





## REPORT: SURVEY INTO PET SHOP WELFARE CONDITIONS FOR BIRDS IN SINGAPORE AND RECOMMENDATIONS

OCTOBER 2020 TO FEBRUARY 2021




 [acres.org.sg](https://acres.org.sg)

 [info@acres.org.sg](mailto:info@acres.org.sg)

 ACRESasia

 eyesofacres

 ACRES SG

91 Jalan Lekar

Singapore 698917

(65) 68929821

24hr Wildlife Crime & Rescue Hotline 97837782



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## **REPORT: SURVEY INTO PET SHOP WELFARE CONDITIONS FOR BIRDS IN SINGAPORE AND RECOMMENDATIONS**

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By Animal Concerns Research and Education Society (ACRES)

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### **About ACRES**

ACRES is a pioneering Singapore-based charity and Institution of Public Character, founded by Singaporeans in 2001 with the aim of advocating an end to animal cruelty in Asia.

We have six focus areas: Tackling Wildlife Crime, Wildlife Rescue and Rehabilitation, Humane Education, Promoting native wildlife coexistence in Singapore, Community Outreach and Promoting Cruelty-Free Living.

### **Tackling Wildlife Crime**

The illegal wildlife trade subjects billions of animals to pain and suffering, and threatens to wipe out countless species. At ACRES, we combat this wildlife trade through our 24-hour Wildlife Crime Hotline, undercover investigations, public awareness campaigns and collaborations with other NGOs and the government. Our investigations have led to the capture of many wildlife criminals. Our campaigns and engagements with the government have led to vast improvements to national wildlife protection laws.

### **Wildlife Rescue & Rehabilitation**

In 2009, we opened the ACRES Wildlife Rescue Centre (AWRC) in Singapore. We now rescue, treat and rehabilitate hundreds of wild animals every year, some from the illegal exotic pet trade and others native to the forests in Singapore that are found injured, lost or disorientated. We run our wildlife rescue services 24 hours a day, 365 days a year. The facility operates on a 'no kill' policy.

As the needs evolve, ACRES also promotes coexistence with Singapore's wildlife through the wildlife management team, that conducts site visits and advises members of public on coexistence measures.

### **Humane Education**

We never forget that the key to ending animal abuse is education. Our talks, roadshows and Humane Education programmes touch a wide cross section of society, from children in kindergarten to the elderly in the heartland, reaching over 100,000 individuals each year. We travel to schools as well as malls, both downtown and in the heartland. Our aim is to encourage sympathy, compassion and respect for animals as well as other human beings, and to inspire and empower children to change their world for the better.



## Community Outreach

We currently have over 20,000 volunteers and supporters in our database. Our volunteer opportunities promote volunteerism in Singapore and create a more caring and compassionate society. We also distribute grants for local animal protection projects, organise conferences and forums and encourage people to become involved in global animal protection campaigns.

## Promoting Cruelty-Free Living

Through our Cruelty-Free Living educational materials, we raise awareness about a wide range of household products, food items and fashion accessories that are either tested on animals or cause needless suffering and death in animal labs and factory farms. Our aim is to get consumers to make more humane, considerate and compassionate choices in their daily life.



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**91 Jalan Lekar**  
**Singapore 698917**  
**(65) 68929821**  
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## TERMS OF REFERENCE

Term	Explanation
<b>NParks</b>	means the National Parks Board
<b>Pet shops</b>	A pet shop is defined in the <i>Animals and Birds Act</i> (Cap. 7), <i>Animals and Birds (Pet Shop and Exhibition) Rules</i> as, ‘any premises where animals or birds intended for use as pets are kept or displayed for sale by retail or wholesale or for export’.
<b>Pet Shop Licence Conditions</b>	means the Pet Shop Licence Conditions (4) Display and Sale of Birds revised as at 1 April 2019. ( <b>Appendix 1</b> )
<b>Noted Conditions</b>	means those of the Pet Shop Licence Conditions that the investigators visually examined.
<b>NParks’s Pet Shop Grading Scheme</b>	<p>According to NParks,</p> <p><i>‘We license the keeping and display for sale of pets to safeguard the welfare of animals. The Pet Shop Grading Scheme was introduced in 2007 to raise the standards of animal welfare and professionalism in the pet retail industry.</i></p> <p><i>Pet shops are graded according to their compliance with licence conditions and their adoption of best practices.</i></p> <p><i>The grading scheme also promotes responsible pet ownership through better customer education and information dissemination.</i></p>
<b>NParks’s Grade List</b>	means NParks’s Pet Shop Grades list updated as on November 2019 ( <b>Appendix 2</b> )
<b>CITES</b>	the Convention on International Trade in Endangered Species of Wild Fauna and Flora. It is an international agreement to ensure that trade ceases to threaten wildlife with extinction. Singapore became a signatory to CITES in 1986 and regulates trade in endangered species through a system of permits.
<b>CITES Appendices</b>	lists of species afforded different levels or types of protection from over-exploitation. Appendix I lists species that are the most endangered among CITES-listed animals and plants. Appendix II lists species that are not necessarily now threatened with extinction but that may become so unless trade is closely controlled. Appendix III is a list of species included at the request of a Party that already regulates trade in the species and that needs the cooperation of other countries to prevent unsustainable or illegal exploitation
<i>Psittaciformes</i> spp	Refers to all parrots.
<b>AVS</b>	means the Animal & Veterinary Service

## EXECUTIVE SUMMARY

1. ACRES conducted an undercover investigative survey from October 2020 to February 2021 into the conditions of shops in Singapore displaying and selling birds<sup>1</sup>. These conditions are a requirement under the Animals and Birds Act (Chapter 7, Section 80) Animals and Birds (Pet Shop and Exhibition) Rules. We examined those conditions which could be evaluated solely on visual examination. They were:

