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Dear Mrs Kennedy

NEW CODE OF PRACTICE FOR THE WELFARE OF LIVESTOCK: MEAT CHICKEN AND BREEDING CHICKENS

The Scottish Government has held two separate consultations; the first on the proposed changes to legislation (Welfare of Farm Animals (Scotland) Regulations 2010). FAWC responded to this at the same time as our response was submitted to the DEFRA and Welsh Assembly Government consultations. We submitted the same detailed response document to each, including comments on a new Code of Practice for Chicken Welfare proposed by DEFRA.

The Scottish Government is now seeking views on its own proposed new welfare Code of Practice.

Bearing in mind FAWC has already submitted to the Scottish Government comments on the proposed DEFRA Codes of Practice, and looking at the proposals from the Scottish Government in its current consultation process, it is clear that the comments FAWC submitted previously have been largely incorporated. This is greatly appreciated and valued.

We also welcome steps that bring DEFRA, Welsh Assembly and Scottish Government Codes to the same end point to ensure that standards across Great Britain are consistent.

We have the following specific comments on the new Code of Practice.

Detailed comments on the proposed Scottish Code of Practice for the Welfare of Livestock: Meat Chickens and Breeding Chickens

Introduction

- We suggest introducing the term “broilers” when referencing meat chickens: this will remove any doubt and help definition especially given use of the term throughout the proposals.
- Reference to the text boxes indicates that additional welfare provisions are a legal requirement for conventionally reared meat chickens but not for other systems. FAWC believes that all chickens should be managed to the same high standards and that the Code should reflect this. It is noted that distinctions have been largely removed and so most provisions apply to all birds, and this is warmly endorsed.
- The word “can” in the last sentence of para 2 should be replaced by “should”.

Recommendations applying to all systems

Stockmanship and Staffing

Para 11. We would like to restate our preference that the Codes of Good Practice on Welfare should apply to all systems, not just “Conventionally reared,” in particular the requirement or desirability of a certificate attesting to completion of a recognised training course or equivalence.

The legal requirement applies to conventionally reared only but the objective of the Code is “to encourage all those who care for farm animals to adopt high standards of husbandry” (see Preface). We therefore suggest that the Code should emphasise that having an accredited Certificate of Training supports the need for competence and that this should be listed as a requirement at all levels. This would also be consistent with recommendations in FAWC’s Report on Stockmanship.

Feed and Water

Para 17. The implication here is that reducing growth rate via nutrient density will improve leg health and reduce ascites and SDS. This is not necessarily true as the balance of nutrients is probably more critical. As mentioned in our previous advice on this, we suggest reference to recommendations from breeders (or other informed specialists), who not only have a responsibility but a vested commercial interest to provide appropriate management support.

Para 19. Correct to “To prevent birds having to use stale or contaminated feed or water, these should be checked on a regular basis and replaced as necessary.”

Para 21. Third sentence. The requirement for day-old chicks is not clear. Provided chicks arrive at their destination within 72 hours after hatching

and the duration of travel is not more than 24 hours, then feed and water need not be provided in transit. However, if any of these parameters are exceeded then feed and water must be provided.

“Health” Is this a separate sub section? If so, underline or larger font?

See also **“Buildings and Accommodation”**, same point.

Disease Control and Slaughter/Killing on Farm

Para 35. The last sentence would be better as “Where multi-age sites are managed, a regular routine should be followed in attending to youngest flocks first through to oldest.”

Leg Health

Para 41. Typo in “lameness”

Para 44. Add “changes” before “should be carried out”

Para 45. Add “on the broiler farm” to list of sites where infections may be acquired in opening sentence.

Para 47. Does “legally fit to travel” need the term “legally”? A legal definition isn’t given or clear and is, therefore, still open to interpretation. It would be clearer to add the following to the end of the sentence: “which is a legal requirement.”

Mutilation

Para 48. The Annex of permitted mutilations is still to be added, so it is not possible to comment specifically, but addition of the list is welcomed.

Ventilation and Temperature

Para 54. The acceptable temperature range should be specified, e.g. 18 – 21°C, rather than vague comments about low and high.

Para 55. The reference to older buildings at higher stocking densities needing additional heat may be true, but the requirement is even greater at lower density in cold weather.

Lighting

Para 64. We would prefer to see an indication of the actual light intensity needed for chicks from placement at day-old for their first 7 days, and consistency with breeders. Sufficient lighting is 20 lux or more.

Stocking Density and Freedom of Movement

Para 71. Rephrase as “to ensure minimal disturbance to the birds and to their feeding and watering and to maintain biosecurity.”

Additional Recommendations for free range systems

Para 77. A supply of fresh water sufficiently far from the house to encourage birds to range is not practical and might be provided at the expense of a water system in the house itself, which should not be encouraged. This could also be interpreted as open water, which is not good because it might attract wild waterfowl with consequent infectious disease risk (AI). We suggest removal of the need for water at a distance from the house.

Record Keeping

Para 79. The Annex does not set out provisions for this so we are not able to comment. We presume this is to be added.

Additional Recommendations for Breeding Chickens

Para 81. This paragraph as written is not accurate and not entirely clear. The opening sentence should be replaced and we suggest:

“The lines which have been crossed as parent stock for breeders (to produce commercial broiler progeny) have been selected for many traits including hatchability and egg production. Broiler selection criteria include feed conversion efficiency and liveweight for age among many other characteristics. A dilemma in managing the parent breeder birds is balancing these potentially conflicting selection traits.”

Feed and Water

Para 83. The use of “quantitative” in the second half of the sentence is apparently a mistake for “qualitative.” We suggest rephrasing as “consideration should be given to exploring qualitative methods of restricting feed, for example by diluting diets”.

Para 84. Change to “may show increased drinking” and “Increasing the fibre content of the feed may increase time taken”

Para 85. The statement that there is no negative impact on subsequent egg production, weight or quality by the breeding birds should be removed. This has not been fully proven at commercial production levels using high levels of diet dilution.

Aggression and Environmental enrichment

Para 90. Alter final sentence to read: “This should improve their welfare by reducing aggression and other injurious pecking in the rearing period.”

Beak Trimming

Para 100. Delete “laser”, as this is not the commonly used term.

Buildings and Accommodation

Para 103. Replace “60 lux” with “20 lux.” Sixty lux is excessive and breeders do not have a greater need for light intensity at this stage than broilers.

We suggest adding a recommendation of dusk/dawn dimmers to help reduce aggressive behaviour when lights come on. Alternatively or in

addition, provision of windows should be considered, to supply natural light.

Genotype Selection

Para 110 The claims on dwarf heavy broiler genotypes and ad-lib feeding and better performance are inaccurate. We suggest the following replacement paragraph.

“Producers should consider genotype carefully with regard to welfare and productivity of both the parent stock and broiler progeny. This particularly applies to integrated producer operations where both generations are managed. Dwarf strains or slower growing strains are examples of options at breeder level which may reduce relative levels of feed restriction during rearing”.

Yours sincerely

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