



# British Game Assurance

## The Gamebird Producer Assurance Scheme

### Breeding

Version 1

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## Introduction

The British Game Assurance (BGA) sets the recognised standards for the gamebird sector in the UK. The BGA Gamebird Producer Assurance Scheme has been devised in association with the Game Farmers Association (GFA). It is divided into sections for breeding, hatching and rearing operations and includes the recommended paperwork required to demonstrate traceability between these three functions and the end user: the shoots. This document sets out the requirements to comply with the breeding section of the overall scheme.

The Game Bird Producer Assurance Scheme is based on the DEFRA Code of Practice for the Welfare of Game Birds Reared for Sporting Purposes. The purpose of this Code is to provide practical guidance in relation to section 9 of the Animal Welfare Act 2006 (the Act) affecting birds bred and reared under controlled conditions for the purpose of release for shooting, together with birds retained for breeding purposes. Failure to comply with a provision of this Code shall not of itself render you liable to proceedings of any kind but a failure to follow the Code can be relied on as tending to establish liability for an offence and compliance can tend to negate such liability. During the production and rearing process, birds are protected from unnecessary suffering by section 4 of the Act.

To cause unnecessary suffering to a protected animal (which includes an animal under the control of man) is an offence under section 4 of the Animal Welfare Act 2006.

Section 9 of the Act requires that the birds' needs are adequately catered for (the duty to promote welfare or the 'duty of care').

Section 9(1) of the Animal Welfare Act 2006 states that: A person commits an offence if he does not take such steps as are reasonable in all the circumstances to ensure that the needs of an animal for which he is responsible are met to the extent required by good practice. Section 9(2) states that: For the purposes of this Act, an animal's needs shall be taken to include:- a. It's need for a suitable environment; b. It's need for a suitable diet; c. It's need to be able to exhibit normal behaviour patterns; d. Any need it has to be housed with -, or apart from - other animals; e. It's need to be protected from pain, suffering, injury and disease.

Other laws, including those relating to planning, registration, medicine controls, disposal of animal by-products and animal transport also apply. It is the duty of everyone involved in the production and rearing of gamebirds to be aware of the relevant laws and codes and abide to them. The Defra Code was made under powers conferred by section 14 of the Animal Welfare Act 2006, applies in England only and issued under section 15 of that Act by the Secretary of State for Environment, Food and Rural Affairs. There are equivalent Government codes for gamebird production in Wales, Scotland and Northern Ireland.

## The BGA Gamebird Producer Assurance Scheme

This BGA Scheme relates to all birds bred, hatched and reared under controlled conditions for the purpose of release for shooting, together with birds retained for breeding purposes. All personnel involved with gamebird management and husbandry are advised to be acquainted with the principles and content of the Scheme, insofar as they are relevant to their particular tasks and duties.

Whatever the species being produced or reared, or the methods used, the over-riding principle that should guide everyone involved is that all due consideration should be given to the health and welfare of the birds concerned. Those responsible for the birds should, therefore, be knowledgeable and competent in gamebird husbandry and management techniques. In order

to achieve this, owners and keepers have a duty to ensure bird welfare as detailed in the 'five needs' in section 9 of the Animal Welfare Act 2006.

Therefore, birds must:

1. Have an environment appropriate to their species, age and the purpose for which they are being kept, including adequate heating, lighting, shelter, ventilation and resting areas.
2. Have ready access to fresh water and an appropriate diet to maintain growth, health and vigour.
3. Be provided with appropriate space and facilities to ensure the avoidance of stress and to allow the exhibition of normal behaviour patterns.
4. Be provided with company of their own kind as appropriate for the species concerned
5. Be adequately protected from pain, suffering, injury, or disease. Should any of these occur a rapid response is required, including diagnosis, remedial action and, where applicable, the correct use of medication.

### How the BGA Scheme Works

- 1.1. This Manual sets out the conditions for participation in and the standards of the BGA Scheme (Breeding). It also provides information on the structure of the company and how it operates.
- 1.2. It is intended as a guide for prospective new applicants and as a source of reference for existing participants.
- 1.3. The Manual contains standards for all Game Farms.
- 1.4. The BGA Scheme will enable individual Scheme members who participate and are approved under the Scheme rules to showcase that they are operating to best practice and, through passported traceability, provide confidence to end consumers that the game they eat has come from animals that have been produced to a high standard.
- 1.5. Participation is voluntary and is open to all game farms of all sizes across the United Kingdom who demonstrate compliance with Scheme standards which will be verified by independent auditing specialist, SAI Global Ltd.
- 1.6. If you have any questions on the content of the Manual, or about the Scheme in general, please contact: BGA via our contact [page](#).
- 1.7. SAI Global Ltd is the Independent Certification Body appointed by the BGA to provide the auditing services for the Scheme. SAI Global Ltd service the BGA Technical Advisory Group (TAG), which is responsible for advising on all technical matters relating to the Scheme. All Scheme participants must comply with all the requirements detailed in the Scheme Regulations available [here](#).

## How to Join the BGA Scheme

### New Participants

- Application to participate in the scheme must be made by registering online with the BGA
- Each individual Game Farm must have its own membership.
- On receipt of a registration a new membership pack will be issued, and arrangements shall be made for a desktop assessment of the applicant's operation. The purpose of this assessment is to provide a report of the applicant's capability (as appropriate) to breed, hatch and rear gamebirds in accordance with BGA Scheme standards. The decision to approve participation will be based on the assessment report.

### Approved Participants

- Ongoing approval of existing participants will be subject to ongoing compliance with Scheme standards and payment of Scheme fees to SAI Global Ltd.

### General

- The BGA Scheme year runs from 1 January to 31 December.
- It is the responsibility of the Scheme participant to notify BGA of any change of business circumstances.
- Supportive evidence of compliance of standards will be required by the assessor.

## Assessment and Approval

### 2.1. Auditing Body

- All audits are carried out by an independent body, SAI Global Ltd which is ISO/IEC 17065 accredited auditing and certification body.

### 2.2. The Assessment

- The initial assessment will be made by appointment with the applicant, typically up to a week prior, and will be carried out during normal seasonal operations with the applicant in attendance.
- All formal credible complaints will result in an audit investigation within 48 hours of the complaint being received. Scheme participants will be obliged to ensure that a representative is available to meet the assessor and cooperate fully with their investigation.
- Prosecutions – at the time of the assessment, participants will be asked to declare any past/current/pending prosecutions relating to their business which are relevant to the BGA scheme standards.