**Table 1. Pet shop licence conditions (4) for display and sale of birds (under Animals and Birds Act Chapter 7, Section 80)**

Condition no.	Explanation
1(a)	All birds housing must be of adequate dimensions and supplied with suitable perches for the birds.
1(b)	Birds must be able to move freely and comfortably and their tails and outspread wings should not touch the sides of the cage.
3	Birds kept together must be compatible. There must be no overcrowding.
4	Housing must be in good condition and kept clean and dry. It must be safe and comfortable for the birds.
5	Sick, diseased or injured birds must be removed from display.
7	Clean drinking water must be provided at all times. Drinking containers must be clean.
10	Common rock pigeons must not be displayed or sold.
11	No poultry, including chickens, quails and pheasants, are to be displayed or sold.
17	Shops with a grade must display their latest Grade Decal prominently

2. Pet shops are graded under NParks' Pet Shop Grading Scheme<sup>2</sup>. According to NParks, it grades pet shops based on their compliance with licence conditions and adoption of best practices. For the purposes of this report, the Pet Shop Licence Conditions (4) Display And Sale of Birds Conditions<sup>3</sup> are used as a benchmark against which to evaluate the bird shops' practices in respect of their display and sale of birds.

<sup>1</sup> [https://www.nparks.gov.sg/avs/-/media/avs/resources/pet-shop/\(4\)-birds\\_avs.pdf](https://www.nparks.gov.sg/avs/-/media/avs/resources/pet-shop/(4)-birds_avs.pdf)

<sup>2</sup> <https://www.nparks.gov.sg/-/media/avs/resources/pet-shop/pet-shop-grade-list.pdf?la=en&hash=DA61BF156825030490043DD82B6744BBBD02EC827>

<sup>3</sup> [https://www.nparks.gov.sg/avs/-/media/avs/resources/pet-shop/\(4\)-birds\\_avs.pdf](https://www.nparks.gov.sg/avs/-/media/avs/resources/pet-shop/(4)-birds_avs.pdf)

We also collated all online advertisements on sale of birds on Gumtree Singapore, Locanto and Carousell from 01 October 2020 to 31 December 2020.

3. The investigation findings revealed the following breaches **directly related to the welfare of the birds**:

**Table 2: Findings revealing breaches directly related to welfare of the birds**

<p><b>Bird Shops surveyed</b> Total: 42</p> <p>All of the pet shops in NParks's Grade List displaying and selling birds, totalling 31.</p> <p>6 pet shops had ceased operating at the given location at the time of the investigation, but this is not reflected in NParks's Grade List at the time of investigation.</p> <p>5 pet shops do not sell birds anymore.</p>	<p><b>19 pet shops breached one or more of the Pet Shop Licence Conditions:-</b></p> <p><b>6 out of 19 pet shops (31.6%)</b> of the said pet shops displayed for sale sick, diseased and/or injured birds (see Table 1 no. 5).</p> <p><b>5 out of 19 pet shops (26.3%)</b> failed to provide clean drinking water (see Table 1 no. 7).</p> <p><b>9 out of 19 pet shops (47.3%)</b> breached by reason of failure to provide adequate space for the birds to move freely and comfortably and their tails and outspread wings should not touch the sides of the cage required under the Pet Shop Licence Conditions (see Table 1 no.1(b)).</p> <p><b>8 out of 19 pet shops (42.1%)</b> breached by failure to prevent overcrowding (see Table 1 no. 3).</p>
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4. From the results of the investigation, there appears to be flouting of the Pet Shop Licence Conditions, and **poor standards in over 61% (19 out of 31 shops)** of the pet shops investigated.

In 2016<sup>4</sup>, ACRES's investigation findings revealed 27 out of 36 shops (75%) flouted at least one condition that is directly related to the welfare of the birds.

Even though there is an improvement from the previous investigation, these findings highlight an urgent need for review of the current conditions for display of birds in pet shops.



*Image 1: Overcrowding budgerigars without sufficient perches in a grade-A bird shop.*

5. ACRES also surveyed **three online platforms for advertisements** offering birds for sale from 01 October 2020 to 31 December 2020. Findings are as follows:

**Table 3 Summary findings from online sales of live birds in Singapore**

Findings	Gumtree Singapore	Locanto Free Classifieds Singapore	Carousell Singapore
<i>No. of ads</i>	1 ad for 1 bird	1 ad for 1 bird	242 ads for 393 birds
<i>CITES-listed species (no. of birds)</i>	Appendix II Conure (1)	None	Appendix I (9) and Appendix II (169)
<i>Others</i>	NA	NA	3 ads for sale of 6 poultry (not allowed in pet shops)

6. **Recommendations:** The current licensing conditions (see Table 1) are very subjective and the two investigations in 2016 and 2021 have identified that they need urgent review on the following items:

- (i) Clearly define what “overcrowding” means for different group of birds;

<sup>4</sup> <https://www.straitstimes.com/singapore/ava-to-take-action-against-15-bird-shops-and-look-into-online-listings-linked-to-protected>





(ii) Recognise the diverse needs of various species of birds sold in the conditions by defining “compatible species” and “suitable perches”;

(iii) Recognise the complexity of behaviours and needs of the diverse species of birds sold, and lay out conditions beyond simply “must be able to move freely and comfortably and their tails and outspread wings should not touch the sides of the cage”; and

(iv) Recognise the complexity of behaviours and needs of the diverse species of birds kept by public, and incorporate them into the animal welfare code for pet owners in Singapore<sup>5</sup>. Most birds such as doves are kept in appallingly tiny cages in households which does not allow any form of natural behaviour for the bird, but meets only food and water provision needs. Detailed recommendations can be found in the full report below in chapter 4.

