



1998 SCAHAW Report: Obsolescence of findings, methodological limitations and opacity of observations

The sector has evolved considerably in 20 years!

Executive summary

The Scientific Committee on Animal Health and Animal Welfare (SCAHAW) was charged between 1997 and 2003 to issue a report on a set of topics related to animal health and welfare. Its report from 1998 on Welfare Aspects of the Production of Foie Gras in Ducks and Geese is highly questionable both from a methodological point of view and in terms of conclusions and recommendations.

With no precise methodological description, the report expressed several non-documented allegations which are refuted by the reality of the living conditions of fat palmipeds. Furthermore, the report admits its inability to make conclusions on fundamental aspects such as liver steatosis and the behaviour of palmipeds at the time of assisted feeding, which is pretty problematic for the development of valid recommendations for proper political decision-making.

In parallel, the report today suffers from its **obsolescence**. Since 1998, many changes have been initiated by producers on some key aspects:

- the type of housing during the fattening phase (transition from individual cages to collective housing)
- and devices used for assisted feeding (optimization of pneumatic and hydraulic devices).

In addition, several scientific studies were published after 1998, in particular on the fattening ability of palmipeds, or on the impact of the fattening phase on birds using behavioural and neurophysiological approaches (response to stress and nociception indicators).

Ultimately, the SCAHAW report on welfare aspects of foie gras production in ducks and geese suffers from obsolescence which - after more than twenty years - clearly disqualifies it as a reference report on the welfare of fat palmipeds. It can no longer provide a true opinion on the reality of foie gras production.

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Proudly promoting the profession of foie gras producer since its creation in 2008, Euro Foie Gras is committed to providing correct and transparent information about foie gras production in Europe. Providing reliable and correct information on the production method should enable decision-makers at both European and national level to lay down rules based on factual elements and to counterbalance preconceived ideas and misinformation associated with foie gras production.

Criticism of foie gras production, and especially of its fattening phase, is not new and has always been strongly influenced by the lack of contact with the field as well as anthropomorphism, i.e. the attribution of human behavior or morphology characteristics to animals despite very different anatomical characteristics. Alas, many publications of several types fall into this trap regarding the welfare of palmipeds in foie gras production, including the 1998 report of the Scientific Committee on Animal Health and Animal Welfare (SCAHAW) on animal welfare aspects of foie gras production¹, which is a pillar of the anti-foie gras literature. Others have been inspired by it, such as the 2015 Cambridge University study on the welfare of ducks in foie gras production, which also did not rely on experimentation or field visits to build its conclusions.

Far from wishing to call into question the skills of the experts of the Committee in charge of drafting the SCAHAW report, the objective is to confront various allegations in the report with the reality of production as practiced today on a daily basis by thousands of passionate breeders, to update a number of other elements that are no longer true today and to promote research with the aim of constantly improving practices for the benefit of animals, producers and consumers alike.

About the SCAHAW



Established in 1997 with a mandate to advise the European Commission on matters relating to animal health and welfare, the SCAHAW was composed of scientific experts in one or more fields of competence of the Committee such as animal diseases, the management of herds, transport, slaughter or even experimentation. It was replaced in 2004 by the European Food Safety Authority (EFSA) Panel on Animal Health and Welfare.²

Lack of methodology



Similarly to its other reports, the SCAHAW report regarding foie gras production does not describe a specific methodology for the drafting. It simply brings together a few scientific elements existing at the time on animal welfare in foie gras production. It does indicate that the members of the working group responsible for writing the report visited foie gras farms in France, but without specifying neither the number nor the objectives

¹ « Welfare Aspects of the Production of Foie Gras in Ducks and Geese », SCAHAW, 1998, available here: <https://bit.ly/2twMFYx>.

² Here is the homepage of EFSA panel on animal health and welfare: <https://www.efsa.europa.eu/fr/panels/ahaw>

of the visits, without illustrations, and above all without specifying whether these visits were carried out within the framework of the report or even the methodology used (p.1).

