



ANIMAL WELFARE REPORT

2022 - 23

INTRODUCTION

Avara Foods is fully committed to the Health and Welfare of all the animals in our care throughout the UK. It is our moral responsibility and an important business issue that applies to every animal in our supply chain.

Our animal husbandry is of the highest priority, and welfare outcomes are continually monitored and challenged.

When it comes to bird welfare it's all about the science – grounded in this approach is understanding the needs of the birds in our care and ensuring they are met. As a responsible business we have an ongoing commitment to continually challenge and improve our existing high standards.

We have established an overarching welfare policy, and supporting standards, that apply to all our birds. They are tailored to the individual needs of both species that we care for, turkeys and chicken.

In practice, good welfare means:

- Understanding the individual needs of each species and making sure they are met.
- Monitoring the tell-tale signs of good welfare.
- Taking immediate action if standards have not been met.
- Demanding continual improvement from the teams charged with their care.

Improving farm animal welfare starts with the 5 freedoms but goes way beyond that. It is a continuous process and will continue to develop as animal welfare science does.

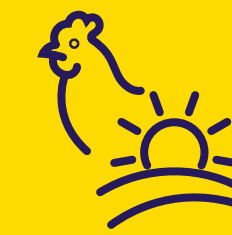
The Farm Animal Welfare Council's (Now Animal Welfare Committee) [Report on Farm Animal Welfare in Great Britain: Past, Present and Future](#) states "Current legislation on the minimum standard of welfare is based on the avoidance of unnecessary suffering and the provision of needs. The Five Freedoms themselves concentrate on suffering and needs. This focus reinforces the negative image of farming and food production. FAWC proposes that the minimum should be

defined in terms of an animal's quality of life over its lifetime on the farm, during transport, at gatherings and at the abattoir, including the manner of its death. Our proposal is that an animal's quality of life can be classified as: a life not worth living, a life worth living and a good life. Giving an animal a life worth living requires good husbandry, considerate handling and transport, humane slaughter and, above all else, skilled and conscientious stockmen."

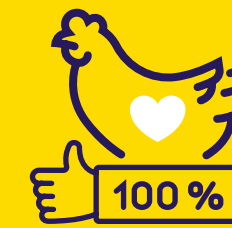
At Avara, we embrace this approach and are committed to identifying the best pathways to ensure the animal we care for have, at least, a life worth living. We do that through our own research, a data-driven approach and industry metrics - focused on outcomes, the direct measurable impact on the birds, as well as inputs that have predictable consequences.

Our standards exceed UK legislative requirements by a significant margin, by adopting "Red Tractor" standards alongside our customers' stringent requirements and additional standards that we believe are appropriate.

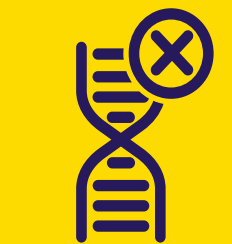
WE ARE COMMITTED TO:



Avoiding confinement of our animals, reduction of routine actions such as beak and toe treatments and to only use antibiotics responsibly throughout our production.



We provide species and generation specific enrichment in the birds' environments and continually promote good animal welfare through innovation and stewardship.



We never use hormonal growth promoting substances and none of our animals are subject to genetic modification or cloning.

100%

100% of our animals are pre-stunned before processing.

MANAGEMENT AND GOVERNANCE OF ANIMAL WELFARE

Everyone that works, or comes into contact, with our birds has a responsibility to protect their welfare. Ultimate accountability for bird welfare rests with the Agriculture Director, who works with his leadership team.

These individuals are directly responsible for the chicken, turkey and feed milling departments. In addition, The Head of Health, Welfare and Agriculture Assurance, and the Compliance Managers work across this team to drive and progress best practice.

A team of Regional Production Managers, Contract Production Managers, Area Managers and Compliance Managers then serve the farms and hatcheries to ensure standards are maintained, and good practice is shared. Farm and Hatchery Managers and Assistant Farm and Hatchery Managers have day-to-day responsibility for the birds on the farms and in the hatcheries.

Our responsibilities cover the direct parents, hatching eggs, embryos and the commercial rearing of all the chicken and turkey that is produced for the company. Some of these birds are reared and managed by external contractors but only ever as part of a close partnership relationship. Contractually, those producers must adhere to Avara welfare standards and procedures across all aspects of caring for the animals.

Whilst not within our direct control, we source responsibly from genetics companies, taking delivery of our parent stock as day olds from suppliers with whom we have very close relationships and a high level of trust. We consistently demand of our suppliers that their natural breeding programmes continually deliver improvements in health and welfare.

Our standards are available and implemented on all our agriculture sites by teams that are specifically trained in poultry welfare, including appropriate methods of on-farm culling of sick or injured individuals. These teams receive day-to-day support from a wealth of experience, comprising poultry technical managers, regional and area poultry managers.

To ensure that our welfare standards continue to develop, we utilise additional expertise, including our own veterinary surgeon and independent vets. We regularly engage with welfare scientists working in academic and practical surroundings, and with welfare NGOs to ensure that our welfare standards are grounded in science and an understanding of the birds' needs.

To ensure transparency, we are committed to publishing our Key Welfare Indicator targets, and our performance against those targets on an annual basis.