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<sup>5</sup> [https://www.nparks.gov.sg/avs/-/media/avs\\_-caw\\_booklet-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_-caw_booklet-(eng).pdf)

## CHAPTER 1. INTRODUCTION

1. This report is based on the results of undercover investigations conducted by ACRES' investigators in October 2020 to February 2021 into the welfare conditions in shops in Singapore displaying and selling birds and online sale of birds.
2. We chose a sample of 42 target shops comprising:
  - (a) all 31 of the pet shops licenced by NParks for the display and sale of birds found in NParks' Grade List (updated as at November 2019);
  - (b) 6 pet shops had ceased operating at the given location at the time of the investigation, but this is not reflected in NParks' Grade List;
  - (c) 5 pet shops do not sell birds anymore.
3. The objectives of the undercover investigation were:
  - (i) to determine the extent to which bird shops in Singapore complied with the Pet Shop Licence Conditions (4) Display And Sale of Birds Conditions, upon visual examination only (see Table 4 below);
  - (ii) to determine whether bird shops live up to their grades, as conferred under the Pet Shop Grading Scheme;
  - (iii) to determine the animal welfare conditions in which birds are displayed and sold in the retail spaces. In this respect, we used the Pet Shop Licence Conditions (4) Display And Sale of Birds Conditions governing the welfare of the animals as a benchmark, based on NParks' statement that pet shops have to adopt the guidelines set out by NParks and comply with the Conditions of Licensing to enhance animal welfare and the professional standards of pet shops;
  - (iv) to determine the prevalence of CITES listed<sup>6</sup> birds sold on online platforms.

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<sup>6</sup> <https://cites.org/eng/app/appendices.php>

## CHAPTER 2. INVESTIGATION METHODOLOGY

### MEANS BY WHICH BASIC INFORMATION WAS ACQUIRED

4. We chose Pet Shop Licence Conditions (4) Display And Sale of Birds Conditions that could be evaluated solely by way of visual examination. They are as follows (the '**Noted Conditions**')

*Table 4: Noted Conditions from the Pet Shop Licence Conditions (4)*

Condition no.	Explanation
1(a)	All birds housing must be of adequate dimensions and supplied with suitable perches for the birds.
1(b)	Birds must be able to move freely and comfortably and their tails and outspread wings should not touch the sides of the cage.
3	Birds kept together must be compatible. There must be no overcrowding.
4	Housing must be in good condition and kept clean and dry. It must be safe and comfortable for the birds.
5	Sick, diseased or injured birds must be removed from display.
7	Clean drinking water must be provided at all times. Drinking containers must be clean.
10	Common rock pigeons must not be displayed or sold.
11	No poultry, including chickens, quails and pheasants, are to be displayed or sold.
17	Shops with a grade must display their latest Grade Decal prominently

### RECORDING OF THE EVIDENCE

5. The investigators took contemporaneous videos of their visits to the target shops.

## CHAPTER 3. TARGET SHOPS THAT BREACHED THE PET SHOP LICENCE CONDITIONS OR FAILED TO COMPLY WITH ANIMAL WELFARE CONDITIONS

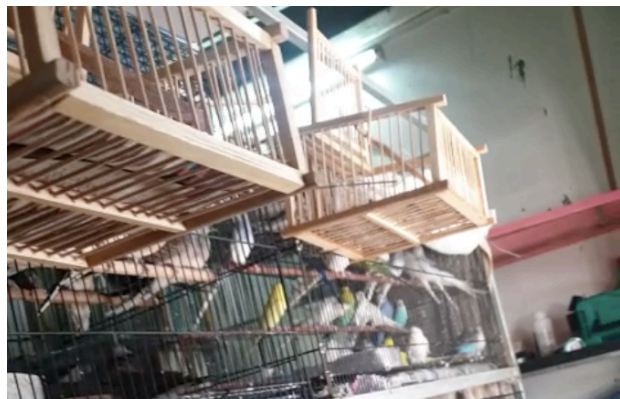
6. **19 out of 31** pet shops (i.e. 61%) failed substantively, in that they breached one or more of the following Noted Conditions directly governing the welfare of the animals displayed for sale i.e. **the most basic welfare conditions were not met:**

<b>Condition no.</b>	<b>Condition</b>
4	Housing must be in good condition and kept clean and dry. It must be safe and comfortable for the birds.
5	Sick, diseased or injured birds must be removed from display.
7	Clean drinking water must be provided at all times. Drinking containers must be clean.

7. **9 out of the above 19 shops received an A grade under NParks' Pet Shop Grading Scheme.**



**Image 2:** Overcrowded finches at a grade-A bird shop, with approximately 49 birds with an average floor area of 11cm x 11cm for one bird, with a wingspan of 22cm.



**Image 3:** Active open bird traps inside a bird shop, committing an offence of taking a wild bird without approval (under the Wildlife Act Section 5C).



8. **6 out of 19 pet shops (31.6%)** of the said pet shops displayed for sale sick, diseased and/or injured birds, such as birds with missing tail and head feathers, bleeding feet and overgrown beak.
9. **5 out of 19 pet shops (26.3%)** failed to provide clean drinking water.
10. **9 out of 19 pet shops (47.3%)** breached by reason of failure to provide adequate space for the birds to move freely and comfortably and their tails and outspread wings were touching the sides of the cage.
11. **8 out of 19 pet shops (42.1%)** breached by having overcrowded cages, for eg, 21 love birds in a cage providing approximately 15 cm by 15cm space for one love bird. This species' wingspan is 24cm, which shows that there is hardly any space for these birds to spread their wings or "move about freely and comfortably".
12. **2 out of 31 pet shops had poultry for sale**, which is a breach of condition 11.
13. **1 out of 31 pet shops had active bird traps** in operation to poach wild birds in the shop's environment. This is an offence under the Wildlife Act section 5C, where trapping of wildlife without approval, by a person who commits the offence in the course of animal-related business can be liable to a penalty of up to \$20,000 or 12 months' imprisonment or both.