The SCAHAW thus specifies at the end of the report that it is “*aware that many of the facts mentioned in the report are based on a relatively small number of scientific publications or on individual observations of experts deriving from farm visits*” (p.68). This acknowledgement demonstrates the absence or at least the uncertain nature of the methodology applied during the redaction of this report.

Incorrect (or out-of-date) information



It is unfortunately not surprising that the report contains a series of statements which do not or no longer correspond to the reality on the ground and which should be exposed in order to reflect the regular improvement of scientific knowledge and farming practices by the sector.

In principle no more than 3 weeks indoor early in life

According to the report, foie gras ducks spend the first 4 weeks of their life in buildings without outdoor access during the day (p.46) when in truth, this first phase of breeding generally varies from 2 to 3 weeks depending on the climate.

The report forgets to mention the fact that this first phase in heated buildings is essential to ducklings because they need to get enough feathers to be able to go outside. The feathering is needed to isolate them from water and low temperatures. Without a sufficient development of their feathering, ducklings would strongly risk to die if they had access to outdoor areas during these first weeks, especially in case of very low temperature or rain. This explains why ducklings can be protected indoor for a maximum of four weeks during winter. However, in summer, this period cannot exceed eight days. The duration of indoor conservation is always related to risk management for young ducklings.



Ducks outdoors.

Fat palmipeds spend about 90% of their life outdoors.

Individual cages no longer exist

The report includes the individual cage among the types of housing used during the fattening phase (p.21). However, the individual cage has disappeared from production in all EU producing countries for several years now. The sector has adapted its housing facilities to the Council of Europe Recommendation of 22 June 1999 concerning Muscovy ducks, hybrids of Muscovy ducks and domestic ducks, domestic geese and their crossbreeds. All individual cages have been replaced by collective cages that meet all the requirements of the Recommendation, namely:

- “- stand with a normal posture,
- turn around without difficulty,
- defecate showing normal movements,
- flap the wings,
- show normal preening movements,
- perform normal social interactions,
- carry out normal feeding and drinking movements.”³

The surface of collective cages enables breeders to match these requirements. For instance, a duck at rest fills an area of 1,000 square centimetres at the ground whereas a duck which flaps its wings covers a surface area of 2000 cm² (it flaps its wings about 2% of the time). Therefore, the minimal surface allows a duck to flap its wings (2,000 cm²) while two others can rest (1,000 cm²), which represents a minimal surface of 4,000 cm². For a four-duck group, this surface is 5,000 cm² as a minimum and at least 1,200 cm² for a group of 5 ducks or more.⁴ Changing these housing units represented an investment of more than 100 million euros.

Individual cages no longer exist



³ Recommendation adopted by the Standing Committee of the European Convention on the Protection of Animal kept for Farming Purposes of the Council of Europe on 22 June 1999 Article 10.7) Available here: <https://bit.ly/2LJq0jO>

⁴ Note DGAL/SDSPA/N2011-8176 of the French Ministry of Agriculture, Food, Fisheries, Rurality and land development, 25 July 2011.

Collective housing is today systematically used



Assisted feeding: improvement of devices and reduction of duration

As it is more than 20-year-old, the report is also not up to date on assisted feeding. The report explains that 30% of palmipeds are fed during the fattening phase with a funnel where inside one can find a manual endless screw or an electric motor whereas these techniques have drastically diminished nowadays.

Yet, as explained by Guy, Pingel and Baéza (2013), this type of funnel has never stopped to be modernised: quality of material and length of the funnel, structure of the feed (whole grain or cracked corn), motorization of the device, etc. Today, the distribution time of a meal varies between 3 and 6 seconds per meal on average, far from the 45 to 60 seconds described in the report (p.20).

Although traditional assisted feeding systems are now rarer, the negative image often associated with this practice is most often due to a lack of knowledge about it. In practice, these systems are far from being a cause of discomfort because they are used by qualified professionals who perform their gesture with skill and dexterity.



Manual funnel. Whole corn is put in the palmiped's jabot by turning the crank.



Funnel with electric motor.



