuse of animals for human enjoyment is often detrimental not only to the welfare of the animals involved, but also to the respect humans have for these animals, which knocks on to concern for species and, thus, conservation.



SATSA had to find a home-grown approach to the growing presence of captive animal attractions in its tourism mix, in a time of rising disapproval of exploitative practices, if it were to deliver on its role in the long-term future for wildlife tourism in Africa and to be on the right side of history.



## This Guide has 10 Principles

A number of principles emerged as the foundation to this Guide. They were critical if the Guide and Tool were to be effective and relevant to all audiences. The Guide and Tool must:

**1** Hold “no matter who’s in the room”.  
i.e no matter who built it, who used it and who built onto it in time

**2** Move the conversation forward  
i.e. be a powerful intervention to set the industry on a healthy trajectory for its future

**3** Underscore the importance of raising awareness (of the industry and the market) thus

- effecting an increase in moral sensitivity
- leading to improved moral decision-making
- influencing the change needed to see the fulfillment of the goal for 10, 20, 50 years’ time.

**4** Identify and draw a line in the sand in 2019 – that will advance as moral sensitivity increases (per point 3 above)

**5** Be founded on a solid ethical framework against which all decisions are referenced, thus

- eliminating informed opinion as the determinant of the outcomes
- leading to consistent and constant outcomes
- being a timeless reference point, that could be continually expanded with time

**6** Heed the reality of a growing, global, progressive social-movement wave away from the animals in captivity for human enjoyment

**7** Help peers still arguing for relevance to see and accept the wave has already overtaken them

**8** Accept that subjectivity cannot be eliminated in the use and application of either Guide or Tool

**9** Focus on utility, sacrificing detail of specific agendas (e.g. welfare, species specific concerns, employment, revenue models etc.)

**10** Immediately, easily and simply identify unacceptable practices to inform Visitors’ choices and SATSA’s membership & endorsement decisions

# The Purpose

Having been developed with in-put from tourism industry stakeholders for application in the tourism industry, this Guide addresses the problem posed and follows the principles identified. As such, it is:

**The Guide** →

The Tool →

## Achieving all of this will gain the greater goal:

- Position Southern Africa's tourism enterprises as leading the way in their field
- Improve Southern Africa's international reputation and competitive edge
- Make it stand out among competitor destinations because of what it stands for
- **ACT LOCAL THINK GLOBAL**- Sets the bar for others to follow, cleaning up the global tourism trade.



### AIMED AT

Assisting owners of captive wildlife experiences, visitors and buyers in making informed decisions based on sound ethics to support good practice only.

### It is also:



### AWARE

Society is rapidly evolving towards adopting an equal relationship with the environment where humans and natural systems, including animals, are viewed as an inseparable entity and where exploitive and selfish behaviours that put fellow humans and animals at a disadvantage are shunned.



### INTENTIONAL

By adopting the outcomes from the tool, there will be a significant reform of captive wildlife experiences and attractions and hence the Southern African tourism sector as a whole.



### PROGRESSIVE

Encouraging examination **leads to** raising moral sensitivity **leads to** improvement in moral decision making **leads to** ethical choices of tourism activities & practices **leads to** transformation in the sector **leads to** improvement in the lives of individual animals & long-term conservation of species and the wildlife Southern Africans are custodians of.

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## The Purpose

This Guide focuses on ethical choices and transformation of the sector, guiding visitors and decision-makers on which attractions to visit and which to avoid. The Guide includes a Tool that is:

The Guide →

**The Tool** →



1

Underpinned by an ethical approach that is rooted in **Southern African thinking**

2

Informed by best **international practices**

3

Developed in consultation with an extensive number of businesses and other interested and affected stakeholders in the **Southern African tourism industry**

(reference to our full study report at SATSA)

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# The Scope

The scope of this Guide includes experiences with captive wild animals that are targeted at tourists, including local visitors, to attract their spend. It looks further than the welfare of animals while in captivity, to the critical issues of source and destination. It examines the full lifecycle of use of wildlife in tourism. It probes deeper than the care of wildlife *in* the system to the ethics and transformation of the system.

**It is not a guide on animal welfare nor does it provide species-specific information.**

## WHY NOT WELFARE?

- It is the major element to only one phase in the full captive cycle
- It is only evident to customers after the experience (this guide focuses on the selection in the first place).
- It requires specialist expertise to evaluate
- Assessing it is beyond the skills of Visitors & Buyers in tourism
- Providing welfare guidelines for the range and extent of wildlife currently in captivity falls outside the task of this study.
- SATSA recommends that a separate panel of experts be established to address welfare in tourism's captive animal facilities.
- For available guidelines on welfare in tourism attractions see [ABTA](#) and [Fair Trade Tourism](#).

**It does not attempt to address the following types of animals directly and indirectly impacted by tourism:**

- ▶ free-roaming wild animals in and around nature reserves, game reserves, game farms and other protected areas; by extension
- ▶ marine wild animal attractions where the animals are not in a captive environment, e.g. shark cage diving, boat-based whale watching, snorkelling with seals
- ▶ free-roaming wild and domesticated animals naturally occurring in and around tourism establishments or areas that tourists visit;
- ▶ domesticated animals such as cats, dogs, horses, donkeys, camels and farm animals, etc. located in or near tourism establishments or areas that tourists visit (see welfare)
- ▶ hunting of free-roaming wild animals.

**It expects:**

Owners to be fully compliant with the regulatory bodies for their sector.

**But Acknowledges:**

this can be hard to ascertain or often is not the case. As such, this tool becomes the first measure to go by.



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## A line in the sand

The travel industry and tourists themselves are clamouring for a clear marker that separates for them the acceptable (to support) from the unacceptable (to avoid). This point is where the industry's tolerance limit is set and where to measure progress from.



**Over time, people have come to realise that certain attractions or activities involving animals are clearly unacceptable –**

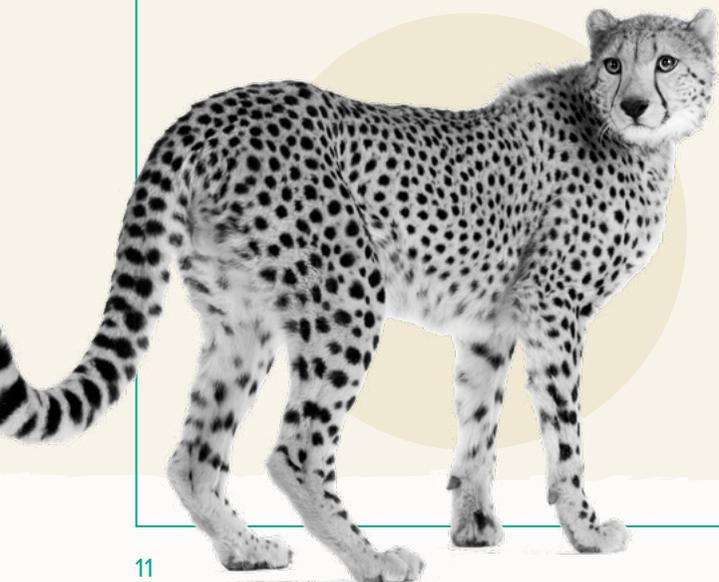
particularly as they result in poor welfare and treatment of the animals concerned and habituation to unnatural behaviours. e.g. animals in circuses, performing whales and dolphins, trading and poaching of wild animals for their body parts and “canned hunting”. Society's maturing awareness of the exploitation of animals for human gain or enjoyment has led to these activities being shunned by the informed public at large.