***Image 4:** Overcrowded red-whiskered bulbuls on display at a B-graded bird shop, with 25 birds in a cage given an average floor area of 14cm x 14cm per bird, whose wing span is 28cm.*



**Image 5:** Bird with feather loss on display at a bird shop with grade A.



**Image 6:** Quails (poultry) openly on sale at a bird shop with grade B.



**Image 7:** Rock pigeons in display at a grade A pet shop. Rock pigeons are prohibited from being sold at bird shops in Singapore.

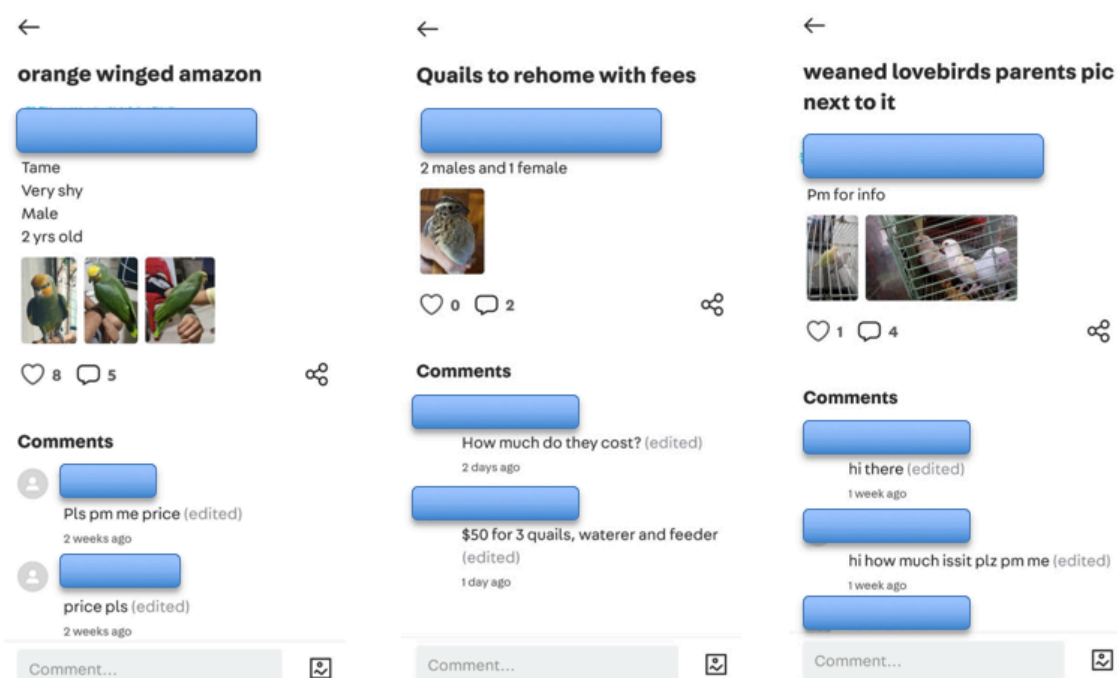


**Image 8:** Zebra doves overcrowded in an A-graded shop, with over 20 birds in one cage with only two perches.

14. ACRES also surveyed **three online platforms for advertisements** offering birds for sale from 01 October 2020 to 31 December 2020. Findings are as follows:

**Table 5 Findings from online sales of live birds in Singapore**

Findings	Gumtree Singapore	Locanto Free Classifieds Singapore	Carousell Singapore
<i>No. of ads</i>	1 ad for 1 bird	1 ad for 1 bird	242 ads for 393 birds
<i>CITES-listed species (no. of birds)</i>	Appendix II Conure (1)	None	Appendix I (9) and Appendix II (169)
<i>Others</i>	None	None	3 ads for sale of 6 poultry (not allowed in pet shops)



**Image 9:** Screenshots of CITES-listed birds such as Amazon parrots and prohibited birds such as poultry (quails) on sale online on Carousell. Young birds (lovebirds) sold also indicate possibility of home-breeding or accidental breeding which is not regulated.

**Table 6. CITES-listed birds offered for sale online in Singapore in a 90-day period.**

Species	CITES Listing
Love Bird	II
Blue Gold Macaw	II
Conures	II
Senegal Parrot	II
Parrotlets	II
Eclectus	II
Hahn's Macaw	II
Lorikeet	II
Caiques	II
Yellow Crowned Amazon	II
Military Macaw	II
Orange Winged Amazon	II
Moluccan Cockatoo	I
Scarlet Macaw & African Grey	I

Out of the 393 birds offered for sale over a period of 3 months, **43%** (242 birds) were CITES-listed (Table 6).



## CHAPTER 4. RECOMMENDATIONS

15. The following are our recommendations based on the outcomes of the investigations. We urge for NParks to consider these recommendations to review the Pet Shop Licensing conditions for birds and the Code of Animal Welfare.

### Pet Shop Licensing conditions review

- (i) To clearly define what “**overcrowding**” means for different group of birds:
- a. The current conditions do not state what is overcrowding, except for being able to “**move freely and comfortably**” and their tails and **outspread wings should not touch the sides of the cage**. For example, the current display conditions involve displaying 30 budgerigars having a mere 13cm x 13cm space, where their wingspan is 30cm each. Even if one third of the birds wished to spread their wings out at the same time, they will not be able to do so, without touching the sides of the cage. This is an outright case of overcrowding that needs addressing by including specific requirements in the licensing conditions.



