

# Written evidence submitted by The Humane League UK (FFS0011) January 2025

## Summary

The Humane League (THL) UK has submitted evidence to the EFRA committee covering the topics: of health and welfare of chickens raised for meat; egg laying hens; farmed fish; and method of production labelling for food.

THL UK is a registered charity that exists to end the suffering of animals raised for food.

## Chickens raised for meat (broilers)

### **Introduction**

- Fast-growing chicken breeds dominate the UK's broiler industry, accounting for over 90% of the 1.2 billion chickens raised annually for meat. The widespread use of fast-growing chicken breeds (also known as Franken chickens) in commercial production is one of the biggest welfare crises of our time.
- These breeds reach slaughter weight in as little as 35 days, compared to 70–80 days for traditional or slower-growing breeds. However, this rapid growth comes at a significant cost. This rapid growth puts undue strain on their bodies, leading to serious health problems. Sadly, this suffering is simply hard coded into their DNA.
- According to the RSPCA's *Eat, Sit, Suffer, Repeat* report, fast-growing chickens can spend up to 86% of their time sitting, increasing their risk of painful conditions such as hock burns and footpad dermatitis, which are prevalent in over 52% of flocks. Additionally, 30% of chickens suffer from gait abnormalities, leaving them unable to walk or access food and water properly. Mortality rates remain alarmingly high, with 4–6% of chickens dying prematurely due to welfare-related issues. This can be as high as [1.5 million birds dying prematurely every week](#), as a result of these welfare issues. These figures highlight the urgent need for a shift away from fast-growing breeds to improve chicken welfare across the UK.

### **Judicial Review**

- We began a Judicial Review case against the government which came to fruition recently in December 2024 ([Judgment here](#)). The Court of Appeal ruling provided a clear and significant interpretation of Schedule 1 of the Welfare of Farmed Animals (England) Regulations 2007 (WOFAR), something which did not exist before this case. It surmised that regardless of convenience, regardless of profit, it is illegal to farm animals who suffer because of their genes. We must now ask DEFRA to react to this ruling, and update their Codes of Practice to reflect this clearly for fast-growing breeds of chicken to make the government's expectation about welfare measures for such breeds more explicit.

### **Welfare Concerns with Fast-Growing Breeds**

#### **a. Genetic-driven health issues**

- Fast-growing breeds are genetically selected for rapid weight gain, often resulting in severe welfare problems.
- Key issues include:
  - **Leg deformities and lameness:** Due to disproportionate weight relative to skeletal development. Lameness affects around 25–40% of chickens in intensive farming systems. Chickens often struggle to walk and experience pain from deformed legs and feet.

- **Organ failure:** Increased incidences of heart and lung problems caused by the strain of accelerated growth. Fast-growing chickens have been found to have weakened hearts and lungs due to the rapid increase in body mass. Their hearts may not be able to keep up with the oxygen demand, leading to respiratory distress and heart failure. Studies have shown that around 60-70% of fast-growing birds suffer from heart and lung abnormalities.
- This can also lead to **Sudden death syndrome.**
- **Reduced mobility:** Chickens struggle to move, often spending up to 86% of their time sitting, leading to further complications such as hock burns and sores.

#### b. Behavioral deprivation

- These breeds exhibit reduced natural behaviors, such as foraging and perching, due to their physical limitations and inappropriate environmental conditions.
- Fast growth rates make it impossible for them to live active, healthy lives which chickens are highly motivated to do, causing further stress and suffering.

#### c. Premature mortality

- Mortality rates are approximately 3 times higher in fast-growing breeds compared to slower-growing strains, often due to metabolic disorders, skeletal defects, or sudden death syndrome.

