

Scottish Government Consultation on the Draft Code of Practice on the Welfare of Gamebirds Reared for Sporting Purposes

Submission by Advocates for Animals

Advocates for Animals welcomes the opportunity to comment on the draft code of practice on the welfare of gamebirds reared for sporting purposes. Our responses to key questions in the consultation are set out below. We have not answered every question, but only those where we feel we have experience and expertise to offer.

We would like to state at the outset that Advocates for Animals is opposed to the shooting of gamebirds for sport. However, for as long as this practice continues in Scotland, we believe that significant improvements should be implemented to limit the negative impacts on the welfare of the birds during rearing.

Q1. Do you agree that a code of practice is sufficient to ensure the welfare of gamebirds, or do you consider that game farms need to be regulated? If you believe that game farms should be regulated who, in your opinion, should regulate them?

No, we do not agree that a code of practice is sufficient to ensure the welfare of gamebirds. Codes of practice are an essential tool to encourage good practice but cannot substitute for legal regulation. As gamebirds are generally reared on agricultural land under farming conditions, we believe that gamebird rearing should be regulated in the same way as other species that are farmed for food.

Q2. Do you think that a code reflecting the gamebird rearing season is the most sensible approach?

Yes, this approach appears logical.

Q3. Is it clear and easily understandable?

Yes, the code is clearly laid out and easy to understand.

Q4. Do you think it would be preferable to set out the Code in the alternative format with sections relating to each of the animal's five needs?

No, the current format is clear.

Q5. Is it useful to have an Annex containing information on other legislation affecting gamebirds?

Yes, it is very helpful to have an annex with details of relevant legislation.

Q6. Are there any additional recommendations that should be in the Code?

We believe that the code should make more specific recommendations regarding the content of the flock health and welfare plan.

We believe that the proposed wording regarding environmental enrichment in the draft code should be significantly strengthened to make clear provisions for minimum requirements for environmental enrichment for gamebirds. For example, minimum perching space should be specified.

When transporting birds, we believe that a maximum journey time of 12 hours is too long. We believe this should be shortened to eight hours.

There are three options presented for Paragraph 6.11 in the draft Code, on the housing of breeding pheasants and partridges;

- (a) that cages can continue to be used;
- (b) that barren cages are not used (allowing the use of enriched cages); or
- (c) that all cages should not be used.

There is concern that cages may compromise the birds' welfare and could leave game farmers vulnerable to prosecution under the 2006 Act. Currently there is no set definition for what constitutes a cage in the draft Code. In their report on the welfare of laying hens the European Food Safety Authority (EFSA) considered a cage to be a system which is operated without the human keepers entering it.

Q7. Do you consider that cages can provide adequately for the welfare needs of breeding pheasants? Or do you consider that barren cages should not be used for the housing of breeding pheasants? Or do you consider that all cages for breeding pheasants should not be used?

We are strongly opposed to the use of all cages for breeding pheasants and support the wording of Option 3 in the draft code (labelled "c" above) with additional clarification regarding the definition of a cage as set out in our answer to Question 9. We note that the FAWC Opinion on the Welfare of Farmed Gamebirds describes gamebirds as "captive wild animals" and believes that pheasants and partridges should be kept in breeding and rearing systems that meet their physical and behavioural needs, and it is our view that cages impose unacceptable restrictions on the natural behaviour of what are essentially wild birds. We believe that legislation should be introduced as a matter of urgency to prohibit the use of all cage systems for gamebirds.

There is widespread support for a ban on all cages, including from animal welfare organisations, politicians and even from some within the gamebird industry itself. Early Day Motion 507 calling for a ban on all cages, whether enriched or not, attracted signatures from over 200 MPs during 2009 and was supported by the British Association for Shooting and Conservation. The FAWC Opinion specifically recommends banning barren cages for pheasants and small barren cages for partridges.

Q8. Do you consider that cages can provide adequately for the welfare needs of breeding partridges? Or do you consider that barren cages should not be used for the housing of breeding partridges? Or do you consider that all cages for breeding partridges should not be used?

We are strongly opposed to the use of all cages for breeding partridges. Cages impose unacceptable restrictions on the natural behaviour of what are essentially wild birds. We

believe that legislation should be introduced as a matter of urgency to prohibit the use of all cage systems for gamebirds. The definition of a cage in this legislation should be as set out in our answer to Question 9. There is widespread support for a ban on all cages, as discussed in our answer to Question 8.

