



Humane Farm Animal Care

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Subject: Response to Animal Justice Canada's Claims that "Certified Humane" Chicken Meat Violates False Advertising Legislation:

The Humane Farm Animal Care standards were written by a Scientific Committee consisting of 37 of the world's most respected farm animal, animal welfare animal scientists. These standards are based on science. The standards were written to meet the actual needs of the animals, not our perceived needs.

Claim #1: Chickens do not enjoy "ample space"

According to Dr. Ruth Newberry, a member of our Scientific Committee: "15 chickens/m², if one assumes that the chickens are around 2 kg when marketed. If a chick weighs around 40-45 g when placed, one could say they have up to 50 times more space at the beginning of their lives.

This organization claims that chicks "are born at a hatchery and sent in large batches to farms, where they spend their entire lives in the company of thousands of other babies..." If thousands means at least 2000 chickens and there are 15 chickens per m², then the minimum chicken house is 133 m² in which the "babies" can roam about.

The European Council Directive 2007/43/EC of 28 June 2007 laying down minimum rules for the protection of chickens kept for meat production, permits keeping broilers at densities up to 42kg/m² if conditions in the annexes of the Directive are met. The Canadian Codes of Practice are voluntary guidelines, with no third party inspections to ensure compliance. Therefore, Canadian farmers certified

by our standards are taking extra steps to ensure good welfare in comparison with those who do not provide any third-party verification of the standards under which their chickens are produced.

Claim #2: Chickens are kept in “cage-free environments.”

The complaint implies that economics and welfare are unrelated. However, there are clear welfare benefits from not keeping broilers in cages, which include a lower risk of breast blisters and leg deformities.

Claim #3: Chickens are handled gently in low stress environments:

It is deceptive of the complainants to claim that the standards make only 3 points about handling when the section of the standards on Transportation has 20 subsections that relate to methods for minimizing stress associated with pre-slaughter catching and transport and the section on Processing has a further 36 subsections, not to mention numerous points that relate to handling methods in the other sections.

Claims #4 and #5: Chickens can engage in ‘natural behaviours’ : Safeway ensures animals’ good health and well-being at all times.”

Animal Justice Canada claims: “These claims communicate that the chickens live a happy life in an environment that meets their needs. They do not. In addition to the overcrowding and rough handling to which they will be subjected, the animals suffer from the following: no access to the outdoors, no fresh air, no natural family structures, unnatural lighting duration and intensity, no limits on genetic selection for rapid growth, and slaughter by electric immobilization.” .”

(1) Response: No access to the outdoors.

The HFAC standards provide provisions for broilers that go outdoors. There is no requirement that they must go outdoors because there is no scientific evidence that chickens suffer if they cannot go outside. Broiler chickens lack adult plumage and are vulnerable to climatic extremes such as those found in Canada in winter when it would be inhumane to force these “babies” to go outdoors. Regarding the Harris survey commissioned by AWI (<https://awionline.org/sites/default/files/uploads/documents/FA-AWI-FreeRangeHumanelyRaised-Poll-Dec2015.pdf>) the footnote indicates that “Because the sample is based on those who agreed to participate in the online panel, no estimates of theoretical sampling error can be calculated.” The HFAC standards require provision of environmental enrichment items to accommodate natural behavior (E28, Stimulating Environment), which substitute for lack of exposure to outdoor stimuli.

(2) Response: No fresh air

The complainants misrepresent the HFAC standards, which state in E22c. "The ammonia concentration at bird height should be less than 10 ppm and is only allowed to go to 25 ppm during brief periods of severe inclement weather when ventilation is affected." Ammonia must be measured and recorded. While the complainants claim that the draft Canadian code of practice for chickens should ideally be less than 10ppm and not exceed 20 ppm... this is not audited.

(3) Response: No family structures

The mother's wing is replaced by a heater which provides chicks with a warm place to rest. It is incorrect to imply that only the mother attends to the peeps made by chicks. Chicks make a variety of different types of peeps that serve as communication among each other. Caretakers also pay attention to the sounds in the chicken house which indicate whether the birds are contented or if there is a potential problem that needs to be corrected. It is therefore incorrect to claim that their peeps are ignored.

(4) Response: Unnatural lighting duration and intensity

The complainants imply that the HFAC standards for light duration and intensity lead to eye problems. This is incorrect. The items in the HFAC E22 standard which include a minimum of 6 hours of dark per night and a light at a minimum of 20 lux, are based on scientific evidence specifically to avoid the conditions that lead to eye problems.

(5) Response: No limits on genetic selection for rapid growth.

Standard H1: selecting birds for good health, requires that "During the selection of birds, care must be taken to select birds for high welfare traits and avoid genetic strains with undesirable traits." This is better than focusing on rapid growth because it focuses on actual welfare of the birds.

(6) Response: Slaughter by electric immobilization.

This is incorrect. Electric stunning is used to render birds unconscious prior to slaughter. The HFAC standards include many points designed to minimize welfare problems associated with electric stunning, including setting a limit of 90 seconds on shackling duration prior to stunning. The standards also include provisions if gas stunning is used, which are necessary due to concerns about the humanness of implementing this method in practice.

Claim number 6, "Pastoral Imagary Does Not Represent Reality."

The Chicken farms that are Certified Humane® have free range chickens as well as barn raised chickens. As you can see the claims that the Animal Justice Canada group (6 individual people) have made are not justified by the facts. Attached is a chart showing the Humane Farm Animal Care Standards in comparison to the actual Canadian Codes of Practice (Draft) requirements. Also attached is a copy of the HFAC Standards for Chickens.

This organization "Animal Justice Canada" claims they care about farm animals and their name implies that they care about justice for animals. I question that they care for either. Sobeys' supermarket (and their Safeway stores) are the only Supermarket chain in the entire western hemisphere that took a stand for improved farm animal welfare. They partnered with Chef Jamie Oliver whose assistant toured farms in Canada and the US to see the Humane Farm Animal Care standards implemented, including chicken farms. Chef Oliver's team has been to farms all around the world. They have very high standards for sustainable and humane foods. They chose the Humane Farm Animal Care standards because they are the highest farm animal welfare standards for farm animals in food production. Our program is similar to the RSPCA's Freedom Food Program in the United Kingdom. It was in fact the RSPCA that recommended Humane Farm Animal Care to Chef Oliver.

Sincerely,



Adele Douglass

Executive Director

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