



FVE comments on the Proposal for a COUNCIL DIRECTIVE laying down minimum rules for the protection of chickens kept for meat production COM (2005) 221 final

Introduction

Members

Austria
Belgium
Bosnia-Herzegovina
Bulgaria
Croatia
Cyprus
Czech Republic
Denmark
Estonia
Finland
France
FYROM
Germany
Greece
Hungary
Iceland
Ireland
Italy
Latvia
Lithuania
Luxembourg
Malta
Netherlands
Norway
Poland
Portugal
Romania
Serbia/Montenegro
Slovak Republic
Slovenia
Spain
Sweden
Switzerland
Turkey
United Kingdom

Sections

UEVP-
Practitioners
EASVO-
State Officers
UEVH-
Hygienists

What is FVE?

This year (2005) the Federation of Veterinarians of Europe (FVE), founded in 1975, celebrates its 30th anniversary. Today, we represent 40 national veterinary organizations across 35 European countries and three vibrant Sections, each of which speaks up for key groups within our profession: Practitioners (UEVP), Hygienists (UEVH), and Veterinary State Officers (EASVO).

FVE represents approximately 175,000 veterinarians throughout Europe.

This paper is drafted by an international, ad hoc FVE working group of veterinary experts in the field of health and welfare of broilers.

General Remarks

FVE, who has been demanding party for legislation covering the welfare of broilers for a very long time, warmly welcomes this proposal. Approximately 5 billion broilers are slaughtered annually in the European Union, a higher number than any other livestock sector in the EU, thus the potential impact of this proposal is huge. Consumers indicated in the recent Eurobarometer¹ study regarding the “attitudes of consumers towards the welfare of farmed animals” that, according to them broilers together with laying hens are the farm animals whose welfare should be improved the most.

FVE congratulates the Commission for already taking into account several important comments FVE made during the consultation phase, but would still like the EU legislators to consider the following important reflections.

The outline of a Directive laying down minimum standards for the protection of broilers COM (2005) 221 final is used as a reference for drafting this position paper. Numbers of articles et cetera refer to the numbers used in this outline.

This position paper can also be found on the FVE website: <http://www.fve.org> → papers → animal welfare → broilers.

President

Tjeerd Jorna

Vice-Presidents

Seán O Laoide
Gundega Micule
John Williams
Walter Winding

¹ http://europa.eu.int/comm/public_opinion/archives/ebs/ebs_229_en.pdf

Comments

Article 1 Subject matter and scope

Under point (a) of Article 1 it is stated that “This directive shall not apply to: establishments with less than 100 chickens”

FVE feels that instead of this it should say “establishments with less than 100 broilers at any moment”

The reason behind this comment is that the number of broilers in an establishment may be temporarily less than 100 chickens at any given instant; nonetheless these establishments should fall within the scope of this Directive.

COM(2005)221 final	FVE’s proposal
Article 1 (a)	Article 1 (a)
“establishments with less than 100 chickens”	“establishments with less than 100 broilers at any moment ”

Under point (b) of Article 1 it is also stated that “This directive shall not apply to: establishments with breeding stocks of chickens”. While FVE recognises that the Commission acknowledges the fact that genetics of breeding stock birds play a paramount factor in welfare problems of broiler chickens and that they intend to further explore this area, FVE hopes that the Commission recognises that breeding stock – and hatcheries - have also a separate set of welfare problems which need to be addressed in the legislation. Thus FVE hopes to welcome future legislation from the Commission regarding these two issues.

Article 3 Requirements for the keeping of chickens

FVE can agree with the maximum stocking density of 30 kilograms live weight per square meter and also supports the idea that an establishment or unit(s) of establishment wishing to fulfil higher welfare requirements can be granted to stock up to 38 kg/lm2 when fulfilling the requirements of Annex II and after being authorised by the competent authority.

FVE recognises that stocking density has an essential influence on the welfare of broilers, especially when housing and management are sub-optimal. Nevertheless, stocking density, is not the solely important factor which was also said in a study performed by M. S. Dawkins *et al*² and published in Nature. The researchers found that other environmental factors such as temperature, humidity, litter and air quality, may – in some situations - have more impact on welfare than stocking density itself. They concluded that: “...although very high stocking densities do affect chicken welfare, stocking density *per se* is, within limits, less important than other factors in the birds’ environment...”.

