



PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

PETA
DEUTSCHLAND E.V.

Friolzheimer Straße 3a
D-70499 Stuttgart
+49 711 860 591-0
+49 711 860 591-111 (Fax)

Info@peta.de
PETA.de

Ministry of Agriculture
The Honourable Tomislav Tolušić
Agriculture Minister
Ulica grada Vukovara 78
10000 Zagreb
CROATIA

28 August 2018

Via e-mail: tomislav.tolusic@mps.hr

Re: Ban on wild-animal circuses and show elements involving unnatural behaviour

Dear Minister,

I'm writing to you on behalf of PETA Germany – an affiliate of PETA US, which is the world's largest animal rights organisation, with more than 6.5 million members and supporters worldwide.

By implementing the new Animal Protection Act in 2017, Croatia banned circuses using all animals except for domestic ones exhibiting natural behaviour. We very much appreciate this animal-friendly and progressive step.

However, it was reported to us – and video footage has confirmed – that circuses currently performing in Croatia are still using camels and forcing domestic animals to perform tricks that can't be considered "natural behaviour"

Please let me explain why we consider a rigorous ban on animal performances in circuses – including by camels and dromedaries – to be crucial.

According to several Acts regarding animal welfare and protection as well as scientific reports, the term "non-domesticated animal" is typically defined as "a species whose collective behaviour, life cycle or physiology remains unaltered from the wild type despite their breeding and living conditions being under human control for multiple generations".¹ Because of the domestication process in Africa and Asia, Old World camels (camels and dromedaries) are often categorised as domestic animals. Yet the status of their domestication is debatable, as there are few genetic differences and a high level of hybridisation between the wild and domestic forms. Starting from the premise that domestic and wild individuals are so similar in

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GLS Gemeinschaftsbank eG
Konto: 78000 78000
BLZ: 430 609 67
IBAN: DE71 43060967 7800078000
BIC: GENODEM1GLS

¹ J Dorning, S Harris, and H Pickett, "The Welfare of Wild Animals in Travelling Circuses", 2016 <<https://goo.gl/LDzSH4>>.



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genetics, morphology², and physiology, it's valid to assume that their behavioural needs are similar as well. Therefore, camels and dromedaries should be included in the category of "wild animals".

In Germany, a motion issued by the federal government³ in 2016 concerning the illegal wildlife trade defines domestic animals, in part, as "domesticated animals from the genus of horses, pigs, sheep and goats except for exotic species (species which are neither native nor domesticated)". It names llamas and alpacas as domestic animals but not camels or dromedaries. Furthermore, in 2018, the Higher Regional Court in Stuttgart, Germany, decided that camels are not domestic animals in legal terms, as they're non-native and rarely kept as "pets" in Germany.

Therefore, we urge you to prohibit the use of camelids in circuses performing in Croatia. Camels used in circuses are subjected to extended periods of confinement in inadequately small pens and trailers that restrict them from moving freely and demonstrating other behaviour that is essential to their physical and behavioural health. They are herd animals by nature and have adapted to walking great distances. If given the option, they would spend much of their day grazing and foraging. None of these basic behavioural needs can be met in circuses. Training techniques used by circus staff can be inhumane and violent, further increasing the animals' risk of stress, injury, and illness. It's well documented that camels in circuses are deprived of the opportunity to express their basic needs – this is inhumane and results in an unhealthy life.

Furthermore, according to online video footage of recent shows in Croatia, acts like Circus Berlin and Circus Safari are still using camels as well as domestic animals such as horses, ponies, and goats. We're especially concerned about some show elements that involve behaviour that is clearly unnatural. Both circuses include performances by horses who are forced to "walk" on their hind legs. This is not in the range of natural behaviour and could even potentially harm the animals' joints. Also, using short side reins when forcing horses to do this carries the risk that the animals will fall backwards. In other video footage, horses show signs of discomfort and anxiety as they try to withdraw from the situation, turning away or swerving sideways. Head-shaking can also be a sign of stress and physical or mental overload.

Because some circus shows still contain elements in which unnatural behaviour is displayed and animals are subjected to pain and fear, we kindly ask that you monitor performances using horses and other domestic animals more closely.

² M Zeder, "Pathways to Animal Domestication", *Biodiversity in Agriculture: Domestication, Evolution, and Sustainability*, 2012, 227–259, DOI: 10.1017/CBO9781139019514.013

<http://alexandriaarchive.org/bonecommons/archive/files/zedergptsetal2012_96265cead7.pdf>.

³ Deutscher Bundestag, "Wildtierschutz weiter verbessern – Illegalen Wildtierhandel bekämpfen", 2016 <<http://dip21.bundestag.de/dip21/btd/18/087/1808707.pdf>>.

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Eingetragen im Vereinsregister beim Amtsgericht Stuttgart, VR 202128.



We're hoping the progressive wild-animal ban will be enforced more strictly in the near future. Croatia might also consider extending the ban to include *all* animals, similar to legislation in Cyprus, Greece, and Malta and to that currently underway in Italy. By doing so, it would serve as a role model for other countries to follow in significantly protecting animals used for entertainment.

Yours sincerely,

Dr Yvonne Würz

Behavioural Biologist | Campaigns Coordinator Entertainment
+ 49 711 860591-439
YvonneW@peta.de

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