

# BVA, BVPA, BSAVA and BVZS joint response to Defra consultation on proposed registration requirements for all bird keepers in Great Britain

May 2023

## Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. The British Veterinary Poultry Association (BVPA), an active non-territorial division of BVA. The objective of the BVPA is to further the knowledge of its members, who are drawn from academia, research, government, commerce and practice, by holding educational and technical meetings. The Association also offers objective science-based advice and comment on issues affecting its members and the poultry industry in general.
3. The British Small Animal Veterinary Association (BSAVA) exists to promote excellence in small animal practice through education and science and is the largest specialist division of BVA representing nearly 10,000 members.
4. The British Veterinary Zoological Society (BVZS) is the specialist division of BVA, dealing with exotic pets, free-ranging wildlife and zoo animals, and has over 400 active members. The membership includes registered veterinary surgeons and veterinary nurses working with these species at all levels, from those in general practice providing a service for herpetologists, aviculturists, aquarists and the owners of exotic pets including primates, to those working in animal sanctuaries, wildlife parks, bird gardens, zoos and aquaria, and with free-living wild animals.
5. We welcome the opportunity to feed into Defra's consultation on proposed registration requirements for all bird keepers in Great Britain.

## Proposals to extend poultry registration to all birds (Questions 11 – 13)

6. We support the principle of registration for poultry and captive birds and the proposals defined in this consultation to extend this to include more birds, excluding pet<sup>1</sup> birds. We currently lack a clear picture of the captive avian population in the UK, and improved traceability is needed to effectively manage disease threats, such as Avian Influenza (AI).
7. Any captive birds can potentially contribute to the risk of disease outbreaks, including small, pet or 'backyard' flocks. In our joint [Avian influenza \(AI\) advice for vets dealing with wild birds and backyard poultry](#), we state that all "*poultry owning clients should be encouraged to register their poultry with Defra*". Improved traceability through registration would support biosecurity measures, protecting both bird populations and humans, providing greater protection from risk of zoonotic or food borne diseases.
8. We support any extension to the current requirements, either to 1 bird or 10. We understand there is currently a real challenge for APHA colleagues when it comes to identifying poultry within AI 3km protection and 10km surveillance zones, and registration for all birds would ensure keepers can be identified and contacted swiftly, supporting biosecurity protocols.

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<sup>1</sup> For the purpose of this consultation only, a "pet bird" is a specimen of avian species other than: chickens, turkeys, guinea fowl, ducks, geese, quail, pigeons and doves, game birds, ostrich, rheas and emus, and swans, and kept exclusively within a domestic dwelling for non-commercial purposes.

9. Anecdotally, we are aware of an increase in the number of chickens presenting in first-opinion small animal practices since the Covid pandemic started, suggesting an increase in 'pet' chicken keeping. Keepers of any size flocks need to be aware of the requirements and risks associated with keeping birds. This includes understanding their welfare needs, being aware of diseases such as AI, and recognising other potential health risks such as salmonella. New keepers of chickens may have little understanding of their legal requirements and of their chicken's welfare needs, which in turn could increase disease risks. Registration would support efforts to contact owners with relevant guidance and educational material when required, for any existing or emerging threat. It would also be beneficial to support any new scheme with an educational campaign to ensure all keepers have a good understanding of the additional legalities surrounding food-producing animals, and best practice guidance for animal welfare.
10. We support the proposal to have all birds registered, as even a small number of birds could have an impact in a disease outbreak. It would also avoid any loopholes or confusion for keepers who may only occasionally have more than 10 birds. However, even though we believe registration for all birds would be ideal, we are concerned that extending the legislation to include all birds may be impractical, and this could lead to a misleading data set and sub-optimal disease control in the long term. Maintaining the accuracy of the database will be essential for the legislation to support disease control efforts, but with the lower cut-off point, the data set is likely to become significantly larger, making it more difficult to manage with both practical and cost challenges. To be effective, it will be essential to ensure the registration process is easy, clearly communicated and not unduly burdensome for owners, to reduce the risk of the regulations being ignored. It will also be important to have a clear process for action when keepers do not respond to the annual review reminders or are found to not be complying with the regulations, to ensure the database is kept up to date. It is also important to question whether extending registrations to single birds would bring a significant benefit in terms of disease control. Any bird can spread diseases such as AI, but we lack clear data on the actual risks posed by keeping a few birds, which would be useful for justifying the need for mandatory registration and the threat of a criminal offence for non-compliance. This evidence would also be useful for incentivising non-commercial owners to register. We would also support the alternative proposed option for registration of 10 or more birds as a pragmatic level for administration purposes. If, however, the intention is to capture all poultry owners, then this option could exclude many backyard poultry keepers, since anecdotally many keep less than 10 birds.

