



BirdLife Malta's comments on the National Animal Welfare Strategy consultation

22nd June 2022

BirdLife Malta welcomes such a useful and long needed initiative as the National Animal Welfare Strategy. Being directly involved in issues which are closely intertwined with animal welfare topics, we are aware of the gaps which require working on and would like to share our insights to contribute to the process of drafting the Strategy, including at a later stage.

General comments

Firstly, the scope of a policy document covering animal welfare should also include the section on wildlife, since as stated in the OIE Terrestrial Animal Health Code¹ and mentioned in the Consultation document, animal welfare is a *"broad term encompassing many species, including wildlife"*. Particularly, a multi-taxa approach can be beneficial. As a non-governmental organisation that works for the protection of birds and their habitats, we strongly recommend including all animal taxa in the document's different sections, particularly, avifauna.

Questions of hunting and trapping

The issues relating to hunting and trapping of wild birds should not be left aside and should be included into the Strategy. Trapping of wild birds is prohibited in many countries around the world, however in Malta the practice is still undertaken under questionable derogations. While directives such as the Birds Directive do not permit trapping for its ecological implications with trapping being considered as an unsustainable way of killing of wild birds, the animal welfare aspect of such a practice should also be considered as part of this strategy. Robbing a wild bird from a life in the wild to be placed in a cage is simply an inhumane practice which causes countless stress on birds which either translates into death or a number of ailments and injuries on the bird itself which might result in an eventual slow and painful death. One must keep in mind that wild birds are still animals, and that an animal welfare strategy should address any means and methods which cause harm to such animals. The practices of trapping and the laws that permit them are not subject to an analysis of the means and methods employed and how these fare with animal welfare standards (such as the use of live-decoys).

It is important to consider animal welfare in relation to captive wild and domestic birds, particularly regarding the conditions they are kept in. While trapping is one aspect of the practice, the keeping after of such wild animals is also a matter which demands consideration. Often birds are mistreated at such a stage, with stress being the ultimate killing factor of a species that has been robbed from the wild. Malnutrition, inadequate space and environment in which they are kept, and other ailments are just some of many welfare issues such animals face.

¹ www.woah.org/en/what-we-do/standards/codes-and-manuals/terrestrial-code-online-access/?id=169&L=1&htmfile=index.htm



Typical enforcement lacunae which are currently prevalent is the use of 'gabjetti' for finches (whether wild or domestic). Such widely-used cages are only permitted for the transportation or use of such birds during trapping under the derogation, but not for the long-term husbandry of such species. Yet the situation is widely tolerated by enforcement authorities with only some cases brought to the law courts annually.

Glue traps issue

Glue traps are widely used and poorly regulated in Malta for various pests (mice, rats, insects) control, however it must be stated that, apart from being not humane in the first place, such a method has a number of negative implications for wildlife. In 2021, BirdLife Malta retrieved at least 8 wild birds that were accidentally caught in glue traps: House martin; Wood warbler, Sardinian warbler, 2 Black redstarts, 2 Spanish sparrows, Robin (refer to Figures 1-3); none of these birds survived. Due to the danger they pose to wild birds and other animals (hedgehogs, rabbits, bats, lizards, insects, etc.), glue traps for pests should be heavily restricted and special regulations should be developed on further use of glue traps only by specialised personnel who are trained to avoid bycatch when using such traps and who would have resorted to the use of such means as a last alternative. There are positive examples of glue traps regulations which can be useful to refer to, such as the Glue Trap Offences Bill (UK)². Furthermore, it should be mentioned that there are more sustainable, humane and equally effective alternatives on the market, such as live traps (or cage traps), snap traps, ultrasonic pest repellers, etc.

Having considered the fact that the strategy applies to all animals, we also note the following:

Farmed fish welfare

We believe that special attention should be given to the issue of animal welfare in aquaculture activities, including such issues as pathogens control and the use of antibiotics, sanitary, fish pens condition and maintenance. With this regard, please refer to the Council Directive 98/58/EC and Council of Europe Recommendation on the welfare of farmed fish³. Also we suggest referring to latest initiatives and guidelines^{4,5,6}, including the Guidelines on Water Quality and Handling for the Welfare of Farmed Vertebrate Fish⁷, and available scientific opinions⁸, as well as promoting voluntary certification and labelling among aquaculture operators⁹.

² <https://www.legislation.gov.uk/ukpga/2022/26/contents/enacted>

³ www.coe.int/t/e/legal_affairs/legal_co-operation/biological_safety_and_use_of_animals/Farming/Rec%20fish%20E.asp

⁴ www.fishwelfareinitiative.org

⁵ www.fao.org/family-farming/detail/en/c/1068913/

⁶ www.asc-aqua.org/what-we-do/our-standards/farm-standards/

⁷ https://ec.europa.eu/food/system/files/2020-11/aw_platform_plat-conc_guide_farmed-fish.pdf

⁸ www.efsa.europa.eu/en/search?s=&f%5B0%5D=topic%3A386&page=0

⁹ www.asc-aqua.org/what-you-can-do/get-certified/about-our-certification/



Figure 1. Glued Black redstart, Mosta.



Figure 2. Sardinian warbler caught in glue trap, Kalkara. The use of such insect glue traps is not regulated.



Figure 3. Glued Spanish sparrow on a home-made turpentine glue trap, Mellieha. The use and application of turpentine glue is not regulated.