As 38kg/m2 is already a lot higher than the 30kg/m2 limit in the SCAWAH report³ “... stocking density must be 25kg/m2 or lower for major welfare problems to be avoided and that above 30/kg/m2, even with very good environmental control systems, there is a steep rise in the frequency of serious problems.”, FVE feels there is no room for further compromises upwards.

² Dawkins, M.S., Donnelly, C.A. & Jones, T.A. Chicken welfare is influenced more by housing conditions than by stocking density. *Nature* **427**, 342 – 344 (2004).

³ http://europa.eu.int/comm/food/fs/sc/scah/out39_en.pdf

Article 4
Training and guidance for persons dealing with chickens

FVE supports the idea that people involved in the attendance of the chickens receive appropriate training and are issued with a certificate to confirm this. However, the phrasing of the article implies that the owner or keeper of chickens may have this requirement waived if they have prior appropriate experience. FVE does not agree with this. While FVE recognises that experience is an important aspect of gaining knowledge on animal issues we think it is of great importance that the owner or keeper of the certificate also carries out an appropriate examination or at least follows the course to prove that he or she has an adequate working knowledge of the subject.

Article 5
Labelling of chicken meat

FVE welcomes this Article. Labelling of chicken meat and chicken meat products and preparations based in compliance with animal welfare standards can have potentially a positive effect for the welfare of chickens.

Article 6
Submission of data by Member States and subsequent report by the Commission to the European Parliament and to the Council

While FVE welcomes this “report concerning the influence of genetic parameters on identified deficiencies resulting in poor welfare of chickens” and the “appropriate legislative proposals”, FVE thinks the time periods proposed in the Directive are much too long and FVE believes there should not be a question about whether or not legislation is necessary as several scientific publications already indicated that the birds’ health and welfare is being affected by genetics e.g. SCAWAH report. FVE does not see the necessity to wait until the Commission has made a report from the data received from Member States regarding mortality and food path dermatitis to propose legislative actions when it has been already very clear for a long time that genetic parameters play a very important role in the welfare problems now seen in broilers. FVE hopes that there will definitely be new legislation not only on this issue but also on the welfare problems of the breeding stock birds themselves.

COM(2005)221 final	FVE’s proposal
Article 6	Article 6
<p>1. <i>Not later than five years from the date of adoption of this Directive, Member States shall submit to the Commission a summary of the data collected as provided for in points 1 and 2 of Annex IV.</i></p> <p><i>Based on that data and on a scientific opinion of the European Food Safety Authority, the Commission shall submit to the European Parliament and to the Council a report concerning the influence of genetic parameters on identified deficiencies resulting in poor welfare of chickens. That</i></p>	<p>1. <i>Not later than three years from the date of adoption of this Directive, Member States shall submit to the Commission a summary of the data collected as provided for in points 1 and 2 of Annex IV. The format of the data to be submitted shall be determined by the Commission within one years from the date of adoption of this Directive in accordance with the procedure referred to in Article 9.</i></p> <p>2. <i>Not later than four years from the date of adoption of this Directive, the Commission shall submit to the European Parliament and to the</i></p>

<p><i>report shall be accompanied by appropriate legislative proposals, if necessary.</i></p> <p>2. <i>The format of the data to be submitted, as provided for in paragraph 1, shall be determined by the Commission within two years from the date of adoption of this Directive in accordance with the procedure referred to in Article 9.</i></p>	<p><i>Council a report concerning the influence of genetic parameters on identified deficiencies resulting in poor welfare of chickens. That report shall be accompanied by appropriate legislative proposal.</i></p>
--	---

The rest of the Articles that is, Articles 7, 8, 9, 10 and 11 are about penalties, implementing powers, Committee procedure, transposition, and entry into force respectively. FVE has no comment on these Articles nor on Article 12.

ANNEX I

REQUIREMENTS APPLICABLE TO ALL ESTABLISHMENTS

Feeding

The Directive requires feed to be continuously available, however several scientific studies have illustrated that meal feeding can be equally beneficial and thus shall also be acceptable according to the Directive.

COM(2005)221 final	FVE's proposal
Annex I Feeding	Annex I Feeding
<i>"Feed shall be continuously available and must not ..."</i>	<i>"Feed shall be either continuously available or be meal fed and must not..."</i>

Litter

(See also ventilation)

In order to prevent outbreaks of contagious diseases that may cause welfare problems to the birds, such as respiratory diseases, Avian Influenza⁴ and Newcastle disease⁵, the level of biosecurity on broiler farms should be high. After a building is depopulated all litter must be removed, the establishment appropriately sanitised (cleaned and disinfected) and provided with clean litter before new birds arrive.