Adherence to our standards is a contractual requirement for our farming partners and is monitored by an internal, but autonomous, audit team and through Key Performance Indicators (KPIs) that are aligned to bird welfare. Results from both these approaches are regularly reviewed, including by members of the Avara Foods Executive Team.

We regularly engage with academia, collaborating on research to continually understand our animals, across the species, and what welfare improvements can be made. As part of the British Poultry Council (BPC) and the BPC Welfare Committee, we help lead the industry in creating best practice guidelines and policies.

This approach allows us to be industry leaders in best practice and innovating for animal welfare.

WORKING TOGETHER WITH THE INDUSTRY AND KEEPING UP TO DATE

At Avara, we keep our ear to the ground and keep up to date with what's occurring within the industry and the wider landscape. We work closely with our customers, NGO's, local councils, and the government to ensure that our business is a forerunner with regards to animal welfare, sustainability and our people. These pillars are at the core of what we do as a business and we continually strive to improve them.

We regularly host customer visits to our sites so they can see first-hand how their products are produced and witness the standards across our supply chain.

We have representation on the board of the BPC as well as BPC Welfare Stewardship committee and BPC Antibiotic Stewardship committee. In addition, an Avara director sits on the Animal Health and Welfare Pathway steering group, and the Head of Health, Welfare and Agriculture Assurance is a member of a pathway task and finish group. We engage in all of these activities to ensure we use our extensive knowledge base and experience to help shape the future of welfare.

THE SCOPE OF AVARA'S SUPPLY CHAIN

Our business is Poultry, we produce both Chicken and Turkey to supply into your favourite restaurants and supermarkets, with added value products and ready to cook meals. Supplying produce reared from Yorkshire to Devon, Wales to Essex, we are a truly British company. To ensure we deliver quality consistently, we ensure all our produce meets, and most often surpasses, Red Tractor standards.

At Avara we are fully integrated. We, along with our farming partners, rear the parent stock birds that lay the eggs, that hatch in our hatcheries to be reared on our farms and go on to be processed in our processing facilities. The company owned feed mills based in Hereford, Banbury and Westbury supply optimum nutrition to the birds on our farms and those of our farming partners.

WELFARE POSITIONS

AVOIDING ROUTINE ACTIVITIES

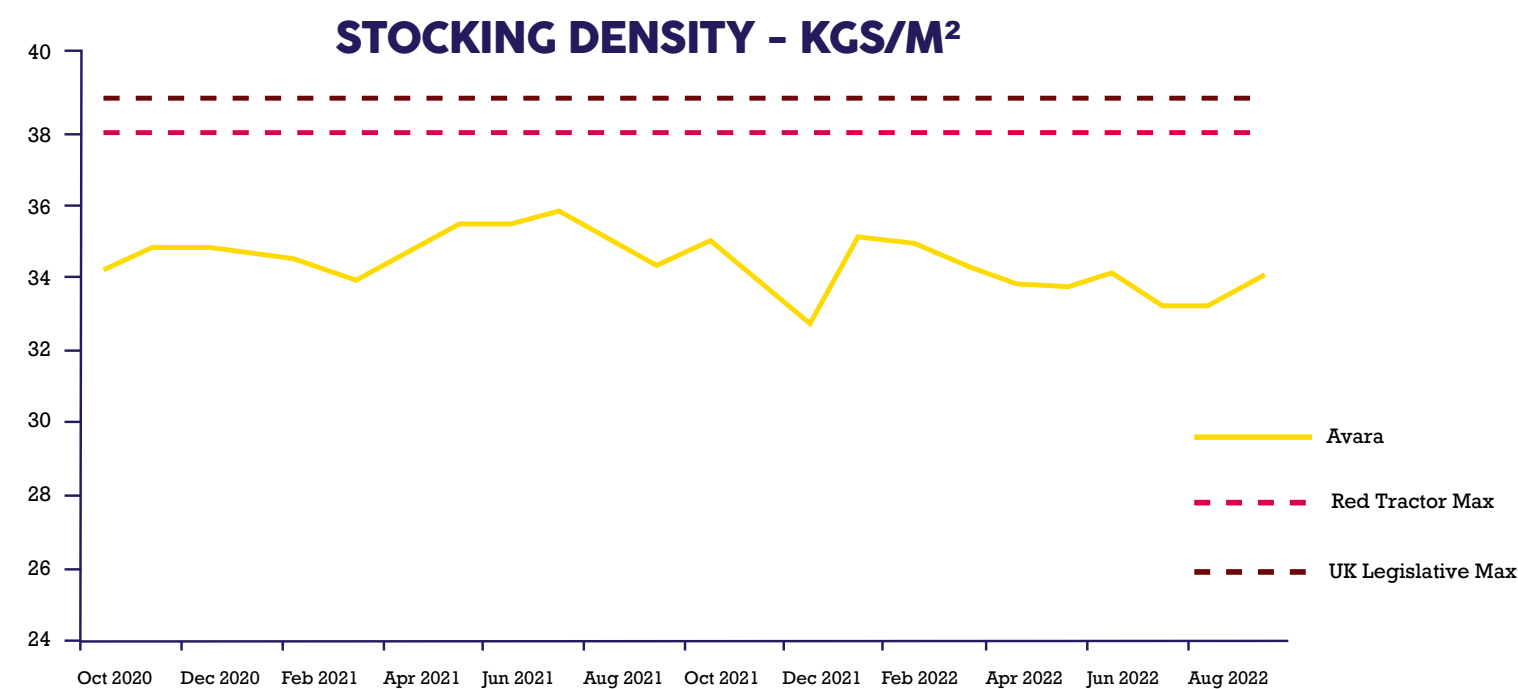
Turkeys and breeding chickens have a tendency to peck at each other during exploratory behaviour. If this leads to injury, then the activity can become frenzied and habit forming. To prevent them from harming the other birds around them we use an infra-red beak treatment to blunten their beak at an early age. It's permitted by the RSPCA and we're happy that it's the best way to do it and that it is a welfare treatment for the birds. This treatment is applied to 100% of these bird types. Similarly, turkey hens and breeding chicken cockerels can scratch their housemates with very sharp nails during mating activity or general life. We treat the nails of 100% of these birds to help prevent painful injuries.

