6 October 2017

BVA, BVPA, VPHA JOINT CONSULTATION RESPONSE TO DEFRA’S PROPOSED NEW CODE OF PRACTICE FOR THE WELFARE OF MEAT CHICKENS AND MEAT BREEDING CHICKENS

1) BVA is the national representative body for the veterinary profession in the United Kingdom and has over 16,000 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 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.

3) 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.

4) We welcome Defra’s draft Code of Practice for the Welfare of Meat Chickens and Meat Breeding Chickens. We support the document in its objectives to maintain 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 provides clear 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 ensure that veterinary advice is available when needed, particularly working collaboratively with those who keep and care for chickens to produce Farm Health and Welfare plans.

We would recommend the following small changes in wording to ensure that the value of veterinary advice is clearly articulated throughout the code and opportunities to safeguard animal welfare are seized (suggested additions are...
underlined and suggested omissions appear in square brackets):

**Paragraph 35** ‘As part of the Farm Health and Welfare Plan, keepers should establish in advance the best course of action to take should problems be identified and ensure that veterinary and other expert advice is available when needed.’

**Paragraph 60** ‘If leg disorders develop, management and husbandry practices must be immediately assessed. Any changes required should be instigated as soon as practically possible [and where appropriate] following veterinary and technical advice of the breed supplier.’

**Paragraph 64** ‘Advice on health and welfare aspects should be sought from knowledgeable advisors and veterinary professionals before any new buildings are planned or when existing buildings are modified…’

6) **Question 2. Do you agree that the new statutory code maintains animal welfare standards as set out in the existing statutory code and the interim guidance?**

**Catching and handling**

We support the recommendations made in the ‘Catching and handling’ chapter (paragraphs 18-22). 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.

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, such as a reference that captures the sentiment of Paragraph 53 in the ‘Disease and biosecurity’ chapter of the proposed code and specifically refers to those catching or handling chickens. This section reads: ‘All those in contact with birds should practise strict hygiene regarding footwear changes or disinfection and hand washing procedures, in particular when moving between each house, to limit potential introduction and spread of disease.’

7) Beak trimming

We recognise the role of routine beak trimming using infrared technology (as the most animal welfare-friendly of methods) to prevent injurious pecking. We would also recommend that the Code of Practice should highlight the role of other interventions to prevent injurious pecking such as environmental enrichment. This should be clearly outlined at Paragraph 128 (beak trimming of breeding birds) in the same way that it is outlined at Paragraph 104 (beak trimming of meat chickens):

Paragraph 104: ‘Consideration should be given to environmental enrichment as a
means of avoiding the necessity to beak trim.’

To ensure that the code is clear and unambiguous in its guidance on relevant legislation and protecting animal welfare standards, the recommendation relating to beak trimming outlined in Paragraph 128 should also be referenced in the preceding discussion of beak trimming at Paragraph 104:

Paragraph 128 ‘... This should be done before 10 days of age, preferably at day old using infra-red technology. Beak trimming of older birds should only be carried out in an emergency when advised by a veterinary surgeon.’

In addition, the Code of Practice should recognise that beak trimming equipment must be well maintained.

8) Question 3. 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.

9) 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.

10) Question 5: Do you agree that the requirement to be acquainted with a single document rather than two will assist new owners and keepers, saving them time?
    We strongly agree that the proposal to present the new code within one document will facilitate access to the code of practice for owners and keepers, and incentivise quick reference of the document at times of uncertainty. Ensuring that the code of practice for welfare is as easy to access and follow as possible will promote engagement with the code and in turn encourage compliance with animal welfare standards.

11) Question 6: Do you agree with the estimate of three hours for owners and keepers of meat chickens and meat breeding chickens to become acquainted with the content of the new statutory code?
    Question outside of our remit as representative bodies for the veterinary profession.

12) Question 7: What do you think is the most effective way for Government to make owners and keepers of meat chickens and meat breeding chickens 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 welfare of the chickens under their care.