



Cymdeithas Frenhinol er Atal Creulondeb i Anifeiliaid Royal Society for the Prevention of Cruelty to Animals

Jack Sargeant MS
Chair - Petitions Committee
Welsh Parliament / Senedd Cymru
Cardiff Bay, Cardiff
CF99 1NA

8 December 2021

Dear Jack Sargeant MS,

Thank you for your recent correspondence dated 23 November 2021, with regard to Petition P-06-1202 *'Ban the killing of day old chicks in Wales'*.

Sadly, it is true that male chicks could be considered a by-product of egg production, with male chicks in hatcheries euthanised shortly after hatching. At present, this could be through exposure to certain gasses or via a process known as maceration.

Maceration (Instantaneous Mechanical Destruction, IMD) is a method involving a mechanical apparatus that instantly kills the chicks using either rapidly rotating blades or a roller-type device with solid projections resulting in the chicks being 'flattened'. The idea of using any of these apparatus to dispose of chicks can be and indeed looks distressing - and this petition is raising awareness of that. However, maceration constitutes a humane method when managed and maintained correctly as it causes chicks to be killed instantly, thus minimising chances of suffering.

While maceration is a legally permitted method of euthanasia in Wales, and the wider UK at present, all male laying hen chicks hatched in Wales are in fact killed using Argon gas. As Argon gas is inert there is no aversive reaction from the chicks to this killing method. The majority of chicks hatched in the UK come from RSPCA Assured hatcheries which must adhere to and be inspected to all relevant RSPCA welfare standards, and currently all these hatcheries use Argon gas to kill the male chicks. In addition, RSPCA standards cover over 80% of eggs produced on farms in Wales and around 89% of laying hens in Wales are in free range flocks - the largest percentage in Europe.

The RSPCA standards do also permit maceration as a method of euthanasia, subject to adherence to strict mandatory rules to ensure the instant and painless death that research shows can be achieved when the nature, maintenance and operation of the equipment are appropriate. Nevertheless, in practice, maceration is generally only used for hatchery waste and unviable eggs (rather than healthy chicks), where gas killing is not an option.

Aside from the humaneness issue, the RSPCA agrees that the killing of young animals raises an ethical issue so any subsequent use of the culled chicks is important. In the UK, these culled chicks are widely used as food for birds of prey, exotic pets and other captive wild animals in zoos. If the domestic market could not supply this demand, day-old chicks would have to be imported or an alternative feed source - such as baby mice and rats - used. Some reports suggest that all the culled



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day old male chicks produced across the UK are already utilised and the RSPCA's own investigations indicate that some imports already occur to meet demand. Young mice and rats are also bred to supply this market and are kept and killed under poor or unknown conditions in Wales, and across the UK, too. So the welfare of any alternative feed sources needs to be considered if chick culling ceases. The RSPCA does not want the welfare concerns associated with day-old chick culling to be worsened by displacing them overseas or onto different species of animal bred and killed under uncontrolled conditions.

Measures to reduce the number of male chicks hatched are being used such as in Germany and France where the culling of day old chicks will be prohibited from 2022. There is on-going research being carried out to discover ways of sexing chicks whilst still in the egg, with this often referred to as in-ovo sexing. These new technologies aim to do the sexing and disposal before an embryo can feel pain, which happens at around nine days. However, alternative feed sources for exotics and captive species would still be needed and as mentioned above, there are currently no welfare standards to inform or control the rearing and killing methods of alternatives. The RSPCA will be considering the consequences of the legislation in France and Germany on issues such as the level of demand for day-old chicks in those countries and how this is satisfied without national production occurring.

As mentioned above, in the UK, the current demand for male chicks appears to be greater than the 40 million hatched in the UK each year. With this in mind, we are hesitant to support any action that would result in these eggs being laid but not used, ahead of an alternative feed source being identified and developed that avoids production and killing of living beings (such as mice) solely for the purpose of animal feed under uncontrolled conditions (in contrast with the well controlled hatchery production). Such a situation would have very significant ethical and welfare implications.

I hope that this has helped to explain the RSPCA's position on this challenging issue and the reasons behind it. Please do not hesitate to contact me if more information would be helpful.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Bowles', written over a faint dotted line.

David Bowles
RSPCA Head of Public Affairs