Title: Poultry Catching **IA No:** **RPC Reference No:** **Lead department or agency:** DEFRA **Other departments or agencies:**	Consultation Impact Assessment (IA) **Date:** 30/01/2025 **Stage: Consultation** **Source of intervention:** Domestic **Type of measure:** Secondary legislation **Contact for enquiries:** Nancy.race@defra.gov.uk

Summary: Intervention and Options

RPC Opinion: RPC Opinion Status

Cost of Preferred (or more likely) Option			
Total Net Present Social Value	**Business Net Present Value**	**Net cost to business per year**	**Business Impact Target Status** Qualifying provision
£0.0m	£0.0m	£0.0m	£0.0m

What is the problem under consideration? Why is government action or intervention necessary?

- Currently, assimilated Council Regulation (EC) No 1/2005 on the protection of animals during transport and related operations ('Regulation 1/2005')[1] prohibits the lifting of animals by their legs when they are handled as part of a loading or unloading operation to or from a vehicle or other means of transport. The Department for Environment, Food and Rural Affairs (Defra) and the Scottish and Welsh Governments' propose to amend paragraph 1.8 (d) of Chapter III of Annex I to Regulation 1/2005, to expressly exclude the poultry species *Gallus gallus,* which includes laying hens and meat chickens ('chickens'), from the prohibition on lifting animals by the legs, and to make it clear that when chickens are caught by the legs, they must be caught by two legs. Due to an absence of evidence at the time that Regulation 1/2005 was drawn up, to indicate that the catching of chickens by the legs was not acceptable, there was no clear expectation, common understanding, or appreciation that paragraph 1.8(d) of Chapter III of Annex I to Regulation 1/2005 applied to chickens.
- This amendment to the legislation will provide clarity on the legal requirements that apply to the manual lifting and carrying ('catching') of birds for the British laying hen and meat chicken industries and catching companies in relation to loading and unloading practices. Only Government can make amendments to legislation.

[1] Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97 (legislation.gov.uk)

What are the policy objectives of the action or intervention and the intended effects?

- By amending Regulation 1/2005[2], to expressly exclude chickens from paragraph 1.8(d) of Chapter III of Annex I to Regulation 1/2005, we will remove the current discrepancy between the legislation and Defra's statutory Code of Practice for the Welfare of Laying Hens[3] and Pullets and the statutory Code of Practice for Meat Chickens and Meat Breeding Chickens[4], similar codes in Wales[5] and equivalent statutory guidance in Scotland[67] (the 'GB statutory guidance') The amendment will provide clarity for the British egg and meat chicken sectors as to the legal requirements that apply when catching birds, also giving producers certainty on the costs expected to be incurred. Success will be shown by these and meat chicken sectors having a clear understanding of the legally permitted methods of catching and handling of birds.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base

- **Option 0** – Do nothing. Chickens cannot be caught by their legs, in accordance with Regulation 1/2005, and must be picked up by the body and carried upright. Due to an existing discrepancy with the GB statutory guidance this will produce ongoing uncertainty as to the legal requirements.
- **Option 1** - Preferred Option – to amend Regulation 1/2005 to expressly exclude chickens from the prohibition on catching animals by the legs and to clarify that if chickens are to be caught by the legs they must be caught by two legs.
- **Option 2 -** The non-regulatory option would be to amend the GB statutory guidance to reflect the prohibition on the lifting of animals by their legs, as per Regulation 1/2005. This option has similar impact to the do-nothing option and does not reflect the common understanding that catching chickens by two legs can be acceptable, nor the established industry practice of catching chickens by the legs.

Will the policy be reviewed? It will not be reviewed. **If applicable, set review date:** Month/Year				
Is this measure likely to impact on international trade and investment?		No		
Are any of these organisations in scope?	**Micro** Yes	**Small** Yes	**Medium** Yes	**Large** Yes
What is the CO_2 equivalent change in greenhouse gas emissions? (Million tonnes CO_2 equivalent)		**Traded:**	**Non-traded:**	

I have read the Consultation Impact Assessment, and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible SELECT SIGNATORY: ..... Date: .....

[2] Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97 (legislation.gov.uk)

[3] Code of practice for the welfare of laying hens and pullets - GOV.UK (www.gov.uk)

[4] Code of practice for the welfare of meat chickens and meat breeding chickens - GOV.UK (www.gov.uk)

[5] Welsh Code of Practice for the Welfare of Laying Hens and Pullets; Welsh Code of Practice for the Welfare of Meat Chickens and Meat Breeding Chickens

[6] Scottish Guidance for the Welfare of Laying Hens and Pullets; Scottish Guidance for the Welfare of Meat Chickens and Meat Breeding Chickens

Contents

Summary: Analysis & Evidence

Policy Option 1

Description: Preferred Option – to amend Regulation 1/2005 to expressly exclude *Chickens* from the prohibition on lifting animals by the legs.

FULL ECONOMIC ASSESSMENT

Price Base Year 2019	**PV Base Year** 2020	**Time Period Years 10**	**Net Benefit (Present Value (PV)) (£m)**		
			Low: Optional	**High:** Optional	**Best Estimate: 0**

COSTS (£m)	**Total Transition** (Constant Price)	Years	**Average Annual** (excl. Transition) (Constant Price)	**Total Cost** (Present Value)
Low	Optional			
High	Optional			
Best Estimate	0		£0m	**£0m**

Description and scale of key monetised costs by 'main affected groups'

- Amending Regulation 1/2005 is zero cost. Any cost incurred by the industry is related to existing non-compliance and is therefore not included in the EANDCB[7]. Further, it is unlikely that the amendment will give rise to familiarisation costs because the chicken industries that will be impacted by the amendment are already required to have a copy of, and be familiar with, the relevant GB statutory guidance. These provide advice on management and husbandry procedures, including catching and handling.
- A total of 1,166 million chickens are handled every year[8,9,10], some are handled more than once. An increased time cost is identified for industry that currently catch birds by one leg, from the additional time taken to catch birds by two legs compared to by one leg. Catching by two legs reduces the number of birds that can be concurrently caught by a single person and increases the overall time to clear a shed. The element of this increase in time cost is related to existing non-compliance, but for completeness it is examined in the analysis below.

Other key non-monetised costs by 'main affected groups'

- This Option makes an amendment to Regulation 1/2005 which changes the legally permitted catching method from upright by the body to allow catching by two legs, thus providing clarity to the British egg and meat chicken industries. Both EU guidance and AWC's recent report confirm that the lifting or carrying of poultry by one leg is detrimental to bird welfare; however, there are gaps in the scientific evidence regarding the overall welfare impact of other methods, including catching chickens upright and by two legs[11].

BENEFITS (£m)	**Total Transition** (Constant Price)	Years	**Average Annual** (excl. Transition) (Constant Price)	**Total Benefit** (Present Value)
Low	Optional		Optional	**Optional**
High	Optional		Optional	**Optional**
Best Estimate	0			

[7] RPC_case_histories_-_counterfactuals_Sep_20.pdf (publishing.service.gov.uk) – page 12

[8] This includes 9.20m breeding flock for meat chicken and laying hens

[9] Agriculture in the United Kingdom data sets - GOV.UK (www.gov.uk)

[10] Livestock populations in the United Kingdom at 1 June (dataset) - GOV.UK

[11] The AWC report 2024 recommended that it is preferable for all poultry to be caught, lifted, carried and loaded upright by the body, but it recommended that Regulation 1/2005 should be amended to allow catching by two legs for meat chickens, laying hens and turkeys under 10kg for a period of five years, during which data on different catching methods and welfare outcomes should be gathered and analysed and for different methods to be examined and trialled.