**Image 10: Grade B shop:** 11 cockatiels in a cage with two perches may seem sufficient. But each cockatiel roughly gets 21cm x 21cm floor space for a bird with 50cm wingspan and 32cm in total length. On the right is a single Shama in a cage, with tail touching the cage and floor at 27cm in length, a direct breach of the licensing condition.

- b. Currently, it may seem that water and food are made available for all the birds when they need access to them, but the floor area made available per bird indicates that there is overt overcrowding<sup>7</sup>.
- (ii) To recognise the diverse needs of various species of birds sold in the conditions by defining “**compatible species**” and “**suitable perches**”;
  - a. In captivity, these birds are already denied the basic flight in the display cages. With a rich species diversity, these birds also come with varied needs – social or in pair housing, perches, substrate, hiding spaces and diet.
  - b. For example, the red-whiskered bulbuls often live in pairs guarding their territory, but flock together at the feeding grounds. Such opportunities to display natural behaviour are denied in captivity and are forced to constantly live in groups without an opportunity to fly in display cages.
  - c. All these birds are in constant view of public and lighting, providing no private hiding space from each other, often from birds in adjacent cages.
- (iii) **Stocking density:** Based on various factors such as
  - a. types of cages used by the bird shops in Singapore and their dimensions,
  - b. species of birds commonly sold in Singapore and their wingspans, and
  - c. regulations in other countries for birds displayed for sale as pets (*Tables 7,8 and 9*),

ACRES identified that the current floor area and the stocking density does not allow all the birds in a cage to be able to spread their wings comfortably as per the licensing conditions (*Table 10*).

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<sup>7</sup> Warwick C, Jessop M, Arena P, Pilny A and Steedman C (2018) Guidelines for Inspection of Companion and Commercial Animal Establishments. *Front. Vet. Sci.* 5:151. doi: 10.3389/fvets.2018.00151

**Table 7 Cage dimensions for birds under UK's Pet Animals Act<sup>5</sup>**

Type	Length of Bird (cm)	Floor Area (m <sup>2</sup> ) housing up to 4 birds	Linear cms per additional bird on either cage length or depth <sup>3</sup>
Budgerigar		0.15	5
Canary		0.15	5
Cockatiel		0.48	7.5
Finches	Less than 12.5	0.113	5
	12.5 – 17.5	0.15	5
	more than 17.5	0.225	7.5
Parakeets and Lovebirds <sup>41</sup>	less than 25	0.42	7.5
	25-30*1	0.48	7.5
	more than 30*1	0.675	7.5
Parrots	less than 30	0.225	10
	30 – 35*2	0.4050	15
	more than 35*2	0.4725	20
Chickens		1.6	
Bantams		1.6	
Quail		16	

**Table 8 Northern Territory (Australia) Minimum cage dimensions (indoor and outdoor) for display of birds in pet shops and owners.<sup>8</sup>**

Size of Bird approx. length	Indoor Display Cage Dimensions				Outdoor Display Cage Dimensions			
	Minimum floor area (cm <sup>2</sup> )	No. of birds	Minimum height (cm)	Increased floor area for each additional bird (cm <sup>2</sup> )	Minimum floor area (cm <sup>2</sup> )	No. of birds	Minimum height (cm)	Increased floor area for each additional bird (cm <sup>2</sup> )
<b>100mm (10cm)</b> Zebra Finches, Cubans, Double bar, Orange Breasted Waxbills, Fife Canaries	600	6	30	150	15000	100	180	150
<b>200mm (20cm)</b> Neophemas, Budgerigars, Yorkshire Canaries, Varied Lorikeets, Musk Lorikeets	1600	10	40	160	1500	75	180	200
<b>300mm (30cm)</b> Rosellas, Cockatiels, Rainbow Lorikeets, Bronzewing Pigeons	6000	10	100	600	60000	100	180	600
<b>400mm (40cm)</b> King Parrots, Princess & Superbs, Ringneck Parakeets, Galahs & Corellas	6000	4	100	1000	60000	40	180	1000
<b>500mm (50cm)</b> Sulphur-crested Cockatoos	6000	3	100	2000	60000	30	160	2000

<sup>8</sup> [https://industry.nt.gov.au/\\_data/assets/pdf\\_file/0003/258843/guidelines-retail-pet-shops.pdf](https://industry.nt.gov.au/_data/assets/pdf_file/0003/258843/guidelines-retail-pet-shops.pdf)

**Table 9 India's minimum cage requirements for parrots in pet shops<sup>9</sup>**

Type of parrot	Length	Breadth	Height	Bar Spacing
Budgerigar	75cm	45cm	60cm	1.5cm
Afr. Lovebirds/Cockatiel/Parrotlets	75cm	60cm	60cm	1.5cm
Conures	100cm	60cm	60cm	2cm
Rosellas/Lorikeets/Australian Grass Parrots	120cm	75cm	75cm	2cm
Pionus Parrots/Caiques	100cm	75cm	90cm	2cm
Amazon Parrots/African Grey Parrots	120cm	75cm	90cm	2.5cm
Small and medium Macaws	120cm	90cm	90cm	2.5cm
Cockatoos	180cm	90cm	90cm	3cm
Large Macaws	180cm	120cm	120cm	3cm

**Table 10 Current dimensions and average stocking density for small birds on display at Singapore's pet shops (as of Feb 2021)**

