



BRITISH VETERINARY ASSOCIATION

GENERAL POSITION STATEMENT ON THE IMPORT OF CAPTIVE LIVE BIRDS

INCLUDING A STATEMENT SUPPORTING A PERMANENT BAN ON THE IMPORT OF WILD BIRDS

JULY 2006

WHAT IS A CAPTIVE LIVE BIRD?

1. There is an important distinction between the import of poultry and the import of 'other captive birds', as the two categories of birds fall under very different legislation.

DEFINITION OF A CAPTIVE BIRD

2. Under European legislation, captive birds are split into two categories:
 1. "poultry" is defined as fowl, turkeys, guinea fowl, ducks, geese, quails, pigeons, pheasants, partridges and ratites kept for breeding, the production of meat or eggs for consumption or for re-stocking supplies of game (as Defined in Directive 90/539/EEC)
 2. "other captive bird" means any bird other than poultry that is kept in captivity for any reason other than those referred to in the definition of poultry including those that are kept as pets or for shows, races, exhibitions, competitions, breeding or selling (as defined in Directive 2005/94/EC)

POULTRY

The import of poultry (including game birds)

3. The import of, and intra-community trade in, poultry in the EU are heavily regulated (Poultry Trade Directive 90/539/EEC) with the enforcement of strict controls for disease and the maintenance of high welfare standards (average mortality rates are <1%) and the BVA supports this well-regulated industry. The high welfare standards are due partly to the fact that most imports of poultry from Third Countries travel as eggs or as day-old chicks, which cope better with the journey.

Game Birds

4. The BVA is concerned, however, about the extensive trade in poultry within the EU, where free trade is allowed between Member States (MS). The intra-community trade in game birds presents a particular concern due to the introduction and release of a significant number of birds in the summer months. The BVA is concerned about the level of biosecurity, monitoring and control of these birds, both before, and after, arrival in the UK. There should be stricter EU controls placed on this trade as the birds pose a greater biosecurity risk for the domestic poultry flock and wild bird populations, compared to poultry trade generally.
5. The British Veterinary Poultry Association (BVPA) and Defra have produced advice on intra-community trade in game birds to help reduce the risk of avian influenza and other notifiable diseases. This provides a useful starting point to improve the controls across the EU and we would urge the Industry and Member States to work together to help

improve controls.

<http://www.defra.gov.uk/animalh/diseases/notifiable/disease/ai/keptbirds/game-advice.htm>.

'OTHER CAPTIVE BIRDS'

6. In the case of wild-caught bird imports (see para 26), the BVA supports the call for a permanent ban on the trade due to the appalling welfare standards from capture to quarantine and the unacceptably high mortality rates recorded.
7. The BVA also believes that the current disease controls and welfare standards for the import of **all** captive live birds into the EU from Third Countries are unacceptable. If the trade is to be permitted, these standards need to be improved for the health and welfare of the birds involved. The BVA would therefore propose an extension of the temporary ban (imposed due to the risk of avian influenza), beyond the 31st December 2006, until it can be demonstrated that improved quarantine controls have been enforced across the EU and that the requirements for identification and traceability have been introduced (as recommended in the Dimmock report, a review of avian quarantine¹).
8. The import of birds from third countries is regulated by a number of different pieces of legislation. The legislation depends on the types of birds imported, and the reasons for importing. Many 'other captive birds' are imported under the Balai Directive (92/65/EEC), which allows the movement of birds from EU Balai registered holdings. The Balai Directive is the most commonly used procedures for the movements of commercial captive birds and bird of prey.

ANIMAL HEALTH AND DISEASE CONTROL

Disease risks from 'other captive birds'

9. In the case of captive caged birds that have been imported legally and have passed through appropriately monitored and assessed quarantine (i.e. birds that have been housed, inspected and tested correctly and competently) the risk of introducing highly pathogenic avian influenza (HPAI) virus to the EU is considered to be negligible¹.
10. However for birds from countries with HPAI that have been illegally imported, so avoiding quarantine and the testing required, there is a high risk that these birds may be infected or contaminated with HPAI virus and thus re-introduce it into the EU¹.
11. Therefore, to reduce the risk to public and animal health:
 1. Increased vigilance is needed across the EU to pick up any illegal trade in captive live birds (including at Border Controls)
 2. Pre-export holding facilities, veterinary health certification and 21 day post-import quarantine are needed
 3. Current quarantine procedures must be adequately enforced and;
 4. The recommendations made in the Dimmock Report² of Avian Quarantine must be enacted upon
12. The temporary ban on the import of all captive live birds should be extended until improvements in quarantine can be demonstrated.