Description and scale of key monetised benefits by 'main affected groups'

- There are no monetised benefits identified due to the lack of sufficient scientific evidence regarding the welfare impact of the different catching methods. AWC was unable to specify a single method that will deliver higher bird welfare in every circumstance because of the multiple variables to consider in any given catching, carrying, and loading situation. To address this, and as recommended by AWC, Defra will soon be commissioning research to examine and trial different catching methods for chickens (and perhaps turkeys under 10kg, subject to the consultation) so that data can be collected. This will include an analysis in practical logistics (such as catch time and staffing requirements) and the relationship between different catch methods and welfare outcomes at scale, under commercial conditions. For chickens, this research will focus upon two-leg and upright catching only.

Other key non-monetised benefits by 'main affected groups'

- We are unable to currently describe non-monetised benefits due to the lack of sufficient scientific evidence of the welfare impact of the different catching methods. AWC was unable to specify a single method that will deliver higher bird welfare in every circumstance because of the multiple variables to consider in any given catching, carrying and loading situation. To address this, and as recommended by AWC, Defra will soon be commissioning research to examine and trial different catching methods for chickens (and perhaps turkeys under 10kg) so that data can be collected. This will include an analysis in practical logistics (such as catch time and staffing requirements) and the relationship between different catch methods and welfare outcomes at scale, under commercial conditions. For chickens, this research will focus upon two-leg and upright catching only.

Key assumptions/sensitivities/risks	**Discount rate (%)**	3.5

- In the modelling and analysis of the counterfactual below we refer to our understanding of current industry practice of catching chickens by the legs. We assume zero compliance with the prohibition on the lifting of animals by the legs in Regulation 1/2005. We recognise that industry practice may vary from our estimates.
- We estimate the times taken to catch meat chickens by one leg, two legs and upright using research from Langkabel et al (2015)[12] and Kittelsen et al (2018)[13]. We double the time per catch for catching laying hens in enriched colony cages. For laying hens in barns or free range we add 50% to the time.
- We have estimated the hourly wage for a catcher is £20.53/hr including the non-wage uplift[14].
- In Great Britain, chickens are caught 1.22 billion[15] times for transport every year, with the majority being meat chickens which are caught and handled once per lifetime. Laying hens are assumed to be caught two to three times depending on production system.
- We also include 12.7 million breeding birds[16] in the meat chicken analysis, these cover both meat chicken and laying hen breeders. We assume they are caught and handled once at the end of their lifetime.
- These assumptions are tested in sensitivity analysis below.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			**Score for Business Impact Target (qualifying provisions only) £m:**
Costs: 0	**Benefits: 0.0**	**Net: 0.0**	0.0

[12] Langkabel et al (2015) - Influence of two catching methods on the occurrence of lesions in broilers - ScienceDirect

[13] Kittelsen et al (2018) - Animals | Free Full-Text | An Evaluation of Two Different Broiler Catching Methods (mdpi.com)

[14] Poultry catchers salary - Check average poultry catchers salary rate on Jooble

[15] Calculated from Agriculture in the United Kingdom data sets - GOV.UK (www.gov.uk) Calculated from Agriculture in the United Kingdom data sets - GOV.UK (www.gov.uk) along with assumptions on the number of times caught.

[16] Livestock populations in the United Kingdom at 1 June (dataset) - GOV.UK

Evidence Base

Problem under consideration and rationale for intervention

1. There is currently a discrepancy between Regulation 1/2005 and the GB statutory guidance.

2. Regulation 1/2005 prohibits the lifting of live vertebrate animals by their legs when they are handled as part of a loading or unloading operation to or from a vehicle or other means of transport[17]. Paragraph 1.8 (d) of Chapter III of Annex 1 to Regulation 1/2005 states:

'1.8 It shall be prohibited to:
(d) lift or drag the animals by head, ears, horns, legs, tail or fleece, or handle them in such a way as to cause them unnecessary pain or suffering;'

3. The GB statutory guidance sets out the minimum welfare standards required to meet various legal requirements (for example, sections 4[18] and 9[19] of the Animal Welfare Act 2006) and advises that the catching of chickens by two legs can be acceptable. For example, Defra's meat chicken code of practice states:

'…Catching should either be by holding them round the body or, if by the legs, by both legs. If birds need to be carried, this should either be by holding them round the body or by both legs……'

4. In the absence of a relevant opinion from the European Food Safety Authority (EFSA), at the time that Regulation 1/2005 was drawn up, stating that the catching of chickens by the legs was not acceptable, there would have been no clear expectation or common understanding that Regulation 1/2005 should be amended to prohibit the lifting of chickens by their legs. It was therefore not widely appreciated that Regulation 1/2005 did in fact include such a prohibition. The scientific consensus when Regulation 1/2005 was adopted was that the catching and carrying of certain poultry by two legs was appropriate and acceptable. The scientific consensus on the catching and carrying of poultry by two legs continues to suggest that this method is appropriate[20,21]. Indeed, the European Commission's proposal of 7 December 2023[22] for a new Regulation on the protection of animals during transport and related operations, amending Council Regulation (EC) No. 1255/97 and repealing Regulation 1/2005 does not include a prohibition on the carrying of poultry by the legs, and specifically states that birds shall be caught, lifted and carried by two legs, using breast slides[23] in cages or operator's leg as support for bird's breast.

5. The proposed amendment to Regulation 1/2005 will apply just to chickens. We also propose to amend Chapter III of Annex I to Regulation 1/2005 to explicitly disallow one-leg catching. This would ensure that the rules in this Chapter are consistent with the GB statutory guidance on permitted catching methods and that exempting chickens from the prohibition on lifting in paragraph 1.8(d) will not result in a lowering of welfare standards in practice. All other poultry, such as ducks, geese, gamebirds and turkeys will not be affected by this amendment and will not be considered further in this analysis.

6. AWC's Opinion on the welfare implications of different methods and systems for the catching, carrying, collecting and loading of poultry[24] was published in February 2024. Whilst AWC consider that it is preferable for all poultry to be caught, lifted and carried and loaded upright by the body, AWC were unable to specify a single method of catching which would deliver higher bird welfare in every circumstance. AWC also recommended that the lifting of chickens (and turkeys weighing less than 10kg) by two legs should be permitted for a period of five years to allow data on the

[17] Council Regulation (EC) No 1/2005 of 22 December 2004 on the protection of animals during transport and related operations and amending Directives 64/432/EEC and 93/119/EC and Regulation (EC) No 1255/97 (legislation.gov.uk)

[18] Animal Welfare Act 2006 (legislation.gov.uk)

[19] Animal Welfare Act 2006 (legislation.gov.uk)

[20] D3 Poultry Final 170819 (europa.eu) (Page 30)

21 See Efsa 2022 S.8.1.2.: ' 3) If birds are handled in inverted position, in order to reduce the risk of dislocated joints or fractures, they should be caught, lifted and carried by two legs, using breast slides in cages, maximum 3 birds/hand' (Welfare of domestic birds and rabbits transported in containers (wiley.com))

[22] EUR-Lex - 52023PC0770 - EN - EUR-Lex (europa.eu)

[23] A device used to assist in the catching of laying hens in cages that supports the hens breast when lifted.