Floor area (sq. cm)	Type of birds	Average Number of birds per cage in Singapore	Floor area per bird (sq. cm)	Estimated floor area per bird	Wingspan (cm)
4890	Love birds	21	233	15cm x 15cm	24cm
4890	Budgerigar	31	158	13cm x 13cm	30cm
4890	Budgerigar	23	158	13cm x 13cm	30cm
4890	Finches	49	100	10cm x 10cm	22cm
4890	Bulbuls	25	196	14cm x 14cm	28cm

**Table 11. Recommendations for stocking density (based on existing cage dimensions in bird shops) for birds with wingspan up to 30 cm for species who can be displayed in groups (budgies, finches, love birds, parrotlets)**

Proposed stocking density for current bird shop cages, based on bird length and wingspan of up to 30cm for species who can be displayed in groups				
Floor area (sq cm)	Height of the cage	Maximum no. of birds	Floor area per bird (sq cm)	Min. number of perches
3,700	62	4	925	2
3,000	70	6	500	3
4,890	45	6	815	2

<sup>9</sup> <http://www.awbi.org/awbi-pdf/draftpetshoprules.pdf>



16. Based on a comparative analyses of the existing minimum requirements in other countries and average cage dimensions in Singapore's bird shops (floor space of 4,890 square centimetres), ACRES recommends a stocking density for smaller birds (up to 30 cm wingspan) as presented in Table 11.

(iv) To recognise the **complexity of behaviours and needs of the diverse species** of birds displayed at the bird shops, by ensuring the following:

- Large parrots (total length >20cm) should not be housed in more than pairs (only of compatible individuals) in one cage.
- Birds who are sold in Singapore's pet shops mostly fall under prey species, even if their food habit may be insectivorous. Their natural behaviour involves taking hide from any dangers/threats faced by them. Hence, all bird cages should have a private space for the bird/s to move away from public view/light when they need. This not only meets the psychological needs for the animals, but also improves the overall wellbeing and welfare of the birds, with their sleep and rest periods.

(v) Parrots have complex needs and enrichment in the form of toys must be provided in the display housing.

(vi) Perches should not be placed directly above/below each other to prevent soiling of other birds.

(vii) Food and water should not be placed directly below the perches to prevent soiling and contamination of water.

(viii) Bread/bun (human food) must not be provided for any birds of all age groups.

(ix) Baby birds such as chicks and squabs (Image 10) must have a private hiding space, instead of boxes or cages with full visibility.



**Image 11:** Squabs (chicks) of collared dove on display in unhygienic conditions at a grade B bird shop.

(x) For birds whose length is over 25cm, they should not be housed in more than a pair (of compatible individuals) in a cage. The recommended dimensions are

based on the length and wingspan. Recommended minimum dimensions (**per bird**) for birds above 25cm in total length are proposed in Table 12.

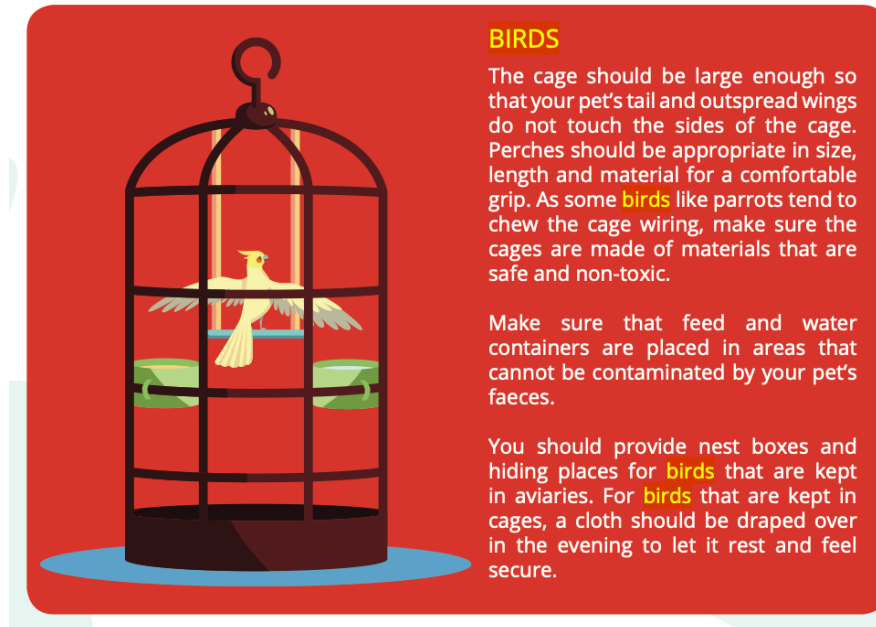
**Table 12 Recommended minimum dimensions above 25cm in length for pet shop display**

Bird groups	Length of the bird (cm)	Wingspan (cm)	Minimum cage length (cm)	Minimum cage height (cm)
Macaws	80-100	110-120	180	150
Cockatoos	40-55cm	100	150	90
Amazons, Jardine parrot and African Grey	30-40cm	50-70	105	90
Senegal parrot, conures and cockatiels	20-30cm	40-50	75	60

- (xii) No birds should be displayed on a metal T stand with/without chains. Tethering should not be allowed for birds whether on display for sale, or keeping as pets, for various welfare reasons such as high tangling risks due to external factors and variety of materials that can cause injuries/infections to their sensitive feet. Most parrots who are displayed in such a manner at a shop get taunted by public, and do not have any opportunities to rest or hide away from public view, unless the owner consciously takes effort to do so. Such displays also completely lack any form of appropriate species-specific entertainment.

## Recommendations to the Code of Animal Welfare (for bird owners)

The current code of animal welfare for pet owners<sup>10</sup> has very limited and subjective information as shown in the image 11 below.



