



Petitions Committee
Welsh Parliament
Cardiff Bay
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By email

1 February 2022

Dear Petitions Committee,

Thank you for the opportunity to respond to the latest correspondence from the Minister for Environment, Energy and Rural Affairs (LG/10383/21) regarding the petition to Ban Game Bird Cages (P-05-1097), and for the Petitions Committee's continued consideration of the issue.

We welcome the Minister's confirmation that the Welsh Government will consult further with stakeholders before concluding its review of the Code of Practice for the Welfare of Gamebirds Reared for Sporting Purposes. We hope that when that takes place, should the Welsh Government have not yet committed to legislative action, an end to the use of cages is considered as part of the remit of the review.

More broadly, we would like to reiterate our welcome of the Welsh Government's Programme for Government containing a commitment to restrict the use of cages for farmed animals. Similarly, we welcome that its Animal Welfare Plan for Wales includes the use of breeding cages for gamebirds within the examination of evidence that will be undertaken.

However, we maintain our view, as expressed in our correspondence of 23 November 2021, that the timescales offered in the Animal Welfare Plan would benefit from a more detailed breakdown of expected delivery. Including a clarification on each component action of the overall commitment to restrict the use of cages for farmed animals. This would enable us to better track the progress of this work, particularly in light of the many delays to related work due to factors such as Brexit and the COVID-19 pandemic.

We also note that, despite the positive developments, the Minister has not so far responded to the overall request of the petition, that the use of cages to breed game birds be banned. Since the petition closed in November 2020, many tens of thousands of pheasants and partridges have continued to be confined to cages in intensive breeding systems, simply to produce more birds to be shot for 'sport'.

Life in a cage does not fully allow for the needs or natural behaviour of gamebirds, all the more so due to their semi wild nature. Cages are inherently cruel, offering so little space that birds are denied the ability to express their natural behaviour. Concessions to enrichment provide little relief from the catalogue of suffering seen in caged birds through indicators such as feather damage caused by pecking, foot injuries and jump escape behaviour.

In the absence of a commitment to end the caged breeding of gamebirds, we remain

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concerned that the practice will simply continue and may ultimately drop off the agenda unless closely monitored, particularly where progress is tied to discussions with other governments. For example, a call for evidence by the UK government expected last year has not so far materialised. While a consistent approach across Great Britain which led to an end to the use of game bird cages would be positive, a lack of action from its counterparts should not be a barrier to action by the Welsh Government.

We believe that an end to the use of the cages in question would be best achieved through legislative means, in light of the weakness inherent to codes of practice detailed in previous correspondence to the Committee (particularly our letter dated 18 January 2021).

For example, the existing code functions as guidance and breaching it is not in itself an offence. This in stark contrast to the position of laying hens, for which conditions such as minimum space requirements are set in the Welfare of Farmed Animals (Wales) Regulations 2007, made under Section 12 of the Animal Welfare Act 2006.

As noted by the Research Service's research brief (RS20/14886-1), the government "could legislate to regulate the breeding of birds for sporting purposes, if the purpose of such legislation was the promotion of animal welfare". We urge the government to move as swiftly as possible to end the suffering of caged breeding, and would suggest that the upcoming Agriculture (Wales) Bill presents an ideal opportunity for such action.

Wales has the opportunity to lead the way for animal welfare by banning the caged breeding of game birds, a measure which would be backed by the vast majority of the public. Nationally representative opinion polling conducted by YouGov in 2018¹ showed that 82% of people in Wales are opposed to the use of cages for this purpose.

In light of the issues highlighted above, we would like to request that the Petitions Committee continue its consideration of the petition to ban game bird cages if it feels it is appropriate to do so. We believe it would be beneficial for the Petitions Committee to seek an additional update on the Welsh Governments work on the use of cages for gamebirds detailed in its Animal Welfare plan to be sought at an appropriate time later this year.

Yours faithfully,

Will Morton
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League Against Cruel Sports

¹ YouGov/League Against Cruel Sports (2018).

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