COM(2005)221 final	FVE's proposal
Annex I Litter	Annex I Litter
	Add extra sentence <i>"After a building is depopulated all litter must be removed, the establishment appropriately sanitised (that is, cleaned and disinfected) and new birds should be provided with clean litter."</i>

Ventilation and heating

Many welfare problems in poultry are caused by deterioration of litter and air quality, especially at high stocking densities where the litter may easily become wet. Moisture, in conjunction with high temperature, promotes bacterial growth, which will decompose organic material, and produce ammonia. Ammonia and wet litter combined are responsible for many welfare problems, such as contact dermatitis, infectious and respiratory diseases and ascites⁶. To eliminate these problems it is recommended that ammonia levels should under all conditions be kept below 20 ppm.. Birds stocked at a lower stocking density should not be penalised by having to suffer higher NH₃ levels than birds stocked at a higher stocking density. Ventilation should be sufficient to remove moisture and avoid overheating.

This is now a part of Annex II but it should be included in Annex I.

⁴ Avian Influenza: http://www.oie.int/eng/AVIAN_INFLUENZA/Disease%20card.pdf

⁵ Newcastle disease: http://www.oie.int/eng/maladies/fiches/a_A160.htm

⁶ Estevez, Inma, Addressing poultry welfare: proactive strategies and voluntary regulations. Multi-state poultry Meeting May 2003.

COM(2005)221 final	FVE's proposal
Annex I Ventilation and heating	Annex I Ventilation and heating
	Remove point 3 from ANNEX II to ANNEX I <i>“The owner or keeper shall ensure that each unit of an establishment is equipped with ventilation, heating and cooling systems designed, constructed and operated in such a way that the concentration of NH3 does not exceed 20 ppm ..</i>

Light

FVE shares the opinion that broiler houses shall have light with an intensity of at least 20 lux during the light periods, measured at bird eye level and evenly distributed within the accommodation. However, every day while it is dark there has to be an uninterrupted period of at least 6 hours without artificial illumination. Exceptions should only be allowed by the competent authorities on the grounds of a veterinary indication and for welfare reasons. Eight hours of darkness is no better than 6 hours, on the contrary, it will lead to poorer litter quality and more skin problems. In addition, 8 hours of darkness will not be possible all the time in open stables during summertime.

COM(2005)221 final	FVE's proposal
Annex I Lighting	Annex I Lighting
<i>“Within three days from the time when the chickens are placed in the building and until three days before the foreseen time of slaughter, the light must follow a 24-hour rhythm and include periods of darkness lasting at least 8 hours in total, with at least one uninterrupted period of darkness of at least 4 hours.”</i>	<i>“Within three days from the time when the chickens are placed in the building and until three days before the foreseen time of slaughter, the light must follow a 24-hour rhythm and include periods of darkness lasting at least 6 hours in total, with at least one uninterrupted period of darkness of at least 4 hours.”</i>

Inspection

FVE agrees with points 8 and 9 on inspection but would like to add that during the inspection special attention should be paid to symptoms that can indicate a reduced level of animal welfare (including animal health). In case the owner or keeper of the broilers observes an increasing number of animals suffering from either a known or an unknown condition, which may affect other animals (e.g. infectious diseases) he or she should consult a veterinarian as soon as possible.

COM(2005)221 final	FVE's proposal
Annex I Inspection	Annex I Inspection
<i>“All chickens kept on the establishment must be inspected at least twice a day.”</i>	<i>“All chickens kept on the establishment must be inspected at least twice a day. Special attention should be paid to symptoms indicating a reduced level of animal welfare (including animal health) A veterinary surgeon should be contacted, whenever necessary.”</i>

Monitoring

The welfare of the animals should be monitored by official veterinary controls and/or as an integrated part of the monitoring controls already in place. When deficiencies are found, the official veterinarian shall request a report from the operator of the holding and the veterinary practitioner of the farm.

The farms must be subject to a annual welfare inspection, combined with other official inspections in place. It must be guaranteed that the assessment of animal welfare is independent and carried out by inspectors trained for this purpose.

