

P-05-1097 Ban game bird cages, Correspondence – Petitioner to Committee, 08.03.21

Thank you for the opportunity to respond to the Minister's reply to correspondence from the Committee Chair following the Committee's most recent consideration of our petition.

We do of course appreciate the challenges that have been caused by Brexit and the unforeseen Covid pandemic. However, we are concerned that the review of the Code of Practice was already delayed in that it was started much later than other reviews of welfare codes applicable to other species. We are keen that much needed improvements in welfare standards, for which there is overwhelming public support, are not delayed any longer than is absolutely necessary.

Recent opinion polling conducted by YouGov in January 2021 on behalf of the League highlights clearly that the vast majority of people in Wales want higher welfare standards for 'game' birds – 72% believe that cages used for breeding 'game' birds should be banned.

We and other stakeholders met with officials earlier in 2019, to give our views on how the code should be revised. We remain unclear about the status of the draft, revised code which was circulated to stakeholders in November 2019 and whether further revisions are being considered. This draft shared with us contains no changes of substance compared with the current code and the changes are mainly to the preamble only. In advance of writing to the Committee today, we asked permission of the relevant officials to share the draft document with the Committee so that it could see how little has been changed, but this permission was refused.

There are no routine inspections of 'game' bird rearing sites carried out in Wales, whether planned or unannounced, in contrast to the regimes which govern the welfare of other species e.g. farmed animals. This, along with the fact that 'game' bird breeding sites are on private land, makes it very difficult for evidence of welfare issues to be gathered. It does not, however, mean that none exist. The Welsh Government appears to be content that the code of practice, and the requirements of the Animal Welfare Act, provide sufficient protection for the welfare of 'game' birds. We have previously asked via Senedd questions for Welsh Government to provide details of the inspections of gamebird premises carried out by both APHA and local authorities in recent years to assess compliance with the code. It seems from their responses that this information is not held centrally. We argue that this makes it difficult for the government to make a proper assessment that the code is actually protecting the welfare of 'game' birds. We are in the process of sending Freedom of Information requests to the relevant bodies to collate this information ourselves. We maintain however that even if followed to the letter, the provisions of the code do not prevent 'game' birds from suffering.

The Minister's reply does not address the Committee's minuted agreement at its last meeting to seek clarification as to why the Minister is not minded to act to move further to prohibit the practice of caging birds for this purpose. We have not had sight of the letter

sent by the Committee to know if this was included but we would also like to have clarification of this from the Minister given that it is the main point of our petition. To the best of our knowledge, the code review did not include within scope the issue of whether the use of cages in 'game' bird breeding should be restricted or banned. The code itself, whether the current version or the draft revised version, does not prohibit their use nor does it contain measures which fully mitigate the cruelty and suffering that their use causes to the birds. This is why we submitted the petition initially, to highlight both the need for cages to be banned to protect the welfare of the birds, and the public support for such measures.

We hope that this letter is a useful update and explanation for the Committee and that this important issue will be given the further consideration it deserves.

With best wishes