[24] Opinion on the welfare implications of different methods and systems for the catching, carrying, collecting and loading of poultry - GOV.UK (www.gov.uk)

relationship between carrying methods and welfare outcomes to be gathered and analysed and for different methods to be examined and trialled.

7. The AWC Opinion reported that catching, lifting, and carrying by one leg catching is commonly employed to catch meat chickens that are ready for slaughter and laying hens that have reached the end of their productive life. Use of this method is contrary to the GB statutory guidance. AWC recommends that lifting or carrying poultry by one leg should continue to not be permitted because this method of handling is detrimental to bird welfare[25].

8. Amending Regulation 1/2005 will provide legal clarity on the requirements that apply to the catching of chickens for the British egg and meat chicken industries and catching companies in relation to loading and unloading practices.

9. The chicken industries will be the primary stakeholders affected by amending Regulation 1/2005 and, in particular, the producers, integrators and independent catching companies. Catching companies are often employed by farms to efficiently and safely depopulate chickens from houses at the end of a production cycle. Catching teams empty the sheds and place animals into crates to be transported to slaughter. The costs of catching vary depending on the catching method applied. Two-leg catching and carrying takes longer than the lower welfare method of one-leg catching, which has long been contrary to the GB guidance and is clearly not a permitted method. Catching companies that are currently non-compliant with the GB statutory guidance will be most affected by the change to the legislation, since catching by two legs is slower and means catching companies would operate less quickly with the same number of staff.

Rationale and evidence to justify the level of analysis used in the Consultation Impact Assessment (IA) (proportionality approach)

10. This amendment is below the threshold for an IA requirement, because where costs from this amendment arise from businesses not complying with Regulation 1/2005, this cost is not included in the EANDCB for the intervention. We have, however, for completeness produced a short IA because the level of assumed non-compliance in the counterfactual results in costs being above the threshold.

11. The rationale for intervention is to address the current discrepancy between Regulation 1/2005 and the GB statutory guidance. There is no market failure for intervention although addressing this discrepancy will help remove uncertainty for stakeholders.

12. The number of birds slaughtered in the supply chain in Great Britain is recorded in published statistics[26].

13. We estimate the number of times each bird is caught, based on our industry knowledge and expert advice.

14. Of the total number of chickens caught in Great Britain, 93% are meat chickens[27]. Evidence of catching times of meat chickens using different catching methods come from Langkabel et al (2015) [28] and Kittelsen et al (2018)[29,]. We use this research as a basis for calculating the time per bird caught. To estimate the time taken to catch laying hens we have made adjustments based on expert knowledge for the different species. We have cross referenced our evidence against publicly available information on the timings[30]. All assumptions are tested in our sensitivity analysis below.

15. In Great Britain in 2023 there were 1,114 million meat chickens, and 39.33 million spent laying hens sent to slaughter[31]. We assume that all birds are caught prior to being transported from the

[25] The AWC recommendation is: 'It should remain illegal for poultry to be lifted or carried by one leg'.

[26] Latest poultry and poultry meat statistics - GOV.UK (www.gov.uk)

[27] Calculations shown in table 4 from (Latest poultry and poultry meat statistics - GOV.UK (www.gov.uk)). Based on our assumption that free range, organic, and barn laying hens are caught 2 times per lifetime, and enriched colony cage laying hens are caught 3 times per lifetime.

[28] Langkabel et al (2015) - Influence of two catching methods on the occurrence of lesions in broilers - ScienceDirect

[29] Kittelsen et al (2018) - Animals | Free Full-Text | An Evaluation of Two Different Broiler Catching Methods (mdpi.com)

[30] Depopulation Systems for Spent Hens—A Preliminary Evaluation in the United Kingdom - ScienceDirect

[31] https://www.gov.uk/government/statistics/poultry-and-poultry-meat-statistics

farm to the slaughterhouse. Out of the 39.33 million laying hens 75% are free range, organic, or barn raised[32], these will be handled twice during their lifetime (from pullet farm into crate for transit to the laying environment, and again from the laying environment for transit to the slaughterhouse). The remaining 25% of laying hens are in enriched colony cages[33], being handled up to three times: firstly, out of the cage at the pullet farm to the crate for transit to the laying environment; secondly, out of the crate and into the enriched colony cage at the laying farm; and thirdly out of the enriched colony cage to go to slaughter.

16. We include 12.72 million breeding birds[34] in the number of meat chickens, which includes both breeders for meat chickens and laying hens. We assume they are caught once at the end of their lifetime. We have not included the catching of day-old chicks as these are handled differently due to their much smaller size.
17. Due to some birds experiencing multiple catch events, there are 1.22 billion catches in total annually[35]. Any change in the time it takes to catch birds will significantly impact catching costs.

Catching method proportions:

18. Our evidence on current industry practice is less robust because the level of non-compliance with Regulation 1/2005, which prohibits the lifting of animals by their legs, is not known. Our understanding is that all chickens are currently caught by the legs, with a higher proportion of meat chickens being caught by one leg. For the counterfactual we assume full compliance with the GB statutory guidance and therefore Option 1 has a zero-cost impact. For completeness we also consider 3 estimated alternative counterfactual scenarios based on our proportionate assessment of industry compliance with Regulation 1/2005 as per RPC guidance[36]. The 3 scenarios show progressively greater compliance with GB statutory guidance, but not with Regulation 1/2005.
19. The AWC Opinion[37] reported that carrying by one leg is commonly employed to catch meat chickens that are ready for slaughter and laying hens that have reached the end of their productive life, however it does not quantify how often this occurs. The Red Tractor farm assurance scheme covering 90% of meat chicken farms does not allow carrying chicken by wings and neck but does not specify that two legs for carrying is required[38]. The British Lion Quality Code of Practice, covering 95% of laying hens, refers to the Joint Industry Welfare Guide to the Handling of End of Laying Hens and Breeders, which requires catching birds by two legs in line with the GB statutory guidance. RSPCA Assured, a farm assurance scheme, covering over half of laying hens and a small share of meat chickens, currently allow the catching of chickens[39,40] by both legs in line with GB statutory guidance.
20. The following tables show the estimated proportions of each catching method currently being used by the chicken industries, which we recognise may vary in practice. Scenario 1 is based on the practices permitted within assurance schemes[41] and the proportion of farms participating in these schemes.

[32] Quarterly UK statistics about eggs – statistics notice (data to December 2023) - GOV.UK (www.gov.uk)

[33] Quarterly UK statistics about eggs – statistics notice (data to December 2023) - GOV.UK (www.gov.uk)

[34] Livestock populations in the United Kingdom at 1 June (dataset) - GOV.UK

[35] As shown in table 4

[36] RPC_case_histories_-_counterfactuals_Sep_20.pdf (publishing.service.gov.uk) – page 12

[37] Opinion on the welfare implications of different methods and systems for the catching, carrying, collecting and loading of poultry - GOV.UK (www.gov.uk)

[38] Poultry-Catching-and-Transport-standards.pdf (redtractorassurance.org.uk)

[39] Chickens | rspca.org.uk

[40] RSPCA welfare standards for laying hens - RSPCA

[41] As described above.

Table 1 – Scenario 1:

	% Meat Chickens	% Free Range, Barn, and Organic Layers	% Enriched Cage Layers
One leg	90%	30%	30%
Two leg	10%	70%	70%
Upright	0%	0%	0%

21. Scenario 2 represents a situation where there is greater compliance with GB statutory guidance requiring catching by two legs, but still a significant share of birds are caught by one leg.