100% of our broiler chickens are free from such activities.

AVOIDING CLOSE CONFINEMENT

100% of the birds that we rear are cage-free. Less than 1% of our chickens, and 6-8% of our turkeys are reared in a free-range environment. All of our chickens and turkeys are reared in large, airy barns and have the ability to roam freely across the whole barn and flap their wings. Keeping birds inside allows us to create a safe and comfortable environment whilst maintaining the highest levels of biosecurity. In this environment, birds are also shielded from diseases as much as possible (e.g. Avian Influenza) and wild predators.

The maximum stocking density that broiler chickens reach as they grow is limited to 42Kg/m² in the EU. In the UK, that is less, at 39Kg/m², and Red Tractor standards for stocking densities state a maximum of 38kg/m², from April 2020 – June 2021 our average supply chain stocking density was well below at 33.95kg/m².



In turkeys there is no legislated maximum stocking density. Since they grow to much higher weights than chickens, the Farm Animal Welfare Council (FAWC - now Animal Welfare Committee) have recommended maximum stocking densities which are dependent on the weight of the birds, because they grow in overall volume, not just a 2-dimensional area. Turkey stocking densities are maintained below these FAWC recommended levels.

CLONING AND GENETIC MODIFICATION

100% of animals produced by Avara or our farming partners are not subject to genetic modification and are not cloned.

ENVIRONMENTAL ENRICHMENT

We challenge the types of environmental enrichments provided and are constantly looking to introduce solutions that the birds prefer.

100%

- Of our breeding chickens and turkeys are provided with nest boxes for comfort and privacy whilst laying eggs.

- Of our commercial chickens have access to natural light, perches and pecking objects.

- Of our turkeys have access to pecking objects.

- Of the chickens and turkeys that we keep have access to litter, either straw or shavings, of sufficient quality to allow comfortable resting, dust-bathing, scratching and pecking.

We recently trialed grain-based pecking blocks for turkeys, which they only showed an interest in for a short period of time. We are currently trialing a rotation system that introduces new enrichment objects throughout the turkey's lives.

WELFARE POSITIONS

ANTIBIOTICS

Avara Foods endorse the guiding principles of R.U.M.A (Responsible Use of Medicines in Agriculture Alliance) which states that antibiotic usage should be “As little as possible, but as much as necessary”. Further details can be found [here](#).

At Avara, 100% of our birds are free from growth hormones and the prophylactic use of antibiotics. 100% of our chicken supply chain also adheres to the government approved target of 25mg/PCU of total average antibiotic use. In fact, we clearly surpass this target with an average of 11.47 mg/PCU in 2021.