Although something of a line has been drawn that clearly shuns such activities, it has not yet extended as consequentially to other captive animal attractions that have actually multiplied in this time. Society is only now questioning them, and the travel industry and tourists themselves are seeking answers to the impact of their choices. **A social movement has swelled and gained world-wide traction highlighting the impact of captive animal facilities on the welfare and wellbeing of captive animals, conservation and species.**



In order to fulfil the principles of *moving the conversation forward* and educating to *increase moral sensitivity* and *improve moral decision-making*, a Line in the Sand at 2019 had to be drawn. It is from that line that the pressure of the **conversation and social movement will keep moving it, ever forward, towards the reformation of captive wildlife attractions such that they can keep ahead of the line thereby securing their continued approval, hence viability and longevity.**



### Evidence of the growing trend for change

**Instagram**

[Read more →](#)

**Tripadvisor**

[Read more →](#)

**Airbnb**

[Read more →](#)

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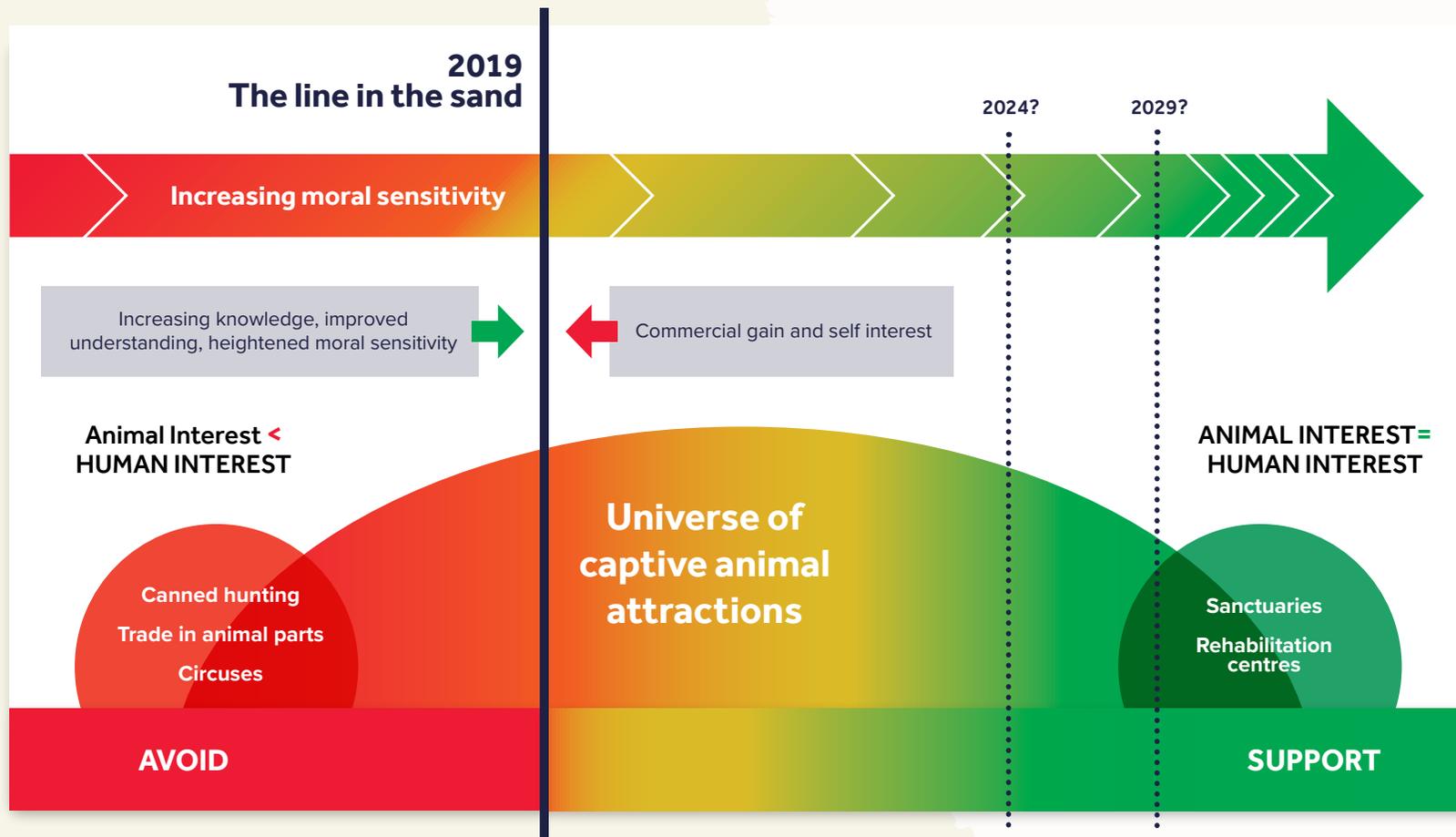


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# Drawing a Line in the Sand

This Guide determined where to draw the Line in the Sand in 2019 based on an applicable **ethical approach** and by a current snapshot-in-time of the captive wildlife attraction industry, i.e. in full consideration of the number of animal attraction facilities and activities that provide care for animals and for employment.

The line differentiates between types of facilities but is based on the activities offered so that there is not reliance on the self-description of the facility (e.g. claiming to be a sanctuary).

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## Advancing the Line in the Sand

The Line in the Sand (Line) is a dynamic concept. The global tourism market, currently manifesting as a social movement, along with actioning the recommendations of this study will see pressure mount on the Line and it will advance.