### 2.3. What the Assessor Will Check

- On initial contact from the assessor a pre-assessment check will be carried out and the assessor will talk through the assessment process and explain what is required.
- The assessor will want to assess a number of areas and this will include where applicable:
  - Planning of the system and site
  - Origin of stock

- Predation and pest control
  - Housing
  - Feed & water
  - Bird health & welfare
  - Medicines and vaccines
  - Transport of birds
- Once the assessment has been completed the assessor will agree with you any areas that do not comply with the scheme standards and require improvement. These will be categorised thus:
    - 'Minor non-compliance' – there has been an attempt to meet the requirements of the standard and there are no immediate risks to Animal Welfare or Food Safety.
    - 'Major non-compliance' – there has been no attempt to meet the requirements of the standard and/or there are immediate risks to Animal Welfare or Food Safety.
    - The participant will be asked to sign the visit record summarising any agreed non-compliances, and a copy will be left with the participant as a record of the assessment.

#### 2.4. At the end of the Assessment

- The Assessor will complete a visit record and if applicable they will record any non-compliances found and will detail the type of evidence required to achieve the BGA standard. The participant will then be asked to sign an undertaking of intention to carry out the action required, provide evidence that the necessary action has been taken or be subject to a re-assessment to confirm that the improvements have been completed satisfactorily. The prompt submission of evidence will help to maintain Scheme approval.

#### 2.5. Certification Decision

- All non-conformances against the standards must be rectified within an agreed timescale of 28 days for minor non-compliances.
- The scheme licensee will be notified of the audit outcome. The possible decisions are as follows:
  - Full ongoing approval: no non-compliances highlighted during the audit.
  - Conditional ongoing approval: participant approval is maintained pending the completion of corrective action to address any non-compliance(s) within the given timescale e.g. 28 days. Participants will be required to supply evidence to the SAI Global office that non-compliance(s) have been rectified and this can be in the form of photos, copies of records/invoices and declarations. Where SAI Global® has not received adequate evidence of corrective action by 28-days after the assessment, SAI Global® will then chase the member. Failure to do so will result in a suspension for a maximum of 90 days. If adequate corrective action is received within the 90-day period, the member will be 'Approved'. Where SAI Global® have not received adequate evidence of corrective action during the 90-day suspension period the membership will be withdrawn, they will be advised in writing that they will be withdrawn from the scheme and their registration becomes invalid. If they wish to rejoin the scheme, they will need to re-register with the scheme and pay for a new audit prior to regaining approval.
- Major non-compliance: The participant will be suspended until rectification of the major non-compliance has been successful. Where the participant has been

suspended and failed to undertake the required actions within the permitted time scale of 3 months, (unless otherwise agreed) will result in withdrawal of Scheme Membership. After this, if they wish to rejoin the scheme they will need to re-register and pay for a new audit and successfully comply with scheme requirements prior to regaining approval.

### **Colour Coding of Standards**

	<b>Recommendation - this may become a standard in the future.</b>
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## The Standards (Breeding)

1 Planning and Documents	
Standard	Guidance
1.1 Game Farms must have a copy of the relevant BGA standards available.	<ul style="list-style-type: none"> <li>Up to date hard copy or electronic copy of the standards available to all staff working on the farm.</li> </ul>
1.2 A site plan and details of the housing must be available on site.	<ul style="list-style-type: none"> <li>The site plan should detail all buildings on the site.</li> <li>Details of all housing used, including pen sizes, provision of feed &amp; water, and stocking rates must be available.</li> </ul>
1.3 A documented emergency action plan must be in place and known to key staff.	<p>The plan must consider risks to the farm and actions to be taken in the event of:</p> <ul style="list-style-type: none"> <li>Feed and/or water equipment or supply failure.</li> <li>Fire.</li> <li>Extreme weather.</li> <li>Disease outbreak.</li> <li>Activist activity.</li> <li>The plan must include key contact numbers.</li> <li>The plan must be available for key staff.</li> <li>The plan must include key contact details for vet, Environment Agency/SEPA, APHA, energy, feed &amp; water suppliers.</li> </ul>
1.4 A prominently positioned action board must be in place with details of emergency procedures.	<p>The board must detail as a minimum:</p> <ul style="list-style-type: none"> <li>The procedures to follow in the event of an emergency.</li> <li>Emergency contact numbers.</li> <li>The location of the site, including GPS Co-ordinates, OS grid reference and postcode.</li> <li>The location of water sources for use by the fire brigade.</li> </ul>
1.5 There must be systems in place to alert key staff in the event of a malfunction or failure of any automated equipment that could be detrimental to the birds' health and welfare.	<ul style="list-style-type: none"> <li>This may include heating, ventilation, lighting, feeding, water systems as a minimum.</li> <li>As a minimum the feed and water systems should be checked twice daily and recorded.</li> <li>It is recommended that a water meter be installed to alert under or excessive water use.</li> <li>Appropriate responses to serious problems must be documented in the emergency action plan.</li> <li>The systems must be tested at least weekly to ensure they are working correctly, and a record of the test and outcome recorded.</li> <li>There must be trained and competent staff available at all times in case of a malfunction or failure of automated equipment.</li> </ul>
1.6	The record must include as a minimum:



As part of the biosecurity plan a visitor record must be kept and completed by all visitors before entering the site. Records must be kept for at least 3 years.	<ul style="list-style-type: none"> <li>• Name.</li> <li>• Address or who they represent.</li> <li>• Date and place of last contact with gamebirds/poultry.</li> <li>• Declaration of any illness in previous 48hrs.</li> <li>• Declaration if carrying any recording equipment .</li> <li>• Signature.</li> </ul>
1.7 There must be systems in place for recording complaints that are relevant to the Game Farm Standards.	<p>Complaints might be made by Local Authority, the general public, customers or others.</p> <p>The following must be recorded:</p> <ul style="list-style-type: none"> <li>• The nature of the complaint.</li> <li>• The details of the investigation, including the result.</li> <li>• Action taken to prevent the issue happening again.</li> </ul>
1.8 The farm needs to be maintained in a manner that does not present risks to bird welfare or environmental protection.	<ul style="list-style-type: none"> <li>• Accumulated rubbish, redundant equipment or scrap must be controlled and disposed of legally.</li> <li>• Must be kept separate from birds, feed storage/public access.</li> </ul>
1.9 Eggs, day old chicks and poults may only be sold as BGA Assured from a BGA Assured Game Farm	<ul style="list-style-type: none"> <li>• Please refer to Appendix 5.</li> </ul>