Table 2 – Scenario 2:

	% Meat Chickens	% Free Range, Barn, and Organic Layers	% Enriched Cage Layers
One leg	70%	10%	15%
Two leg	30%	90%	85%
Upright	0%	0%	0%

22. Scenario 3 represents a situation where industry is mostly compliant with the GB statutory guidance and catch by two legs, except for meat chickens, where 50% of catches are by one leg.

Table 3 – Scenario 3:

	% Meat Chickens	% Free Range, Barn, and Organic Layers	% Enriched Cage Layers
One leg	50%	0%	0%
Two leg	50%	100%	100%
Upright	0%	0%	0%

23. AWC sought evidence in writing and in oral evidence sessions from a wide range of GB-based stakeholders for its Opinion and was unable to find any evidence on commercial upright catching. We have, therefore, not approached the industry for further data on this as we believe this method is not practiced commercially in Great Britain.

Wages:

24. The ONS average wage in 2023 for farm workers with SOC 2020 code 9111[42] across Great Britain was £14.48/hr[43] including a non-wage uplift[44] and an annual salary of approximately £25,000 (assuming a 40 hour work week). This SOC code includes a variety of farm labouring roles, including catching. We consider this wage may be an underestimate as it includes other lower paid roles, and we understand that catching jobs attract a wage premium. This is because catching takes place during the night or at dusk when the birds are calmer and requires the catchers to work unsociable hours. It is also strenuous as they lift large numbers of birds over the course of several hours and requires some skill level and training. We further understand that there are difficulties with retention and recruitment for catching jobs. These factors are likely to increase the wage premium for poultry catching.

25. Glassdoor reports an annual salary range of £20,000 – £30,000[45], and job advert websites offer around £35,000 pa[46]. In our analysis we use an estimate that average salary of catching staff is £35,000 pa which is based on 40 hours per week and is equivalent to an hourly wage of £16.83

[42] Extended SOC 2020 - Office for National Statistics (ons.gov.uk)

[43] Earnings and hours worked, region by occupation by four-digit SOC: ASHE Table 15 - Office for National Statistics (ons.gov.uk)

[44] Non-wage uplift is 22%

[45] Salary: Chicken Catcher in United Kingdom 2024 | Glassdoor

[46] 4D Farm Services Ltd hiring Chicken catcher Job in Tiverton, North West England, England | Glassdoor, Poultry catchers salary - Check average poultry catchers salary rate on Jooble

excluding non-wage uplift. A wage uplift of 22% is added to account for non-wage costs, such as pension contributions, holiday pay, sick pay, hiring costs, payroll costs and liability insurance. This makes the estimated hourly wage rate for catchers £20.53/hr including non-wage uplift. We undertake sensitivity analysis on wages, including a scenario for the ONS wage.

Catching times:

26. When birds are caught in a barn environment they are caught by the body or leg(s) and carried over a short distance (approximately 5 metres) to modular crates. Each crate is filled with 34 to 42 birds depending on the weight of the birds[47]. The time taken for catching and loading is a combination of the distance between the birds and the crates, and the ease of catching. Some birds are more active than others and if the birds are in enriched colony cages it might involve additional effort to get them out of the cage safely. We exclude mechanical catching of chickens by automated machines[48], as it is not believed to be a common practice and there is a lack of evidence on the current levels of mechanical catching used in these industries.

27. Academic research[49,50] on catching times for meat chickens has been used as a basis for our estimates. The reports state the time to fill a crate, and we have adjusted the figures to obtain a time per bird, with the data and calculations in Annex 1. For two-leg catching the two research papers report different times. To calculate an average time per bird, we have weighted the time by the number of birds included in each study. This results in an average time per meat chicken for each catching method as shown in Table 4 below.

Table 4 – Time estimates for 1 catcher:

	one leg:	two legs:	Upright:
Time per bird (seconds)	2.22	3.42	3.79

28. As catchers can carry multiple birds at one time, the time per bird should be multiplied by the number of birds being carried. The main time cost increase (reduction) results from the catcher making more (fewer) journeys to the crates with fewer (more) birds. In the research the one leg method catchers can hold up to 6 birds, compared to the two-leg method where catchers can hold up to 4 birds[51]. For example, in one-leg catching we assume catchers take 6 birds × 2.2s = 13.2s per trip to the crate, compared to two-leg catching where a trip to the crate takes 4 birds × 3.4s = 13.6s. But 1.5 trips are needed to put 6 birds in a crate, which would take 1.5 trips × 13.6s = 20.4s. This is longer than with one-leg catching.

Table 5 – Catch times in the context of number of trips to crates (seconds)

Catching method	Time per bird	Birds carried per trip to crate	Time per trip to crate	Total time for 6 meat chickens to crate:
1 leg	2.2s	6	13.2s	13.2s
2 leg	3.4s	4	13.6s	20.4s
Upright	3.8s	2	7.6s	22.8s

29. Table 6 summarises the time assumptions for each type of chicken (based upon sector and housing system). We assume that catching times for laying hens are longer than for meat chickens. For laying hens in barns or free range, we assume the time is one and a half times longer as the birds are livelier and more difficult to catch. For laying hens in enriched colony cages, we assume, that each move (as described above) takes twice as long. This is because they are often in tiered (stacked) cages and the layout of the farms may not allow the crates to be

[47] Langkabel et al (2015) - Influence of two catching methods on the occurrence of lesions in broilers - ScienceDirect

[48] The welfare impacts of mechanical and manual broiler catching and of circumstances at loading under field conditions - PMC (nih.gov)

[49] Langkabel et al (2015) - Influence of two catching methods on the occurrence of lesions in broilers - ScienceDirect

[50] Kittelsen et al (2018) - Animals | Free Full-Text | An Evaluation of Two Different Broiler Catching Methods (mdpi.com)

53 Langkabel et al (2015) - Influence of two catching methods on the occurrence of lesions in broilers - ScienceDirect

placed as near to the cages. In addition, it may also take longer to get birds in and out of the cages that are on the higher tiers.

Table 6 – estimated time per catch per bird (seconds)

	One Leg	Two Leg	Upright
Meat Chicken	2.2	3.4	3.8
Free Range, Organic or Barn Laying Hen	3.3	5.1	5.7
Enriched Colony Cage Laying Hen	4.4	6.8	7.6

30. In total, chickens are handled 1.22 billion times annually, as shown in Table 7. Therefore, small differences in catching time will have significant effects on the total costs of the amendment to Regulation 1/2005. We test this in our sensitivity analysis.

Table 7 – Quantity of catchings calculations

Species	Slaughter Quantity of species (2023)	Percentage of included population	times caught	total catches per species	Percentage of all catchings:
Meat chicken	1,126,719,899	97%	1	1,126,719,899	93%
Free range, organic and barn laying hen	29,501,195	3%	2	59,002,391	5%
Enriched colony cage laying hen	9,833,732	1%	3	29,501,195	2%
Total	**1,166,054,826**			**1,215,223,485**	

Description of options considered.

31. The desired outcome is to remove the discrepancy between the current Regulation 1/2005 and GB statutory guidance on chickens to allow the GB statutory guidance to continue to be followed. This will provide clarity on the legal requirements that apply to the British egg and meat chicken industries and catching companies in relation to loading and unloading practices.

