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Response to Defra's draft Code of Practice on Gamebird Rearing

1. We have long experience with rearing pheasants and partridge for shooting and we pioneered many of the current techniques during the 1960s and 1970s when we were adapting methods from the then developing poultry sector. Much of that work, which is still referred to, was developed empirically in response to the needs of the time and was not based on scientific studies.
2. In recent years our research studies have mainly concentrated on disease control, although we have looked at welfare aspects such as the use of bits and spectacles where necessary. We have worked closely with the Game Farmers' Association and we have readily recommended their voluntary code of practice when asked.
3. We supported the adoption of the Animal Welfare Act (2006) and now support the drawing up of a code of practice for those that rear game. We understand this code will be for guidance and will not exempt gamebird rearers from legal requirements in the Animal Welfare Act.
4. At an early stage we recommended that the Farm Animal Welfare Council should consider and report on the gamebird rearing sector and we are pleased that Defra did this and have followed their recommendations in this draft code of practice.
5. The principal matter that remains unresolved in the draft is whether or not to ban completely the use of cages for laying pheasants and partridges. We strongly recommend that Defra follow the advice of the Farm Animal Welfare Council and not ban them completely but allow their use to continue if they are constructed and used in such a way as to not compromise the welfare of the birds. We believe that some of the barren cages currently in use do fall below this standard and would need to be modified or replaced. We

recommend that Defra pursue its option (b) ie that barren cages are not used (allowing the use of enriched cages).

6. Below are our responses to Defra's specific questions:

Q1. Do you agree that a code of practice is the most appropriate option or do you consider that game farms should be regulated?; if so, who should regulate them?

Yes, a code of practice under the Animal Welfare Act is the most appropriate mechanism here.

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

The code is intended to guide gamebird rearers and it should indeed therefore reflect the gamebird rearing season.

Q3. Is it clear and easily understandable?

Yes.

Q4. Or do you think it should be set out in the alternative format with sections relating to each of the animal's five needs?

No.

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

Yes. This is helpful

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

Not at this stage

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 concur with the view of the Farm Animal Welfare Council that barren cages are inadequate for pheasant breeding but they might acceptable if they are modified or improved i.e. the second option (b).

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 believe the code should follow the recommendations of the Farm Animal Welfare Council. i.e. the second (b).

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?

No. The true test for the adequacy or not of gamebird housing should be on how well it addresses the welfare needs of the birds.

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

No. Setting a minimum level would become a de facto norm and it is better to emphasise the welfare of the birds in relation to space rather than any minimum size. We know of no research that would adequately define such size standards.

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

There is no basis for calculating a space allowance.

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

There is no basis for calculating a space allowance.

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

Spectacles should not generally be used on pheasants.

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?

Yes. There are good welfare reasons for using them, but their use should always be kept under review

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

Yes.

Q16 Is this a fair assumption?

Yes

Q17. Are these estimates reasonable?

Yes.

Stephen Tapper & Chris Davis
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