2 Staff	
Standard	Guidance
2.1 All new staff are to be effectively trained and deemed competent to carry out the tasks they are employed to do.	<ul style="list-style-type: none"> <li>• Before anybody starts work there must be an induction, supervision or explanation of the tasks they will carry out.</li> <li>• For specific tasks related directly to bird welfare or bird health specific training and assessment of competence must be provided by a nominated qualified person, who in turn is deemed competent by the vet. A written declaration of competence must be provided by the vet.</li> </ul>
2.2 The performance of staff must be regularly reviewed, and refresher training implemented as required.	<ul style="list-style-type: none"> <li>• Training must be reviewed annually.</li> </ul>
2.3 Records of training must be kept.	<p>These must include:</p> <ul style="list-style-type: none"> <li>• Name.</li> <li>• Start date.</li> <li>• Dates of training.</li> <li>• Details of Induction/training given.</li> <li>• Who provided the training.</li> </ul> <p>Details of specific training and assessment of competence to be detailed in the records.</p>

<p>2.4 Training and supporting documents must be delivered in all necessary languages where English is not the first language.</p>	<p>This must be declared on the training record.</p>
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3 Origin of Stock	
Standard	Guidance
<p>3.1 Records must be kept for the source of all birds in order to trace their origins should this prove necessary.</p>	<p>Records must include as a minimum:</p> <ul style="list-style-type: none"> <li>● Source of birds.</li> <li>● Number of birds.</li> <li>● Date of arrival.</li> <li>● Health status of supplier .</li> <li>● Copies of BGA passports for both incoming and outgoing birds/eggs. These must be kept for a minimum of 3 years.</li> </ul>
<p>3.2 Where birds are caught up from the wild there must be a suitable isolation accommodation separate from the main flock</p>	<ul style="list-style-type: none"> <li>● Where birds are brought in, especially from the wild, they must be held in an isolation facility for a minimum of 14 days until their health status can be established.</li> <li>● It is recommended that some sentinel birds from the main flock are mixed with the incoming birds.</li> <li>● Once the health status is established, a decision can be made regarding introduction to the main flock.</li> <li>● It is <u>recommended</u> that Mycoplasma testing is undertaken under guidance from the vet.</li> </ul>
<p>3.3 Sourcing of birds to comply with the BVPA Mycoplasma Working Group recommendations.</p>	<ul style="list-style-type: none"> <li>● Please see Appendix 4.</li> </ul>
<p>3.4R It is <u>recommended</u> that where birds are sourced from outside the UK, farmers make themselves aware of the conditions under which the birds have been produced to ensure that these meet the requirements of the BGA standards.</p>	

4 Predator and Pest Control	
Standard	Guidance
<p>4.1 A pest control plan must be in place.</p>	<p>Systems must be adopted to exclude and discourage pests which should include:</p> <ul style="list-style-type: none"> <li>● Maintaining the site in a clean and tidy state.</li> </ul>

	<ul style="list-style-type: none"> <li>● Removal of overgrown vegetation.</li> <li>● Clean and secure storage of feed.</li> <li>● Maintenance and proofing of buildings against pests.</li> </ul>
<p>4.2 Where baits are used the requirements of the Campaign for Responsible Rodenticide Use (CRRU) must be adhered to.</p>	<p>This can be achieved by:</p> <ul style="list-style-type: none"> <li>● The use of an external contractor.</li> <li>● Use of trained and competent staff.</li> </ul> <p>The CRRU code requires as a minimum:</p> <ul style="list-style-type: none"> <li>● Completion of an environmental risk assessment &amp; a site survey prior to the decision to use bait.</li> <li>● Only use of bait where it is required.</li> <li>● All bait points must be mapped, with records of checks and findings recorded.</li> </ul>

5 Housing	
Standard	Guidance
<p>5.1 Game birds must not be handled more than is necessary.</p>	<ul style="list-style-type: none"> <li>● They are non-domesticated birds and may be more prone to stress when confined.</li> <li>● Staff must be trained how to handle them in an appropriate manner.</li> </ul>
<p>5.2 All housing and penning must be located to minimise disturbance to the birds.</p>	
<p>5.3 Accommodation must be of sound construction and in good repair.</p>	<ul style="list-style-type: none"> <li>● Should be constructed of hard wearing and washable materials.</li> <li>● Floors must be designed to avoid foot injury and appropriate for the species.</li> <li>● No sharp edges or other hazards.</li> <li>● Protected against entry of wild birds, rodents and pests which may be vectors of disease.</li> </ul>
<p>5.4 Accommodation must be designed and managed in such a way to minimise aggressive behaviour within the flock.</p>	<p>Pens must have the following :</p> <ul style="list-style-type: none"> <li>● physical and sight barriers.</li> <li>● perches (see 5.11 re perches)</li> <li>● scratching area.</li> </ul>
<p>5.5 Housing must be designed to protect all the birds in extremes of weather.</p>	<ul style="list-style-type: none"> <li>● There must be sufficient shelter to provide protection for all birds during period of adverse weather.</li> <li>● The size of the protected area must allow all the birds to shelter without causing over stocking/over crowding.</li> </ul>