COM(2005)221 final	FVE's proposal
Annex I	Annex I add Monitoring
	<i>“The welfare of the animals should be monitored by official veterinary controls or/and as an integrated part of the monitoring controls already in place. When deficiencies are found, the official veterinarian shall request a report from the operator of the holding and the veterinary practitioner of the farm.”</i>

Cleaning

In order to prevent outbreaks of contagious diseases that may cause welfare problems to the birds, such as respiratory diseases, Avian Influenza and Newcastle disease, the level of biosecurity on broiler farms should be high. To enhance a thorough cleaning and disinfection of the broiler houses, FVE strongly recommends “all in all out” systems. Between each two consecutive groups of broilers, every site should, after the litter has been discarded and the house has been sanitised, be a number of days without broilers.

COM(2005)221 final	FVE's proposal
Annex I Cleaning	Annex I Cleaning
	Add sentence: <i>“All in/all out systems with sanitation of the unit between consecutive groups are strongly recommendable.”</i>

Surgical Interventions

Beak trimming has already been banned in some countries and is being phased out in others. Before using this painful procedure, other measures to reduce feather pecking and cannibalism should be examined such as environmental enrichment, nutritional and lighting strategies, or the use of fitted devices⁷. FVE is very much opposed to the castration of male broilers as there is no justification for national authorities to authorise this, neither from a veterinary perspective nor from an animal welfare perspective.

COM(2005)221 final	FVE's proposal
Annex I Surgical interventions	Annex I Cleaning
12. All surgical interventions carried out for reasons other than therapeutic or diagnostic purposes which result in damage	12. All surgical interventions carried out for reasons other than therapeutic or diagnostic purposes which result in damage to or the loss of a sensitive

⁷ For more information see Book Poultry Welfare Issues: Beak Trimming edited by PG Glatz published by Blackwell <http://store.blackwell-professional.com/1904761208.html>

<p>to or the loss of a sensitive part of the body or the alteration of bone structure shall be prohibited.</p> <p>However, in order to prevent feather pecking and cannibalism, the Member States may authorise beak trimming provided it is carried out by qualified staff on chickens that are less than 10 days old. In addition, Member States may authorise the castration of male chickens. The castration shall only be carried out under veterinary supervision by personnel who have received a specific training authorised by the competent authority.</p>	<p>part of the body or the alteration of bone structure shall be prohibited.</p> <p><i>Beak trimming should only be allowed by Member States when all other measures to prevent feather pecking and cannibalism are exhausted, and only after consultation and on the advice of a veterinarian and carried out by qualified staff on chickens that are less than 10 days old.</i></p> <p><i>delete</i></p>
---	---

Good Management Practices

Establishments are strongly encouraged to develop a Good Management Practice and self-evaluate themselves according to this GMP. It should cover common broiler welfare guidelines such as descriptions of stocking density, the “all in all out” procedure, cleaning-disinfection procedures, etc. This self-evaluation plan should be easy to check by the veterinary inspector who supervises/inspects the farm. GMP will be able to complement official controls but never to replace them.

COM(2005)221 final	FVE’s proposal
Annex I	Annex I extra Good Management Practice
	Add sentence: “Establishments are strongly encouraged to develop a Good Management Practice and self-evaluate themselves according to this GMP.”

ANNEX II

REQUIREMENTS FOR THE USE OF HIGHER STOCKING DENSITIES

Notification and documentation

According to point number 1 “The owner or keeper shall notify the competent authority of their intention to use a stocking density of more than 30 kilogram’s live weight”. FVE agrees with this, however, it then says that “the notification shall be endorsed by the veterinarian attending the establishment”, FVE does not agree with this, it may be more prudent for the establishment to employ an independent veterinarian to do this, to minimise the likelihood of a conflict of interest.

COM(2005)221 final Annex II	FVE’s proposal Annex I extra Good Management Practice
<p>The owner or keeper shall notify to the competent authority their intention to use a stocking density of more than 30 kilogrammes liveweight.</p> <p>That notification shall be accompanied by a document summarising the information contained in the documentation required under point 2. The notification shall be endorsed by the veterinarian attending the establishment</p>	<p>The owner or keeper shall notify to the competent authority their intention to use a stocking density of more than 30 kilogrammes liveweight.</p> <p>That notification shall be accompanied by a document summarising the information contained in the documentation required under point 2. The notification shall be endorsed by an independent veterinarian</p>

Requirements for the establishments and the personnel

As already mentioned before, the requirement that the NH₃ concentration will not exceed 20 ppm should be part of Annex 1 and applicable to all establishments covered by this Directive.