### PRESENT

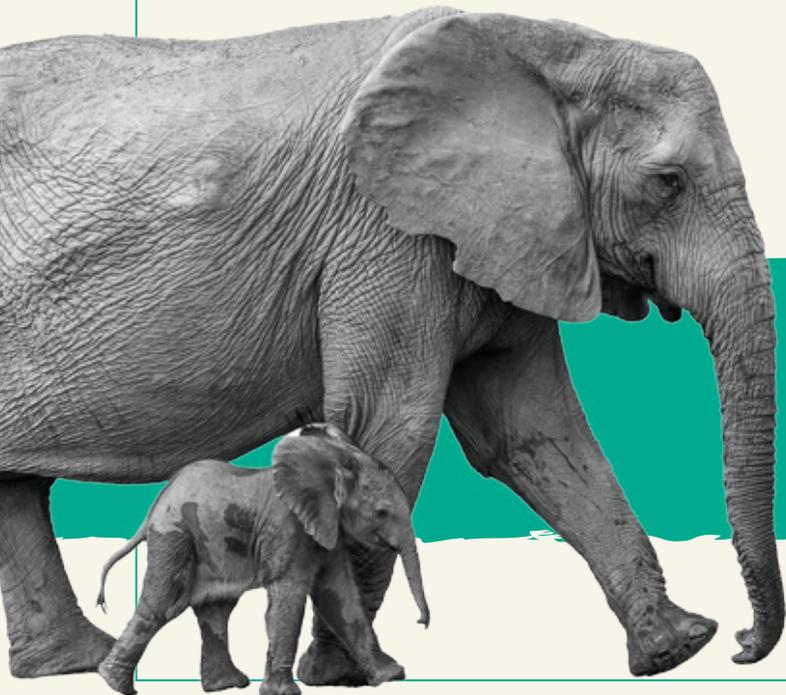
**The 2019 Line allows for immediate pressure on, and addressing of, the most controversial and reputation-damaging practices** with the anticipated reaction/consequence being reform rather than resignation to unsustainability.

### REALITY

In an ideal world there would be no animals in captivity, but **cognizance is needed of the current range and extent of captive wildlife attractions** and the impact rapid transformation would have on the lives of these animals and the livelihoods of the people working in the entities.

### FUTURE

**As our knowledge advances, so will the line in the sand. It is anticipated that it will move increasingly quickly.** The move is towards operations where the interests of animals are not subordinate to the interests of humans and away from practices where the interests of humans outweigh those of the animals in captivity. With this advance over the medium term all captive wildlife facilities, excluding true sanctuaries and rehabilitation centres and genuine conservation programmes, will fall into the “avoid” zone.



**Thus, Visitors, Owners and Buyers of captive wildlife experiences are urged to take note of the advancing Line in the Sand and continually evolve their practices and choices to ensure that they are always on the “right side of the line”.**

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## This Guide has an Ethical Framework

The extensive search for an applicable and relevant ethical framework that could navigate complex decisions around the use of captive wildlife for tourism activities, led to the identification and selection of the Integrative Approach, developed by Professor David Bilchitz, (*Professor at the University of Johannesburg and Director of the South African Institute for Advanced Constitutional, Public, Human Rights and International Law (SAIFAC), and current Secretary-General of the International Association of Constitutional Law*).

This Guide and the Tool are underpinned by his Integrative Approach to ethics that is rooted in African philosophy. Unlike many other ethical frameworks, the Integrative Approach is an African approach that:



Recognises the importance of the philosophy of **Ubuntu**



Is focused on **sustainable use and conservation** of animals



Is specific to the relationship between animals, the environment in which they live, and their **connection with human beings**

The merger of the Integrative Approach with the challenge at hand resulted in the guiding statement for this Guide and the Tool:

**“The interests of animals should not be subordinate to the benefits humans derive from their existence”**

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## The philosophy of “Ubuntu”

An individual’s existence has meaning in the collective, often expressed as “I AM BECAUSE WE ARE”. Ubuntu imbues humanity with values such as respect, dignity, harmony, empathy, reciprocity and love for others.

“Ubuntu” has featured strongly in Southern African society and consciousness. In long-held African traditions, Ubuntu extends to encapsulate an intimate relationship between humans and nature, including animals.

Supporting this is the Ndebele proverb:

**“Inkomo kayisengwa ngokwehlisa”**

“do not continuously milk a cow until there is nothing to milk” i.e. we shouldn’t commit exploitative and self-serving acts.

Similar proverbs and long-held beliefs can be identified across Africa; thus, African philosophy and knowledge systems enshrine the concepts

of co-existence, respect, compassion for fellow human beings as well as nature, animals and the environment.

They call for cohabitation where humans, animals and the environment are continually interconnecting and occupy the world in balance without dominance from any one species.

This is contrary to Anthropocentric thinking that came to dominate the western world for centuries, where nature has been reduced to an instrument to achieve human-centric benefits i.e. human interests take precedence over animal/ environmental interests.

**African philosophy and the concept of Ubuntu provide a solid platform for the ethical consideration of the use of animals in tourism experiences, and is the starting point here for an African approach to an African situation.**



# Ethical Approaches

Prof. Billchitz explains there are two ways to approach the notions of sustainable use and conservation of animals and species:

## The Aggregative Approach

- ▶ focuses conservation on the **species as a whole**
- ▶ allows for the **sacrifice of many individuals** for the wider goal.
- ▶ **justifies harm to an individual animal** for the greater good.
- ▶ **the term “sustainable use” focuses on “use”** where, as long as it does not harm the survival of the species, the use of an individual animal for human/economic gain is considered sustainable.



## The Integrative Approach

- ▶ focuses on the survival of both the **individual and the species.**
- ▶ **rejects the sacrifice of individuals** to advance the goal of species conservation.
- ▶ recognises a relationship between **respect for an individual animal** and the survival of the species, the former being essential for preserving the species as a whole.
- ▶ Such respect means uses that incorporate respect for the animal so uses that ignore individual welfare are harmful for sustainability, because
- ▶ mis-use of individuals means no long-term learning of respect or concern, which results in no consideration for group (species) survival either in the end.
- ▶ equal weight given to the composite terms “sustainable” and “use”. **“Use” must provide a future for the individual animal** and recognise its role in a wider, holistic ecosystem.
- ▶ only when the individual animal is respected and afforded protection for its interests is any use of that animal sustainable. Sustainable use enshrines the idea that any use is legitimate only when it is done in a manner compatible with respect for the entity that is being used. For example, riding an elephant for mere pleasure or experience is not justified even though the revenue from the activity pays for the herd’s care and protection.

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# The Integrative Approach

The Integrative Approach is strongly to be preferred because it unifies the below points with African philosophy and, in the case of South Africa, with its Bill of Rights\*

## The Preferred Approach

- ▶ it addresses our ethical obligations to treat individual animals with respect in their own right; and
- ▶ the Aggregative Approach is self-defeating because it leaves animals as instruments to human ends so human purposes become primary with hardly any moral limits as to what can be done to the animals. This undermines the long-term sustainability of the species which is the intended aim of the approach.
- ▶ Only the Integrative Approach can achieve the very goals aimed at by the Aggregative Approach i.e. the long-term survival of the species. Only by encouraging an ethical respect for animals will we be able to ensure their long-term survival.

\* “Environment: 24b Everyone has the right to have the environment protected for the benefit of present and future generations...that - (ii) promote conservation and (iii) secure ecologically sustainable...use of natural resources while promoting justifiable economic and social development.”

