

# EAZA Position Statement on the protection of feed animals, with focus on day-old chicks



Approval by EAZA Council  
16 August 2023

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## Executive summary

This statement expresses EAZA's views on the protection of feed animals, with specific focus on day-old poultry.

We acknowledge the serious issue posed by the killing of day-old chicks of domestic chicken *Gallus gallus* considered a by-product in the laying hen sector. However, while more than 300 million day-old chicks are killed across the European Union with no purpose, several million serve as biologically and nutritionally appropriate feed for wild animals in human care, obtained through culling methods recognized and approved by EU law.

Therefore, when the killing of day-old chicks is restricted or banned, whether nationally or in EU law, we recommend granting an exemption for the specific purpose of feeding day-old chicks to other animals.

## Introduction

EAZA supports the ambition of the European Union to be a leader in animal welfare. In this context, we welcome the efforts to examine whether the EU's legal framework guarantees adequate animal welfare. We also support all research that contributes to increased welfare at all stages of an animal's life.

In the context of the public discussion on day-old poultry, we acknowledge the serious issue posed by the killing of day-old chicks of domestic chicken *Gallus gallus*. At the same time, we wish to point out that next to the 300 million chicks that are killed in this process across the EU every year as a mere by-product of the laying hen sector<sup>1</sup>, several million serve an important nutritional purpose: they are fed to wild animals in human care, in zoos and other facilities, as a biologically and nutritionally appropriate feed, obtained through culling methods recognized and approved by EU law.

Currently, day-old chicks used as animal feed are killed by modified atmospheres, i.e., primarily CO<sub>2</sub> gassing. This method is permitted by EU Regulation (EC) No 1099/2009 (Article 4 and Annex I). Modified atmospheres using CO<sub>2</sub> for the killing of day-old chicks have been shown to be a humane culling method,<sup>2</sup> particularly when 100% immersion is undertaken<sup>3</sup>.

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<sup>1</sup> [https://food.ec.europa.eu/animals/animal-welfare/animal-welfare-practice/slaughter-stunning\\_en](https://food.ec.europa.eu/animals/animal-welfare/animal-welfare-practice/slaughter-stunning_en)

<sup>2</sup> Wang, X., Zhao, D., Milby, A.C., Archer, G.S., Peebles, E.D., Gurung, S., Farnell, M.B. (2021) Evaluation of Euthanasia Methods on Behavioral and Physiological Responses of Newly Hatched Male Layer Chicks. *Animals* (Basel). 2021 Jun 17;11(6):1802. doi: 10.3390/ani11061802. PMID: 34204180; PMCID: PMC8235231.

<sup>3</sup> Baker, B.I., Torrey, S., Widowski, T.M., Turner, P.V., Knezacek T.D., Nicholds, J., Crowe, T.G., Schwean-Lardner, K. (2019) Evaluation of carbon dioxide induction methods for the euthanasia of day-old cull broiler chicks, *Poult Sci.* 2019 May 1;98(5):2043-2053. doi: 10.3382/ps/pey581. PMID: 30624707

## Use of day-old chicks as animal feed across the EU

Most of the estimated 2,000 zoo license holders in the EU are likely to regularly feed whole-body day-old chicks to their animals. While exact figures are not available, the German-speaking Association of Zoological Gardens (Verband der Zoologischen Gärten, VdZ) collected estimates for an expert hearing at the German Bundestag in May 2021<sup>4</sup>:

In Germany, at least 31 million chicks are fed each year. Of that, the 250 zoos that are members of the country's zoo associations feed approx. 20 million chicks. Additionally, the falconries, pet shops and shelters fed more than 10.5 million chicks<sup>5</sup>. In the Netherlands, 6.8-8.6 million chicks were used by 11 zoos and 200 falconers in 2010<sup>6</sup>.

Day-old chicks are a suitable feed for a variety of carnivorous animals, such as birds of prey, reptiles, and mammals. Feeding of culled whole-body day-old chicks encourages natural feeding patterns, and provides essential vitamins, nutrients, and indigestible structures important in carnivore diet. Moreover, other feed animals – that could be potentially considered for substitution – have significantly different calcium levels (potentially causing energy deficits), lower protein and dry matter energy content, and higher fat percentage. Beneficial nutrient compositions that are present in day-old chicks don't appear in other potential feed animals until 7-12 weeks of age.

In consequence, to meet the nutritional demand in situations where domestic supply of day-old chicks becomes restricted, zoos and other sectors may have to resort to replacing them with animals of other species (bred in larger quantities and raised over a much longer period) or importing day-old chicks from abroad. These alternatives potentially come with a higher cost and footprint (in terms of welfare, finance and energy).

## Policy solutions

EAZA supports solutions that address the problem of day-old chick killing as a by-product, while safeguarding the needs of other animals that rely on them as feed.

Well-balanced measures have recently been introduced in Austria and France. In Austria, a ban on the killing of day-old poultry is accompanied by an agreement between the authorities and sectoral associations (poultry producers and consumers, such as zoo- and falconry associations) that provides for a limited and duly documented supply of day-old chicks as feed<sup>7</sup>. Also in France, a recent ban allows an explicit exemption for the purpose of feeding to other animals (Article 1, 3°)<sup>8</sup>.

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<sup>4</sup> <https://www.bundestag.de/presse/hib/839240-839240>

<sup>5</sup> Fischer, D. (2021) Stellungnahme, Expertenurteile zum geplanten Verbot des Kükentötens. [https://www.bundestag.de/resource/blob/838746/69fa521a018a8283dcbfb8e7e733e300/02\\_G\\_Stellgn-Dr-Fischer-data.pdf](https://www.bundestag.de/resource/blob/838746/69fa521a018a8283dcbfb8e7e733e300/02_G_Stellgn-Dr-Fischer-data.pdf)

<sup>6</sup> Bokma, M., F. Leenstra (2010) De afzetmarkt voor eendagshaantjes in beeld. In: Wageningen UR Livestock Research, Rapport 382. <https://edepot.wur.nl/146142>  
Brujinis, M. R. N., V. Blok, E. N. Stassen, H. G. J. Gremmen (2015) Moral "Lock-In" in Responsible Innovation: the ethical and social aspects of killing day-old chicks and its alternatives. *Journal of Agric Environ Ethics*; 28: 939-960.

<sup>7</sup> <https://www.qgv.at/allgemein/zag-gefluegelwirtschaft-bekannt-sich-zur-sinnvollen-verwendung-maennlicher-kueken/>

<sup>8</sup> <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000045124750>

When the killing of day-old chicks becomes restricted or banned, we recommend that an exemption be granted for the specific purpose of feeding day-old chicks to other animals. Should such restrictions be introduced on the EU level via a revision of the Council Regulation (EC) no. 1099/2009 on the protection of animals at the time of killing, we advise introducing the following amendment:

**Article 26**

[...]

2. Member States may adopt national rules aimed at ensuring more extensive protection of animals at the time of killing than those contained in this Regulation in relation to the following fields:

[...]

/Introduce new point: (d) the killing of day-old chicks of domestic chicken *Gallus gallus*. The killing may be banned or restricted, provided that national rules explicitly grant exemptions for the specific purpose of feeding day-old chicks of this species to other animals.

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**About EAZA**

Established in 1992, EAZA ([www.eaza.net](http://www.eaza.net)) is the world's largest regional zoo and aquarium association, with over 400 Member institutions in 48 countries including 25 EU Member States. EAZA facilitates cooperation within the zoo and aquarium community in Europe and Western Asia towards the goals of education, research and conservation, centred around the animals in our Members' care. Membership in EAZA is based on strict accreditation requirements.

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