



25 August 2009

Jim Fitzpatrick MP
Minister of State
Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR

Dear Minister,

Transposition of EU Broiler Directive into English law

Compassion in World Farming, the RSPCA and the World Society for the Protection of Animals, together with Mike Hancock MP who tabled EDM 581 are writing to urge you to set high standards of animal welfare in the Regulations that transpose the EU Broiler Directive into English law.

The draft Regulations proposed by Defra will do little to improve the welfare of meat chickens (broilers); indeed, they permit broilers to continue to be farmed in conditions that fail to meet many of their basic needs.

We hope you will respond to the concerns of the many MPs and members of the public who have made clear their belief that broilers should be reared to much higher welfare standards.

EDM 581, tabled by Mike Hancock, is among the top EDMs to be tabled during this current Parliamentary session. Over 260 MPs have signed the EDM which calls on the Government to make it a requirement for all chicken producers to meet the conditions of the RSPCA's *Freedom Food* scheme. On its website Defra reports that it has received around 30,000 emails from people who are concerned about the stocking density for broilers.

We particularly urge you to address the following points in the Regulations:

Stocking density

The Directive sets a maximum density of 33 kg/m² but, by way of derogation, permits Member States to allow the keeping of broilers up to a maximum of 39 kg/m² provided that a number of welfare conditions are met. By way of further derogation, Member States may allow broilers to be kept up to a maximum of 42 kg/m² if certain further criteria are fulfilled.

We believe that Defra should not permit producers to go beyond the Directive's initial maximum of 33 kg/m²; this is broadly in line with Defra's Code which recommends a maximum of 34 kg/m² and indeed higher than the maximum recommended by the EU Scientific Committee on Animal Health and Animal Welfare which concluded that "above 30 kg/m², *even with very good environmental control systems*, there is a steep rise in the frequency of serious problems".

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We particularly urge Defra not to permit a maximum of 42 kg/m². Scientific research shows that such high densities are damaging to welfare. Dawkins and others (2004) compared stocking densities of 42 kg/m² and higher with lower densities, and reported poorer gait scores, more jostling and slower growth rates at the higher stocking densities. Most importantly, and unusually for a publication in the scientific press, they specifically suggested that “at least some aspects of leg health are compromised at or above a stocking density of 42 kg/m²”.

It is worth noting that current UK industry standards (Assured Chicken Production (ACP)) according to which the large majority of UK chickens are reared, set a maximum stocking density of 38kg/ m². Allowing a maximum of 42kg/ m² under new law would, therefore, represent a significant backward step compared with current practice. This is surely not the aim when introducing new legislation which professes to protect chicken welfare.

Of course, as Defra website points out, stocking density cannot, by itself, ensure the welfare of birds. Nonetheless, the provision of sufficient space is an important prerequisite for acceptable welfare.

Growth rate

Recent Defra-funded research studied broiler flocks belonging to five major UK producers who together accounted for over 50% of UK production. The study found that 27.3% of the chickens had gait scores of 3 or more, i.e. lameness that is likely to be painful. The researchers concluded that rapid growth rates are the primary risk factors for leg problems in broilers.

We urge Defra to address this problem in the new Regulations. We suggest the Regulations should take the approach of the RSPCA welfare standards for meat chickens which stipulate that the genetic growth rate of a bird must not be greater than 45g per day on average.

Environmental enrichment

The RSPCA welfare standards, as used in the *Freedom Food* scheme, require the provision of enrichment materials including straw bales, perches and pecking objects such as brassicas. Research shows that chickens that are provided with an enriched environment are more active than those kept without any enrichment. The low level of activity in an unenriched shed can lead to lameness and skin problems such as hock burn, breast blisters and foot pad dermatitis.

Yours sincerely,



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Mark Watts
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Mike Baker
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Mike Hancock MP