**The argument in support of the Integrative Approach is bolstered by the South African Constitutional Court which has told us that animals themselves have inherent value as individuals and that matters of welfare and conservation are intertwined and must be considered together.**

**The Constitutional Court’s reasoning supports the adoption of an Integrative Approach to the notion of conservation and sustainable use.** (Constitutional Court of South Africa, 2016)

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# Applying the Integrative Approach

You can evaluate a tourist attraction or activity that involves animals in captivity by answering a **set of questions**. Reflecting on, investigating and discussing your responses should give you guidance about whether they are really:

▶ **in the best interests of each individual animal, and**

▶ **in the best interests of conservation and sustainability in general**

1

Is it in the best interest of the animal/s to be in this facility or in captivity?

Ideal Answer: **YES**

2

Was the acquisition of the animal/s in the best interest of each animal and/or conservation?

Ideal Answer: **YES**

3

Is it in the best interest of each animal and/or conservation to remain in this facility or captivity?

Ideal Answer: **YES**

4

Does the activity or the facility where the animal is kept, interfere with the natural capabilities or behaviour of the animal/s?

Ideal Answer: **NO**

5

Is the activity natural for the animal/s?

Ideal Answer: **YES**

6

Does the animal have freedom of choice to be involved in the activity? I.e. the animal is not managed, coerced or restricted in any way.

Ideal Answer: **YES**

7

Was or is the animal negatively affected in any way pre, during or post the activity?

Ideal Answer: **NO**

8

Is there education or conservation value in the activity that cannot be achieved better by other means?

Ideal Answer: **YES**

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# Categorising Captive Wildlife Attractions

The cumulative responses to the questions will classify the attraction and/or activity into one of 3 categories:

The “Ideal Answer” is **not** achieved for the majority of the questions.

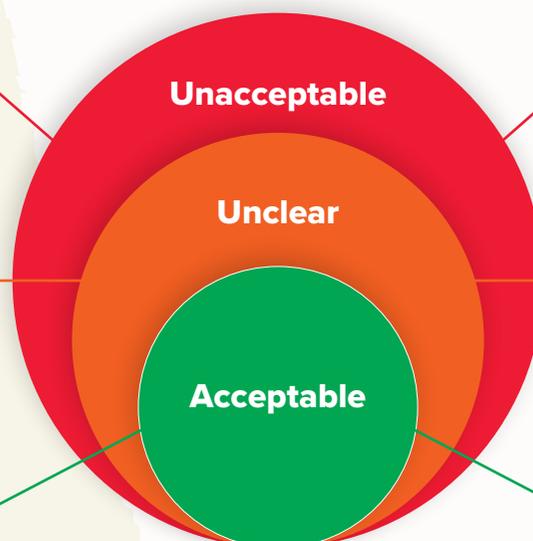
No immediate answer is achieved to 1 or more of the questions. Additional information is needed. **ASK MORE QUESTIONS**, investigate, seek insights from scientists/animal behaviourists/animal welfarists. Own morals and judgment may need to be applied. Subjectivity cannot be entirely avoided.

The “Ideal Answer” **is** achieved for the majority of the questions.

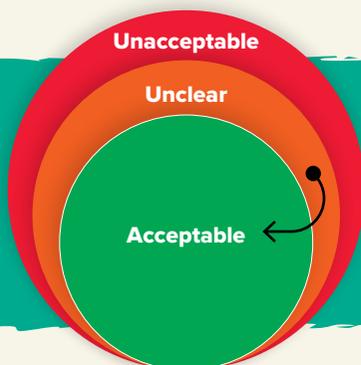
You are advised not to visit these ones as the interests of animals are subordinate to human/commercial interests.

You are encouraged to be cautious, ask more questions and apply your own moral judgement as these may or may not be striving to best meet the interests of the animals involved in activities.

You are advised to support these ones as tourism revenue supports animal welfare and conservation. They include recognised sanctuaries and rehabilitation centres that serve the interests of animals.



**The Changing Universe of captive animal attractions**



It is hoped that those attractions and activities that fall within the “unclear” zone will be encouraged to adapt and advance their practices and approaches such that they ultimately move into the green “acceptable” zone, on the right hand side of the Line in the Sand. The green zone grows bigger with a higher concentration of attractions while the red & orange zones shrink as attractions reform to keep up with the advancing Line in the Sand.

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## Tourism Activities involving captive wildlife that are classified as unacceptable

The following activities are clearly categorized as “unacceptable” by the application of the questions to the range and extent of those involving captive wildlife in Southern Africa. I.e. the ideal answer could not be reached for the majority of the questions. These activities thus fall on the left of the current Line in the Sand and should not be supported by tourists or the tourism trade.

### Performing Animals\*



Tactile interactions with ALL infant wild animals



Walking with predators or elephants



Tactile interactions with predators or cetaceans



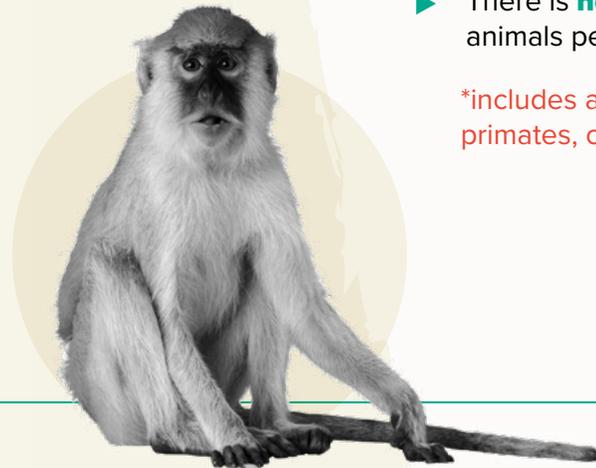
Riding of wild animals



### Why?

- ▶ In order to perform in a public show or display, **the animal would have undergone training of some form.** Training techniques employed frequently involve corporal punishment, tethering and/or food deprivation. All are contrary to the animals' natural behaviour, may be physically and/or mentally damaging to the animals involved and does not consider the best interests of the individual animal.
- ▶ The tricks or acts that the animal is required to perform are, in the main, **contrary to the natural behaviour of the species** and would not be in the best interests of the animal.
- ▶ The animals do not have **freedom of choice** to be involved in the performance.
- ▶ There is **no educational or conservation value** in watching animals perform unnaturally in public performances.

\*includes all types of animals e.g. elephants, predators, primates, cetaceans, birds & reptiles



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## Tourism Activities involving captive wildlife that are classified as unacceptable

Performing Animals →

**Tactile interactions with ALL infant wild animals\*** →

Walking with predators or elephants →

Tactile interactions with predators or cetaceans →

Riding of wild animals →

### Why?

- ▶ **Predators are dangerous animals** that can inflict serious damage to humans, whom they may view as prey.
- ▶ It is **unnatural for predators and cetaceans to be in close proximity to humans** and thus it could be extremely stressful for these animals to be touched by a human.
- ▶ In order for predators and cetaceans to be touched, they **would need to be trained and handled**, sometimes using harmful and negative techniques.
- ▶ The training and handling techniques as well as the unnatural relationship between a prey-species (humans) indicate that **tactile interactions are not in the best interest** of the individual animals involved.
- ▶ There is **no education or conservation value** in tactile interactions with predators or cetaceans that cannot be achieved better by other means.
- ▶ Being in captivity will **interfere with the natural behaviour** of large predators and cetaceans.

