BVA British Veterinary Association | Consultation response

BVA, BVZS and Vet Sustain response to Call for Evidence on Gamebird Release, Shooting and Welfare during Rearing in England

30 October 2026

Introduction

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 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 Zoological Society (BVZS) supports and promotes veterinary knowledge and scientific advancement in the health, welfare and conservation of free-ranging and captive wildlife, zoo animals and non-traditional companion animals, and encourages veterinary input and support for the health and welfare of these species by those individuals and organisations responsible for their care.
3. Vet Sustain are volunteers who dedicate their time to championing the health of humans, animals and ecosystems.
4. We welcomed the opportunity to contribute to Defra's call for evidence on gamebird release, shooting and welfare during rearing in England.
5. Our specialist division the British Veterinary Poultry Association (BVPA) have submitted a separate and more comprehensive response. We consider them to have a lot of expertise and knowledge in this area, and we welcome the detail they have provided.
6. We are submitting a separate response because the SmartSurvey format does not readily accommodate evidence drawn from the collective expertise of multiple veterinary professionals across different sites and businesses.

Section: Biodiversity
The questions in this section ask for evidence on the potential impacts of gamebird release and shooting on biodiversity. This includes both positive and negative effects on species, habitats and wider ecosystems, as well as the role that management practices and standards of practice may play in influencing outcomes.

7. We recognise that gamebird management can create both challenges and opportunities for land use, habitat management and conservation, and that constructive engagement between the gamebird sector and other key stakeholders is essential. There are serious concerns about unlawful raptor persecution, the RSPB Investigations team have recorded hundreds of shooting, trapping and poisoning incidents. The majority of these crimes are linked to land managed for gamebird shooting where some individuals perceive birds of prey as a threat to their gamebird stocks. In the uplands of the UK, these crimes are predominately associated with grouse shooting and in the lowland areas, pheasant and partridge shooting.
8. We note that gamebird management may also include the provision of food, water and cover from late summer through winter and spring, which may benefit wildlife as well as released gamebirds. We would welcome independent comparative research examining biodiversity outcomes, including songbird and ground-nesting bird populations, on land managed by gamekeepers and comparable land without gamekeeper management. Though preservation of woodland areas may be a positive impact, ecologically degraded upland areas maintained for grouse shooting for example have well documented negative impacts, including significant run-off from rainfall events, which have cascading impacts further down the river catchment.

9. Alongside these potential outcomes, we have concluded that lead ammunition used in hunting and sports shooting pollutes the environment and creates serious, avoidable risks to wildlife, domestic animals and people. Birds may ingest spent lead shot from the environment, or be exposed through ingestion of contaminated prey and carrion, resulting in both lethal poisoning and harmful accumulative sub-lethal effects.
10. Taken together, these impacts support replacing lead ammunition with effective non-lead alternatives, while strengthening the independent evidence base needed to assess the wider positive and negative effects of gamebird management on biodiversity.
11. As with many forms of farming, scale may be part of the negative impact. There is a significant difference between a small local shoot on a mixed farm vs a large commercial shoot. This might be considered in welfare terms, but certainly in terms of nutrient loading and ecological impact. The RSPB points to a 10x increase in the numbers of gamebirds released in the last 40 years, so that this is now the most significant avian "migration" we see nationally, and the impacts of that scale are likely to be more significant than historic patterns of use.

Section: Biosecurity and disease

The questions in this section ask for evidence on biosecurity risks associated with gamebird release and shooting, including the potential spread of disease such as Highly Pathogenic Avian Influenza (HPAI), Salmonella and Mycoplasma. We are also interested in how risks may vary and whether mitigation measures or standards of practice are effective.