32. In the do-nothing scenario we estimate that chickens are caught by the legs. Regulation 1/2005 currently does not allow animals to be lifted by their legs which means that poultry need to be picked up by the body and carried upright. The do-nothing option would not resolve the discrepancy between Regulation 1/2005 and the GB statutory guidance, and would not reflect the widespread view (based on UK and EU guidance) that two-leg catching can be acceptable, nor our understanding of current industry practice. There is currently insufficient scientific evidence to support a comprehensive shift to catching chickens upright by the body on a commercial scale. We need to better understand the risk that existing labour shortages may pose on chicken welfare outcomes when combined with a slower, more labour intensive, catch method. AWC were unable to specify a single method of carrying, catching and loading which would deliver higher bird welfare in every circumstance. To address the gaps in the scientific evidence, we will soon be commissioning research to examine the logistical and overall welfare impact of catching chickens by two legs and upright, by the body.

33. The preferred option, to amend Regulation 1/2005 to expressly exclude chickens from the prohibition on lifting animals by the legs, removes the discrepancy between Regulation 1/2005 and the GB statutory guidance. As the scientific consensus, and all EU and GB guidance, at the time that Regulation 1/2005 was drawn up, indicated that the catching of chickens by two legs was appropriate and acceptable, there would have been no clear expectation, common understanding or wide appreciation that Regulation 1/2005 included a prohibition on the lifting of chickens by their legs. The scientific consensus on the catching and carrying of poultry by two legs continues to suggest that this method is appropriate[52]. Indeed, the European Commission's

[52] D3 Poultry Final 170819 (europa.eu) (Page 30)

recent proposal of 7 December 2023[53] for a new Regulation on the protection of animals during transport and related operations, amending Council Regulation (EC) No. 1255/97 and repealing Regulation 1/2005 does not include a prohibition on the catching of poultry by the legs, and specifically states that birds shall be caught, lifted and carried by two legs, using breast slides[54] in cages or operator's leg as support for bird's breast.

34. The non-regulatory option would be to amend the GB statutory guidance, to reflect the requirement in Regulation 1/2005 that birds cannot be lifted by the legs. Whilst the option would provide legal clarity it may have unintended welfare outcomes linked to longer catch times and staffing shortages. There is currently insufficient scientific evidence to support upright catching within a commercial British setting. Our intention is to commission research into the practical logistics and welfare outcomes associated with manual (two-leg and upright) chicken catching methods. This should help us to establish whether a comprehensive transition to upright catching is appropriate and practically feasible (in terms of further increasing welfare potential) in the long-term. The non-regulatory option is not considered further as it is the same as the do-nothing option and does not meet the desired outcome.

Policy objective

35. An amendment to Regulation 1/2005, to exclude chickens from the prohibition on the lifting of animals by the legs in Great Britain, will reflect the long-established and widely held opinion that two-leg catching of chickens is appropriate. It will enable chicken welfare to be protected in the short term while the consequences of further legislative change (associated with a comprehensive shift to upright catching) are investigated.[55]. Such an amendment will remove the discrepancy between the current Regulation 1/2005 and the GB statutory guidance, which advise that the catching of chickens by two legs can be acceptable.
36. The amendment will provide legal certainty for the British egg and meat chicken industries, and catching companies, as to the requirements that apply to the catching and handling of birds for transport. It will also give producers certainty on the minimum costs expected to be incurred from catching.
37. To assess whether the objectives for amending Regulation 1/2005 are successful, further consideration of monitoring procedures will be needed to ensure that those catching chickens comply with the legal requirements.

Summary and preferred option with description of implementation plan

38. Regulation 1/2005 applies in England, Wales and Scotland. However, the protection of animal welfare during transport and related operations is devolved. Our intention is to agree an approach between the UK, Welsh and Scottish governments to allow the amendment to Regulation 1/2005 to be made jointly. There will be no transitional arrangements.
39. By amending Regulation 1/2005 to exclude chickens from the prohibition on the lifting of animals by the legs in Great Britain, we will be reflecting the position when the EU legislation was drawn up, namely the lack of evidence for such a ban being applied to some species of poultry. It will also enable us to safeguard chicken welfare in the short-term, while we collect data to enable a comprehensive analysis of the collective welfare impact that a more labour-intensive (upright body) catching method may have[56]. The amendment will remove the discrepancy between the current Regulation 1/2005 and the GB statutory guidance[57] which advise that the catching of chickens by two legs can be acceptable.

[53] EUR-Lex - 52023PC0770 - EN - EUR-Lex (europa.eu)

[54] A device used to assist in the catching of laying hens in cages that supports the hens breast when lifted.

[55] Opinion on the welfare implications of different methods and systems for the catching, carrying, collecting and loading of poultry - GOV.UK (www.gov.uk)

[56] Opinion on the welfare implications of different methods and systems for the catching, carrying, collecting and loading of poultry - GOV.UK (www.gov.uk)

[57] Code of practice for the welfare of laying hens and pullets - GOV.UK (www.gov.uk)

40. The Animal and Plant Health Agency (APHA) is responsible for safeguarding animal health and welfare and monitors and assesses farmer compliance with animal welfare legislation. Local Authorities enforce the animal welfare in transport legislation.

41. To address the lack of scientific knowledge in this area, Defra will soon be commissioning targeted research to examine and trial different catching methods for chickens (and perhaps turkeys under 10kg) so that data can be collected and analysed on the relationship between method, logistical measures (such as catch times and staffing requirements) and welfare outcomes under commercial settings. For chickens, only two-leg and upright catching methods will be studied. Once the overall animal welfare impact of these different catch methods are known, we will consider whether future changes are needed to the Regulations and the GB statutory guidance.,

Monetised and non-monetised costs and benefits of each option (including administrative burden)

The preferred Option 1

Expected costs:

42. Amending Regulation 1/2005 is unlikely to give rise to familiarisation costs because those chicken industries that will be impacted by the amendment are already required to have a copy of, and be familiar with, the GB statutory guidance which provide advice on management and husbandry procedures, including on catching.

43. There will be no increased administrative burden for the chicken industries or for government.

44. The main cost of the preferred option is the increase in labour cost for the chicken industries and catching teams, because of the increased time taken to catch the birds compared to the counterfactual scenarios. We use 3 estimated scenarios of current industry practice, with each representing differing levels of compliance with the GB statutory guidance. This approach is used to allow for uncertainty in the predictions. These scenarios are set out in Tables 1, 2 and 3 above. By disapplying the prohibition to chickens, they can legally be caught by two legs. Compared to the catch times in the counterfactual, industry would face increased catch times for two-leg catching as shown in Table 6 above. Table 8 shows a summary of the annual costs under each scenario in counterfactual, and the cost over the 10-year appraisal period which is discounted and deflated. This cost is excluded from the calculation of the EANDCB as per RPC guidance[58], because these cost increases are a result of businesses not complying with existing requirements.

Table 8a – Scenario Comparison: move to two-leg catching

Counterfactual Scenario	Annual Cost	Cost Over 10 Years (discounted at 3.5%)
Scenario 1	£7.3m	£62.7m
Scenario 2	£5.6m	£47.8m
Scenario 3	£3.9m	£33.4m

45. If the industry is compliant with Regulation 1/2005 then the main cost saving from this option would be the theoretical reduction in cost for the chicken industries and catching teams, by reducing the time taken to catch the birds compared to the counterfactual. Under this counterfactual, we would assume 100% compliance with Regulation 1/2005, which prohibits the lifting of animals by the legs. By disapplying the prohibition to chickens they can be caught by two legs. Compared to this counterfactual, industry could reduce catching times as shown in Table 6 above. The annual average net cost saving would be £2.7 million per year, with a total cost saving of £22.9 million when discounted at 3.5% over a 10-year appraisal period. We believe that using this counterfactual does not reflect current industry practice and so have not included this in our main analysis.