- One of the current devices:**
- A tank carried on a trolley avoids carrying buckets
 - A corn meal dispensing device with low hydraulic or pneumatic pressure reduces the length of the funnel
 - An internal system allows a permanent adjustment of doses

Palmipeds enjoy daylight and electric light

The report states that on some farms, ducks or geese remain in the dark almost all the time except during the fattening phase (p.21). This allegation has proven to be inaccurate both in 1998 and today. Ducks and geese had and still have access to an outdoor course for most of the rearing cycle. They are indoors only during the first 2-3 weeks of their life for protection and during the last days of the fattening phase (9 to 12 for ducks, 12 to 15 for geese). Inside, sufficient (natural or artificial) light is provided, as well as adequate temperature, humidity and ventilation. It is a pity that the report does not specify how many visited farms kept palmipeds in the dark, nor its intensity, but nevertheless judges "*reasonable to conclude that when birds are kept in near darkness they are likely to show impaired exploratory behaviour and hence would not be likely to exercise properly*" (p.35). This allegation is free, unproven and out of step with the reality on the ground.



Mulard ducks benefiting from natural light during the fattening phase.

Palmipeds have no trouble standing up straight

The absence of details on the visits made by certain members of the SCAHAW is also to be deplored when the topic of palmipeds posture is addressed: *“Some experts of the working group observed on visits to fattening units that the legs of the force fed animals were pushed outwards, away from the mid-line of the body so that (...) the leg could not be held vertically when the bird was standing or walking and they conclude that it was caused by the great expansion of the liver. (...) They assume that there must be increased lateral force on the leg joints when birds with hypertrophied livers are standing or walking but this has not been studied”* (p.34).

In reality, the enlarged liver exerts no pressure on the legs. Palmipeds - like many other birds - are naturally capable of storing large amounts of food while standing perfectly upright. They also manage to run while flapping their wings, even with a liver weighing more than 600 grams in the abdomen, and even to take flight for long migratory journeys. Thus, as indicated by Knudsen & al. (2018), in some birds such as the garden warbler (*Sylvia borin*) or the ruby-throated hummingbird (*Archilochus colubris*), the live weight can be more than doubled in the space of a few days or weeks, with reserves mainly in the form of lipids. It has also been observed that in captivity several species of migrating waders, having access to an unlimited diet, could have an ingestion up to 8 times higher than that necessary to cover their basal metabolism, and exceeding the levels necessary for the reproduction or maintenance in extreme cold conditions for example (Kvist and Lindstrom, 2003).

As the report itself admits, there is no scientific evidence to support the hypothesis of increased pressure on the legs due to enlargement of the liver. Moreover, fattening practices have changed a great deal over the last 20 years in particular, as scientific

work has identified that the optimum quality for processing foie gras was at average weights of 450 to 550 g. Thus, the payment scales within the framework of the companies' contractual policy with the producers value at the best price these livers which thus constitute the production objective. In the past, the interest of a producer was to obtain a maximum weight of liver, as weight was the basis of his remuneration. Today a duck at the end of its fattening period can only be distinguished from an unfattened duck by expert eyes.

Suggestions without conclusions



Although the SCAHAW report is intended to provide timely recommendations to the European Commission, it concedes that it cannot draw conclusions on several central elements of the welfare of fat palmipeds such as the pathological nature of fatty liver steatosis, the animals' fear towards the fattener and the stress during the fattening phase.

Hepatic steatosis is not pathological for palmipeds

The report is ambiguous on the central issue of hepatic steatosis caused by the fattening phase in order for the liver to become fat. While confirming the total reversibility of the fattening process⁵, the report does not consider this fact to be sufficient to consider that the evolution of the liver during the fattening phase is not pathological. The report uses a 1984 study (Bogin et al.) stating that if the fattening phase lasts 3 to 4 days longer than usual, the level of cell damage increases considerably and therefore this level of liver steatosis should be considered pathological. Nevertheless, the report relies on an extension of the assisted feeding period to make this assertion (pp.40-41) and, above all, concedes that an epidemiological study on 20,000 carcasses (Bénard, 1992) revealed that pathological lesions in the liver (perihepatitis, fibrosis, local necrosis) were very rare (less than 0.5% of the carcasses).