Q9. Do you consider that having a standard definition for a cage is necessary for a clear understanding by keepers if cages are to be restricted or banned? If so would the EFSA definition be a suitable approach?

Yes, we believe it is essential to agree a clear definition of a cage. We consider the EFSA description of a cage as “a system which is operated without the human keepers entering it” to be a very helpful and unambiguous definition and this is the definition that we believe should be used in the code and in any legislation on this matter.

An alternative approach to the welfare concern that birds are unable to exhibit normal behaviour patterns would be to set specific space allowances.

Q10. Do you consider that setting space allowance for breeding pheasants and partridges would address the concern?

Whilst it would certainly be beneficial to establish minimum space allowances, we believe that this should be in addition to a clear prohibition of cages (as defined in our response to Question 9) to avoid any confusion.

If yes

Q11. What would be the space allowance for an adult pheasant and what is the evidence that this is appropriate?

Further research would be necessary to establish appropriate space allowances for pheasants. However, we believe it is essential that any enclosure provides space and height sufficient to allow the birds to engage in their full repertoire of natural behaviours, including foraging, wing-flapping, fluttering, flying and escape from other birds.

Q12. What would be the space allowance for an adult partridge and what is the evidence that this is appropriate?

Further research would be necessary to establish appropriate space allowances for partridges. However, we believe it is essential that any enclosure provides space and height sufficient to allow the birds to engage in their full repertoire of natural behaviours, including foraging, wing-flapping, fluttering, flying and escape from other birds.

Paragraph 5.6 of the Code recommends that spectacles should not be used because they can cause damage to the nasal septum (this was based on the research *The Effects of the Application of Bits and Spectacles in Gamebirds, 2005-2007*, (published March 2009).

Q13. Do you agree that spectacles should not be used? Or do you consider that spectacles have welfare benefits provided they are used appropriately?

We are strongly opposed to the use of spectacles. The FAWC Opinion recommended in 2008 that spectacles should be banned and we also believe that that a ban should be brought in as soon as possible. Until such legislation is introduced, we believe that the code should clearly state that spectacles should not be used.

The evidence in the Game Conservancy Trust (2009) research mentioned above is very clear that any welfare benefits spectacles have to offer are likely to be undone by the damage they can cause to the nares and nasal septum of hens. The reduction in perching and foraging observed in spectacled hens in this research suggests that spectacles are also likely to restrict the natural behaviour of the birds.

Paragraphs 5.3 and 5.4 of the Code recommend that bits when used in younger pheasants (aged 3-7 weeks) should be justified, monitored regularly, be appropriate for the size and age of the bird and be fitted and removed by trained and experienced stockmen; and bumpa bits should only be used in special circumstances. This is based on research carried out by *The Effects of the Application of Bits and Spectacles in Gamebirds, 2005-2007*, (published March 2009) and the Farm Animal Welfare Council's *Opinion on the Welfare of Gamebirds*, published November 2008.

Q14. Do you agree that the use of bits for younger pheasants should continue when justified, monitored and fitted on an enterprise-by-enterprise basis as described above?

No, we are strongly opposed to the use of bits. We believe that the use of bits should be prohibited by legislation. Until such legislation is introduced, we believe that the code should clearly state that bits should not be used.

If feather pecking and cannibalism are a problem, the root causes of the problem should be addressed rather than resorting to the use of bits, which the Game Conservancy Trust (2009) research indicates can cause inflammation of the nostrils and crossed mandibles.

Since the banning of the use of dimetridazole as a treatment for protozoan diseases (particularly hexamitosis) some game farmers have reduced stocking densities by increasing run size to try to prevent infection becoming a problem and have found that, in some cases, this has eliminated the need to bit the birds to prevent feather pecking (Dampney, 2009). This strongly suggests that there is potential to eliminate the use of bits through reductions in stocking density and other improvements in housing and management practices.

Although there has been little research into feather pecking and cannibalism in gamebirds, many studies have investigated feather pecking and cannibalism in laying hens. Evidence from these studies suggests that in addition to a reduction in stocking density, providing an enriched environment and opportunities for foraging and refuge are likely to be useful in reducing feather pecking and cannibalism and avoiding the use of bits.