\*includes cub petting



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## Tourism Activities involving captive wildlife that are classified as unacceptable

Performing Animals →

Tactile interactions with ALL infant wild animals →

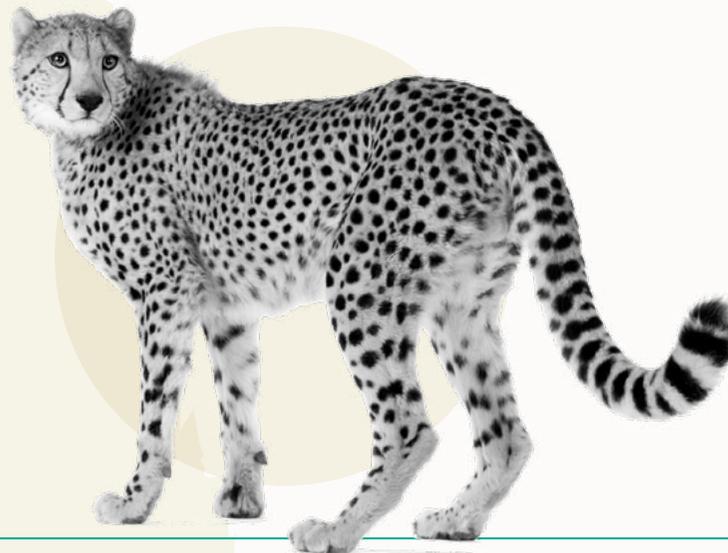
**Walking with predators or elephants** →

Tactile interactions with predators or cetaceans →

Riding of wild animals →

### Why?

- ▶ Elephants and predators **would need to be trained** to walk alongside humans as this is an unnatural activity for these animals.
- ▶ The training and handling techniques employed are **frequently harmful** to the animal.
- ▶ The animals do not have **freedom of choice** to be involved in the activity and it is not an activity that the animal would naturally initiate.
- ▶ There is **no education or conservation value** in walking with predators or elephants that cannot be achieved through other means.



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Peforming Animals →

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**Tactile interactions with predators or cetaceans** →

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## Tourism Activities involving captive wildlife that are classified as unacceptable

Performing Animals →

Tactile interactions with ALL infant wild animals →

Walking with predators or elephants →

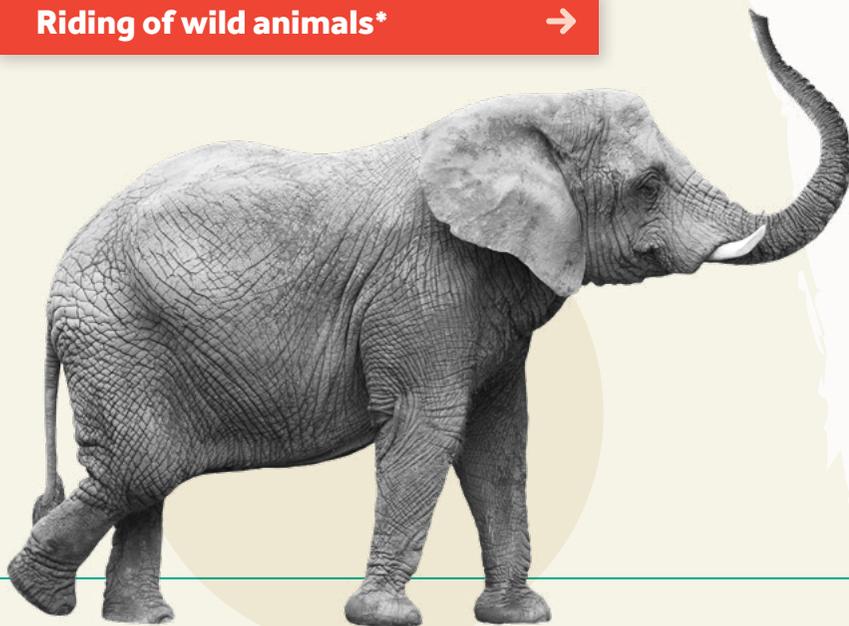
Tactile interactions with predators or cetaceans →

**Riding of wild animals\*** →

### Why?

- ▶ For any wild animal, having a human ride or sit on it, is **contrary to natural behaviour** and would not be in the best interests of the animal.
- ▶ In many cases the animal would need to be **trained to accept humans on their backs**. These training techniques frequently involve negative reinforcement that is harmful to the animal.
- ▶ It is likely that the **animal may be injured or damaged** from having a human ride it or sit on it at some point in its training or tourism duties.
- ▶ The animals **do not have freedom of choice** to be involved in the activity, with animals often being forced to accept humans on their backs.
- ▶ It is not an activity that wild animals would **naturally initiate**.
- ▶ There is **no educational or conservation value** in riding or sitting on a wild animal that cannot be achieved better by another means.

\*includes riding and sitting and is respect of handlers and customers



# THE TOOL

Everything the Guide has contemplated comes into effect with the Tool. This is a decision tree that incorporates and simplifies the Integrative Approach.

**To assist you to rapidly choose what to support and what to avoid, the Tool takes you through a sequential list of questions that:**

1

First, immediately identify true sanctuaries and rehabilitation centres, in which case you need go no further down the decision tree. Those that fall on the very right of the current Line in the Sand (Line) you are **encouraged to support**.

2

Thereafter, follow a process of elimination that pinpoints disqualifying criteria. As soon as an attraction fits one of these criteria, it falls on the left of the Line and you are **encouraged to avoid** them. These questions may require additional research before an answer can be realised.

3

Finally, identify a few grading criteria to place attractions, that pass questions 2 – 5 without elimination, **in the spectrum of unclear through to acceptable**. They fall to the right of the Line and **can be supported**.

It is intended that, as the Line in the Sand advances in future, more elimination questions will be added to keep ahead of the wave accelerating away from old practices. Currently, facilities are evaluated on their lowest level compliance. Thus, this is a **dynamic Tool**.

A “Yes” answer to Question 6 (any one of), plus these additional elimination questions in future, keeps the pressure from the **Visitor and Buyer** on facilities to reform in a reasonable period of time so they fall entirely in the acceptable zone and their support can continue.

