BVA, BVPA, VPHA JOINT CONSULTATION RESPONSE TO DEFRA’S DRAFT CODE OF PRACTICE FOR THE WELFARE OF LAYING HENS

1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 17,000 members. Our primary aim is to represent, support and champion the interests of the veterinary profession in this country, and we therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

2) The Veterinary Public Health Association (VPHA) is a division of BVA and is committed to the protection of the consumer and the environment as well as to the promotion of animal welfare. VPHA currently has over 300 members many of whom work as Official Veterinarians in slaughterhouses dealing with both public health and animal welfare issues.

3) The British Veterinary Poultry Association (BVPA) is an active non-territorial division of the British Veterinary Association. The objective of the BVPA is to further the knowledge of its members, who are drawn from academia, research, government, commerce and practice, by holding educational and technical meetings. The Association also offers objective science-based advice and comment on issues affecting its members and the poultry industry in general.

4) We welcome Defra’s draft Code of Practice for the Welfare of Laying Hens. We support the document in its objectives to maintain and improve animal welfare standards, present clear guidance to facilitate compliance with animal welfare legislation and promote evidence-based best practice for all those responsible for safeguarding poultry welfare.

5) Question 1: Do you agree that the new statutory code (provided in draft as part of this consultation) provides improved, up-to-date guidance to owners and keepers on how to comply with the relevant farm animal welfare legislation?

We agree that the new statutory code provides clear guidance to owners and keepers on how to comply with relevant animal welfare legislation. We welcome the code’s recommendations to seek appropriate veterinary advice where relevant and ensuring that veterinary advice is available when needed. We strongly support recommendations for owners and keepers to work collaboratively with their veterinary surgeon to produce Farm Health and Welfare plans to address the specific health and welfare needs of laying hens, as well as performing welfare outcomes assessments to assess ongoing positive or negative welfare states.
6) **Health and welfare planning**

We strongly support the recommendation at paragraph 17 that a farm health and welfare plan developed in consultation with the supervising veterinary surgeon should be implemented for each farm. This section could build on the references in the Code to the need for health records to be kept, the creation and monitoring of flock health plans, and consultation with veterinary surgeons. This section could also highlight the benefits of contributing to veterinary surveillance systems that bring together industry, vets in practice, and government to benefit poultry health and welfare by building a picture of and feeding back on disease patterns and the health and welfare landscape.

7) **Contingency planning for disease and other emergencies**

Further, in light of the Avian Influenza outbreaks of recent years, we welcome the Code of Practice’s emphasis on measures that should be put in place for contingency planning for diseases and other emergencies. We would suggest the inclusion (paragraph 32) of explicit requirements regarding legal notification of suspected notifiable avian disease, due to the substantial negative impacts that incursion of Avian Influenza or Newcastle Disease can have on the health and welfare of birds and individual flocks, as well as potential for knock-on effects in the wider poultry population. Keepers should have appropriate biosecurity and hygiene measures in place, know what to look for with regard to the first signs of likely disease, and know what action to take, including prompt consultation with a veterinary surgeon.

8) **Biosecurity**

To strengthen this section, we would suggest that at paragraph 24 a reference to assessing the cleanliness of transport lorries and crates arriving on farm to collect chickens that are no longer laying is included, as these can present a disease risk for premises.

9) **Beak trimming**

We also welcome the emphasis the document puts on highlighting the role of interventions and strategies other than beak trimming to prevent injurious pecking such as environmental enrichment, as well as the recommendation for bespoke action plans to reduce injurious pecking developed in consultation with a veterinary surgeon. BVA recognises the role of the routine beak trimming using infrared technology (as the most animal welfare friendly of methods) to prevent injurious pecking. However, as the draft Code of Practice outlines, the aim is for routine beak trimming not to be necessary and keepers should employ all possible system management strategies and interventions to reduce the risk of injurious pecking.

10) **Surplus chicks and embryos**

We support the recommendation at paragraph 109 that ‘Surplus chicks and
embryos in hatchery waste must be killed humanely by a trained and competent person and in accordance with the specific welfare at the time of killing legislation.’ We support this recommendation, however would also advise that the Code of Practice outlines the humane methods that can be used to kill surplus chicks and embryos. We recommend that the Code uses the same wording that is used in the draft Welsh Government Code of Practice for the welfare of laying hens, which reads: “Surplus chicks and embryos in hatchery waste should always be killed humanely, by a trained and competent person in accordance with the welfare at the time of killing requirements, using gas killing or purpose designed high speed maceration.” In addition, we would also advise that the Code of Practice signpost to the Humane Slaughter Association’s Code of Practice for the Disposal of Chicks in Hatcherries, which outlines in detail information about humane methods of killing and good practice.