<p>5.6 All birds must have access to environmental enrichment.</p>	<ul style="list-style-type: none"> <li>• This must be accessible to all birds.</li> <li>• Must be checked regularly to ensure it is clean and in good condition.</li> </ul>
<p>5.7 R Barren raised laying units for breeding pheasants and small barren raised laying units for breeding partridges should not be used. All laying systems used for the housing of birds should be designed and managed to ensure the welfare of the birds. Any system should be appropriately enriched.</p>	<ul style="list-style-type: none"> <li>• All birds should have access to environmental enrichment</li> <li>• This should be accessible to all birds</li> <li>• Must be checked regularly to ensure it is clean and in good condition.</li> </ul>
<p>5.8 Laying birds must be provided with nest areas sufficient for the number of birds housed.</p>	<ul style="list-style-type: none"> <li>• Where nest areas are provided there must be a minimum of 1 nest area per 10 birds (including cocks).</li> <li>• As a minimum there must be an area shielded for privacy with space allowance &amp; availability as if it were a nest area.</li> </ul>
<p>5.9 Where dry litter is not available naturally, a non-toxic, non-irritant material must be provided to allow for dustbathing and the dilution of droppings.</p>	<ul style="list-style-type: none"> <li>• This must be maintained in a clean and tangle free form.</li> </ul>
<p>5.10 Birds must be stocked at a rate in accordance with best practice.</p>	<ul style="list-style-type: none"> <li>• Pens must of sufficient size to allow birds to exhibit normal behaviour patterns.</li> <li>• The minimum floor space allowance for pheasants, partridges and ducks on raised laying units is 1kg per 1300cm<sup>2</sup>.</li> <li>• The minimum covered floor space in a floor laying systems should equate to 1kg per 180cm<sup>2</sup> for pheasants, partridges and ducks.</li> <li>• The range area should be appropriate for the number of birds occupying it, as to not cause excessive ground contamination.</li> </ul>
<p>5.11 Sufficient perching must be available appropriate for age and species.</p>	<ul style="list-style-type: none"> <li>• 9cm per pheasant, 11 birds per meter.</li> </ul>
<p>5.12 Conditions in accommodation must be</p>	<ul style="list-style-type: none"> <li>• Immediate action must be taken if birds unable to keep clean.</li> </ul>

<p>maintained in a manner that ensures birds are able to keep clean</p>	<ul style="list-style-type: none"> <li>Records detailing every incidence of dirty birds, the number of birds involved, the cause and actions taken to resolve the issue must be kept and available for inspection.</li> <li>The records must be included in the review of the Veterinary Health Plan.</li> </ul>
<p>5.13 Housing must be lit to allow normal behaviours, rest and effective inspection</p>	<ul style="list-style-type: none"> <li>In the event of a lighting failure there must be a back up lighting system in place to allow adequate inspection.</li> </ul>
<p>5.14 Fixed artificial lighting, if used, must have a dimming facility to allow birds to prepare for darkness. Birds must have a minimum continuous night-time dark period of 6 hours in every 24 hours</p>	<ul style="list-style-type: none"> <li>A shorter period of natural darkness is permissible where the natural day/night cycle is less than 6 hrs dark in 24 hrs and birds have access to natural daylight unless derogated by your veterinary health plan.</li> </ul>
<p>5.15 Housing must be adequately ventilated where relevant.</p>	<p>Checks must be made, and records kept at least daily to ensure:</p> <ul style="list-style-type: none"> <li>No build-up of odours or high humidity.</li> <li>The housing is thermally comfortable.</li> </ul> <p>There must be documented procedures in place to follow the event of a mechanical ventilation failure.</p>
<p>5.17 All automatic systems regularly checked to ensure they are working correctly.</p>	<ul style="list-style-type: none"> <li>Records must be kept of the checks, including date of checks, findings &amp; and action taken as a result of the check.</li> <li>There must be back up systems in place in the event of system failure. This must be documented in the emergency action plan.</li> </ul>
<p>5.18 All housing must be cleaned and disinfected between batches of birds</p>	<ul style="list-style-type: none"> <li>Appropriate DEFRA approved disinfectant must be used.</li> <li>Records must be kept of cleaning.</li> </ul>
<p>5.19R It is <u>recommended</u> that advice be taken prior to the installation of new systems or equipment so that they can be managed in ways that meet the full requirements of the BGA Standards</p>	<ul style="list-style-type: none"> <li>This could include advice from the vet or BGA.</li> </ul>

6 Feed & Water	
Standard	Guidance
6.1 Birds must be provided with a nutritionally balanced diet appropriate for the age and species.	<ul style="list-style-type: none"> <li>• The diet must maintain the body condition of the bird, maintain them in good health and satisfy their nutritional and foraging need.</li> <li>• Bagged feed must be used in date rotation – oldest first.</li> <li>• Where the feed is medicated it must be used before the expiry date on the medication.</li> </ul>
6.2 Birds must have sufficient access to feed.	<p>There must be a minimum of:</p> <ul style="list-style-type: none"> <li>• 7cm of linear feeding space per pheasant and ducks for a raised laying unit.</li> <li>• 3cm of linear feeding space per partridge for a raised laying unit.</li> <li>• For pheasant, partridge and duck floor laying systems 2.4cm of circular feed space per bird.</li> </ul>
6.3 Where a natural source is not available, ad lib insoluble grit must be provided.	<ul style="list-style-type: none"> <li>• This can be included in feed.</li> <li>• The grit must be of the correct size (4.75 – 6.35mm) for the age and species of bird.</li> </ul>
6.4 Sudden changes in diet must be avoided.	<ul style="list-style-type: none"> <li>• Good practice is to blend 2 rations over a period time.</li> </ul>
6.5 Feed must be purchased from an Assured Source.	<ul style="list-style-type: none"> <li>• Compound or blended feed – UFAS or equivalent.</li> <li>• Grains from a UFAS, Red Tractor, SQC or equivalent Assured source.</li> </ul>
6.6 Records of all feed purchased must kept.	<p>As a minimum, records must show:</p> <ul style="list-style-type: none"> <li>• Supplier name.</li> <li>• Feed type.</li> <li>• Ingredients.</li> <li>• Date of delivery.</li> <li>• Quantity.</li> <li>• Load/batch number.</li> </ul> <p>Delivery documents/invoices/grain passports must be kept and available for inspection.</p> <p>Records must be kept for at least 2 years.</p>
6.7 All stored feed must clearly labelled, either on the bag or bulk store.	<ul style="list-style-type: none"> <li>• This applies to both medicated and non-medicated feed.</li> </ul>

