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To [Animalwelfareconsultations@defra.gsi.gov.uk](mailto:Animalwelfareconsultations@defra.gsi.gov.uk)  
Subject Consultation on beak trimming of laying hens

To Emma Jones  
On-farm Animal Welfare Team  
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31 March 2010

Dear Emma

I would like to respond to Defra's "Consultation on an amendment to The Mutilations (Permitted Procedures) (England) Regulations 2007" on behalf of the Farm Animal Welfare Council.

**Q1. Do you consider the Government's approach of postponing the ban on beak trimming and permitting routine beak trimming using infra-red technology only to be the most sensible and pragmatic approach to adopt?**

Yes. As we indicated in our letter of 8 September 2009 to the Minister, we cannot yet be confident that birds can be managed without beak trimming in British conditions, without the risk of severe outbreaks of feather pecking and cannibalism. This is especially so, as those British producers currently using conventional cages (in which injurious pecking is less likely) will have to stop doing so by the end of 2011. Banning beak trimming now would therefore almost certainly cause worse welfare problems than those of beak trimming. While beak trimming continues to be necessary, infra-red technology is preferable to alternatives, as it is better for welfare.

**Q2. Do you agree with the Government's approach of not setting a specific date for a review of the deferment of the ban on beak trimming laying hens until after the conventional cage ban in 2012 and until results of further research are known?**

No. We do not believe it is possible to set a realistic, new date for the ban at this stage. However, we note with approval the statement that "The Government's long-term goal is to ban routine beak trimming." Achieving this will take considerable effort and focus, and, in the absence of a target date for the ban, that focus can best be provided by a target date at which progress will be reviewed. We previously proposed a review in 2015, because that will be three years after the ban on conventional cages in 2012, so by then producers will have experience of a reasonable number of flocks (three) in their new husbandry systems.

We also note that Defra may “decide it is appropriate to carry out a review earlier than 2015.” On that basis, **we now recommend that deferment of the beak trimming ban should be reviewed in 2015 or earlier.**

As you know, we have also again urged reconvening of the Beak Trimming Action Group with immediate effect, to organise the effort required and develop a strategy to achieve a ban on beak trimming, including reviewing the results of the Bristol research as they become available. There was considerable support for this at the Beak Trimming Core Stakeholder Group meeting convened by Defra on 1 March 2010.

**Q3. Do you agree that the suggested costs and benefits set out in the Impact Assessment at Annex A are a reasonable estimate of the likely costs and benefits?**

**If not, can you provide evidence of what any likely costs and benefits should be?**

First we wish to commend the consideration of costs and benefits to the birds concerned, in terms of mortality and animal welfare, in addition to those accruing to humans.

In terms of financial costs, there will be some increases in costs that you have not included, but these are likely to be offset by increased benefits, so there will probably be little if any net effect.

Costs of infra-red technology that you have not covered include training of staff, installation cost and maintenance (including cleaning) of the equipment. This highly technical machinery needs greater input in terms of labour cost compared to hot blade equipment (on an ongoing basis) and each device carries a cost of installation in the hatchery (hydraulic air, electrical supply and telephone connection) not usually covered by lease agreements.

However, FAWC has previously stated that infra-red beak treatment has welfare advantages of (i) absence of an open wound with potential reduction in secondary bacterial infection and (ii) greater consistency of application (less over/ under trimming). It is likely that reduced infection and consistency of application of treatment will realise cost benefits from reduction in mortality and morbidity – extra egg production, reduced carcass disposal costs, etc. While it is not currently possible to quantify such benefits, it is likely that the net financial impact of the change in technology will be negligible.

In conclusion, the Impact Assessment is a reasonable analysis of the situation in terms of major costs and benefits.

**Q4. Do you have any comments on the draft Statutory Instrument attached at Annex B?**

1. We suggest altering the title to “The Mutilations (Permitted Procedures) (Amendment on beak trimming of poultry) Regulations 2010,” to clarify the content.

2. In the new version of paragraph 5 of Schedule 4, sub-paragraph (d), delete “(b) and (c)” and substitute “(c) (ii) and (c) (iii)” to read:

- (d) Sub-paragraphs (c) (ii) and (c) (iii) do not apply where the procedure is carried out in an emergency in order to control an outbreak of feather pecking or cannibalism.

**Explanation:** all the following should still apply in an emergency, and retaining the requirement for these will not hamper emergency measures.

- (b) no more than one third of the beak should be removed,
- (c) (i) beak trimming should only be carried out to prevent injurious pecking, and
- (c) (iv) staff should be competent.

**Q5. Do you have any comments on the draft guidance attached at Annex C? Is it clear and easily understandable?**

**Is there any other information/advice that you consider should be included?**

1. Concerning paragraph 4, second bold entry, we understand that it may not be permitted to refer to external websites or documents in this form (as Defra has no control over whether they are subsequently altered). We therefore recommend including the relevant information from those sources, which is helpful, at full length within this Guidance Note, or as appendices.
2. Concerning paragraph 4, third bold entry, delete “may only remove not more than one third” and substitute “may not remove more than one third” as this wording is clearer.

Yours sincerely

Michael Appleby  
Chair, Pigs Poultry and Fish Standing Committee