



Animal Welfare Institute

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Jay Fuller, DVM
Assistant State Veterinarian
Office of the State Veterinarian
Department of Environmental Conservation
5251 Dr. Martin Luther King Jr. Ave.
Anchorage, AK 99507

VIA EMAIL

RE: Avian Workshop Comments

Dear Dr. Fuller:

I am writing on behalf of the Animal Welfare Institute (AWI) and our supporters in the state of Alaska to offer comments on Alaska's draft avian care standards. I write to encourage Alaska to take a strong position on animal welfare in drafting its avian care standards.

Since its founding in 1951, AWI has been dedicated to reducing animal suffering and promoting the welfare of all animals, including animals in agriculture. As a part of our mission, we promote humane farming systems and work to advance legislative and regulatory efforts to improve the conditions of farm animals. We also administer our own animal care certification program, Animal Welfare Approved, through which we work with scientists and farmers to set the highest farm animal care standards in the country. The program employs a highly trained field staff to audit farms for compliance with these standards, and communicates regularly with hundreds of family farmers across the U.S. For this reason, AWI urges Alaska to base its avian standards on the "Five Freedoms"¹ to ensure that its birds receive adequate minimum care.

A. Basis of AWI's Position: The Five Freedoms

Enacting care standards that meet the Five Freedoms will maximize animal well-being and eliminate certain practices that cause unacceptable pain, fear, or distress to the animals. Contrary to industry adage, a productive animal is NOT necessarily a physically or mentally healthy animal, since advances in science and technology allow animals to maintain productivity even under duress. As a result, numerous sets of guidelines have been developed to account for fundamental aspects of animal well-being. Most of these guidelines are based on the concept that humans have a moral obligation to afford farm animals five basic freedoms.

¹ *Five Freedoms*, Farm Animal Welfare Council, <http://www.fawc.org.uk/freedoms.htm> (last modified Apr. 16, 2009).

The Five Freedoms are listed below:

1. **Freedom from Hunger and Thirst** - by ready access to fresh water and a diet to maintain full health and vigor.
2. **Freedom from Discomfort** - by providing an appropriate environment including shelter and a comfortable resting area.
3. **Freedom from Pain, Injury or Disease** - by prevention or rapid diagnosis and treatment.
4. **Freedom to Express Normal Behavior** - by providing sufficient space, proper facilities and company of the animal's own kind.
5. **Freedom from Fear and Distress** - by ensuring conditions and treatment which avoid mental suffering.

B. Recommendations

1. Expressly prohibit forced molting.

AWI commends DEC for prohibiting induced molting by feed or water withdrawal in its draft standards. The practice of forced molting compromises the welfare of laying hens by denying them access to food and water over the course of days or weeks. Research shows that prolonged food deprivation causes “pronounced suffering” in laying hens.² Studies show that hens exhibit increased aggression and non-nutritive pecking during forced molts, behaviors which suggest “severe frustration and extreme hunger.”³ The egg industry has acknowledged the welfare concerns of the feed-withdrawal molt method, and United Egg Producers has banned the practice since 2006.⁴ For this reason, AWI urges DEC to preserve the express prohibition of the practice of forced molting through food deprivation.

2. Include species-specific environmental guidelines and space allowances.

Alaska Statute 03.55.100(2) requires that animal owners provide “an environment compatible with protecting and maintaining the good health and safety” of their animals. One environmental requirement necessary to maintaining the good health and safety of birds includes providing the animals adequate space to express normal behavior. Alaska’s draft standards recognize this fact and require that “poultry cages” be large enough to “allow birds to stand up, turn around, and spread their wings without restriction.” Nevertheless, this standard falls far short of providing clear, enforceable animal care guidelines.

Although AWI opposes the use of cages to permanently confine birds, we recommend that DEC adopt numeric, species-specific minimum space requirements for all covered birds. For example, a chicken requires 74 square inches just to stand, 138 square inches to stretch one wing, 178 to preen, 197 to turn around, and 291 inches – or at least **2 square feet** – to flap her

² United Poultry Concerns, *The Animal Welfare and Food Safety Issues Associated With the Forced Molting of Laying Birds* (2003).