Faced with these various elements, the report struggles to demonstrate the pathological nature of hepatic steatosis and concludes that it "*there is good evidence that liver structure and function that would be classified as normal is severely altered and compromised in force fed ducks and geese, but that lipid metabolism biochemical pathways are still functioning normally, albeit at an increased rate*" (p.48). The report therefore does not state that the foie gras of a palmiped is a diseased liver, but rather that some pathologists consider the level of steatosis obtained by the fattening phase as pathological while others do not (pp.41-42). The report regrets the lack of data on the metabolism of minerals and the corresponding hormonal homeostatic controls, the examination of the oropharynx for tissue damage and the determination of the adaptation time required to attenuate the nausea reflex associated with the so-called "force" feeding (p.48). Since then, many studies have been conducted confirming the

⁵ Experiments showed that the liver cells no longer showed signs of excess lipids after four weeks following the cessation of fattening (Prehn, 1996).

non-pathological nature of hepatic steatosis in foie gras palmipeds, in particular through the study of liver lipogenesis in ducks.⁶

No particular fear towards the person in charge of feeding the animal

Members of the working group reportedly observed during the fattening phase that just before feeding, the ducks and geese adopted avoidance behaviour towards the person feeding them. However, they also reportedly observed that the birds showed less avoidance behaviour towards the person feeding them than towards a visitor walking along the housing one hour after feeding.⁷ For the report, “*This suggests that the stranger is more aversive than the force feeder at this time but gives no information about the force feeding process itself*” (p.33). The report therefore fails to draw any “*conclusive scientific evidence as to the aversive nature of the force-feeding process*” (p.63) which does not, however, prevent it from further concluding that the fattening phase as carried out contravenes animal welfare (p. 65).

No stress during the fattening phase

The report describes an experiment conducted by the *Institut national de la recherche agronomique* (INRA) on 30 mulard ducks to test the causal link between the fattening phase and stress in the animal (Faure et al., 1996). It turns out that adrenal reactivity data did not show a significant difference between the fattening and pre-fattening period. The report admits that these data cannot demonstrate that the fattening phase generates stress in the mallard duck, but nevertheless considers that no definite conclusions can be drawn on the physiological activity of the birds due solely to the consideration of pituitary-adrenal activity during this experiment (pp.37-38). However, an experiment carried out in 2001, also by INRA, on mulard ducks confirmed that the handling of the animal, intubation and introduction of food into its oesophagus had not led to any observations of acute or chronic stress, measured by corticosterone measurement in the blood.⁸

⁶ Among which :

- Scientific study from Elisabeth Baeza, INRA Prod. Anim, 2013, 26 (5), 403-414.

- PhD Thesis from Wittawat MOLEE, « Facteurs de variation de la composition lipidique des membranes plasmiques des hépatocytes chez les palmipèdes : relation avec le rendement technologique des foies gras », S.E.V.A.B., 2006.

- E Baéza & collab., « Canards de Barbarie, Pékin et leurs hybrides : aptitude à l'engraissement », INRA Productions, 2005

⁷ The report states that the information on animal aversion towards visitors comes from member Jean-Michel Faure (Researcher at INRA).

⁸ D. Guéméné & al., “Force-feeding procedure and physiological indicators of stress in male mule ducks”, British Poultry Science, 2001

Yet, highly oriented recommendations based on an inappropriate anthropomorphic perception



In its report, the SCAHAW was not able to demonstrate the pathological nature of hepatic steatosis, nor the hypothesis of stress or fear of palmipeds in the fattening phase. Worse still, it is inaccurate in terms of the length of time ducklings are kept indoors, the access to light and the ability to stand up straight. These inaccuracies are certainly not related to any intellectual dishonesty but to a lack of own research. Unfortunately, the report does not provide any details on the few visits that may have been carried out by some of the members of the working group, both on the number of farms and on the objectives and method of observation. It therefore relied mainly on the literature available at the time and quite logically admitted that several elements of the report were based on a small number of scientific publications and individual observations by experts on farms (p.68).