12. The BVPA written response will offer more detail but Defra and APHA have identified the potential for released pheasants and red-legged partridges to contribute to HPAI transmission between wild and kept bird populations. The level of risk varies according to species susceptibility, the number and density of birds, proximity to susceptible wild or kept populations, prevailing infection pressure and management practices. APHA's assessments also highlight differences in risk between pheasants, partridges, grouse and wildfowl, and between local and longer-distance transmission. The evidence further indicates that biosecurity standards can materially influence the level of risk posed to kept birds. Surveillance and timely communication between keepers, veterinary surgeons, laboratories and national bodies are needed to improve understanding of disease incidence, medicines use and vaccine use and to support proportionate disease-control decisions.
13. Robust biosecurity is essential across all stages of gamebird rearing and release. Effective measures help limit disease transmission within captive populations and reduce the risk of spread to wild birds. Veterinary surgeons take biosecurity extremely seriously, routinely discussing and assessing arrangements during site visits. Annual veterinary reviews and health plans include a dedicated biosecurity assessment, while documented site procedures, clear signage and visitor records are increasingly becoming standard practice.
14. The Trusted Game Assurance Scheme (SG) is an audit-based scheme to ensure the health and welfare of gamebirds on Shoots and Game Farms. This scheme was developed by the vets working in partnership with their Gamekeeper and Game Farming clients. It involves veterinary auditing of shoots to assess and develop management practices with defined standards to ensure good practice.
15. We consider the current evidence base on the health and welfare of gamebirds to be incomplete in the following areas, and call on Defra to prioritise their investigation:
16. **Prevalence of endemic disease, including zoonotic potential:** Robust, current data on the prevalence of endemic disease across the sector, disaggregated by species (including pheasant, red-legged and grey partridge, and mallard) and by production system (breeding, rearing and release). Particular attention should be given to diseases with zoonotic potential. Relevant sources include national disease surveillance and post-mortem data, private veterinary practice and laboratory records, and sector-held health and mortality records.

17. **Impact of common diseases on productivity and welfare**: Quantification of the effects of common diseases on gamebird productivity (for example mortality, growth and fertility) and on welfare outcomes, so that the burden of disease can be properly weighed. Production records held by the sector, linked to diagnostic findings, would be a valuable source.
18. **Prevention and control, including predisposing factors:** Evidence on effective prevention and treatment options, gamebirds are considered food producing animals so should be treated in accordance with relevant legislation, including any genetic, strain-related or husbandry-system factors that predispose birds to disease or increase their vulnerability.
19. **Medicines, vaccination and antimicrobial resistance**: Evidence on the range of veterinary medicines available for use in gamebirds, with particular emphasis on vaccines. Data on antimicrobial and antiparasitic use, and on the associated risk of resistance, are also needed. Veterinary medicines sales and prescribing data, and antimicrobial resistance surveillance, should be examined for what they can and cannot currently show for gamebirds.
20. **Extrinsic risk to the commercial poultry sector:** Quantification of the scale of risk that exotic or other disease spill-over from the gamebird sector poses to the UK's commercial poultry sector, together with evidence on the cost-effectiveness of proposed mitigations. Evidence on the reverse direction of transmission (from commercial poultry and wild birds into gamebirds) is also needed, as both are relevant to effective biosecurity.

Section A: Call for Evidence Questions – Animal welfare post-release

The questions in this section ask for evidence on animal welfare considerations associated with gamebird release and shooting. This includes management practices following release, and the conduct of shooting activities. We are interested in understanding the nature and extent of any welfare concerns, as well as whether compliance with relevant regulatory requirements, statutory or industry codes of practice, guidance, assurance schemes, or other recognised good practice may influence outcomes. This is intended to refer to relevant standards and guidance applying to activities during and following release, rather than the Code of practice for the welfare of gamebirds reared for sporting purposes, which applies to birds up to and including the period when they are confined to release pens.