**Image 12:** The current soft-binding code has subjective information that does not recognize the diverse needs of wildlife such as birds.

The code of animal welfare for the pet industry<sup>11</sup> players however lists out more items such as placement of food, perches, water, tethering, health and hygiene. These guidelines are also very subjective and does not address what is sufficient size enclosure for different groups of birds.

Most birds such as doves and love birds are kept in appallingly tiny cages in households which does not allow any form of natural behaviour for the bird, but meets merely the food and water provision needs. These cages are hung in well-lit areas day and night, at times with no shelter from sun or rain.



**Image 13:** Cruelty case in 2021, involving a pet conure tangled in tethered chain, in a tiny cage. With no specific regulations, there are no obvious welfare breaches in this case, even though one can easily spot how small the cage is.

<sup>10</sup> [https://www.nparks.gov.sg/avs/-/media/avs\\_caw\\_booklet-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_caw_booklet-(eng).pdf)

<sup>11</sup> [https://www.nparks.gov.sg/avs/-/media/avs\\_caw-pet-industry-full-\(eng\).pdf](https://www.nparks.gov.sg/avs/-/media/avs_caw-pet-industry-full-(eng).pdf)

The code of animal welfare for bird owners must recognise that these birds are of wild nature with diverse needs. While dogs are required to be walked outdoors and also have moving space indoors, birds kept in cages have absolutely no opportunities to express any natural behaviour.

17. There is a pressing need to improve the welfare of these animals, with a rising trend in bird ownership in Singapore<sup>12</sup>.

The following are the recommendations for the code of animal welfare for bird owners:

(i) ACRES urges NParks to phase out the sale and use of small wooden/metal cages (20-25cm in length) which are used to house song birds. Such a primitive manner of keeping a pet animal not only shows absolute disregard for the needs of a complex animal, but also reflects poorly on animal welfare standards in Singapore. ACRES has investigated several welfare and cruelty cases related to housing conditions. It is very obvious that it is impossible to meet many basic needs of a bird in a cage as shown in the image 14.



**Image 14:** Cruelty case in 2021, involving possession of several conures and lorries kept in small cages and left outdoors with no choice for shade.

<sup>12</sup> <https://www.birdlife.org/news/2021/08/18/70-of-singapore-parrot-owners-disapprove-of-wild-parrot-poaching/>





**Image 15:** Typically used bird cages for song birds in Singapore. Such cages measuring a mere **20-25 cm** in length for birds like spotted doves whose wingspan is **48cm**.



**Image 16:** Examples of cruelty cases filed by members of public for ACRES to investigate, but could not be further investigated due to lack of specific guidelines on bird keeping.

(ii) ACRES reviewed and analysed minimum housing dimensions (for bird owners) proposed by the bird keepers industry<sup>13</sup> and RSPCA<sup>14</sup> based on their wingspan. ACRES also reviewed other existing guidelines<sup>15,16</sup> for better understanding. Adopting the RSPCA's guidelines listed below, the table 13 lists the proposed minimum housing dimensions for bird keepers.

<sup>13</sup> <https://naturalinspirationsparrotcages.com>

<sup>14</sup> <https://www.rspcaqld.org.au>

<sup>15</sup> <https://pijaccanada.com/for-businesses/resources/recommended-space-requirements-for-birds-kept-in-a-pet-retail-environment/>

<sup>16</sup> <https://www.shropshire.gov.uk/media/3155/pet-shop-conditions.pdf>



### RSPCA's guidelines:

- The minimum width of a cage for a pair of birds should be three times their combined wing span.
- The minimum length of a cage should permit at least 2 wing beats (the more the better) between perches. Perches should be placed far enough from the ends of the cage to allow the birds to turn around on the perches without scraping their tail feathers against the cage.
- The minimum height of a cage should be three times the length from head to tip of tail of the largest bird to be confined in it, and should be increased accordingly if more than one pair or more than one species is kept in the cage.
- The cage should be constructed or positioned such that at least one perch is at standing shoulder height (for the sense of security of the birds).
- The cage should provide room for the bird to fly between perches in an approximately horizontal plane.
- There should be sufficient room for the bird to fully extend its wings and to fly without damaging wings or feathers on the walls or ceiling of the cage.

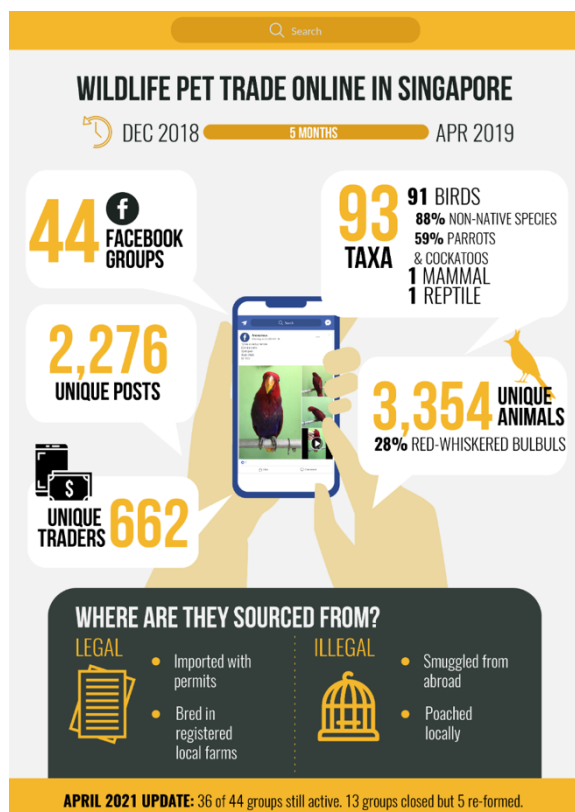
**Table 13. Proposed minimum dimensions for pet bird keeping in Singapore**