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# A tool to help you make good choices

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**1 Does the facility practice ALL the criteria for a true sanctuary or rehabilitation centre?**

- ▶ No breeding of animals
- ▶ No trading of animals
- ▶ No performing animals
- ▶ No animals in tactile interactions/walking with the public
- ▶ Animals are in captivity because they were sick, injured, orphaned, rescued, donated and/or abandoned
- ▶ The animals will have a home for life or will be used for in-situ repopulation by reintegration back to the wild or be relocated as part of a recognised conservation programme
- ▶ And the facility is compliant with all relevant legislation and is transparent in its operations and marketing collateral

**NO** **YES**

CONSIDER ACTIVITIES / USE

**2 Does the facility offer any one or more of:**

- ▶ Performing animals
- ▶ Tactile interactions with all infant wild animals e.g. cub petting
- ▶ Tactile interactions with predators or cetaceans
- ▶ Walking with predators or elephants
- ▶ Riding of wild animals

**YES** **NO**

CONSIDER DESTINATION

**3a Do any of the animals end up in:**

- ▶ canned hunting
- ▶ trade in body parts
- ▶ Illegal trade

**3b Is there breeding of lions and/or tigers?**

**YES** **NO OR NOT SURE**

CONSIDER MARKETING

**4 Is there any indication of:**

- ▶ misleading advertising
- ▶ deceptive behaviour
- ▶ lack of transparency

**YES** **NO**

CONSIDER COMPLIANCE

**5 Is there any indication of illegal operations?**

**YES** **NO**

CONSIDER SOURCE AND REASON

**6a Are any of the animals** wild captured, purchased, bred in captivity OR traded commercially (unless part of recognised conservation programme)?

**6b Is any animal's freedom of choice** to participate in a tourist activity restricted in any way?

**6c Are any of the animals kept** in captivity only for tourism/entertainment purposes?

**YES TO ONE OR MORE** **NO TO ALL**

DISQUALIFYING CRITERIA

GRADING CRITERIA

2019: Line in the sand

AVOID

SUPPORT

# Disqualifying Criteria

Further rationale for questions 2 – 5

## PRACTICE

- 
- ▶ **Canned hunting**
  - ▶ **Trade in body parts**
  - ▶ **Illegal trade**
  - ▶ **Breeding of Lions & Tigers**
  - ▶ **Misleading advertising, Deceptive behavior  
Lack of transparency**
  - ▶ **Illegal operations/  
non-compliant**

## WHY IS IT UNACCEPTABLE

Restrictions on the space for the hunt creates an unnatural advantage to the hunter and limits the animal's possibility for flight and evasion. There is also the possible manipulation of the animal's state for the hunt.

An animal is harmed/killed in order to retrieve the body part(s) and there is no agricultural, conservation or education value.

Trade in wild animals could be a parallel, commercial intention of a tourism attraction, which subordinates animals to commercial interests.

Recent research has shown that there is no conservation value in breeding lions and tigers in captivity in South Africa (Williams & Sas-Rolfes, 2019).

This equates to lying to, or hiding the complete facts from, the customer i.e. information should be complete and accurate so that the customer knows what they are buying into

Any illegal activity or non-compliance with relevant national, provincial and local permits and permissions.

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## Digging Deeper & Taking Assessment Further

Do you want to do a more detailed and in-depth review of a captive wildlife attraction or activity?

The next 5 pages provide further guidance on:

- ▶ **what is currently considered to be best and worst practice**
- ▶ **what to take into consideration**
- ▶ **additional questions for further investigation**

The questions on the left of each page are aligned to the **Integrative Approach** and indicate assessment is divided into four sections that highlight the MOST CRITICAL FACTORS in determining the ethicalness of an operation:

- ▶ **the REASON why the animals are in captivity in the first place**
- ▶ **the SOURCE of the animals**
- ▶ **the USE of the animals whilst in captivity**
- ▶ **the likely DESTINATION of the animals**



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## Critical Factor 1: REASON

### Why are the animals in captivity? →

Where did the animals come from? →

What happens to the animals whilst in captivity? →

What is the likely destiny of the animals? →



✗ **Worst Practice**  
Solely for entertainment, display or other human interests

✓ **Best Practice**  
It is in the best interest of each individual animal

### Additional Consideration:

As organisations transform and their stance on keeping animals in captivity advances, they will have animals that were originally acquired primarily for human interest but no longer involved in undesirable activities. In many cases it may be in the animal's best interest to remain in captivity. If these animals are well looked after and no new animals are acquired this is considered acceptable. These organisations should be supported.

### What to look out for:

- ▶ Do the animals need to be in captivity – can they be rehabilitated and released back into the wild?
- ▶ Have all avenues for rehabilitation and/or re-wilding been considered?
- ▶ Why are animals that are in the process of rehabilitation being exposed to humans?
- ▶ Are the animals being kept in captivity only to support a volunteering programme?

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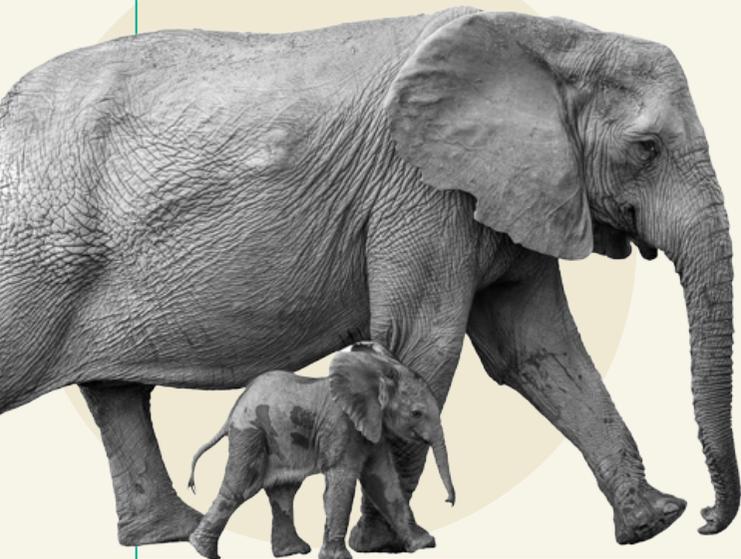
## Critical Factor 2: SOURCE

Why are the animals in captivity? →

**Where did the animals come from? →**

What happens to the animals whilst in captivity? →

What is the likely destiny of the animals? →



### ✗ Worst Practice

The animals were purchased, captured and/or bred solely for a tourism activity

### ✓ Best Practice

The animals were sick, injured, orphaned, donated and/or abandoned

### Additional Consideration:

Purchasing and commercial trade of animals is not illegal, but it is important to consider the best interests of the animal and the conservation of the species as a whole. Animals may be traded, swapped or purchased for bona fide conservation programmes and to ensure the genetic integrity of the species.

Ideally, there should be no breeding of wild animals in captivity but in some cases breeding is necessary i.e. as part of recognised conservation programmes.

True animal sanctuaries and rehabilitation centres do not trade or breed captive animals. Animals in true sanctuaries and rehabilitation centres are there because they were sick, injured, confiscated, donated, rescued or orphaned and those that remain cannot be rehabilitated.