11) Catching and handling
We support the recommendations made in the ‘Catching and handling’ chapter (paragraphs 116-124). However, we believe the code should also encompass all aspects outlined in the Humane Slaughter Association’s Poultry Catching and Handling guidance ‘General Requirements’, as well as some further considerations for inclusion:

• Water must be available to the birds right up to the point of catching and periodically available for birds waiting to be caught, depending upon the length of time of the catching operation.

• Feed should be withdrawn for no longer than 12 hours prior to slaughter, with the timing of this planned in consultation with the person who schedules processing at the plant.

• Before catching begins, the transport containers should be placed as close as possible to the group of birds being caught. This will help ensure carrying distances from the catching area to the crate or module are kept to a minimum.

• Birds must be approached quietly and calmly, in order to minimise disturbance

• To avoid herding or driving poultry, loose-housed birds can be confined by mobile catching frames before they are caught. We believe these frames would need to be designed for purpose so as not to injure birds.

• Once caught, birds must be handled with care and consideration. Bone breaks, dislocations and bruising are common injuries which can occur in the pre-slaughter period resulting in unnecessary suffering, carcase downgrading and financial loss.

• Care must be taken to avoid hitting any part of the bird against solid objects. If any bird escapes it should be re-caught immediately and as quietly as possible.
• Visibly unfit or injured birds must not be loaded into a transport container but must be killed on-farm as quickly and humanely as possible by a suitably trained person.

• Care must be taken to ensure injury does not occur to birds while pushing drawers into module frames or closing the doors of fixed crates. Module drawers must be filled from the top drawer to the bottom to avoid the possibility of injuring birds in the tray below when returning drawers to their original position. In addition to this recommendation, we believe that catching team members should also be provided with suitable lighting such as head torches to ensure that no trapping injuries occur when closing module doors.

• If birds are to be unloaded from transport containers whilst alive, the container design should allow handlers to remove birds gently and easily without pulling them across the floor of the container. Care must be taken to ensure injury does not occur when birds are removed from containers with narrow openings.

As per the Humane Slaughter Association’s guidance on Poultry Catching and Handling, we would also recommend that, in addition to the wing or by the neck, birds must not be carried by the head or the tail. Whilst we support both leg catching and this should be encouraged where possible, we recognise the practical limitations of implementation across the industry.

Further, we would strongly support the inclusion of reference to checking the condition of crates on transport lorries that come onto premises to collect spent hens as damaged crates pose a serious welfare risk to birds.

We strongly recommend that the code should require that all poultry catchers are familiar with the Humane Slaughter Association’s guidance on Poultry Catching and Handling and that they receive appropriate induction training in order to successfully apply the guidance set out by the proposed Code of Practice and the Humane Slaughter Association.

We would also welcome the inclusion of recommended measures to ensure biosecurity during catching or handling.

12) Backyard poultry

Whilst we recognise that the draft Code of Practice is predominantly intended for those keeping large numbers of poultry, it would be useful for the document to make some reference to the care of backyard poultry. This could be achieved through the provision of some basic information on how to meet the welfare needs of backyard poultry and best practice in terms of bio-security. Consideration should also be given as to how to draw these messages out of the Code and successfully target backyard poultry keepers through appropriate communications channels.
13) **Question 2:** Do you agree that the new statutory code reflects the latest scientific and veterinary knowledge?

We believe that every effort has been made to ensure that the code reflects the current state of knowledge in this area.

14) **Question 3:** In what ways do you think the new statutory code will reduce industry’s ongoing costs in complying with legislation? Can you quantify this?

Question outside of our remit as representative bodies for the veterinary profession.

15) **Question 4:** In what ways do you think the new statutory code will reduce industry’s ongoing costs in complying with legislation?

Question outside of our remit as representative bodies for the veterinary profession.

16) **Question 5:** Do you agree with the estimate of three hours for owners and keepers of laying hens to become acquainted with the content of the new statutory code?

Question outside of our remit as representative bodies for the veterinary profession.

17) **Question 7:** What do you think is the most effective way for Government to make owners and keepers of laying hens aware of the new statutory code?

The Government should work collaboratively with the professional and representative organisations of the stakeholders outlined at the start of this consultation to promote the code across their various communications channels, aiming to reach keepers and owners directly and those that work closely with these groups to ensure the high health and welfare of the laying hens under their care. Further, consideration should be given to extracting certain sections of the Code of Practice eg. recommended strategies and interventions to prevent injurious pecking and presenting this information as a quick reference resource to facilitate compliance from owners and keepers.