[58] RPC_case_histories_-_counterfactuals_Sep_20.pdf (publishing.service.gov.uk) – page 12

46. For completeness, in table 8b below, we estimate the cost of moving from current industry practice to compliance with Regulation 1/2005 (Option 2) – upright carrying. We also estimate the cost if everyone were currently complying with the GB statutory guidance (i.e., two-leg catching).

Table 8b – Scenario Comparison: move to upright carrying

Counterfactual Scenario	Annual Cost	Cost Over 10 Years (discounted at 3.5%)
Scenario 1	£9.9m	£85.6m
Scenario 2	£8.2m	£70.7m
Scenario 3	£6.5m	£56.3m
Compliance with GB statutory guidance	£2.7m	£22.9m

Expected Benefits:

47. There are no monetised or non-monetised benefits identified due to the lack of sufficient scientific evidence of the welfare impact of catching by two-legs or by upright body methods. To address the gaps in scientific knowledge in this area and, as recommended by AWC, Defra will soon be commissioning research to examine and trial different catching methods (including two-leg and upright body catching for chickens) so that data can be collected and analysed on the relationship between catch method, logistical measures and welfare outcomes, in a commercial setting.

Direct costs and benefits to business calculations

Costs:

48. For businesses that do not already comply with the GB statutory guidance, there will be a time cost as it is slower to catch chickens by two legs rather than by one leg. Table 9 shows the estimated times per lifetime for catching chickens from each sector, by housing system[59]. Table 9 multiplies the times in Table 7 by the number of catches in the bird's lifetime. We assume that: meat chickens are caught only once in a lifetime; that free range, organic, and barn laying hens are caught twice in a lifetime; and that enriched colony cage laying hens are caught 3 times in a lifetime. Hourly wages are calculated to be £20.53 including the non-wage uplift, and are based on a salary of £35,000pa for 40 hours work.

Table 9: Catching times per animal lifetime in seconds and hours

	One Leg (seconds to 2.d.p)	One Leg (hours to 5.d.p)	Two Leg (seconds to 2.d.p)	Two Leg (hours to 5.d.p)
Meat Chicken	2.22	0.00062	3.42	0.00095
Free Range, Organic, and Barn Laying Hen	6.65	0.00185	10.27	0.00285
Enriched Colony Cage Laying Hen	13.29	0.00369	20.54	0.00571

49. Equation (1) shows how the annual time cost for the counterfactual scenarios and for 100% two-leg catching is calculated. This is shown for Scenario 1 for in Table 10, Scenario 2 in table 11, Scenario 3 in table 12, and for two-leg in Table 13. Equation (2) shows how we calculate the net time cost per year, with a summary of results in Table 14. These costs are excluded from the calculation of the EANDCB.

[59] Calculations based on times from Langkabel et al (2015) and Kittelsen et al (2018)

$$(1)\ Total\ time\ cost$$

$$= £\ hourly\ wage \begin{cases} qty\ meat\ chicken \times one\ leg\ catch\ proportion \times one\ leg\ catch\ time \\ qty\ meat\ chicken \times two\ leg\ catch\ proportion \times two\ leg\ catch\ time \\ qty\ free\ range\ laying\ hen \times one\ leg\ catch\ proportion \times one\ leg\ catch\ time \\ qty\ free\ range\ laying\ hen \times two\ leg\ catch\ proportion \times two\ leg\ catch\ time \\ qty\ enriched\ colony\ laying\ hen \times one\ leg\ catch\ proportion \times one\ leg\ catch\ time \\ qty\ enriched\ colony\ laying\ hen \times two\ leg\ catch\ proportion \times two\ leg\ catch\ time \end{cases}$$

$$(2)\ Additional\ time\ cost\ = Time\ cost\ scenario - Time\ cost\ 100\%\ two\ leg$$

Table 10: Total Costs for Scenario 1

	One Leg Lifetime Catching Time (hrs to 5.d.p) (A)	One leg proportion (B)	Two Leg Lifetime Catching Time (hrs to 5.d.p) (C)	Two leg proportion (D)	Slaughter Quantity (mill to 2.d.p) (E)	Hourly Wage (£ to 2.d.p) (F)	((A x B) + (C x D)) x E x F (£million to 2.d.p)
Meat Chicken	0.00062	90%	0.00095	10%	1,126.72	20.53	15.10
Free Range, Organic, and Barn Laying Hen	0.00185	30%	0.00285	70%	29.50	20.53	1.54
Enriched Colony Cage Laying Hen	0.00369	30%	0.00571	70%	9.83	20.53	1.03
						TOTAL	**17.67**

Table 11: Total Costs for Scenario 2

	One Leg Lifetime Catching Time (hrs to 5.d.p) (A)	One leg proportion (B)	Two Leg Lifetime Catching Time (hrs to 5.d.p) (C)	Two leg proportion (D)	Slaughter Quantity (mill to 2.d.p) (E)	Hourly Wage (£ to 2.d.p) (F)	((A x B) + (C x D)) x E x F (£million to 2.d.p)
Meat Chicken	0.00062	70%	0.00095	30%	1,126.72	20.53	16.63
Free Range, Organic, and Barn Laying Hen	0.00185	10%	0.00285	90%	29.50	20.53	1.67
Enriched Colony Cage Laying Hen	0.00369	15%	0.00571	85%	9.83	20.53	1.09
						TOTAL	**19.39**

Table 12: Total Costs for Scenario 3

	One Leg Lifetime Catching Time (hrs to 5.d.p) (A)	One leg proportion (B)	Two Leg Lifetime Catching Time (hrs to 5.d.p) (C)	Two leg proportion (D)	Slaughter Quantity (mill to 2.d.p) (E)	Hourly Wage (£ to 2.d.p) (F)	((A x B) + (C x D)) x E x F (£million to 2.d.p)
Meat Chicken	0.00062	50%	0.00095	50%	1,126.72	20.53	18.16
Free Range, Organic, and Barn Laying Hen	0.00185	0%	0.00285	100%	29.50	20.53	1.73
Enriched Colony Cage Laying Hen	0.00369	0%	0.00571	100%	9.83	20.53	1.15
						TOTAL	**21.04**

Table 13: Total Costs for Two Leg Catching

	Two Leg Lifetime Catching Time (hrs to 5.d.p) (A)	Slaughter Quantity (E) (millions to 2.d.p)	Hourly Wage (£ to 2.d.p) (F)	A x E x F (£million to 2.d.p)
Meat Chicken	0.00095	1,126.72	20.53	21.97
Free Range, Organic, and Barn Laying Hen	0.00285	29.50	20.53	1.73
Enriched Colony Cage Laying Hen	0.00571	9.83	20.53	1.15
			TOTAL	**24.85**

Table 14: Summary of catching time costs

Counterfactual Scenario	Current time cost	100% two leg time cost	Additional time cost[60]
Scenario 1	£17.67m	£24.85m	£7.18m
Scenario 2	£19.39m	£24.85m	£5.46m
Scenario 3	£21.04m	£24.85m	£3.81m

Risks and assumptions

50. There are three key areas of assumptions; catching times, catcher wages, and the amount of extra time factor applied to catch laying hens. These are discussed in detail below, with sensitivity analysis for catching times and catcher wages.