### What to look out for:

- ▶ Are the animals being bred or traded purely for tourism purposes?
- ▶ Are the animals being bred or traded to support a volunteering programme?
- ▶ Is there a bona fide conservation purpose for trading or breeding wild animals in captivity? Is the programme supported by a recognised research or conservation institution and is there evidence that animals in the programme will be used for repopulation, re-integration or re-wilding?
- ▶ Is the species really endangered or threatened (check the latest Threatened or Protected Species ("TOPS") list)?
- ▶ Are there records of the source of each animal?
- ▶ Is there a stock book of animals?
- ▶ Is there a written policy on no trade and breeding?
- ▶ Is there evidence that the animals were sick, injured, orphaned, donated, rescued, confiscated or abandoned?

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## Critical Factor 3: USE

Why are the animals in captivity? →

Where did the animals come from? →

**What happens to the animals whilst in captivity? →**

What is the likely destiny of the animals? →

### ✘ Worst Practice

One or more animals are used in any one of:

- Public performances involving animals;
- Walking with predators or elephants;
- Tactile interactions with infant wild animals e.g. cub petting;
- Tactile interactions with predators or cetaceans;
- Riding of wild animals

### ✔ Best Practice

The facility where the animals are kept practices all of the following:

- No breeding of animals;
- No trading of animals;
- No public performances involving animals;
- No animals in tactile interactions/ walking with the public
- No commercial exploitation of animals

### Additional Consideration:

As organisations transform they may have wild animals in their care that were trained and utilised purely for tourism purposes but unacceptable activities are no longer available to the public. However, these animals are likely to be tame and accustomed to interacting with humans. If these animals willingly wish to interact with humans (they are not coerced or forced) then this activity could be supported.

Organisations may call themselves a sanctuary and/or rehabilitation centre – this does not mean that they are a genuine facility. A true sanctuary or rehabilitation centre does not breed animals, trade in animals, allow tactile interactions with captive animals, have animal shows or performances and where possible will rehabilitate wild animals or provide a “comfortable home for life” should the animal not be in a position to be returned to the wild or rehabilitated.



## Critical Factor 3: USE

Why are the animals in captivity? →

Where did the animals come from? →

**What happens to the animals whilst in captivity? →**

What is the likely destiny of the animals? →



### What to look out for:

- ▶ Is the attraction a genuine sanctuary or rehabilitation centre and are they recognised as such by a credible organisation?
- ▶ Is there a written policy on how and when animals can interact with visitors or tourists?
- ▶ Is the welfare of the animals supervised by a licensed veterinarian and is there documentary proof of such?
- ▶ Are the relevant permits and licences in place and does the facility adhere to the specifications included in these?
- ▶ Is there a written policy for conservation and/or education programmes?
- ▶ Are the animals being coerced or forced to participate in an activity?
- ▶ Can the animal/s move away or be out of sight of visitors and other animals?
- ▶ Are animals negatively affected in any way prior to, during or after an activity or interaction?
- ▶ Are the animals required to do anything that is considered to be unnatural behaviour?
- ▶ Can the animals, insofar as reasonably possible, act and behave naturally whilst in captivity?

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## Critical Factor 4: DESTINATION

Why are the animals in captivity? →

Where did the animals come from? →

What happens to the animals whilst in captivity? →

**What is the likely destiny of the animals?** →



### ✗ Worst Practice

The animals could be used in canned hunting, trade in body parts and/or animal trade

### ✓ Best Practice

The animals will have a home for life or will be used for repopulation, relocated, re-integrated or re-wilded as part of a recognised conservation programme

### Additional Consideration:

Research has shown that there is no conservation benefit to the breeding of lions in captivity. Further research shows that lions bred in captivity are likely to be destined for the lion bone trade or canned hunting. The onus should be on the owners/operators of captive animal facilities to prove that the animals in their care are not destined for canned hunting, trade in animal body parts, illegal animal trade or destinations where the fate of each animal is unknown and/or welfare may be compromised.

### What to look out for:

- ▶ What is the likely future for the animals in captivity?
- ▶ Are there records of the disposition of all animals?
- ▶ Is there evidence that a disposed animal is/has been mistreated?
- ▶ Are the rehabilitation programmes recognised and/or supervised by a credible organisation with experience in animal rehabilitation and is there evidence that animals will be used for repopulation, relocated, re-integrated or re-wilded?
- ▶ Is there any evidence or commentary linking the attraction to canned hunting, trade in animal parts and/or animal trade?

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## Wrap Up. Way Forward...

This Guide and Tool, like SATSA, has no regulative or legislative power. It is hoped they will find utility amongst Visitors (tourists) and Buyers (travel trade) such that the market comes to hold the power to “be the change you want to see”.

If such use only achieves the basic minimum of heightening awareness and adding to education in the travel space to improve moral-based decision-making, then we will see the progression of the interests of animals towards being considered more equally. This gives Africa the opportunity to hold onto its USP .

This is critical for the sustainability and value of tourism across the continent in the long-term compared to what the manipulation of wildlife into tame environments achieves in the short-term.

SATSA believes member-driven, national associations are obliged to review the industry and practices in their destinations and assist adaptation i.e. to advance the Line in the Sand.

SATSA has completed its mandate. It is considering a timeline over which to adopt the study’s recommendation into policy and plans to periodically update the two dynamic elements noted – the Line in the Sand and the Tool.

By SATSA articulating its stance, the stage is set for those in authority, in South Africa at least,

- SAT/South African Tourism
- TBSA/Tourism Business Council of South Africa
- NDT/National Department of Tourism,
- DEFF/Department of Environment, Forestry & Fisheries
- Department of Agriculture

to take this material and make further strides in securing a stellar reputation in a competitive market. Much work is required and SATSA states its expectations of this clearly here.

The extent to which the above authorities and the private sector companies (individually) support and adopt this locally derived, deeply researched and applicably crafted approach will determine the fate of the local industry and all the economic spin-offs that it affects.



**Tourism and conservation, humans and animals are entwined whether we like it or not. The study and report behind this Guide and Tool detail the approach and position SATSA has taken in the best interests of the industry’s future in its region of Africa and the wildlife under custodianship here.**

**You are invited to use this Tool to come to yours.**

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# Definitions Applicable to this Document

**Note:** these definitions have been adopted from various sources and adapted to conform to the narrative in this document

## **Animal**

Includes all members of the kingdom Animalia. However, for this document the definition of animal focuses vertebrates i.e. fish, amphibians, reptiles, birds and all mammals excluding humans

## **Wild animal**

Any animal species that has populations that live on their own without assistance from humans and specifically excluding domestic animals

## **Attraction and Facility**

An attraction is a facility with living wildlife that is primarily open to the visiting public. The words “facility” and “attraction” are used interchangeably in this document.

## **Activity**

Recreational pursuits, undertaken for enjoyment, amusement, or pleasure.

## **Canned Hunting**

A hunt in which an animal is kept in a confined area, such as in a fenced-in area, increasing the likelihood of the hunter obtaining a kill i.e. the animal does not have a fair chance of escaping the hunter.

## **Captive Animals**

Where one or more animals are kept in a human-made enclosure that is of insufficient size for the management of self-sustaining populations of the species, and designed to hold the animal/s in a manner that prevents

them from escaping and facilitates intensive human intervention or manipulation in the provision of food and/or water, artificial housing and/or healthcare.