Evidence suggests that feather pecking in laying hens is redirected ground pecking behaviour associated with foraging (Blokhuis, 1986; Huber-Eicher and Wechsler, 1997; Ramadan and von Borell, 2008) and recent research indicates that severe feather pecking in particular derives from frustrated motivation to forage (Dixon *et al*, 2008). It is therefore likely that appropriate feeding and design and management of systems to provide opportunities for birds to forage, with the aim of increasing the length of time birds spend engaged in foraging and feeding, is likely to reduce the incidence of feather pecking. This has been confirmed by a number of studies in laying hens:

Aerni *et al* (2000) found that providing hens with food in a form that is time-consuming to eat reduces the likelihood of feather pecking. The authors state: "High rates of feather pecking and pronounced feather damage were only found in hens housed without access to straw and fed on pellets". El-Lethey *et al* (2000) similarly conclude: "Provision of foraging material and food form have significant effects on both feather pecking and indicators of stress". Hartini *et al* (2002) found that the way in which food is presented, in particular that it is time

consuming to eat, appears to be more important than dietary deficiencies in triggering cannibalism in laying hens.

Feeding high-fibre, low-energy diets or roughage reduces feather pecking in laying hens (Van Krimpen *et al*, 2005). Insoluble fibre (non-starch polysaccharides and lignin) affects gut functions and modulates nutrient digestion and there are indications that diets high in insoluble fibre are preventive of cannibalism outbreaks in laying hens (Hetland *et al*, 2004).

Nørgaard-Nielsen *et al* (1993) found that providing cut straw in the laying environment reduced feather pecking in laying hens. Similarly, Steinfeldt *et al* (2007) found that access to maize silage, barley-pea silage or carrots decreased damaging pecking, reduced severe feather-pecking behaviour and improved plumage quality. McAdie *et al* (2005) found that environmental enrichment through the addition of simple string devices to the pens of laying hens decreased feather pecking.

Research indicates that ensuring appropriate early experiences by providing enriched conditions and appropriate feeding during rearing is important in reducing the future tendency of laying hens to feather peck. Chow and Hogan (2005) suggest that laying hen chicks deprived of exploratory-rich environments may come to perceive pen mates as appropriate exploratory stimuli and subsequently direct exploratory behaviour toward other birds, which may lead to the development of feather pecking.

Huber-Eicher and Sebö (2001) found that early access to litter (from one day of age) increased foraging behaviour and reduced feather pecking. Similarly, Nicol *et al* (2001) showed that early experience with litter stimulated ground pecking and dustbathing and reduced the chance of feather pecking in later life.

Van Krimpen *et al* (2009) found that dietary energy dilution from hatch increased feed intake and probably also the number of feeding pecks from the first week of life onwards. The authors suggest that these pullets were likely to be more "imprinted" on their feed and therefore less oriented toward the feathers of other birds, which they suggest could explain their findings of improved feather condition at 49 weeks of age for those hens fed a 15% diluted diet during rearing.

Riber *et al* (2007) found that chicks reared with broody hens showed higher ground pecking activity, earlier development of daytime perch use and significantly lower mortality due to feather pecking and cannibalism compared with non-brooded chicks. Rodenburg *et al* (2008) conclude that the presence of a hen during rearing has profound effects on behavioural development and on reduction of feather pecking and cannibalism. They recommend that rearing chicks with a mother hen may be a very rewarding method to reduce behavioural problems in laying hens.

Riber and Forkman (2007) found that inactive birds were more likely to become the targets of both gentle and severe feather pecking. They suggest providing distinct resting areas so that mixing of active and inactive birds can be avoided. Friere *et al* (2003) also recommend the provision of refuge areas where birds can avoid pecking.

The provision of high perches can reduce feather-pecking damage in laying hens. Wechsler and Huber-Eicher (1998) found that plumage condition was significantly better for hens kept in pens with high (70cm above floor level) rather than low (45cm above floor level) perches. They recommend that housing systems for laying hens should contain adequate foraging material and high perches to avoid welfare problems with feather pecking and feather damage.

With experience gained from the management of feather pecking and cannibalism in laying hens and from the management of gamebirds in countries where bits and spectacles have been prohibited (e.g. Denmark), housing systems and management practices should be devised which will allow gamebirds to be managed successfully without the use of these devices.

Q15. Do you agree that bumpa bits should only be used in exceptional circumstances?

We are strongly opposed to the use of bumpa bits under any circumstances. We believe that the use of bumpa bits should be prohibited by legislation. Until such legislation is introduced, we believe that the code should clearly state that bumpa bits should not be used.

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