#### Antibiotic use and sustainability (OWA Sustainability report / Antibiotics & the ECC)

##### Animal health:

- Approximately 1 in 20 conventional faster growing birds dies, or is culled, before ever reaching slaughter
- Slower growing breeds experience significantly lower levels of lameness, cardiopulmonary disorders and thermal stress
- Slower growing breeds have a significantly lower incidence of muscular myopathies such as white striping and wooden breast

##### Human

##### Health:

- Overuse of antibiotics in poultry production is the leading cause of resistance developing in bacteria
- **Faster growing breeds use up to 9 times more antibiotics than slower growing breeds**, including over 6 times more critically important antibiotics, with commercial data showing that the number / share of broilers treated with antibiotics has been up to 133 times higher

##### Environmental Health

- Reduced mortality rates in slower growing breeds and lower reliance on soya in their feed help to reduce emissions

##### Ethical sustainability

- Adoption of the Better Chicken Commitment, is estimated to prevent **at least 33** (13 to 53) hours of disabling pain, 79 (-99 to 260) hours of hurtful pain and 25 (5 to 45) seconds of excruciating pain for every bird affected by this intervention\*
- Surveys show animal welfare is important to the majority of consumers

#### Impact on Farming and Public Perception

##### Farmer challenges

- Fast-growing chickens require intensive management to mitigate health issues, increasing workload and potential economic losses from mortality and culls.
- Welfare issues in production risk undermining trust in farming practices and damaging the UK's reputation for high welfare standards.

### **Consumer expectations**

- Public opinion increasingly favors higher-welfare farming, with surveys showing strong support for phasing out fast-growing breeds. Supermarkets and food brands are also under growing pressure to meet consumer demand for ethical sourcing.
- Fast growing breeds exhibit higher rates of wooden breast syndrome and white striping, the latter leading to visible fatty stripes in chicken meat which increases fat content and raises health concerns.
- Increase antibiotic use also raises public health concerns
- Hock burns and green muscle disease can also be visibly seen on resulting meat causing further potential health issues, as well as meat quality issues.

### **Better Alternatives: Slower-Growing Breeds**

- Slower-growing breeds are already successfully adopted in various systems that meet the Better Chicken Commitment (BCC) standards.
- Over 350 companies have already signed up to the BCC across Europe, showing this is viable commercially.
- Benefits include:
  - Improved health outcomes with fewer welfare problems.
  - Enhanced behavioral expression and quality of life for the birds.
  - Economic viability with growing demand for higher-welfare products.

### **Recommendations for EFRA**

- Urge the government to phase out the use of fast-growing chicken breeds in favor of slower-growing breeds.
- Implement stricter welfare regulations, including growth rate limits.
- Provide support for farmers transitioning to higher-welfare systems through subsidies, backing up what is written in the [Animal Health and Welfare Pathway](#) around support for the BCC.
- Use the existing legal framework (e.g., the Welfare of Farmed Animals Regulations) to ensure compliance and enforcement, strengthening these in light of the [Judicial Review](#).

### **References for chickens raised for meat**

[Eat Sit Suffer Repeat RSPCA](#)

[Welfare Footprint](#)

<https://thl.link/bcc-sustainability>

[Judicial Review 2024 judgment](#)

## Cages for Laying Hens:

### Overview

- In the UK over 8.3 **million laying hens are STILL kept in cages** stacked on top of each other, often unable to stretch their wings.
- Just over 20% of the UK's eggs still come from hens in cages.
- All major food companies are transitioning to cage-free egg supply chains and the majority of egg packers have committed to removing cage egg production from their supply chain by 2025.
- However, *even with all the commitments made*, around 5 million hens will still be in cages in 2025 AND these companies may still go back on their commitments unless this is enshrined in law.
- To end cages for good, the UK government needs to put into legislation a ban on cage-egg production and the sale of eggs from caged systems.

