BVA, BVPA, VPHA JOINT CONSULTATION RESPONSE TO WELSH GOVERNMENT’S PROPOSED NEW CODES OF PRACTICE FOR THE WELFARE OF MEAT CHICKENS AND BREEDING CHICKENS AND 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 BVA’s Welsh Branch brings together representatives of the BVA’s territorial and specialist divisions, government, academic institutions and research organisations in Wales. The Branch advises BVA on the consensus view of the Welsh members on Welsh and United Kingdom 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) 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.

5) We welcome Welsh Government’s draft Codes of Practice and support the aims of encouraging all those who care for laying hens, or meat and breeding chickens, to adopt high standards of husbandry, and facilitate compliance with animal welfare legislation. We welcome the codes’ 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 like to see both Codes incorporate reference to the value of performing welfare outcomes assessments.

Meat chickens and breeding chickens

6) We support the proposed code and note that a number of the suggestions and recommendations we previously made to Defra in October 2017 regarding the consultation on the code of practice for the welfare of meat chickens and meat breeding chickens have been reflected in the Welsh Government draft code.
7) Catching and handling
We support the recommendations made for ‘Catching and handling chickens’ (paragraphs 14-19). 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. Although this is covered in ‘Feed and water’ (paragraph 25) it should also be mentioned here.
- 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 plan. Although this is covered in ‘Feed and water’ (paragraph 25) it should also be mentioned here.
- 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.

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.

8) Health planning
We strongly support the recommendation at para 31 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.

9) Beak trimming
We welcome the reference in the Code to the role of interventions and strategies, other than beak trimming, to prevent injurious pecking (para 59). We would like to see greater emphasis on this, with some examples of the types of enrichment that may be introduced to reduce the causes of injurious pecking and therefore reduce the need for beak trimming.

10) Contingency planning
We would suggest the inclusion (paragraph 90) 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.

11) Surplus chicks and hatchery waste
We support the recommendation at paragraph 121 that “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”. However 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 Hatcheries, which outlines in detail information about humane methods of killing and good practice. It should also be clear that any gas mixture used should be inert, and non-aversive.

12) 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:

Paragraph 60 ‘Expert advice should be sought before any buildings for housing birds are constructed or modified’ – this should also include reference to the role of the veterinary surgeon in providing advice on health and welfare aspects.

Laying hens
13) We support the proposed code but would like to see the suggestions listed above on catching and handling, health planning, beak trimming and enrichment, contingency planning, and surplus chicks and hatchery waste, incorporated here for laying hens.

14) Backyard poultry
Whilst we recognise that the draft Codes of Practice are 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 Codes and successfully target backyard poultry keepers through appropriate communications channels.