Avian quarantine

13. The BVA welcomes the recommendations made in the Dimmock Report² on Avian Quarantine and the announcement that the UK Government has accepted the majority of the recommendations made which will help to improve both biosecurity measures and the welfare of the birds being imported in the longer term.
14. The Dimmock Report² highlighted the poor level of official supervision within quarantine facilities in the UK. When compared to the level of supervision demanded of a primary poultry breeding company in the UK, which regularly imports breeding stock from its parent operation overseas with high biosecurity and health standards, the supervision standards accepted for the captive wild bird trade are grossly inadequate.
15. It is absolutely critical that the quarantine facilities for the import of captive live birds are improved in line with the Report. The BVA supports closer supervision of the import of live captive birds, by the State Veterinary Service, to ensure that welfare standards are improved and to ensure that strict biosecurity measures are enforced to minimise the risk of disease spread. (Veterinary Surgeons inspecting quarantine facilities must be given adequate training to become familiar with the species of bird being quarantined).
16. The BVA believes that any facilities which do not comply, as recommended by the Report, should be suspended until they have rectified the faults identified.
17. Quarantine should not be confined to the control of avian influenza and Newcastle disease. The emerging problem of West Nile fever needs to be considered when birds are imported and testing for this disease should be considered. New technology should also be adopted to improve the surveillance for exotic diseases rather than just visual inspection.
18. Birds entering the European Union through quarantine facilities can subsequently travel freely within the EU. It is important therefore that the current controls and any additional controls on importation are applied equally and effectively by every Member State. The BVA welcomes the current EU review of quarantine facilities across Europe for this reason, and urges MSs to review their current quarantine procedures.

Border controls

19. It is estimated that the current global illegal trade in CITES species is worth \$5-8 billion³. There are no estimates for the trade in non-CITES species. The current border controls across the EU are inadequate. Increased vigilance is needed at border controls to pick up illegally smuggled birds. There is a need to increase the number of border controls and Border Inspection Posts (BIPs) and to standardise the border control procedures across the EU to help ensure a consistent approach. More stringent border checks coupled with adequate salaries for border officials will also help to reduce incentives for corruption.

Traceability and Identification

20. Traceability and identification are essential for disease control. All birds imported or involved in intra-community trade should be individually identified to allow each bird to be traced back to their point of origin. Identification should be done before export and should be permanent to facilitate certification and traceability.
21. The importer should be required to provide individual identification details to the buyers of any bird, detailing the origin of the bird. Birds should be identified with the appropriate equipment for the species (such as BTO rings, closed rings or intramuscular identification chips) and should be accompanied by certification documents.

22. If birds cannot be identified using an approved method and without causing unnecessary suffering then they should not be imported.

ANIMAL WELFARE

23. The BVA welcomes the Government's draft welfare codes for quarantine facilities. The BVA believes, however, that welfare standards should be mandatory, not just advisory. An amendment to the Animal Health Act allows Government to set welfare standards for quarantine facilities, and the profession would encourage Defra to pursue this issue. High welfare standards should also be applied to every part of the journey from the country of origin to quarantine. Any welfare codes should also be adopted across the EU.
24. The BVA is also encouraged to note that Defra will be publishing central figures on the number of mortalities in quarantine facilities and would ask that figures should also be published on the number of mortalities prior to arrival at quarantine.
25. (See paragraph 27 for welfare concerns specific to wild caught birds)

Transport controls

26. BVA is concerned at the apparent failure of many Member States to effectively enforce the existing legislation on animal transport.

Categories of 'other captive birds'

1. The import of wild caught live birds from Third Countries

27. The BVA supports the call for a permanent ban on the import of wild-caught birds from Third Countries. The trade should not be allowed on welfare grounds due to the appalling welfare standards during capture, holding, transit, quarantine, and the associated unacceptably high mortality rates of up to 60%. If the EU does not consider it feasible to ensure that mortality can be reduced significantly and the welfare improved through regulation of the industry, then the trade should be permanently banned throughout the Community.
28. The BVA acknowledges the argument that a total ban may drive trade underground, which could lead to increased illegal trade and therefore an increased risk of welfare problems and disease spread. However, a total ban on the import of CITES species in the US (The US Wild Bird Conservation Act of 1992) has not increased the illegal trade in wild caught live birds, in fact there is evidence to suggest that it has decreased illegal trade⁴.
29. It is unethical to keep wild-caught birds as pets, for the sake of human pleasure, given the mortality rates in the current trade. The veterinary profession believes that on ethical grounds the current mortality rates are not acceptable for the purposes of trade.
30. An analysis of the welfare of captive wild birds throughout the supply chain is lacking and the BVA would urge Defra to carry out this analysis immediately in order to gather evidence to support a ban.
31. **Animal Welfare and Mortality Rates:** The veterinary profession's main concern is the health and welfare of the birds involved. Between 2000 and 2003 more than 2.7 million CITES birds were imported into the EU. This represents 93% of the worldwide trade in wild birds⁵.