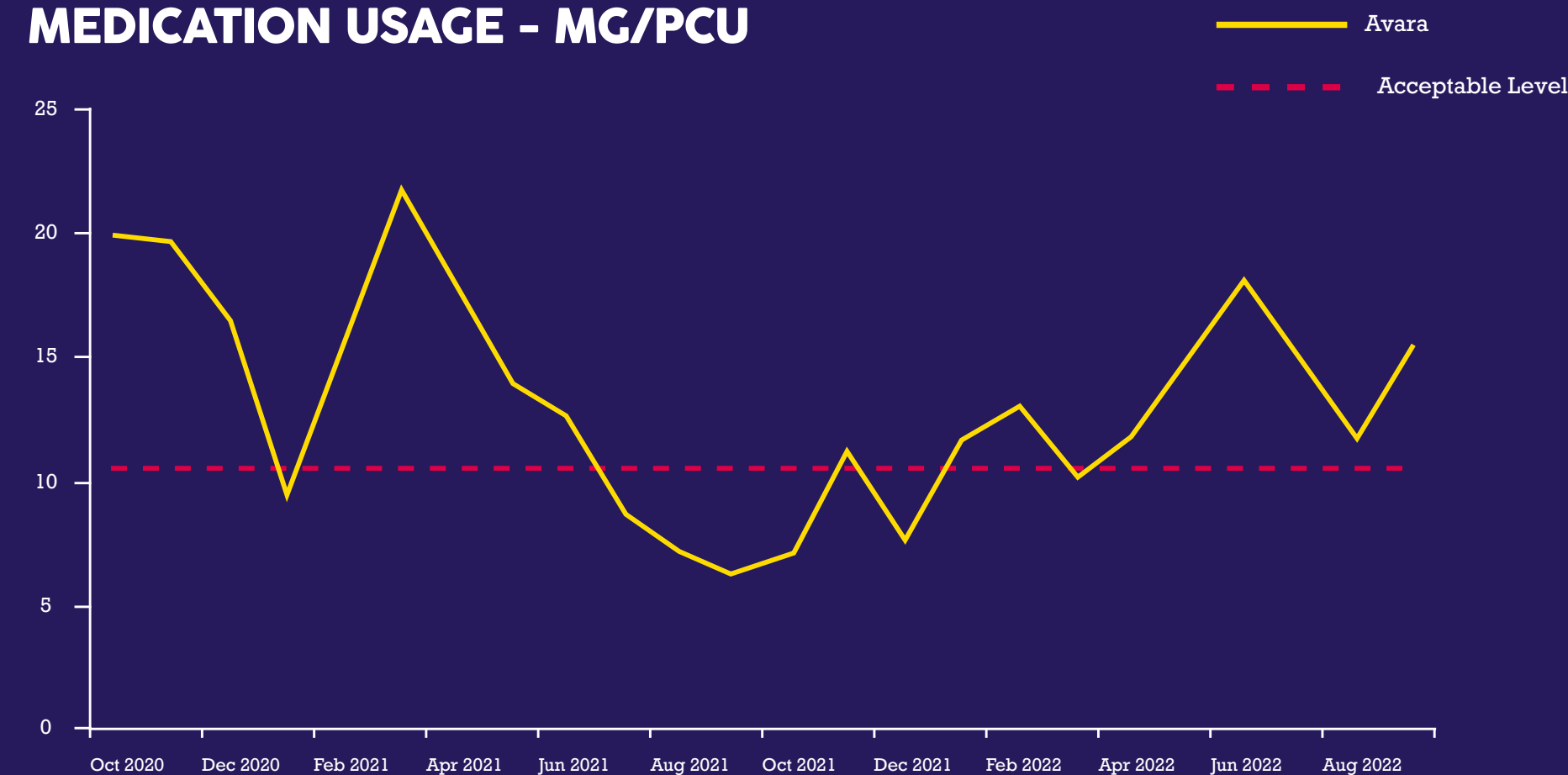
Our turkey supply has had some health challenges as a result of an important commercially produced vaccine becoming unavailable. This resulted in the need to medicate our stag turkeys in the later stages of their rearing period, which leads to a very high mg/PCU measurement.

We have since had an autogenous vaccine manufactured (a vaccine exclusive to Avara foods, manufactured using pathogens recovered from our farms). Recently medication use in depleted farms has returned to acceptable levels. This is replicated in turkeys that are still on farms, so we are confident this lower trend will be sustained.

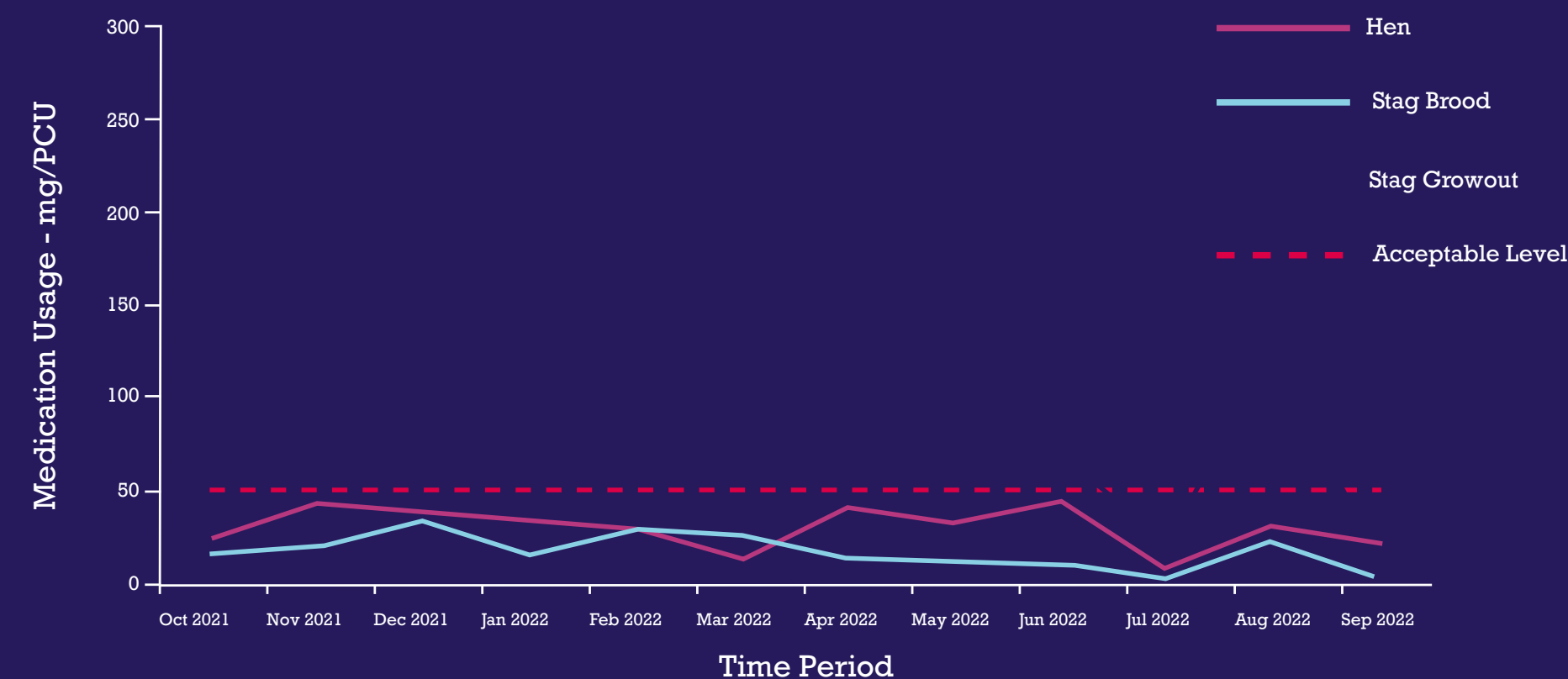
Antibiotic residue does not find its way into the food chain. Any animal that is treated with antibiotics is observed for a specific amount of time after the course has been completed to ensure that the antibiotics are not in the meat.