<p>6.8 Feed must be stored in a manner that minimises the risk of contamination.</p>	<p>This includes contamination:</p> <ul style="list-style-type: none"> <li>● From other feed.</li> <li>● By other substances.</li> <li>● From machinery or equipment.</li> <li>● From birds/pests/dogs/cats.</li> </ul> <p>Grains must be of good quality and free from obvious animal, chemical and microbiological contamination such as mould.</p>
<p>6.9 Birds must have adequate access to a supply of fresh clean drinking water.</p>	<ul style="list-style-type: none"> <li>● There must be adequate drinkers for the number of birds as follows: <ul style="list-style-type: none"> <li>● 2 nipples per 10 birds (pheasant/duck/partridge) for floor and raised laying units or</li> <li>● 1 Bell drinker (32cm diameter) per 125 birds (pheasant/partridge/ducks) for floor and raised laying units or</li> <li>● 2 x cups per 10 birds (pheasant/partridge/ducks)</li> </ul> </li> </ul>
<p>6.10 Where water is from a private supply it must be independently tested at source.</p>	<ul style="list-style-type: none"> <li>● Water supply must be either from the mains or if from a private supply tested at least annually to ensure it is potable (appropriate).</li> <li>● The test must clearly state the water is considered an acceptable source of drinking water for livestock <ul style="list-style-type: none"> <li>● Coliforms must be &lt;100 cfus per ml</li> <li>● TVC must be &lt; 100 cfus per ml</li> </ul> </li> <li>● Records must be available for inspection and kept for a minimum of 2 years.</li> </ul>
<p>6.11 There must be a system in place to provide drinking water for at least 24hrs in the event of a primary system failure.</p>	<ul style="list-style-type: none"> <li>● The use of header tanks (fitted with lids).</li> </ul>
<p>6.12 The feed system must be thoroughly cleaned and disinfected and the water system must be flushed through, equipment cleaned and disinfected between batches of birds.</p>	<ul style="list-style-type: none"> <li>● Automated feeding systems must be cleaned annually as a minimum.</li> <li>● Records must be kept of this.</li> </ul>

7 Bird Health and Welfare	
Standard	Guidance
<p>7.1 All sites must be registered with a BGA approved vet or vet practice.</p>	<ul style="list-style-type: none"> <li>● The vet or practice must be an active member of BVPA (British Veterinary Poultry Association).</li> <li>● The practice must send a member of its team to the annual ABN game vet meeting.</li> </ul>

	<ul style="list-style-type: none"> <li>• A register of approved vets and Practices is held by BGA.</li> <li>• (Details of BGA Registration Scheme in Appendix 3).</li> </ul>
7.2 The health and welfare of birds must be met at all times.	<ul style="list-style-type: none"> <li>• Routine review of records to identify key issues.</li> <li>• Any health or welfare issues are detected and managed.</li> </ul>
7.3 The farm must have a named person who is responsible for bird welfare.	
7.4 All birds must be inspected by a trained and competent person at least twice daily.	<ul style="list-style-type: none"> <li>• Records must be kept of the checks and any findings.</li> </ul>
7.5 Any bird suffering ill health must receive immediate attention, including, where appropriate, treatment, the attendance of an approved veterinary surgeon or euthanasia.	
7.6 A flock health plan must be drawn up in conjunction with the vet and reviewed at least annually.	<p>The flock health plan must as a minimum:</p> <ul style="list-style-type: none"> <li>• Be produced by the vet.</li> <li>• Be site specific.</li> <li>• Be reviewed at least annually.</li> <li>• Consider performance results.</li> <li>• Contain a strategy for the prevention and control of disease.</li> <li>• Contain a review of antibiotic use (Including only minimal and specifically justified use of CIAs).</li> <li>• Contain an antibiotic use reduction plan.</li> <li>• Contain action plans to address any vice issues in birds .</li> <li>• Contain records of any occurrence of vice in birds, reviews the cause, the number of birds affected, and actions taken to resolve the issue &amp; prevent further occurrences.</li> <li>• Review the need for use of management devices.</li> <li>• Contain action plans to address any occurrence that would prevent to movement of eggs to the hatchery .</li> <li>• Detail all staff deemed competent for tasks related to health and welfare.</li> <li>• Detail permitted methods for euthanasia, and staff trained and competent to carry out euthanasia.</li> <li>• Include a biosecurity plan.</li> </ul>
7.5 Records of performance must be kept and be kept for a minimum of 3 years.	<p>Records must show as a minimum:</p> <ul style="list-style-type: none"> <li>• Origin of chicks/breeding stock on arrival.</li> <li>• Bird numbers.</li> </ul>



	<ul style="list-style-type: none"> <li>• Numbers of dead on arrival.</li> <li>• Any abnormalities.</li> <li>• Mortality (and reason if known).</li> <li>• Birds euthanised (with reasons if known).</li> <li>• Any laboratory tests with results.</li> <li>• Post mortem results.</li> </ul>
7.6 A biosecurity plan must be drawn up in conjunction with the vet and reviewed at least annually.	<p>The biosecurity plan must include</p> <ul style="list-style-type: none"> <li>• Procedures for visitors.</li> <li>• Procedures for incoming birds/eggs.</li> <li>• Procedures for cleaning/disinfection/fumigation of premises, equipment and vehicles.</li> <li>• Provision and management of foot dips.</li> <li>• Requirements for staff &amp; visitors in clean/dirty areas.</li> </ul>
7.9 Appropriate PPE must be provided for all staff & visitors.	<ul style="list-style-type: none"> <li>• It is recommended that dedicated wellingtons and disposable overalls are provided for visitors.</li> </ul>
7.10 Foot dips should be provided at the entrance to all buildings and housing. All visitors and staff must use them.	<ul style="list-style-type: none"> <li>• If foot dips are outside, they must be covered to prevent dilution by rain</li> <li>• DEFRA approved disinfectant must be used.</li> <li>• Manufacturers' instructions and safety data sheets must be available.</li> <li>• They must be kept clean and the disinfectant regularly changed in line with manufacturers' instructions to maintain efficacy.</li> </ul>

8.0 Management Devices	
Standard	Guidance
8.1 The use of management device practices that do not allow birds to fully express their range of normal behaviours must not be used routinely.	<ul style="list-style-type: none"> <li>• The circumstances for use must be detailed in the veterinary health plan.</li> <li>• They must be used only as a last resort.</li> <li>• The vet must be consulted and agree to their use.</li> </ul>
8.2 Records must be kept for any outbreaks of vice in birds and reviewed as part of the review of the Veterinary Health Plan.	<p>Records must include</p> <ul style="list-style-type: none"> <li>• The location of the outbreak.</li> <li>• The number of birds involved.</li> <li>• The age of the birds involved.</li> <li>• The reasons for the outbreak.</li> <li>• Actions taken to resolve the issue.</li> <li>• Numbers of deaths, birds euthanised and treated.</li> <li>• Actions taken to prevent further outbreaks.</li> </ul>