Time assumptions:

51. The calculation of catching time has been informed by two academic papers, Langkabel et al (2015)[61] and Kittelsen et al (2018)[62] and is in Annex 1. They examine the effects of different catching methods on the welfare of meat chickens, particularly injuries incurred during handling, and assess the factors that could influence these injuries, including catching time. From this data, the weighted average time taken to catch a single meat chicken for each catching method has been calculated as discussed previously.

52. Spent laying hens are held in different conditions to meat chickens, with 25% of eggs being produced in enriched colony cages, 64% birds are in free range conditions, and 11% of birds in barn or (free range) organic conditions[63]. Free range, organic and barn chickens (75% total) are more active[64] than meat chickens, making them harder to catch and slows down the catching teams. For the 75% of laying hens that are in free range, organic, or barn systems, it is assumed that it takes 50% longer to catch them than a meat chicken across all catching methods. The 25% of laying hens that are kept in enriched colony cages will be caught differently to the hens in barns, as they are in tiered cages that are emptied by catchers into crates. Transport crates cannot always be placed as near to the birds compared to a barn setting, which will slow down catching, as well as the variation in height and the difficulty of catching the caged birds. It is

[60] There is variation between costs in table 14 and 8 due to rounding. Here, the additional time costs use inputs rounded to 2.d.p (from tables 9-13), whereas table 8 accurately shows the total cost of the option as only the final output is rounded to 2.d.p.

[61] Langkabel et al (2015) - Influence of two catching methods on the occurrence of lesions in broilers - ScienceDirect

[62] Kittelsen et al (2018) - Animals | Free Full-Text | An Evaluation of Two Different Broiler Catching Methods (mdpi.com)

[63] Quarterly UK statistics about eggs – statistics notice (data to December 2023) - GOV.UK (www.gov.uk)

[64] They move faster and can fly further

assumed that it takes twice as long to catch a spent laying hen in an enriched colony cage than a meat chicken across all catching methods.

Sensitivity analysis:

53. The analysis above is based on several assumptions which are tested in this sensitivity analysis. We test the wages of the catchers, the time it takes to catch birds by the catchers, and the assumptions made on additional time factor applied for laying hens.

Wages:

54. Our central estimate of the annual salary for a catcher is £35,000[65], based on an estimated 40 hours work week, this is equivalent to £16.83/hr or £20.53/hr including the 22% wage uplift. This is based on a few live adverts, but note that this is different from the reported ONS wage. We test the sensitivity of this below.

55. Our sensitivity analysis considers the ONS hourly wage of £14.48/hr including uplift (approx. £25,000pa), a low hourly wage of £17.60 including uplift (£30,00pa), and a high hourly wage of £23.46 including uplift (£40,000pa) as summarised in Table 15. The ONS wage is lower because it includes a wide variety of agricultural labour jobs and we understand that the unsociable hours, the strenuous nature of catching, the skill level involved, and retention difficulties means that poultry catching jobs command a wage premium.

Table 15 – sensitivity analysis on the wage of catchers

Scenario:	Annual salary	Hourly wage (excl uplift)	Hourly wage (incl uplift)
ONS	£25,000	£11.87	£14.48
Low	£30,000	£14.42	£17.60
Central	£35,000	£16.83	£20.53
High	£40,000	£19.23	£23.46

56. Table 16 presents a summary of the cost of the preferred option compared to the counterfactuals under the ONS wage scenario, the low wage scenario, and the high wage scenario, and compares these costs to the original costs in the central wage scenario. This shows how our estimates are affected by wages. In all scenarios of current practice, the cost of using two-leg catching is under the £10m IA threshold for the ONS, low, central, and high wage cases.

Table 16 – Summary of the Impact of Wages on Cost Increase

Scenario:	Scenario 1 Annual cost	Scenario 2 Annual Cost	Scenario 3 Annual Cost
ONS	£5.14m	£3.92m	£2.74m
Low	£6.25m	£4.76m	£3.33m
Central	£7.29m	£5.55m	£3.88m
High	£8.33m	£6.35m	£4.43m

Catching time per bird:

57. The catching time estimates are based on research by Langkabel et al (2015)[66] and Kittelsen et al (2018)[67] that both examine meat chicken catching. We conduct a sensitivity analysis to allow for

[65] Poultry catchers salary - Check average poultry catchers salary rate on Jooble

[66] Langkabel et al (2015) - Influence of two catching methods on the occurrence of lesions in broilers - ScienceDirect

[67] Kittelsen et al (2018) - Animals | Free Full-Text | An Evaluation of Two Different Broiler Catching Methods (mdpi.com)

uncertainty of these studies. The analysis considers 2 scenarios where it is quicker and slower to catch birds by 25%, and 50%. In each case we change the catching time for all birds including using the additional time added to laying hens as described above. The annual time costs in each case are summarised in Table 17 below, which shows high variation in estimated outcomes with respect to catching time. The costs exceed the £10 million threshold for an IA of the 50% slower case of Scenario 1.

Table 17: Sensitivity analysis on catching time – annual cost

	Quicker	Central	Slower
Scenario 1 - 25%	£5.47m	£7.29m	£9.11m
Scenario 1 - 50%	£3.64m	£7.29m	£10.93m
Scenario 2 - 25%	£4.17m	£5.55m	£6.94m
Scenario 2 - 50%	£2.78m	£5.55m	£8.33m
Scenario 3 - 25%	£2.91m	£3.88m	£4.85m
Scenario 3 - 50%	£1.94m	£3.88m	£5.82m

Catch times factors for laying hens:

58. Table 18 shows the central estimate for the times taken to catch chickens compared to the sensitivity cases. With the central case it is assumed that laying hens in free range, organic, or barn systems take 50% longer to catch than meat chickens across all catching methods. It is also assumed that it takes twice as long to catch a spent laying hen in an enriched colony cage than a meat chicken across all catching methods. In the high sensitivity we increase the factor we apply to the time it takes to catch all laying hens by 50% compared to meat chickens. In the low sensitivity we decrease the factor we apply to the time it takes to catch laying hens by 50% compared to a meat chicken.
59. Table 19 compares the time costs under each of the counterfactual scenarios for the time sensitivities. All scenarios are below the £10m IA threshold for all multiplier factors. There is no change in cost for Scenario 3 because 100% of laying hens are assumed to be caught by two legs already.

Table 18 – Catch time factors for laying hens – sensitivity analysis

	High Catch Time Factor +50%	Central Factor	Low Catch Tme Factor -50%
Meat Chickens:	NA	NA	NA
Free range spent Layers	2.25	1.5	0.75
Enriched Cage Layers	3	2	1

Table 19 – Summary of Costs Depending on Catch Time Factors

Total cost	High catch time +50%	Central	Low Catch time -50%
Scenario 1	£7.44m	£7.29m	£7.14m
Scenario 2	£5.62m	£5.55m	£5.49m
Scenario 3	£3.88m	£3.88m	£3.88m

Conclusion on sensitivity analysis:

60. This sensitivity analysis highlights that the estimates of catch timings, and wages have a significant impact on our estimates.