As a checking measure, we also test samples of meat each month to prove that they do not contain antibiotics.

MEDICATION USAGE - MG/PCU



MEDICATION USAGE - MG/PCU (DEPLETED FARMS)



FEED AND ANIMAL DIETS

The majority of Avara poultry feed is produced in house at one of the 3 Avara feed mills at Hereford, Westbury and Banbury. All other feed is provided by third party feed manufacturers. Whether from our own mills, or third party, all feed must conform to the Universal Feed Assurance Scheme (UFAS) and be appropriate for the species it is fed to. 100% of the feed is free from Antibiotic Growth promoters or hormones. Our birds' feed is natural, most of it is vegetarian. Organic and Bronze turkeys are also fed fish meal as an additional source of protein. We tailor the feed to the species and their age, to make sure they get exactly what they need, but the basic ingredients are wheat, barley, field beans and oil seed rape from the UK, with soya added for protein. Vitamins and minerals are added to meet the birds' requirements. We monitor the raw materials in every load delivered to the mill, allowing our nutrition partners to manipulate the formulation of the diet to match the birds' needs. In doing so, we minimise protein use, which reduces ammonia production, which is better for the environment, and for the birds.

Each farm operates to a strict set of standards to ensure each and every bird has easy access to feed and water.

We continually assess our diets to maintain the health and welfare of our birds, and produce food as efficiently as possible, whilst minimising the impact to the environment. Recently, we have implemented changes to reduce the phosphate content of the birds' excreta, and reduce the soya content of the birds diets by over 8%. This soya reduction improves our carbon footprint as well as lowering ammonia excretion. We are trialling diets with 50% soya reduction, and also trialling the use of insect protein in diets. The latter is occurring within the EU, as the UK is yet to legislate for this potential opportunity.

WELFARE POSITIONS

OUR PROCESSING SITES

Each of our slaughterhouses, based in Brackley, Hereford, Newent, and Scropton, operates with the presence of an official veterinarian (OV) acting on behalf of the authorities. The OV monitors compliance with welfare and food safety regulatory requirements during processing - from the arrival of each bird transporter vehicle through to the slaughter and post-mortem inspection stages. Teams of Poultry Inspection Assistants (PIAs) and Meat Hygiene Inspectors (MHIs) assist the OV by undertaking the necessary checks on each bird carcass and the corresponding viscera.

All employees handling live birds receive welfare training and additionally a number of experienced and appropriately qualified individuals (each holding an official certificate of competence) perform duties as Poultry Welfare Officers (PWOs). This role involves overseeing welfare operating procedures, providing guidance to slaughterhouse personnel, ensuring that all procedures are being followed correctly and taking remedial action when necessary.

Closed circuit television systems (CCTV) monitor live birds in each area of the slaughterhouse. Video images are kept for a minimum of 90 days and can be viewed by the official veterinarian on request.

STUNNING

All birds (chickens and turkeys) are stunned prior to slaughter, with over 95% of our broiler chickens and 100% of our turkeys irreversibly stunned using a controlled atmosphere process from which the birds will not recover. Electrical stunning is used for less than 5% of our broiler chickens that are destined for a Halal sale. The electrical parameters used deliver a stun-to-stun process, with the birds subsequently slaughtered before they recover from the stun. All birds are closely monitored during stunning and slaughtering operations.

TRANSPORT

As a company, we are committed to ensuring that transportation times are kept to a minimum, with strategically placed farms and processing facilities.

In the year 2021, 98.4% of our broiler chicken journeys were under 8 hours in length with 70% being less than 4 hours. 91.4% of our turkey journeys were under 8 hours in length.