Despite this admission, the report reaches the following general conclusion: *“Force feeding, as currently practised, is detrimental to the welfare of the birds”* (p.65). And among its specific recommendations, the report states that *“No process should be used that results in an increase in liver size such that its function is significantly modified or that it directly or indirectly causes increased mortality, pain, or distress to the animal”* (p.67).

However, as mentioned above, the report was unable to draw firm conclusions on the so-called pathological nature of liver steatosis in ducks and geese, nor on the hypothesis of stress and fear of the palmipeds in front of the person in charge of fattening them. This hypothesis is moreover challenged by a 2017 study of the Technical Institute of the Poultry, rabbit and fish sectors (ITAVI), which indicates a lower mortality rate during the fattening phase (1.90%) than during the rearing phase (3.53%). These figures are also lower than in 2016 (3.57% in the rearing phase and 2.26% in the fattening phase). Moreover, field observations indicate that it is not uncommon to conduct batches of animals for fattening without any case of mortality. Mortality cases are not caused by an increase in liver weight but can be induced by various factors such as poor control of the feeding gesture by the operator.

The rest of the specific recommendations are more common sense than scientific expertise: it was already clear to the sector at the time that the people in charge of the animals needed to be trained and competent and that it was in the interest of the sector that research into production be carried out, that monitoring programmes for mortality, morbidity and other welfare indicators be conducted. Since 1998, however, several research projects have been carried out on improvements in husbandry practices and alternatives to assisted feeding.⁹ In addition, animal welfare monitoring programmes

⁹ Since 1998, several studies have been conducted on alternatives to assisted feeding. In 2006, an experiment (Guy & Fernandez, 2013) aimed at fattening the liver of mulard ducks by supplying them with food while alternating with periods without food (**food rationing - release sequence**) showed that mulard ducks are able to overeat and fatten their liver spontaneously, although this fattening remains very moderate (the liver goes from 60g to 150g) so that in the current state of knowledge, this technique can only be conceived for pre-fattening to shorten the duration of assisted feeding. Another alternative that has been studied since 2009 is that of possible **hyperphagia behaviour** (overconsumption used

are being conducted, such as "Palmi G confiance", which since 2014 has been voluntarily committing professionals in France to have an independent body monitoring the proper implementation of the European Charter for Fattened Palmiped Production and a certain number of animal welfare indicators.¹⁰

Euro Foie Gras pleads for reports based on experimentation and methodical observation



In light of the inaccuracies detected and the outdated nature of several elements of the 1998 SCAHAW report as well as the changes made by the sector over the past several years, particularly in terms of housing and fattening systems, Euro Foie Gras considers that this document can no longer be a valid reference on the welfare of fat palmipeds. Indeed, any reference document aiming to issue recommendations at the national or European level on foie gras production must be able to integrate the most recent scientific data and to draw conclusions based more on experimentation than on individual observation, and with clearly defined objective research methods. The European foie gras sector has always been open to scientific initiatives aimed at improving both the welfare and health of animals as well as the ergonomics and productivity of foie gras producers and will continue to do so.

to build up reserves) corresponding to the pre-migration period of palmipeds. The experiment consisted in simulating the occurrence of the autumn period in a dark building in order to trigger hyperphagia in the geese. However, the hepatic steatosis induced by this system is on average half that obtained in the conventional fattening system (Knudsen et al., 2018), especially as such an alternative would confine the animals to the building whereas, as a reminder, ducks and geese currently live 90% of their lives outdoors.

¹⁰ The European Charter for fattened palmiped production is available here:

<http://www.eurofoiegras.com/wp-content/uploads/2019/05/Charter-for-fattened-palmiped-production.pdf>

For more information about « Palmi G Confiance » programme : <https://foiegras-factsandtruth.com/foie-gras/our-commitments>