



ANIMAL CONCERN

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Wednesday, 14 September 2005

Ms Pam Kennedy,
Environment and Rural Affairs Department,
The Scottish Executive,
Room 350,
Pentland House,
47 Robb's Loan,
EDINBURGH EH14 1TY

CONSULTATION ON PROPOSAL FOR A COUNCIL DIRECTIVE
ON THE WELFARE OF CHICKENS KEPT FOR MEAT PRODUCTION

Dear Ms Kennedy,

Thank you for the somewhat belated invitation to take part in the above consultation. I trust we will be included in the original consultee lists for future animal welfare related consultations.

It should be noted that Animal Concern would like to see all intensive livestock farming phased out. However we realise that is unlikely to become a reality in the near future and therefore it is vital that all livestock farming is controlled by legislation aimed at providing animals with at least minimum welfare standards.

We are concerned that the proposals make much of any extra time and expense which may be caused to broiler producers by the implementation of even very minimal welfare standards. If producers cannot swallow the increased overheads then they must be passed on to the consumer – animal welfare should not be dictated by the ridiculously low profit margins imposed by the mass purchasing power of supermarkets.

We would like to respond to the specific questions in the covering letter from Allan McFarlane.

1: I'm not 100% sure of the difference between a Directive or Regulation (perhaps this could have been more clearly defined) but I would hope that any welfare standards would be encapsulated in enforceable legislation and not in any form of code of conduct or non enforceable voluntary measure.

2: It is widely recognised that stocking density is a vital component in the welfare of intensively farmed animals and we would like to see maximum stocking densities of 20 to 25 kilos liveweight per square metre.

3: We would prefer a lighting regime to reflect natural daylight instead of artificial lengthening of the day to encourage birds to put on weight faster.

4 and 5: I know a little about monitoring of carcasses at chicken slaughter houses having once gone to Wiltshire to apply for the post of poultry meat inspector with the local council. As a Chippenham Chunky Chicken Checker I was expected to insert two fingers in the body cavity of a plucked, very recently deceased chicken. You could not

be certain the bird was dead as most chickens try to peck themselves free from the overhead conveyer belt and miss the electric stun bath and the slaughtering and eviscerating knives and have to be killed and beheaded by employees sitting on a high bar stool and armed with razor sharp knives.

In addition to looking inside the body cavity to check for any sign of disease or contamination it was also the job of the poultry meat inspector to exercise quality control and remove obviously deformed chickens such as those with severe bruising, broken limbs or a third leg growing from the Parson's Nose. Removed diseased chickens were sent for pet food while mutated or damaged birds went for portioning, pies, pastes or soup where appearance was unimportant.

As a Chippenham Chunky Chicken Checker I was expected to inspect a carcass every 1.5 seconds. It is obvious by the number of broiler carcasses on sale with hock burns and other signs of injury that the current poultry checking regime only removes the most severely damaged birds from the system. Under the current regime you cannot rely on slaughterhouse inspection as a monitor of broiler chicken welfare – the inspectors barely have enough time to ensure birds unfit for human consumption are taken off the conveyor.

I would suggest that Council employed poultry meat inspectors not be compelled to fit in with the speed of the chicken slaughter process and that the production line is either slowed down or additional inspectors employed to give a check time of at least 3 seconds per bird. Given closer inspection it should be possible to identify and remove birds with lesser injuries such as hock burns. Once taken off the conveyor and before being sent for processing, details of removed carcasses could be recorded to give an accurate number for those suffering from injuries indicative of poor welfare conditions on the farm. If high injury levels (say more than 2.5% of birds slaughtered) are found the inspector could order that the carcasses be retained and checked by a Council employed veterinary officer and/or that the production unit be subject to a full welfare inspection.

In addition to slaughterhouse inspection all packaging should carry a means of identifying the farm of origin. That way consumers can also act as inspectors by reporting any damaged or injured birds purchased.

There will of course be cost implications for local authorities given the statutory duty to monitor and enforce any new welfare legislation. I have grave doubts that local authorities have the resources to properly police current animal welfare legislation far less cope with the demands of new laws. Indeed the number of farm animal welfare prosecutions brought by the Scottish SPCA show that farm animal welfare in Scotland relies on a charity which should be protecting animals which are outside the remit of any of the existing official bodies instead of doing the work of local or central governmental agencies.

To reduce costs and increase the effectiveness of local authority animal welfare inspectors we recommend that this proposed new legislation include a requirement for all broiler chicken producers to install webcams or internet connected CCTV systems in all their chicken rearing units. These cameras would allow inspectors to “visit” dozens of farms a day instead of, at best, a dozen farms in a month. Monitoring livestock farms via the internet would give inspectors instant access to the livestock and allow them to determine what farms required site visits and advice or assistance in meeting welfare standards.

There is no doubt that simply knowing they are being monitored would encourage farmers to meet their legal obligations to the welfare of their stock. The system would also give farmers added security and an additional aid in caring for their animals. Such systems can be security coded to allow access only to permitted persons but farmers who meet welfare and hygiene standards may want to allow public access as a means of increasing consumer confidence in the product.

Ideally a legal requirement to provide webcam/CCTV remote monitoring should be extended to all livestock producers.

Yours sincerely,



John F Robins,
Campaigns Consultant