WHERE WE OPERATE



WELFARE MONITORING AND REPORTING

ANIMAL WELFARE BREACHES

Compliance with our welfare standards is part of the contractual agreement between us and any external contractor who rears and/or manages birds for us. In addition, our autonomous compliance team carry out unannounced farm and hatchery audits to farms and hatcheries across our supply base to assess compliance to the standards. 100% of our supply farms and hatcheries are subject to at least one external audit carried out by Red Tractor Assurance auditors. Some of Avara's customers also appoint external auditors to carry out further checks.

If any major or critical non-conformances are identified during an audit or any other farm visit, a follow-up visit is carried out by a member of the compliance team and the area manager / contract production manager responsible for the site.

If any minor non-conformances (e.g. incorrect completion or storage of paperwork) are identified, a follow up audit is not required but documentary evidence must be supplied to show that the identified non-conformances are corrected.

The number and severity of the non-conformance raised will impact the status assigned to the site. Using the BRAG scoring system shown in Figure 1.

Once an internal audit is completed by the compliance team, a report is generated and sent to the site manager, production manager and area manager for review. The area manager or site manager will submit the requested corrective actions to their compliance manager. An audit report and corrective actions are logged on an active audit tracker. If all corrective evidence (CE) provided is deemed sufficient then the audit is closed out. If the corrective evidence submitted is not deemed sufficient then further action and corrective evidence is requested by the compliance manager.

Figure 2 shows the audit resolution process flow which differs depending to the BRAG score of the site. Sites classified as Amber or Red are a business risk and may be a risk to animal welfare, and need immediate action. If sites are identified as Red and are unable/ unwilling to rectify the issues, then they are at risk of being given notice and will no longer be supplying Avara. We also reserve the right not to place birds on farms until critical non-conformances are remedied, and if there were particularly severe welfare impacts on birds that could and should have been avoided, to serve immediate notice to that farm.

BRAG STATUS	NUMBER/TYPE OF NON CONFORMANCES (NC'S)
RED	> 5 Major NC's or 1 or more Critical NC
AMBER	1-4 Major NC's, or > 10 Core NC's
GREEN	< 10 Core NC's
BLUE	Zero NC's

Figure 1 Avara audit BRAG scoring

DISEASE

Disease risk is something we monitor very closely, by horizon scanning for risk of notifiable disease, e.g. Avian Influenza. We have developed a robust Notifiable Disease Contingency Plan which we share with APHA, for external input. We have representation on the Poultry Health and Welfare Group, Poultry Discussion group and meet regularly with APHA to discuss a collaborative approach to disease management.