## **Cetacean**

An aquatic, mostly marine, mammal including whales, dolphins, porpoises.

## **Commercial Purposes**

Carrying out an activity with the primary purpose of obtaining economic benefit, including profit in cash or in kind, and is directed towards exchange for economic use or benefit, or any other economic use or benefit

## **Conservation**

Securing populations of a species in natural habitats for the long term

## **Conservation Purposes/Programme**

Carrying out an activity, including the collection from the wild, with the primary purpose of ensuring the survival of such specimen in the wild, in accordance with a:

- Conservation strategy and research programme approved by a recognised issuing authority; or
- Recognised Biodiversity management plan. And has been evaluated for its ethical and welfare standards and conforms to the principles of the 4-R Framework i.e. Reduction, Refinement, Replacement and Rehabilitation.

## **Conservation Outcomes**

Quantitative, qualitative and otherwise demonstrable conservation results at the species and/or habitat level, either in human care or in the wild

## **Education Purposes**

Facilitated learning, or the transfer to, and acquisition of, knowledge, skills, values, beliefs, and/or habits that are of value to the recipient with the potential of positively influencing recipient's personal development.

## **Freedom of Choice**

The animal is not managed, coerced or restricted in any way to influence its participation in an activity, i.e. it is entirely by its own inclination and choice.

## **Infant animal**

A young animal which, based on natural behaviour, would be under the care and guidance of a mother/parent

## **Natural Behaviour**

The individual behaviours, or the repertoire of different behaviours, that exhibit species-specific survival value, and which reflect the ecological niche in which the animal species has evolved

## **Orphan**

A young animal that is unsupported by its mother, by reason of the mother's demise or decision to abandon.

## Definitions Applicable to this Document

### Predator

Wild Animals that live by preying on other animals for food. Includes animals from the following families:

- Family Felidae - lion, tiger, jaguar, leopard, snow leopard, cheetah, cougar, serval, caracal, ocelot, margay, bobcat, lynx, black-footed cat, African wildcat, etc
- Family Viverridae: civit, genet, etc
- Family Hyaenidae: hyena, aardwolf, etc
- Family Canidae: wolf, jackal, fox, African wild dog, etc
- Family Ursidae: bear, sloth, panda, etc
- Family Obobenidae: walrus
- Family Otariidae: fur seal, sea lion, etc
- Family Phocidae: seal, elephant seal, etc
- Family Ailuridae: red panda
- Family Mephitidae: Skunk, badger, etc
- Family Mustelidae: honey badger, marten, wolverine, polecat, weasel, etc
- Family Procyonidae: raccoon, coati, etc

### Rehabilitation Facility

A registered facility equipped for the temporary keeping of live specimens for:

- Treatment and recovery purposes, in the case of sick or injured specimens;
- Rearing purposes, in the case of young orphaned;
- Quarantine purposes; or
- Relocation purposes.

With the overall intent to release each specimen.

### Release

To intentionally:

- Cease exercising physical control over;
- Cease having in possession; or
- Set free from its captive environment

A live specimen of a species.

### Sanctuary

A facility that provides permanent care to an animal in captivity that would be unable to sustain itself if released. Defining pre-requisites are:

- No breeding of animals;
- No trading of animals;
- No public performances involving animals;
- No animals in tactile interactions/ walking with the public;
- Animals are in captivity because they were sick, injured, orphaned, rescued, donated and/or abandoned;
- The animals will have a home for life or will be used for in-situ repopulation by reintegration back to the wild or be relocated as part of a recognised conservation programme

### Scientific or Research Purposes

Carrying out a restricted activity with the primary purpose of practicing science or conducting research. All research programmes involving animals, should at minimum be approved by a recognised issuing authority, be evaluated for ethical and welfare standards and should adhere to the 4-R framework (Reduction, Refinement, Replacement and Rehabilitation)

### Sentience

The capacity to have subjective experiences and feel and perceive emotions such as pain and pleasure. It implies a level of awareness and an ability to suffer

### Stock Book

A register that indicates:

- Quantities of specimens acquired, whether such specimens were born or purchased, or received as a donation or on loan;
- Quantities of specimens kept; and
- Quantities of specimens disposed of, whether such specimens died or were sold, or given as a donation or a loan returned

### Sustainable

Meeting the needs of the present without compromising the ability of future generations to meet their needs and aspirations

### Tactile Interactions

Where tourists/visitors touch, pet, stroke or feed an animal in human-made confinement

### Trade

The commerce of products that are derived from non-domesticated, captive animals. It can involve the trade of living or dead individuals, tissues such as skins, scales, horns, tusks, bones or meat, or other products



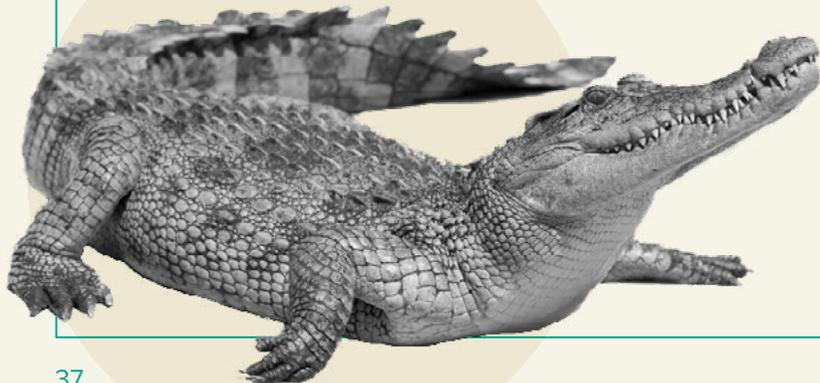
# Acronyms & References

## ACRONYMS

|       |   |
|-------|---|
| &     | and   |
| ABTA  | Association of British Travel Agents            |
| DEFF  | Department of Environment, Forestry & Fisheries |
| DMC   | Destination Management Company                  |
| FTT   | Fair Trade Tourism (South Africa)               |
| NDT   | National Department of Tourism                  |
| No.   | Number  |
| TBCSA | Tourism Business Council of South Africa        |
| USP   | Unique Selling Point                            |

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## REFERENCES & RESOURCES

This document is the result of extensive research and consultation, which has been summarized in a document addressed to SATSA and titled “Research Report to inform the Development of Guidelines for Captive Wild Animal Tourism Attractions in South Africa”. The study referenced a wide range of documents. Below is a list of some of the reference documents that the reader may find useful:

ABTA: Global Welfare Guidelines for Animals in Tourism

Agjee, A., Fourie, M., Loser, N., Reddell, C., Youens, K., Gibbs, A., Rodwell-van Hasselt, L. (2018). Fair Game? Improving the well-being of South African wildlife: Review of the legal and practical regulation of the welfare of wild animals in South Africa, 2018

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