### Welfare

- Moving to cage-free (i.e. non-cage) systems and banning laying hens, pullets and layer breeders from being housed in cages will allow these birds to better express their normal behaviours.
- Both barren and enriched battery cages represent some of the worst abuse of farm animals raised for food. Cages severely restrict laying hens' abilities to move around, rest undisturbed and to express their priority normal behaviours, causing them pain, stress and frustration.
- Scientific evidence has clearly shown that laying hens are unable to fully express their normal behaviours within cages due to the insufficient space provision, crowded conditions, and the lack of and/or insufficient resources.
- The EFSA Scientific Opinion on the Welfare of Laying Hens On Farm (2023) found that laying hens, pullets and layer breeders kept in cages experience the highly relevant welfare consequences 'inability to perform comfort behaviour', 'inability to perform exploratory or foraging behaviour' and 'restriction of movement'. One of the main recommendations of the EFSA opinion to improve the welfare of laying hens, pullets and layer breeders was to 'house all birds in non-cage systems'.
- The Welfare Footprint Project looked at the welfare impact of transitioning to cage-free systems from cage systems (both the barren/conventional cage and the enriched cage) and calculated the amount of time laying hens spend in pain within the different systems. One of the main findings of the project was that cage-free aviaries were found to be clearly superior to conventional cages and furnished cages even soon after a transition to cage-free environments. Overall, an average of at least 275 hours of disabling pain, 2,313 hours of hurtful pain and 4,645 hours of annoying pain are prevented for each hen kept in an aviary instead of CC during her laying life, and 1,410 hours of hurtful pain and 4,065 hours of annoying pain prevented for each hen kept in an aviary instead of a FC during her laying life. The longer time in pain in cage systems was due to laying hens being prevented from performing their highly motivated behaviours.
- Cage-free systems provide hens with the space to move around freely, and the opportunity to perform their priority normal behaviours such as foraging and exploring, nesting, and comfort behaviours such as wing flapping, wing stretching, body shaking and dustbathing. Cage-free systems providing sufficient raised perching, such as multi-tier systems, can also better meet a hens' need for elevated roosting at night and perching during the day for safety and to avoid other hens.

## Health

- We also believe that housing birds in cage-free (i.e. non-cage) systems will help to improve some elements of their health, including bone strength and reduce fractures at depopulation, and reduce incidences of Fatty Liver Haemorrhagic Syndrome.
- Bone health: All commercial laying hens are susceptible to osteoporosis due to selective breeding for high egg yields, however bone health is poorer in caged hens because of an inability to perform load bearing exercise, resulting in a high likelihood of fracture at depopulation. Laying hens in cages are considered to have the poorest bone strength and to suffer more fractures at depopulation.
- Fatty liver haemorrhagic syndrome: Hens in caged systems are predisposed to fatty liver haemorrhagic syndrome (FHS). One of the factors associated with hens being predisposed to fatty liver haemorrhagic syndrome is considered to be restricted movement.

## Pullets

- Pullets suffer from many of the same welfare concerns as laying hens housed in cages. The EFSA Scientific Opinion on the Welfare of Laying Hens On Farm (2023), considered the welfare of pullets housed in cages, as well as for laying hens and layer breeders housed in cages, the opinion identified many of the same highly relevant welfare consequences for pullets as for laying hens and layer breeders housed in cages, including: inability to perform comfort behaviour; inability to perform exploratory or foraging behaviour; and restriction of movement. In addition, the EFSA Opinion found that pullets housed in collective cages suffer resting problems as a highly relevant welfare consequence due to a lack of perches.
- Evidence has shown that the rearing of pullets in systems similar in complexity to their future layer housing is important for the welfare of the birds later in life at the laying farm, as this can help to:
  - reduce fearfulness
  - prevent the development of injurious feather pecking in adult birds,
  - improve the birds ability to navigate the laying environment, reducing poor landings and the risk of bone fractures
  - reduce the incidence of floor eggs.
- It is therefore important that any ban on cages for laying hens is accompanied by a ban on cages for pullets, this will both help to improve the welfare of pullets by preventing them from being housed in a system that restricts their movement and prevents them from expressing priority normal behaviours, and also helps to send a message about the importance of rearing pullets in systems similar in complexity to the laying environment for the future welfare of the birds.

## Farmed fishes:

The Humane League UK submitted evidence to the Animal Welfare Committee in August 2021, articulating our concerns about the lack of species-specific slaughter legislation for farmed fishes that is equitable to the legislation afforded to terrestrial farmed animals, and a lack of robust enforcement and oversight of fish farms and slaughterhouses. We haven't reiterated that evidence here, but we still remain concerned that despite the Animal Welfare Committee publishing their updated [Opinion](#), which included a recommendation to include stunning requirements for farmed fish in law, this legislative gap has still not been addressed nor have the Government announced plans to address it.