³ *Id.*

⁴ United Egg Producers, *Animal Husbandry Guidelines for U.S. Egg Laying Flocks* 10 (2010).

wings.⁵ AWI recommends that DEC use similar measurements to establish optimum space needs of chicks, layers, broilers, turkeys, ducks, and game birds. Including in regulation minimum space requirements for each species of bird will ensure that law enforcement officers and private veterinarians have a meaningful, quantitative means of assessing proper animal care.

3. Limit ammonia levels in bird housing.

Birds confined indoors are susceptible to compromised air quality due to high levels of dust and toxic gases caused by the birds' waste. Ammonia, formed from the decomposition of a bird's urine, can cause respiratory, skin, and eye ailments. These pathologies can be painful and stressful to birds, so ammonia levels are an important gauge of proper animal care. Studies show that chickens suffer elevated levels of respiratory, skin, and eye diseases caused by ammonia concentrations of 25ppm.⁶ For turkeys, ammonia levels as low as 10ppm can cause respiratory damage.⁷ Industry standards require ammonia to be less than 25ppm at bird level, but this exposure limit is set on the basis of human safety rather than animal welfare.⁸ To ensure proper bird welfare, ammonia levels should be lower than 10ppm when measured at bird level.⁹ Ammonia can be detected by the human nose at 5ppm.¹⁰

4. Expressly prohibit debeaking.

Some poultry and egg producers perform painful beak amputation (known as "beak trimming" or "debeaking") in order to prevent cannibalistic pecking behavior that results from the stress of intensive confinement. Debeaking causes acute short term pain, and it likely causes chronic long-term pain as well.¹¹ In the US, beak cutting is prohibited by the National Chicken Council,¹² and the National Organic Program has proposed a ban on it. Debeaking is prohibited under high-welfare certification programs as well. Debeaking is an intentional, human-inflicted injury

⁵ M.S. Dawkins & S. Hardie, *Space Needs of Laying Hens*, 30 *Brit. Poultry Sci.* 413 (1989).

⁶ H.H. Kristensen and C.M. Wathes, *Ammonia and Poultry Welfare: A Review*, 56 *World's Poultry Sci. J.* 235 (2000).

⁷ Sally L. Noll, et al., UMN Avian Research Center, *Air Quality in Turkey Production* (2003).

⁸ Nat'l Chicken Council, *Animal Welfare Guidelines and Audit Checklist for Broilers* (2010); Nat'l Turkey Fed'n, *Animal Care Best Management Practices* (2010); Kristensen, *supra* note 6.

⁹ See, e.g., Noll, *supra* note 1 (stating that turkey ammonia levels should not exceed 20ppm); *Standards, Animal Welfare Approved*, <http://www.animalwelfareapproved.org/standards/> (requiring ammonia to be monitored when detectable to the human nose at 5ppm); *Our Standards*, Global Animal Partnership, <http://www.globalanimalpartnership.org/the-5-step-program/our-standards/> (ammonia levels should not exceed 15ppm turkeys at all levels and 10 ppm for broilers at the highest levels); *Standards, Certified Humane*, <http://www.certifiedhumane.org/index.php?page=standards> (ammonia should not exceed 10ppm for turkeys).

¹⁰ AWA Turkey Standards, *supra* note 9, § 8.0.15.

¹¹ Michael C. Appleby, Inst. of Ecology and Res. Mgmt., Univ. of Edinburgh, *Do Hens Suffer in Battery Cages?* (1991).

¹² Nat'l Chicken Council, *supra* note 8.

with lasting effects on bird welfare, and Alaska's animal care guidelines should expressly prohibit it.

C. Conclusion

AWI urges the DEC to include the standards discussed herein to provide clear guidelines for private veterinarians and law enforcement assessing animal care. By prohibiting painful practices such as forced molting and debeaking, and setting minimum environmental standards such as space guidelines and ammonia levels, Alaska will have clear, enforceable avian care standards.

Thank you very much for your consideration. I encourage you to share this letter with your colleagues and with members of the public at next week's meeting. Please do not hesitate to contact me at 202-446-2139 or rachel@awionline.org should you have any questions or desire additional information.

Very truly yours,

A handwritten signature in black ink that reads "Rachel Mathews". The signature is written in a cursive style with a long, sweeping horizontal line extending from the end of the name.

Rachel Mathews
Farm Animal Policy Associate