32. There are no central figures for mortality rates prior to export, and the data is often unrecorded in Third Countries. From the studies available, it has been estimated that 40-66% of the birds captured die in the exporting country before arriving at markets for export^{6,7,8,9,10}.
33. High mortality rates are recorded in many consignments of captive birds imported into the UK. The MAFF figures from 1988 to 1991 quoted in the Dimmock Report of Avian Quarantine² show an average of 13.4% bird mortality, which includes dead on arrival and died in quarantine. This compares to less than 1% in poultry imports and zoo stock. This level of mortality is not accepted in commercial poultry imports or imports for zoo stock and should not be accepted in the wild bird trade.
34. It is more difficult to collate data from 1991 onwards as no central recording exists however a survey from 2003 of quarantine facilities, featured in the Dimmock report, showed a similar % mortality rate to the MAFF figures above. Figures from the US prior to the ban showed 20% mortality during transport and quarantine⁶.
35. Capture methods have caused particular concern amongst the profession due to the welfare problems reported. Methods include spring-loaded netting of flocks attracted to tethered call birds, and the use of "bird-lime" which is an adhesive applied to bush and tree branches to stick to the parrots' feathers when they alight, cause unnecessary suffering. The birds are often handled by their wing tips to prevent biting, and packed densely by the trappers into transportation crates, which causes further suffering^{6,9,12,13}.
36. The next stage in the chain is the dealers, who travel from village to village collecting birds for sale to exporters. Trappers, dealers and exporters may all hold the birds at facilities, awaiting the next stage in the chain, where there can be little or no knowledge, resources or regard for husbandry and minimum welfare standards upheld¹⁴.
37. Conditions in the exporting countries lead to mortality which is attributable to poor handling, inadequate provision of food and water, hyperthermia, inadequate ventilation, infectious disease outbreaks and aggression.
38. Finally, the birds are received by a small number of large importing companies, again maintained in high densities at holding facilities, before being distributed to the pet retailers. Before arriving at pet shops it is estimated that approximately 6 out of 10 wild-caught parrots will have died¹⁵.
39. Studies on parrots have shown that wild caught birds have more health and behavioural problems and find it harder to adapt to the pet bird environment¹⁶.

2. The import of captive bred birds

40. In the vast majority of cases all birds sold in the pet trade in the UK could and should be bred within the EU. They do not need to travel the long distances from Third Countries. In the few circumstances where it is not possible to captive breed, it would be preferable to import these species from captive bred stock in Third Countries to reduce the stress involved, as the birds will be used to handling. The argument against captive breeding in many cases is the cost, and this is not a justifiable reason for accepting such high mortality rates in the wild bird trade.
41. The need for improvements in quarantine and border controls, identification and

traceability, and welfare standards along the supply chain, detailed above, apply to the captive bred bird trade. Better policing across the EU is also needed to ensure that the birds are properly identified, that breeders are registered and that illegally smuggled wild birds are not sold as captive bred.

3. The import of birds for zoo stock

42. It is now rare for zoos to take animals from the wild. If birds are taken from the wild, it is usually as part of an international breeding programme with the co-operation of the Government of the exporting country.

43. The BVA would support the continued derogation to allow the import of new breeding stock from the wild for carefully controlled and essential breeding programmes in zoos, as the capture, storage and travel conditions conform to extremely high welfare standards compared to the import of wild birds for the pet trade.

44. Zoos also import captive bred birds from outside the EU in very low numbers.

4. The import of pet birds

45. Under the current legislation, pet owners are allowed to travel with up to 6 pet birds. The BVA is concerned by the number of people moving back and forth between mainland Europe and the UK, and further afield with pet birds. There is concern that the disease risks to, and from, these birds are high. Pet birds entering Great Britain are required to undergo a minimum of 35 days quarantine at destination premises under the supervision of a Local Veterinary Officer (LVO).

<http://www.defra.gov.uk/corporate/regulat/forms/health/intrade/im98.pdf>.

46. The Government should further assess the risk posed from these birds and should publish information on the number of movements of pet birds within the EU and internationally. The Family Pet Birds Import Licence includes the requirement for health certification to be provided by an official veterinary surgeon within 7 days of the date of export. Birds certified as healthy and free from clinical signs of infectious or contagious disease, and no case of Newcastle disease or avian influenza to be diagnosed on premises of origin during the previous 6 weeks.

5. The import of birds for research purposes

47. Birds imported for research purposes and used under the terms and conditions of the Animals (Scientific Procedures) Act will be treated in accordance with Home Office licence authorities which include welfare provisions for the life of the bird. Veterinary surgeons are involved in advising on the health and welfare of these birds. It is believed that the importation of birds for research purposes should continue, as the welfare standards required for importation and research are high.

Responsible Ownership

48. Members of the veterinary profession regularly report cases of poor welfare in pet birds presented at surgeries¹⁷. This is often due to a lack of knowledge on the appropriate care for the species and the RSPCA rescued 16,249 pet birds between 2000 and 2003. It is important therefore to make all owners, and potential owners, aware of the welfare needs of their pets.

49. The introduction of the Animal Welfare Bill will hopefully help to ensure that pet owners are aware of their duty of care. The BVA would welcome the production of a welfare code for pet birds under the Secondary legislation of the Bill.

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