*(only primary dimensions proposed; absolute minimum enclosure size can be discussed further)*

Groups of birds (no. of birds)	Length of the bird in cm	Wingspan in cm	RSPCA's recommended minimum cage length in cm	Minimum length in cm	Minimum height in cm
Cockatoos (1)	40-55	100	300	200	110
Amazons, Jardine parrot, Hahn's macaw and African grey (1)	30-40	50-70	210	150	60
Senegal parrot, conures and cockatiels (1)	20-30	40-50	150	150	60
Macaws (1)	80-100	110-120	360	240	150
Spotted dove (1)	33	48	144	100	50
Finches (1)	10-25	25	75	50	40
Red-whiskered bulbul (1)	20	28	84	80	50
Hwa Mei (1)	23	38	114	60	40
Magpie robin (1)	20	60	180	120	40
White-rumped shama (1)	27	29	87	60	85

## Online sales of birds in Singapore

As shown in Table 5, ACRES surveyed three online platforms for sale of live birds as pets. Out of the 393 birds offered for sale over a period of 3 months, **43%** (242 birds) were CITES-listed (Table 6).



**Image 17:** TRAFFIC report's infographics on the level of online bird trade in Singapore, Dec 2021

Online platforms such as Facebook and Telegram were not possible to survey during the short period due to limited resources and to the presence of closed and private groups.

18. The findings also highlight the need for regulated sales of live animals online in Singapore. Regulation will not only restrict unmonitored home breeding of animals, but also will reduce unfair competition for the many legal animal pet businesses. These pet shops are subjected to pet shop licensing conditions, government and public scrutiny and have overheads to pay, unlike many sellers who ply their trade online.

The recent report published by TRAFFIC<sup>17</sup>

on the sale of birds online, also highlights very serious concerns with very useful recommendations.

### 19. Other concerns arising from the investigations:

- (i) **Sale of bird traps** was widely observed in these shops. With poaching incidents increasingly reported in Singapore, we urge NParks to regulate sale of bird traps.
- (ii) Baby birds such as hatchlings, nestlings, squabs were found openly on display in acrylic tanks in the bird shops. Concerns on the origin of these chicks and sale of chicks to public, who would not have the necessary knowledge and

<sup>17</sup> [https://www.traffic.org/site/assets/files/16465/trading\\_faces-dec2021.pdf](https://www.traffic.org/site/assets/files/16465/trading_faces-dec2021.pdf)



expertise to care for these chicks arise from our visits. The legality of selling chicks and breeding at a shop that is licensed only for sale (and not for breeding) are also unclear.

- (iii) Species such as munias<sup>18</sup> should not be imported or offered for sale in Singapore. Munias are very fragile birds with anxious and agitated behaviour in cages. They are not bought for the keeping, but for mercy release<sup>19</sup> in Singapore. Releasing of animals requires permits in Singapore, which these operations do not have. If this species is not a pet bird species, we urge NParks to end the import and sale of munias. Singapore already has introduced red avadavat and Javan munias, very likely through bird trade and mercy release operations.
- (iv) We observed that many bird shops except Pet Lovers Centre had at least more than 50 birds, sometimes close to over 200 birds in a day. The question arises on the turnover rate for birds pet shops. Unlike commodities, is there a need for so many live animals stocked up in a confined space for extended periods of time? A recommendation would be to ensure that the bird shops only stock a certain number of animals at a given period of time, based on sales receipts.
- (v) Sale of at least the CITES species should be reported to the NParks and documented for trade monitoring purposes.
- (vi) Bird owners have also shown inclination towards captive-bred birds<sup>20</sup>, hence the birds sold should have a label of origin (captive-bred or wild-caught).

<sup>18</sup> <https://singaporebirdgroup.wordpress.com/2015/05/20/save-our-native-munias-and-weavers/>

<sup>19</sup> <https://www.facebook.com/ACRESasia/posts/when-kindness-hurts-the-effects-of-releasing-animals-the-acres-animal-crime-inve/10154730846896523/>

<sup>20</sup> <https://www.birdlife.org/news/2021/08/18/70-of-singapore-parrot-owners-disapprove-of-wild-parrot-poaching/>



## CHAPTER 5. CONCLUSION

20. From the results of the investigation, there appears to be flouting of the Pet Shop Licence Conditions, and poor standards in **61.3 %** of the pet shops surveyed.

21. It would also appear that the NParks' Pet Shop Grading System, or the implementation thereof, needs reviewing, as 9 pet shops that had breached basic, animal welfare conditions received an A grade.

22. All the breaches highlighted above are evident from a visual examination. As such, members of the public are equally capable of monitoring pet shops and farms in Singapore.

23. The current licensing conditions for display of birds in pet shops and the code of animal welfare for the birds are subjective and ambiguous. There is a pressing need for review, recognising the complex and diverse behaviours of birds (of wild nature).

24. There is an urgent need for better welfare standards for keeping of birds, as the current code of welfare is inadequate and subjective.

25. There is a rise of e-commerce as more and more people exchange goods and services all over the world via the Internet. One of the negative aspects of this phenomenon is the unregulated and indiscriminate sale of animals by virtually anyone. At any one time, thousands of advertisements on the sale of animals can be found on online classifieds sites daily, including birds. The current lack of effective policing of such online trade of animals, including birds are worrisome and have many repercussions. We cannot reiterate enough the urgency and importance of the government, including NParks to enact an effective system to police the current sale of animals, including birds online.