13 August 2018

BVA SCOTTISH BRANCH, BVPA, VPHA JOINT CONSULTATION RESPONSE TO THE SCOTTISH GOVERNMENT’S DRAFT GUIDANCE ON THE WELFARE OF MEAT CHICKENS AND MEAT BREEDING CHICKENS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 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) BVA’s Scottish Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Scotland. The Branch advises BVA on the consensus view of Scottish members on Scottish and United Kingdom issues.

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) 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.

5) We welcome the Scottish Government’s draft guidance on the welfare of meat chickens and meat breeding chickens. 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.

6) General comments
We believe that this document provides clear guidance to owners and keepers on how to comply with relevant animal welfare legislation. We welcome the document’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 meat chickens, as well as performing welfare outcomes assessments to assess ongoing positive or negative welfare states.

7) Below we set out additional considerations for the Scottish Government, which have been informed by specialist veterinary input. We believe these additional considerations will work to strengthen this guidance and safeguard the health and welfare of the animals concerned.

8) Introduction
We welcome the statement at paragraph 4 that ‘No person should operate or set up a meat chicken or meat chick breeding unit unless the welfare of birds can be safeguarded to the fullest extent possible’. We would welcome the additional wording of ‘to the fullest extent possible across all points of production.’

9) Stockmanship and staffing
We strongly support the recommendation that keepers of all meat breeding birds and those handling birds in hatcheries should be appropriately trained before being given responsibility for animals. We would welcome further detail as to how the Scottish Government will ensure compliance with the recommendation set out at paragraph 14 for all keepers to have completed certain training courses or met certain training requirements in areas covered by Annex IV to Directive 2007/43/EC.

10) We would welcome the following additional wording at paragraph 10, bullet point 1: ‘Recognise whether or not the birds are in good health or not; and take appropriate actions to correct this if necessary.’

11) Catching and handling
We support the recommendations made in the ‘Catching and handling’ chapter (paragraphs 18-22). We also welcome references to relevant Humane Slaughter Association guidance in the document’s ‘Sources of further information section’. However, we believe the guidance 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 catching by both legs 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 guidance 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 draft guidance and the Humane Slaughter Association.

12) Consideration should also be given to the inclusion of reference to the fact that owner/keeper should be present during catching and handling and can stop the process if the correct procedure is not followed or catching teams are non-compliant with bio-security or welfare standards. In addition, consideration should be given to stating that it is the operation manager’s duty (at the slaughterhouse) to have an extra team on standby in such cases of non-compliance.

13) **Health and welfare planning**
We strongly support the recommendation at paragraph 34 that a health and welfare plan is developed in consultation with appropriate veterinary advice. We would recommend that the plan is regularly reviewed against performance and updated with the required corrective and preventive measures as they are identified. 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.

14) **Feed and water**
We would welcome the following additional wording at paragraph 33:

‘If the litter needs to be replaced due to excess water/humidity, the affected area/perimeter should be closed off until dry to limit bird access.’

15) **Inspection and humane culling**
In this section, consideration should be given to specifically mentioning that all stock persons should understand signs associated with effective stunning and culling, and that there should be the provision of culling training by a stockperson with appropriate experience.

16) We would welcome the following addition to the assessments included in the flock inspection outlined at paragraph 39: crop texture. Crop texture can be used as a useful management tool that would highlight problems in the crop earlier and also reflect flock performance.

17) **Disease control and biosecurity**
Further, in light of the Avian Influenza outbreaks of recent years, we welcome the emphasis on measures that should be put in place for contingency planning for diseases and other emergencies. We would suggest the inclusion 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.

18) Biosecurity
To strengthen this section, we would suggest that at paragraph 53 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.

19) Leg health
We would welcome the following additional wording at paragraph 66:
‘Lame birds must not be transported.’

20) Ventilation, temperature and heat stress
At paragraph 69, ‘carbon monoxide’ should be replaced with ‘carbon dioxide.’

21) We would welcome the following additional wording at paragraph 71:
‘Young chicks are particularly susceptible to extremes of temperature and an even distribution of the chicks in the house will usually indicate…’

22) Beak trimming and strategies to prevent injurious pecking
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. We recognise 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 guidance 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.

We would also strongly suggest that the guidance should include reference to consulting with a veterinary surgeon to develop bespoke action plans to reduce injurious pecking, as well as recognising that beak trimming equipment must be well maintained.

23) Additional ventilation requirements
At paragraph 80, ‘Evidence that the plan is meeting these operational requirements may be provided by maintaining a record of direct measurements of NH₃, CO₂, relative humidity and temperatures’ should be amended to read: ‘Evidence that the plan is meeting these operational requirements must/should be provided by maintaining a record of direct measurements of NH₃, CO₂, relative humidity and temperatures.’

24) Additional recommendation for free range systems
We would welcome the following additional wording at paragraph 113:

‘Sufficient housing should be available to the birds at all times. It may be necessary to exclude birds from the range, for example in bad weather or in the event of a compulsory housing order (Avian Influenza Protection Zone) being issued during a notifiable disease outbreak, if there is a danger that their welfare will be compromised. \textit{This should be considered when considering the number of birds placed.}’

25) \textbf{Raising awareness of welfare guidance}

The Scottish Government should work collaboratively with the professional and representative organisations of the stakeholders outlined at the start of this consultation to promote this guidance 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 standards of the laying hens under their care. Further, consideration should be given to extracting certain sections of the guidance e.g. recommended enrichment strategies and interventions to prevent injurious pecking (paragraph 97/133-134) and presenting this information as a quick reference resource to facilitate compliance from owners and keepers.