[Animal Welfare Committee updated Opinion](#)

## Method of Production food labelling:

- Making method of production labelling mandatory is the only way to ensure consumers have consistent and clear information at the point of purchase regarding how the animals used to produce their food have been reared.
- Mandatory method of production labelling mitigates against a proliferation of different labels and terms producing a lack of consistency and confusion for consumers.
- Mandatory method of production labelling ensures transparency on systems of production and animal welfare for consumers, empowering them to make informed choices when purchasing food produced from animals.
- Voluntary labelling typically only includes higher welfare systems but lower welfare systems should be included for full transparency.
- Mandatory method of production labelling helps to remove some of the knowledge based barriers to consumers accessing higher welfare products. Since the introduction of mandatory method of production labelling of eggs, including the use of the word 'caged', higher welfare egg sales have grown consistently.
- Mandatory labelling reduces the opportunity for consumers to be misled on actual welfare standards.
- Mandatory method of production labelling provides a level playing field with all producers/businesses operating to the same minimum standards. This would support higher welfare producers and domestic producers by protecting them from imports from countries with lower standards than UK baseline standards.
- Mandatory method of production labelling which includes identifying standards which are lower than the UK baseline is imperative to protect animal welfare. However, labelling alone is not enough and import tariffs should also be utilised to prevent an influx of products from countries with lower welfare standards, e.g. eggs from barren battery cages.
- It is very important that method of production labelling is as far reaching as possible, enabling consumers to be informed about the method in which the animals used to produce their food have been reared whether they are purchasing processed or unprocessed animal products.
- All consumers of animal products deserve to have the same information regarding method of production at the point of purchase, so that they can make informed decisions about the methods of production they choose to support through their purchases.
- Applying method of production labelling to processed and unprocessed animal products will provide more transparency for consumers on this issue, and ensure that lower welfare methods of production can not hide behind marketing and branding.
- Mandatory labelling reduces the opportunity for consumers to be misled on actual welfare standards.
- Mandatory method of production labelling provides a level playing field with all producers/businesses operating to the same minimum standards. This would support higher welfare producers and domestic producers by protecting them from imports from countries with lower standards than UK baseline standards.

- Welfare outcome assessments (WOA) are an important method of assessing the actual welfare achieved, as well as highlighting welfare issues/areas for improvement on farms and we support their implementation across all production systems to achieve these aims. WOA does not enable the definition of methods of production. Method of production labelling must focus on evidence based input standards which clearly differentiate the different production methods, such as caged, barn and free-range for egg production. As highlighted above this can give an indication of the potential level of welfare a production system may achieve, rather than actual welfare achieved for animals on an individual farm.
- Welfare outcome assessments (WOA) can be used as part of a certification / accreditation process to:
  - ensure that welfare inputs are delivering the desired welfare outcomes;
  - target the dissemination of advice and support to farmers who fail to meet the required outcome standards;
  - promote awareness of key welfare issues and interventions<sup>1</sup>.
- WOA's have a clear role within farm assessments and they have already been incorporated into some UK assessments such as RSPCA Assured, Red Tractor and Soil Association certification assessments. The WOA data is used at scheme level to identify the top and bottom performing producers, requiring those in the bottom third to implement improvement measures. WOA is used to improve the robustness of the certification process, rather than as a labelling opportunity, and we fully support the use of WOA in this way.
- Simply including a requirement for welfare outcome assessments at any tier as part of mandatory method of production labelling is unlikely to have a meaningful impact on animal welfare. It is therefore important that WOA is accompanied by a requirement for robust and meaningful action plans to be developed in response to poor outcomes and that these must be implemented to help ensure a meaningful impact on animal welfare. Where robust and meaningful action plans are not developed and implemented there should be a downgrading of tier.
- We appreciate the difficulties around not including a proposal to remove a tier rating from a product based on the WOA results, but there must be a robust process in place to ensure consistent poor outcomes are addressed and are not permitted to continue.
- Applying WOA only to higher welfare production also adds additional costs to higher welfare farmers; if WOA is required it should be applicable to all production systems.
- There also needs to be serious consideration to what the tier system looks like for method of production labelling, as detailed in The Humane League UK's submission to the Department for Environment, Food and Rural Affairs's consultation on labelling. Universally recognised scales must be used, for example letters, and not numbers.

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