ANNEX III

INSPECTIONS AND FOLLOW-UP OF DEFICIENCIES IN THE ESTABLISHMENT IN CASE OF THE USE OF HIGHER STOCKING DENSITIES

FVE welcomes the decision to implement inspections of establishments or units of establishments that wish to avail of higher stocking densities, however, there are some items that FVE thinks should be changed. Under point number 1 FVE is of the opinion that the competent authority should carry out the inspections on a more regular basis, that Annex III should include a protocol for this, for example, it would seem reasonable if it was stipulated in this Annex that these inspections must be carried out at least once a year as well as when the competent authority “receives a notification under point 3 of Annex IV indicating a severe deficiency or a deficiency which already had been the subject of a previous notification”.

FVE would like to point out that annual inspections should be carried out on all broiler establishments or unit(s) of establishments and not just those seeking to have or having higher stocking densities.

COM(2005)221 final Annex III	FVE’s proposal Annex III
1. The competent authority shall carry out inspections to verify: (a) ..	<i>1. The competent authority shall carry out in all broiler establishments (lower and higher stocking density) at least one yearly inspection to verify: (a) ..</i>

As for the second paragraph of point number 2 of Annex III, that is, the “procedure in case of non-compliance”, FVE feels that careful attention should be given to the interpretation of the following statement, “the competent authority may order the reduction of the maximum stocking density for the establishment or units of establishments concerned to an extent to correct the deficiencies. The competent authority shall inform the owner or keeper of the decision taken, and in particular of the moment from when the reduction in stocking densities shall take effect”. While this is a good way to prevent future suffering (with reducing the stocking density of the following stock), there also has to be a way of dealing with acute suffering.

The third point stipulates conditions whereby the owner or keeper may apply to increase the stocking limit again after resolving the case of prior non-compliance. It says that the competent authority shall decide whether or not this may occur, however, while FVE agrees with this, it is also of the opinion that the competent authority should send an independent veterinarian acting on behalf of the competent authority or a veterinarian from the competent authority itself making sure that the on-farm veterinarian doesn’t become a “hostage” of the producer.

COM(2005)221 final Annex III	FVE’s proposal Annex III
The owner or keeper of the establishment may request a revision of the order of reduction of maximum stocking densities as ref to in point 2 provided that (a) the two previous flocks complied with	The owner or keeper of the establishment may request a revision of the order of reduction of maximum stocking densities as ref to in point 2 provided that (a) the two previous flocks complied with the limits

the limits set out in point 3 of Annex IV; and	set out in point 3 of Annex IV; and
(b) the veterinarian attending the establishment has given a favourable opinion on the request.	(b) an independent veterinarian attending the establishment has given a favourable opinion on the request.

ANNEX IV

MONITORING AND FOLLOW-UP AT THE SLAUGHTERHOUSE

Point 2 states that “the official veterinarian shall evaluate the results of the post-mortem inspection to identify other possible indications of poor welfare conditions in the establishment or the unit of the establishment of origin”. Then under point number 3 it is stated that the official veterinarian shall notify various different people. However, it does not say what will happen as a result of this. Presumably there will be inspections on the establishments or units of establishments.

FVE would also like to point out that while we commend this “monitoring and follow-up at the slaughterhouse”, an action needs to be taken prior to this, in other words, it would be advisable to take action while the birds are still alive as nothing can be done for their welfare if they are already dead.

To guarantee uniformity within the EU, the detailed rules for a scoring system must be introduced by writing down proper descriptions with photographs as examples of “typical” lesions for the different levels, in order to standardize the classifications all over Europe.

COM(2005)221 final Annex IV	FVE’s proposal Annex IV
4. The score of food pad dermatitis shall be established in accordance with this point. One foot from each bird shall be checked and each categorised into three groups: Group 0: no foot pad lesions; Group 1: minor foot pad lesions Group 2: severe foot pad lesions	4. The score of food pad dermatitis shall be established in accordance with this point. One foot from each bird shall be checked and each categorised into three groups: Group 0: no foot pad lesions; Group 1: minor foot pad lesions Group 2: severe foot pad lesions <i>Detailed written descriptions, added with photographs of lesions in group 0, 1 and 2 shall be laid down by the European Commission in order to standardize the classifications all over Europe.</i>

ANNEX V

TRAINING

(as referred to in Article 4(2))

The view of FVE on “training” has already been stated above.