21. We consider that the welfare of gamebirds should be assessed across the whole of their lives, taking account of both physical health and mental wellbeing. Some figures suggest about 60% of pheasants released do not end up being shot. The release period presents particular challenges as birds adapt to unfamiliar environments and habitats. Artificially reared birds may be less able to avoid predators or identify natural food sources, while sudden exposure to adverse weather, unfamiliar terrain and high densities around release pens may cause stress and exhaustion. Released birds may also face disease and parasite transmission, including avian influenza, and injuries from collisions with fences, vehicles or other obstacles. Welfare assessment should therefore consider the severity, duration and frequency of negative experiences including pain, fear, frustration, hunger and thirst alongside opportunities for positive experiences and normal behavioural expression, rather than relying on mortality alone.
22. This whole-life approach should include greater attention to the welfare consequences of lead poisoning after release when ingested, which can cause serious sub-lethal effects on physiological systems, body condition and behaviour, resulting in significant harm even where death is not immediate. There are also significant concerns around secondary poisoning of raptors. We support up-to-date, evidence-based welfare assessment covering nutrition, physical environment, health, behavioural interactions and mental state. Regulatory requirements, codes and assurance schemes should not only prevent avoidable suffering but also promote positive welfare outcomes and enable animals to experience at least a life worth living. Clear requirements should be supported by veterinary involvement, accessible written health plans, staff education, proportionate recording and assurance arrangements, and incentives to improve husbandry and

biosecurity. Standards should be routinely reviewed as welfare science develops, using outcome-based measures, data and benchmarking to assess compliance and practical impact; the Trusted Game Assurance Scheme provides one mechanism through which this can be achieved.

Section A: Call for Evidence Questions – Use of natural resources

The questions in this section ask for evidence on the use of natural resources associated with gamebird shooting. This includes the number of birds shot, their use within the food chain, and any potential issues relating to waste or disposal.

23. We have identified lead ammunition as a One Health concern because ammunition fragments can remain in shot game and expose people and domestic animals through the food chain. We therefore consider the risks to human and animal health from lead-contaminated game to be unacceptable and avoidable where effective non-lead ammunition is available.

Section A: Call for Evidence Questions – Other impacts

The questions in this section ask for evidence on other potential positive or negative impacts of gamebird release and shooting that are not covered elsewhere. This may include environmental, animal health, regulatory, public health, or social considerations. You are also invited to provide evidence on any additional impacts not listed in this call for evidence.

Question 28: What evidence exists of links between gamebird activities and:

a. lead shot contaminating in the environment;
b. misuse of medicated products;
c. antimicrobial resistance;
d. misuse of pesticides;
e. other environmental or social impacts.

Respondents should address only those topics for which they have evidence

24. **Lead ammunition:** We support a complete ban on the sale, use and possession of lead ammunition because the risks it poses to wildlife, domestic animals, people and the shared environment are serious, unacceptable and avoidable. A comprehensive restriction would also be easier to enforce and monitor, as no lawful residual use would remain. Effective non-lead alternatives are already available in Great Britain, making the transition practical; BVA has therefore previously supported an 18-month transition period, rather than five years, to prevent further unnecessary contamination, harm and suffering.
25. **Antimicrobial resistance:** We recognise AMR as a critical One Health issue and support responsible prescribing and use across animal, human and environmental health. Antimicrobials should not be used as a substitute for good management, vaccination or site hygiene, and Highest Priority Critically Important Antibiotics (HP-CIA) should be reserved as a last resort under veterinary direction, supported by diagnostic or sensitivity testing. Administration to an animal for prophylactic purposes in exceptional circumstances where the risk of an infection or of an infectious disease is very high and where the consequences of not prescribing the product are likely to be severe. There must be an action plan to prevent use in the future for the same problem otherwise it would become "routine" use. Preventive group use should be avoided, while any use for metaphylaxis should be clearly justified and recorded. BVA also supports improved antimicrobial-usage data, surveillance and information-sharing to strengthen understanding of disease incidence, medicines and vaccine use, enable benchmarking and guide proportionate interventions. The Veterinary Medicines Directorate (VMD) publishes the UK Veterinary Antibiotic Resistance and Sales Surveillance (UK-VARSS) Report annually, providing data on antibiotic use and resistance in animals to support the protection of animal and human health. Antimicrobial use

data from the gamebird sector have been included in the report since 2016. The use of HP-CIAs is referred to and at species level, gamebirds appear to be proportionally the highest user of HP-CIAs. The report also indicates an increase in use which is concerning.