61. The estimates are very sensitive to catch timings. If timings are 50% longer, then costs increase 50%. Such an increase is less than 2 seconds per meat chicken for upright catching. It is, therefore, very likely that the real cost could be larger than our current estimates. We note that the study[68] which included upright catching times did not include a large sample size[69].

62. Wages have a direct proportional impact on the potential time costs for industry. The wage of £35,000 was based on a few live job adverts and may not be representative. Evidence on the average agricultural wages from the ONS[70] reports wages that are lower than our central estimate. Despite our reasoning above, it is possible that the central estimate of costs are more likely to be overestimates than underestimates.

63. Our estimates are not sensitive to the assumption that it takes longer to catch laying hens, as birds kept in barns or free-range are livelier and more difficult to catch, and laying hens kept in enriched colony cages take longer to remove from the cages. Although laying hens are caught multiple times in a lifetime, the effect of an increase, or decrease, in the factor applied to the meat chicken catch times has a very small impact on the time cost. This is because the quantity of laying hens is small compared to the quantity of meat chickens. If our timing expectations for laying hens relative to meat chickens are inaccurate, there will only be a small impact on time costs.

Impact on small and micro businesses

64. SMBs should not be exempt from the amendment to Regulation 1/2005. If they were exempt, this would mean they would have to catch chickens upright by the body and incur greater time costs from catching. Exempting SMBs from this amendment would give a competitive advantage to larger firms that would then be able to catch birds faster by using two legs.

65. The UK market for meat chickens is highly concentrated, with the top 6 integrators supplying around 85% of the market. Integrators are firms that operate multiple holdings from day old chicks through to slaughter and processing. In 2023 there were 16,700 commercial holdings with over 1000 poultry[71]; the share of these that are operated by integrators is unknown. It is likely that there are a large number of independent small holdings that would be disadvantaged by comparatively higher catch times if they were excluded from this amendment.

66. The amendment to Regulation 1/2005 will not result in any costs to SMBs as there are no costs resulting from this change. Stakeholders currently catching using the upright method could realise cost savings by catching by two legs, but we have no evidence to indicate that chickens are currently being caught by the body under a commercial setting.

Wider impacts (consider the impacts of your proposals)

67. The legislative clarity created by amending Regulation 1/2005, in the manner proposed, will not impact the behaviour of stakeholders already complying with the GB statutory guidance or consumers of eggs or chicken meat. It will only impact catching practices of stakeholders that are currently non-compliant with the GB statutory guidance (which has existed, effectively unchanged, since 2002), and so will not have any unexpected impact on cost to business.

68. The amendment is not expected to impact innovation. The number of birds that are mechanically collected in Great Britain remains low but there may be a greater role for them in future as this technology develops.

69. The environment will be unaffected by this amendment to Regulation 1/2005 as no emissions or environmental externalities are associated with the manual catching of chickens.

A summary of the potential trade implications of measure

70. The proposed amendment to Regulation 1/2005 is not expected to have any impact on trade. There is no cost impact to compliant producers. Further, we do not consider that there will be any trade or food security impacts as a result of this amendment.

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[68] Animals | Free Full-Text | An Evaluation of Two Different Broiler Catching Methods (mdpi.com)

69 1941 meat chickens were caught by the upright method.

[70] Earnings and hours worked, region by occupation by four-digit SOC: ASHE Table 15 - Office for National Statistics (ons.gov.uk)

[71] Structure of the agricultural industry in England and the UK at June - GOV.UK (www.gov.uk)

Monitoring and Evaluation

71. The Animal and Plant Health Agency (APHA) is responsible for safeguarding animal health and welfare. APHA monitors and assesses farmer compliance with animal welfare legislation. APHA takes a risk-based and proportionate approach to inspection, by considering the degree of the risk of harm caused by non-compliance. Local Authorities enforce the animal welfare in transport legislation.

72. Although APHA do not currently enforce catching, we will work with then to consider whether there are more effective monitoring procedures which can be implemented, to ensure that those catching chickens follow the legal requirements. In addition, farm assurance schemes have a role to play in ensuring their monitoring of members is effective and members are compliant with scheme requirements and legal requirements for catching birds. Any additional guidance developed by assurance schemes could be included in individual scheme depopulation plans. This will further aid the monitoring and evaluation needed to assess whether the amendment to Regulation 1/2005 is successful.

73. To address the gaps in scientific knowledge in this area, and as recommended by AWC[72], Defra will soon be commissioning research to examine and trial two-leg and upright (body) catching methods in chickens to better understand the relationship between catch method, logistical measures (such as catch time and labour requirements), and welfare outcomes, on a commercial scale. It is estimated that such a study will take approximately three years to collect data, plus additional time for analysis, writing up and dissemination.

74. Once we have a more comprehensive scientific evidence base regarding the animal welfare impacts of different methods of catching chickens (and perhaps turkeys under 10kg), it will be possible to determine whether future changes are needed to the Regulations and the GB statutory guidance. This will include an informal review of the regulatory change considered in this document.

[72] AWC Opinion: 144. Because of the multiple variables to consider in any specific catching, carrying and loading situation, AWC is unable to specify a single method that will deliver higher bird welfare in every circumstance.

ANNEX 1 – Catch times:

Kittelsen et al (2018):

Calculation of time per bird for 1 catcher	2 legs	Upright
Number of drawers per crate[1]	8	8
Mean qty of birds per drawer[1]	31.25	30.5
Calc Mean qty birds per crate[1]	250.0	244.0
Mean Time per Crate:	252.0	231.2
Number Catching staff per crate	4	4
Calc Birds caught per person	62.5	61
Calc Mean Time per bird for whole team of 4:	1.01	0.95
Calc mean time per bird for 1 catcher	4.03	3.79

1) A crate is a transport unit for birds, with 8 drawers, which can each hold around 30 birds on average per drawer, and around 250 birds per crate.

Langkabel et al (2015):

Team 1:	1 legs light	2 leg light	1 leg heavy	2 leg heavy
Total birds caught	3939	4141	12910	13004
Calc Total birds per container	328.25	345.08	537.92	541.83
People on team:	6	6	7	7
Calc Birds caught per person per container	54.71	57.51	76.85	77.40
Calc Team Time per container (secs)	109.8	250.2	75	143.4
Calc time per bird for 1 person	2.01	4.35	0.98	1.85

Team 2:	1 legs light	2 leg light	1 leg heavy	2 leg heavy
Total birds caught	2654	2723	11209	10788
Calc Total birds per container	331.75	340.38	509.50	490.36
People on team:	8	8	8	8
Calc Birds caught per person per container	41.47	42.55	63.69	61.30
Calc Team Time per container (secs)	186	222	88.8	129.6
Calc time per bird for 1 person	4.49	5.22	1.39	2.11

1 leg vs 2 leg Summary:		
Average of light and heavy, and both teams	1 leg	2-leg
Calc Time per bird for 1 person	2.22	3.38

Kittelsen et al (2018) assessed fewer birds than Langkabel et al (2015). We have applied a weighing to the time per bird to give greater weight to Langkabel et al (2015) due to its higher sample size proportional to the number of birds assessed. We gave a weighting of 94% to Langkabel et al (2015) as it included 30,656 meat chickens for the 2 leg timings, and 6% to Kittelsen et al (2018) as it only included 2010 meat chickens for 2 leg timings. Final timings including the weighted 2 leg time are below.

	1 Leg	2 Leg	Upright
Time per bird for 1 catcher:	2.22	3.42	3.79