### Exemptions for pet birds (Question 14)

11. We support the principle of this exemption, avoiding the need for pet birds which pose little disease risks to be registered. However, clarity on the definition of pet birds will be critical to avoid confusion among owners, to avoid loopholes and to reduce potential unintended welfare issues. For example, the regulations would need to clarify whether fully enclosed outdoor aviaries of pet birds, including those kept for breeding or show/exhibition, would be excluded. The terminology will be especially important when communicating with non-commercial owners, many of whom will consider their bird to be a pet regardless of species type. It may be beneficial to consider alternative language such as "high-risk birds" and "low-risk birds", rather than the current terms of "poultry" and "pet birds". Bird keepers being told to register high-risk birds may be more inclined to check if their species is included in that category, and more willing to register them since the rationale has been directly articulated. This could reduce the risk of confusion regarding which birds are classed as pets and would align well with a risk-based approach.
12. From a disease control perspective, pet (or low-risk) birds would need to be kept indoors at all times with no access to wild or externally kept domestic birds in order to be excluded from registration. However, this could lead to the welfare needs of some birds not being met if keepers restrict their movements to 'a cage entirely within a domestic dwelling'. A more appropriate exclusion would focus on the type of outside space provided, and the access to this from other birds.
13. Some keepers of very valuable captive birds may be reluctant to register their animals for fear of theft. The exemption for pet birds is likely to exempt many such keepers, but those who are included, such as falconry keepers, may be tempted to remain unregistered to protect their flock. Confidence in data protection will be essential for encouraging those keepers to register, and specific engagement with these groups could encourage greater compliance. It would also be beneficial to require only the category of non-poultry bird to

be registered, rather than the specific species (eg pigeons, falconry birds, parrots) to provide additional protection and confidence to those with especially valuable species.

14. Wildlife rehabilitation is not adequately covered in the consultation, potentially still allowing for the risky practice of members of the public rescuing and keeping sick wild birds as pets, which under this exemption would not need to be registered. Addressing the keeping of wild birds is essential for limiting the risks to both people and other animals from infectious diseases. Anyone keeping wild birds should be registered to do so, with the exception of keeping a bird for a very short period of time (eg 24hours), before veterinary care or a registered wild bird keeper can be found. Keeping a wild bird as a pet outside of a wildlife rehabilitation centre should require a licence under the Wildlife and Countryside Act. To prevent a potential loophole of wild birds becoming pets which can be kept indoors without a licence, a full definition of 'pet bird' will be required, making a clear distinction from rescued wild birds. There will also need to be clarity around when a wild bird becomes 'captive', eg after how long, under what circumstances, and in what type of housing. Clarifying these regulations in relation to wild birds could bring the added benefit of creating a useful way to register premises keeping wild birds, including wildlife rehabilitation centres and individuals caring for them. The practicalities of how the procedures outlined above will work needs to be made clear perhaps by means of guidance, covering how the system is intended to be monitored, enforced and the consequences of non-compliance. Again, a government educational campaign to support any amendments to the regulations would prove valuable.

### Annual review requirements (Questions 15 – 17)

15. We support the proposal to send annual reminders to bird keepers, asking them to update their details and that of the birds they keep as defined in this legislation via an online portal. This would support the knowledge base regarding the number of captive birds in Great Britain.
16. We would welcome more clarity on how the registration and annual review process will work. The current requirement to notify Defra of changes in numbers of 20% or more is sensible for larger flocks but will effectively require smaller holdings to provide an update for every bird added or lost. This would be especially challenging for organisations such as wildlife rehabilitators, where numbers fluctuate frequently. An annual review date would be more appropriate for keepers with fewer than 50 birds. We suggest considering an approach similar to the licensing of other farm species, such as [sheep](#), which requires keepers to update their holding register and complete an inventory of animals once a year.

### Additional information (Questions 18 – 20)

17. We would welcome more clarity on who will be required to register, including veterinary practices, licensed zoos, and organisations such as agricultural shows.
18. The consultation suggests that a new database will combine data from Defra and local authorities in one place, which we would support.