<p>8.3 Staff must be trained and deemed competent in the use of management devices.</p>	<ul style="list-style-type: none"> <li>• Staff must be trained and deemed competent by the vet. This must be detailed in the Veterinary Health Plan and their training records.</li> </ul>
<p>8.4 Bird welfare must not be compromised by the use of devices.</p>	<ul style="list-style-type: none"> <li>• Particular care must be taken when applying and removing management devices.</li> <li>• Bird welfare must not be compromised by the speed of operation when applying the devices.</li> </ul>
<p>8.5 Any device that is designed to pierce the nasal septum is illegal and must not be used.</p>	
<p>8.6 The use of plastic spectacles fitted to prevent feather pecking and egg eating is prohibited.</p>	
<p>8.7 Anti-aggression masks or shrouds must only be used with agreement from the vet as a form of bird management.</p>	<ul style="list-style-type: none"> <li>• Written permission from the vet must be obtained before use – this must be available for inspection at any time.</li> <li>• They must only be fitted by trained and competent staff.</li> </ul>
<p>8.8 Outer primary feathers may be trimmed to restrict flight Trimming growing feathers (blood quills) is a mutilation, and illegal.</p>	<ul style="list-style-type: none"> <li>• Trimming growing feathers is ‘interference with a sensitive tissue’ and is therefore a mutilation.</li> <li>• Trimming of outer primaries must only be carried out by trained and competent staff.</li> </ul>
<p>8.9 Brailing one wing to restrict flight must only be done with extreme care. Brails must be removed before release.</p>	<ul style="list-style-type: none"> <li>• Brails should only be used in open pens.</li> <li>• Written permission from the vet must be obtained before brailing is used in closed pens.</li> <li>• Records must be kept detailing the reason for use, the location and number of birds affected, and the dates fitted and removed.</li> <li>• Brailing of birds must only be carried out by trained and competent staff.</li> </ul>

9 Medicines & Vaccines	
Standard	Guidance
<p>9.1 Medicines (including vaccines) must only be used when necessary or when prescribed by an</p>	

approved veterinary surgeon.	
9.2 Antibiotics must not be used prophylactically.	<ul style="list-style-type: none"> <li>• Antibiotics must only be administered when prescribed by a veterinarian for the treatment of a specifically diagnosed condition.</li> <li>• Antibiotics must only be administered in strict accordance with the veterinarian's prescription.</li> </ul>
9.3 Medicines and veterinary treatments must be authorised for use in the UK and used appropriately.	<ul style="list-style-type: none"> <li>• Prescription Only Medicines (POM) are prescribed by the vet.</li> <li>• General Sales Medicines (non-prescription) are used in accordance with manufacturers' or veterinary instructions.</li> <li>• Highest Priority Critically Important Antibiotics must only be used as a last resort under veterinary direction, backed up by either sensitivity or diagnostic testing. Details and justification for each use must be recorded on the BGA CIA use template together with the results of sensitivity or diagnostic testing.</li> <li>• BGA CIA use template can be found on <a href="https://www.britishgameassurance.co.uk/">https://www.britishgameassurance.co.uk/</a></li> </ul>
9.4 Staff administering medicines must be trained and deemed competent by the vet.	<ul style="list-style-type: none"> <li>• Staff training records must record this.</li> </ul>
9.5 Medicines and vaccines must be stored in an appropriate locked store in accordance with the manufacturers' instructions.	<ul style="list-style-type: none"> <li>• Particular care must be taken to ensure both vaccines and medicines are stored according to manufacturer's instructions.</li> </ul>
9.6 Medicated feed must be stored in clearly marked bags or bulk containers.	<ul style="list-style-type: none"> <li>• Signs and labels must clearly indicate 'medicated feed'.</li> <li>• Care must be taken to avoid cross contamination with non-medicated feed.</li> </ul>
9.7 Prescriptions for medicated feed must be available for inspection.	<ul style="list-style-type: none"> <li>• Medicated feedstuffs prescriptions must be kept for a minimum of 5 years.</li> </ul>
9.8 Records for all medicines purchased must be kept for a minimum of 5 years.	<p>Purchase records must include:</p> <ul style="list-style-type: none"> <li>• The date of acquisition.</li> <li>• The name of the product.</li> <li>• The batch number(s) of the product.</li> <li>• The expiry date of the product.</li> <li>• The quantity purchased.</li> <li>• The name and address of the supplier.</li> </ul>

<p>9.9 Records for all medicines administered must be kept for a minimum of 5 years.</p>	<ul style="list-style-type: none"> <li>● This includes in feed and in water medications.</li> <li>● This includes vaccines.</li> <li>● Administration records must include: <ul style="list-style-type: none"> <li>● The date of administration started and finished.</li> <li>● The name of the product.</li> <li>● The batch number(s) of the product.</li> <li>● The expiry date of the product.</li> <li>● The quantity administered.</li> <li>● The length of the withdrawal period and date of the end of the withdrawal period.</li> <li>● The identification of the animals/birds treated.</li> <li>● The name of the person administering the product.</li> <li>● The reason for treatment.</li> <li>● Treatment outcome.</li> </ul> </li> </ul>
<p>9.10 Records for disposal of medicines must be kept for a minimum of 5 years.</p>	<p>This could include medicines surplus to requirement, past their expiry date or no longer needed. Records must include:</p> <ul style="list-style-type: none"> <li>● Date of disposal.</li> <li>● Quantity of product disposed .</li> <li>● Name of product.</li> <li>● How and where disposed.</li> </ul> <p>It is illegal to sell/pass on unused medicines (or products containing medicines) to anyone else unless you are authorised to supply them.</p>

10 On Farm Casualty Killing/Slaughter (Culling)	
Standard	Guidance
<p>10.1 The killing/slaughter of birds must only be carried out by a trained and competent person</p>	<ul style="list-style-type: none"> <li>● There must always be a trained and competent person available.</li> <li>● If this is not possible the vet or a licenced slaughterman must be called in.</li> <li>● Where on farm staff are used for culling or killing birds they must be trained and deemed competent in all the methods they may use by the vet. This must be documented in the training records and Veterinary Health Plan.</li> </ul>
<p>10.2 Each farm must have provisions for the humane killing/slaughter of casualty birds without delay.</p>	
<p>10.3 Only permitted methods of culling/killing are allowed.</p>	<p>The permitted methods are:</p> <ul style="list-style-type: none"> <li>● Neck dislocation.</li> <li>● Hand-held electrical stunning, immediately followed by neck cutting.</li> </ul>