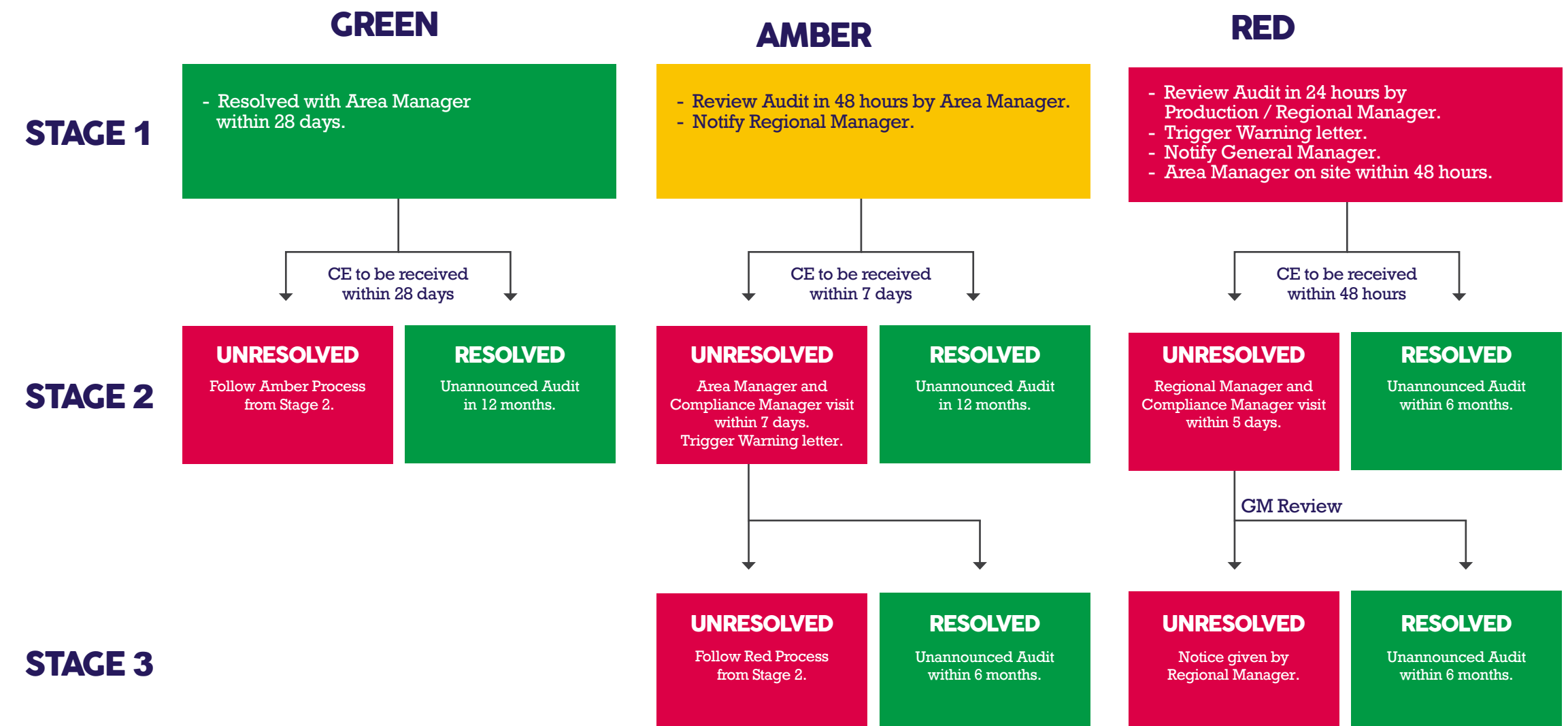


Figure 2 Avara audit resolution process flow

WELFARE MONITORING AND REPORTING

OBJECTIVES AND TARGETS

Working closely with our supplier base and our customers we collect, analyse and share data regularly, enabling us to report on a variety of output measures that aid in welfare improvements. These cover things like Pododermatitis, Hock marks, lameness, mortalities and more.

PODERMATITIS %



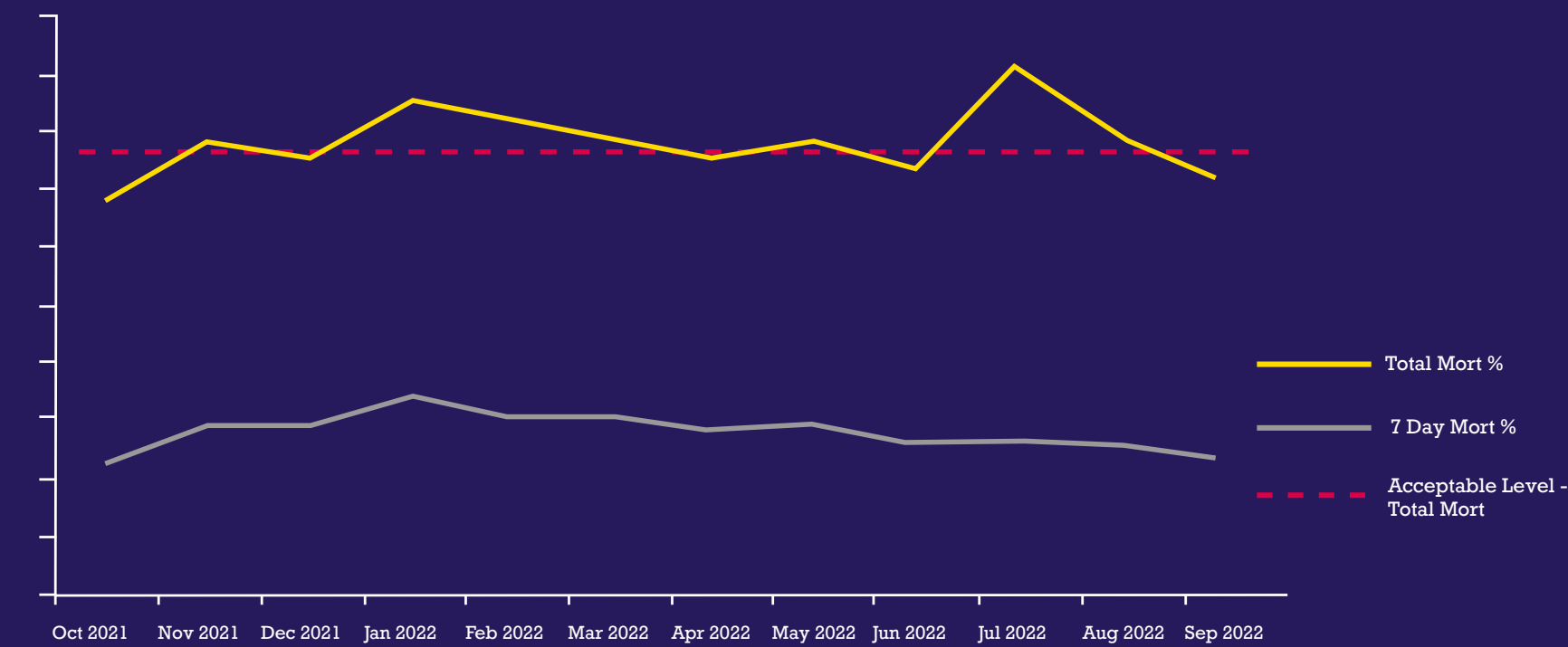
We strive for continual improvement, and have recently moved our target for Pododermatitis occurrence in broiler chicken from being consistently below 25% to 15%.

HOCK MARKS %



And a hock mark occurrence of below 15% to below 10%.

MORTALITY %



This is an improvement on our previous two years by over 20% for Pododermatitis and 10% for Hock Burns. Our overall broiler chicken mortality target has moved from below 4.2% to below 3.8%.

PROJECTS AND INNOVATION

Our commitment to science and data is why we underwent a full commercial evaluation of the European Chicken Commitment, alongside pen trials of slower growing breeds, and lower stocking densities. This is aimed at gaining a better understanding of what predictable outcomes these controlled inputs will deliver and gathering a considered opinion with the evidence. We already meet the other 4 of the 6 criteria the European Chicken Commitment defines.

As a responsible business, we feel it's only right that we fully understand the impact changing breed and stocking density inputs will have on the environmental and affordability aspects of sustainability. It is essential that activities intended to address one perceived issue do not have unintended consequences for other long-term sustainability objectives.

Our position is that any assessment of welfare should be determined by welfare outcomes: objective and measurable factors that reliably reflect the health and wellbeing of the bird. Physical welfare outcomes that we already collate should be considered alongside behavioural ones to assess the effect on the bird and its response objectively. These behavioural measures will include measures of activity, play behaviour, distress vocalisation and possibly chemical signals indicating emotional state. The physical, behavioural and emotional wellbeing will be driven by the bird's environment and management as much it will be from inputs and health.

The advantage that the ECC has is that it calls for simple changes, which are arguably easier to communicate and understand than complex welfare outcomes, and certainly easier to measure. The disadvantage is that they don't, by necessity, achieve the goal of consistently improving broiler welfare, as they do not define any outcomes. This point is not necessarily widely understood by commenters and consumers. In addition, it is highly probable that, if implemented as currently written, the proposals would have detrimental effects upon environmental impact and economic efficiency.

Following the investigation, we have implemented a commercial programme producing ECC chicken, approved by RSPCA to fulfil current customer demand. We will use this programme to learn, and to benchmark welfare outcomes against our current chicken rearing standards.

An alternative approach would be to clearly define the desired welfare outcomes of any system. This would allow more avenues for innovation, to deliver in the same timeline (2026), but enable organisations to address three potentially conflicting priorities of bird welfare, environmental sustainability and food affordability, achieving on commitments in all areas. The outcomes of our ECC programme will help us in this.

Work is ongoing to better understand the science behind welfare improvements. Avara's data, as well as that shared by the British Poultry Council Welfare Stewardship group, will help inform what range of physical welfare outcomes are achievable from the various recently used inputs (breeds and stocking densities). Research projects are underway to look at how best to monitor behaviour in sheds, and we must investigate and invest in technology to aid in environmental monitoring and control as well as monitoring behavioural and emotional wellbeing.

Avara recently won 'Innovation of the year' at the National Egg and Poultry awards, with an entry that one of the judges described as "Head and shoulders above the rest, a clear winner by a significant margin."

PROJECTS AND INNOVATION

Working with our partners, Sonas, we've installed new technology into our hatcheries that eliminates health and safety risks, improves egg quality, improves animal welfare and requires the use of less chemical - so more environmentally friendly too. The data shows us that this innovation significantly improved broiler chicken welfare on our farms.

In short, the system is a new way of sanitising and disinfecting the hatchery and suppressing pathogens that can affect chick health. Our new approach eliminates human contact with the chemicals (safer), uses targeted, exact doses with less waste (more environmentally friendly), and is more effective at suppressing harmful pathogens (welfare). All those factors mean that those chicks are in better health so have better welfare outcomes on farm.

We have also trialled on-farm hatching systems to assess the welfare impacts on birds using this process. In our systems, the welfare outcomes to the birds were not significantly better in any of the measured parameters, but were poorer in others. We believe this is related to the greater level of hygiene control we have in the hatcheries as a result of our innovation, driving lower mortalities, and the precision nutrition approach we employ, driving better foot and hock health.

We continually assess our diets to maintain the health and welfare of our birds, and produce food as efficiently as possible, whilst minimising the impact to the environment. Recently, we have implemented changes to reduce the phosphate content of the birds' excreta, and reduce the soya content of the birds' diets by over 8%. This soya reduction improves our carbon footprint as well as lowering ammonia excretion. We are trialling diets with 50% soya reduction, and also trialling the use of insect protein in diets. The latter is occurring within the EU, as the UK is yet to legislate for this potential opportunity.

We recently trialed grain-based pecking blocks for turkeys, which they only showed an interest in for a short period of time. We are currently trialing a rotation system that introduces new enrichment objects throughout the turkey's lives.

We are continually assessing new innovations both within and outside the industry that will help deliver a better standard of welfare for our birds. This is seen through our trials of new LED lighting systems where the colour spectrum is more suited to the natural light spectrum within which a bird's eyes see, compared to traditional lighting systems developed for humans. These systems are for use at times when they do not have access to natural light.

We are also trialling IoT (Internet of Things) systems that help us monitor the health and welfare of our birds 24/7 365 days a year. IT also allows us to delve into the data behind production in more depth so we can continually improve the bird's environment and therefore its welfare.

Tracking improvements in feed and water technology to allow us to find the optimum nutrition for happy and healthy birds. As well as ensuring the water they drink is as clean as we expect ours to be. We are currently trialling a mechanical cleaning system for water hygiene, which, if successful will reduce the need for disinfectant use.

We work closely with universities and companies to trial and test out new information and research. This allows us to stay on the pulse of new processes and systems to aid welfare.

EDUCATION AND COMMUNICATION

We are open about what we do, engaging in campaigns like Farm 24, to raise consumer awareness and help people better understand farming and our responsibilities. We have had media teams on farm for interviews and regularly welcome a range of auditors who ensure that we are meeting the high standards expected of us.