	<ul style="list-style-type: none"> <li>● Captive bolt (followed immediately by bleeding or neck dislocation).</li> </ul> <p>Equipment that crushes the neck (eg; killing pliers) must not be used.</p>
10.4 Where equipment is used for the slaughter of birds it must be maintained according to the manufacturers' guidelines and tested by trained operators to ensure that it is working effectively.	<ul style="list-style-type: none"> <li>● Testing of all equipment must be carried out at least weekly.</li> <li>● Record must be kept of the inspection, findings and any subsequent actions.</li> <li>● Equipment must be tested immediately before use.</li> </ul>
10.5 Birds must be thoroughly checked to ensure that all are dead before disposing of the carcasses.	<ul style="list-style-type: none"> <li>● Staff must be trained and deemed competent by the vet to do this.</li> </ul>
10.6 Disposal of carcasses must only be done by use of an incinerator, a National Fallen Stock Company or by means of a Registered Animal By-Products Premises.	<ul style="list-style-type: none"> <li>● Game carcasses must be disposed of before they present an infestation or health risk.</li> <li>● While awaiting disposal, they must be stored in leak proof containers, which are either locked, or stored in a locked building.</li> <li>● Incinerators must be registered and approved by the Animal and Plant Health Agency (APHA) and serviced at least annually by the manufacturer or a competent person to ensure it continues to operate correctly.</li> <li>● Ash must be either disposed of either via licenced premises, or, with a permit from the Environment Agency or SEPA can be mixed with manure and spread on agricultural .</li> <li>● Records of the use of National Fallen Stock Companies or an Approved &amp; Registered Animal By-Products Premises must be kept for at least 2 years.</li> </ul>
10.7 Daily records must be kept of the death, euthanasia and disposal of carcasses.	The cause of death or the reason for euthanasia must be recorded if known.

11 Transport of Birds	
Standard	Guidance
11.1 The transport of game birds for the purpose of an economic activity is covered by the Welfare of	

Animals (Transport) (England/Scotland/Wales) Order 2006.	
11.2 The design of the containers must ensure that there is adequate ventilation and air circulation to maintain optimal temperature within the container during transportation.	
11.3 Birds must only be moved in containers that are appropriate for the size and number of birds.	<ul style="list-style-type: none"> <li>● Transportation in sacks is not permitted.</li> <li>● Overcrowding must be avoided.</li> <li>● Maintain a thermally comfortable environment.</li> <li>● A maximum of 175cm<sup>2</sup>/kg weight (pheasant/partridge/ducks).</li> <li>● Must be secure to prevent birds from escaping.</li> </ul>
11.4 Containers must clean. In good repair, well ventilated and offer protection from the weather.	<ul style="list-style-type: none"> <li>● Containers must be thoroughly inspected, cleaned and disinfected and allowed to dry properly between each batch .</li> <li>● An appropriate DEFRA approved disinfectant must be used.</li> <li>● Records must be kept of cleaning schedules.</li> </ul>
11.5 The transporting vehicle must be fitted with appropriate equipment that ensures a controlled environment and maintain a constant internal temperature during transportation.	<ul style="list-style-type: none"> <li>● There must be a monitoring system to alert the driver of any changes to the environment and/or temperature during the journey.</li> </ul>
11.6 Contingency plans must be in place in the event of any failure of the vehicle and/or temperature control system.	<ul style="list-style-type: none"> <li>● Contingency plans must include contact numbers of relevant personnel.</li> </ul>
11.7 Procedures must be in place to minimise the risk of heat stress when transporting birds.	<ul style="list-style-type: none"> <li>● The risk of smothering is increased in hot weather.</li> <li>● Procedures could include the use of insulated barns to park a trailer during loading/unloading.</li> <li>● The use of fans systems.</li> <li>● Reduced stocking rates in the crates.</li> <li>● Sheeting or other form of protection.</li> </ul>

<p>11.8 Birds that are unfit at the time of loading must not be transported.</p>	
<p>11.9 Birds ready for transport to release pens must be inspected before transport to ensure they are fit for release before being moved.</p>	<p>The gamebirds must be:</p> <ul style="list-style-type: none"> <li>● Healthy.</li> <li>● Adapted and hardened off in respect of feather development/weather tolerance/diet/method of feeding.</li> <li>● Fit for transport.</li> </ul>
<p>11.10 The maximum journey time for all mature birds is 12 hrs.</p>	<ul style="list-style-type: none"> <li>● Care must be taken when planning a journey to ensure minimum waiting time before unloading on arrival.</li> </ul>
<p>11.11 Staff must be competent in catching and handling techniques.</p>	<ul style="list-style-type: none"> <li>● Staff are used for catching and handling birds they must be trained and deemed competent by the vet. This must be documented in the training records and Veterinary Health Plan.</li> <li>● Catching and carrying too many birds constitutes poor welfare practice.</li> </ul>
<p>11.12 Drivers must be trained and competent.</p>	<ul style="list-style-type: none"> <li>● For journeys over 65km, but less than 8hrs duration the driver must hold a Certificate of Competence for the transport of game birds on short journeys.</li> <li>● For journeys over 8hrs duration the driver must hold a Certificate of Competence for the transport of game birds on long journeys.</li> </ul>
<p>11.13 A valid transporter authorisation must be held.</p>	<ul style="list-style-type: none"> <li>● A short journey (Type 1) Authorisation must be held for journeys between 65km and 8 hrs duration.</li> <li>● A long journey (Type 2) Authorisation must be held for journeys over 8hrs duration..</li> </ul>
<p>11.14 All containers and vehicles must be thoroughly cleansed and disinfected between each load of birds.</p>	<ul style="list-style-type: none"> <li>● Appropriate DEFRA approved disinfectant must be used.</li> <li>● Records must be kept of cleaning.</li> </ul>
<p>11.15 All BGA audited Gamebird Producers must supply a completed Breeder Passport with each/every delivery.</p>	<ul style="list-style-type: none"> <li>● Copies must be kept at the producer's farm and be available for inspection .</li> </ul>

## **APPENDIX 1**

### Gamebird Legislation and Codes of Practice

This list is not exclusive, and it is the responsibility of members to be aware of, and adhere to all relevant legislation.

Avian Influenza (Preventive Measures) (England) Regulations 2006 – those keeping 50 birds or more must provide details of species of bird, husbandry system in which they are kept, the number of species usually kept, number with access to open air, details on seasonal stocking variations and nearby open water. Any changes in stocking rate by an increase or decrease of 20% or more requires notification.

- [The Avian Influenza \(H5N1 in Poultry\) \(England\) Order 2006](#)
- [The Avian Influenza \(H5N1 in Wild Birds\) \(England\) Order 2006](#)
- [The Avian Influenza \(Preventive Measures\) \(England\) Regulations 2006](#)

Animal By-Products Regulations 2005 – require various records to be kept on the disposal of animal by-products such as fallen stock and hatchery waste. In addition, game and hatchery waste in the form of surplus chicks, live unhatched birds or embryos must be disposed of in accordance with the Welfare of Animals (Slaughter or Killing) Regulations 1995 and the Animal By-Products Regulation (EC) No. 1774/2002. The Code of Practice issued by the Humane Slaughter Association also provides helpful guidance.

Mutilations (Permitted Procedures) (Amendment) (England) Regulations 2008 – pulling flight feathers from wings to restrict flight, together with wing tagging, was exempted from the general mutilations prohibition in section 5 of the Animal Welfare Act 2006 by the Mutilations (Permitted Procedures) (Amendment) (England) Regulations 2008.

Welfare of Animals (Transport) (England) Order 2006 – see Council Regulation (EC) No. 1/2005 (the protection of animals during transport and related operations) and the Welfare of Animals (Transport) (England) Order 2006 and associated guidance for information on transport.

<https://www.gov.uk/guidance/farm-animal-welfare-during-transportation>

<http://adlib.everysite.co.uk/adlib/defra/content.aspx?doc=263156&id=263157>

The Veterinary Medicines Regulations 2009 – require records to be kept on medicine usage, administration and disposal of unused medicines. Records must be kept for at least five years. Medicines and veterinary treatments must be stored and used in accordance with current legislation and codes of practice, and manufacturers' instructions should be followed. Records of all medicinal products must be maintained, and all withdrawal periods must be strictly adhered.

## **APPENDIX 2**

Code of Practice for the welfare of gamebirds reared for sporting purpose (England)

[file:///C:/Users/User/Documents/British%20Game%20Alliance/Key%20documents/Codes%20of%20best%20practice/Code%20of%20practice%20for%20the%20welfare%20of%20gamebirds%20reared%20for%20sporting%20purposes%20\(England\).pdf](file:///C:/Users/User/Documents/British%20Game%20Alliance/Key%20documents/Codes%20of%20best%20practice/Code%20of%20practice%20for%20the%20welfare%20of%20gamebirds%20reared%20for%20sporting%20purposes%20(England).pdf)

Code of Practice for the welfare of gamebirds reared for sporting purpose (Scotland)



file:///C:/Users/User/Documents/British%20Game%20Alliance/Key%20documents/Codes%20of%20best%20practice/Code%20of%20practice%20for%20the%20welfare%20of%20gamebirds%20reared%20for%20sporting%20purposes%20(Scotland).pdf

Code of Practice for the welfare of gamebirds reared for sporting purpose (Wales)

file:///C:/Users/User/Documents/British%20Game%20Alliance/Key%20documents/Codes%20of%20best%20practice/Code%20of%20practice%20for%20the%20welfare%20of%20gamebirds%20reared%20for%20sporting%20purposes%20(Wales).pdf

'Practical Slaughter of Poultry: A Guide for the Small Producer' published by the Humane Slaughter Association (HSA)

<https://www.hsa.org.uk/publications/printed-publications>

### **APPENDIX 3**

Registration as a BGA Approved Veterinary Practice

Practice or vet must:

- Register with the BGA
- Be an active member of the BVPA (British Veterinary Poultry Association)
- The Practice must attend or send a delegate to the ABN annual game bird meeting (held at Enstone each year)
- The vet must attend a one off, one day course that describes the requirements of the BGA Gamebird Producer Assurance Scheme.

### **APPENDIX 4**

BVPA Website

- <http://www.bvpa.org.uk>

## **APPENDIX 5**

### Std 1.9 - Assurance Status at sale of BGA Assured and Non Assured Eggs/Day Old Chicks/Poults

Game Farm catches up own laying birds	<ul style="list-style-type: none"> <li>• <i>If the Game Farm is <u>BGA Assured</u> the eggs/day old chicks/poults can be sold as BGA Assured.</i></li> </ul>
Game Farm buys in caught up laying birds from non BGA Assured Game Farms or Non BGA Assured Shoot	<ul style="list-style-type: none"> <li>• <i>If the Game Farm purchasing the laying birds is <u>BGA Assured</u> the eggs/day old chicks/poults can be sold as BGA Assured.</i></li> </ul>
Game Farm buys eggs to hatch from a non BGA assured source	<ul style="list-style-type: none"> <li>• <i>If the Game Farm hatching the eggs is BGA Assured then it can sell the hatched birds as BGA Assured.</i></li> <li>• <i>Members must be aware of the requirements of Std 3.4.</i></li> </ul>
Game Farm buys day old chicks from a non BGA Assured source	<ul style="list-style-type: none"> <li>• <i>If the Game Farm rearing the day old chicks is BGA Assured then it can sell the <u>reared</u> birds as BGA Assured.</i></li> <li>• <i>Members must be aware of the requirements of Std 3.4R.</i></li> </ul>
Game Farm buying in non BGA Assured poults to cover shortfalls.	<ul style="list-style-type: none"> <li>• <i>Only non assured laying birds/eggs/day olds allowed to be brought on to a BGA Assured Game farm without affecting assurance status</i></li> <li>• <i>any other birds - for example - for example - poults from non assured source brought onto a BGA Assured Game Farm, the whole farm becomes non assured.</i></li> <li>• <i>If birds sent direct to shoot from non assured source to make up order from assured game farm - whole order becomes no assured.</i></li> </ul>
GF buying in non-assured poults late season to sell on for profit.	<ul style="list-style-type: none"> <li>• <i>GF loses BGA Assurance status.</i></li> </ul>
People at all stages who trade eggs, d/o's or poults but don't produce anything themselves	<ul style="list-style-type: none"> <li>• <i>Eggs &amp; Day Old Chicks can become BGA assured as detailed above.</i></li> <li>• <i>Poults can never be sold as assured unless are from a BGA Assured game farm - in which case BGA poults passport needs to accompany them. Non assured poults can never become assured poults.</i></li> </ul>

## **GLOSSARY**

Buildings/Housing	An enclosed space that has 4 walls and a roof.
Accommodation	Anywhere that birds are kept
Batch	A group of birds that are directly linked with one operation or event or the same age