



**SUBMISSION TO ANIMAL HEALTH AUSTRALIA ON THE
*PROPOSED DRAFT AUSTRALIAN ANIMAL WELFARE
STANDARDS AND GUIDELINES FOR POULTRY***

26 February 2018

Voiceless Limited

ACN 108 494 631
2 Paddington Street
Paddington NSW 2021

P +61 2 9357 0723
F +61 2 9357 0711

Disclaimer: Voiceless Limited ACN 108 494 631 ('Voiceless') is a company limited by guarantee. Voiceless is not a legal practice and does not give legal advice to individuals or organisations. While Voiceless makes every effort to ensure the accuracy of information presented on its behalf, Voiceless does not guarantee the accuracy or completeness of that information. Information is provided by Voiceless as general information only and any use of or reliance on it should only be undertaken on a strictly voluntary basis after an independent review by a qualified legal practitioner (or other expert). Voiceless is not responsible for, and disclaims all liability for, any loss or damage arising out of the use of or reliance on information it provides. To learn more about Voiceless, please visit <http://www.voiceless.org.au>

Voiceless, the animal protection institute (**Voiceless**) is a non-profit think tank focused on educating, raising awareness and alleviating the suffering of animals in factory farming and other animal-use industries. We are grateful for the opportunity to comment on the Proposed Draft Australian Animal Welfare Standards and Guidelines for Poultry (**S&G**) and the associated Regulatory Impact Statement (**RIS**).

The significance of this review process cannot be overstated, considering the sheer number of animals affected by the outcome, the high level of public interest in the matter and the potential to profoundly impact on Australia's international standing in regard to animal welfare.

In order to give value to this review process it is essential that the S&G do not reinforce existing and outdated industry practices. Instead, the review process must address current community expectations, independent animal welfare science, and best available practices that demand higher welfare standards for all birds used in the poultry industry across Australia.

These elements are not reflected in the proposed S&G, which in its current form fails to achieve meaningful reform. Voiceless maintains that the proposed S&G do not mark a significant departure from the provisions in the current *Model Code of Practice for the Welfare of Animals – Domestic Poultry* (**Model Code**). Although endorsed in 2002, this Model Code drew upon industry guidelines from 1983, which in turn codified practices from the 1950s. As correctly identified by the RIS [p13], animal welfare science and community values have matured since the creation of the Model Code, as have expectations from international trading partners. Indeed, the Model Code itself expressly stipulates that it will need to be reviewed in order to take account of advances in technology, animal welfare understanding and public expectations. It is unacceptable that the proposed S&G does not reflect the technology, science and social attitudes that have rapidly transformed in the past 70 years.

In 2017, Voiceless published a report on hen welfare in the Australian egg industry entitled *Unscrambled: The hidden truth of hen welfare in the Australian egg industry* (**our Report**).¹ Voiceless appreciates that the RIS makes reference to our Report, but notes that the substantive content is not reflected in the proposed S&G. Voiceless wishes to reiterate that our Report is based on current animal welfare science, has been reviewed by six leading animal welfare experts on our Scientific Expert Advisory Council and has been endorsed by major animal welfare organisations including Animals Australia, Compassion in World Farming and Mercy for Animals. As such, Voiceless has reiterated a number of key points from our Report in this Submission. Unless otherwise referenced, all media, literary and scientific citations for research referred to throughout this Submission are available in our Report.

Voiceless makes a number of recommendations in Part I of this submission. Voiceless recommends that the proposed S&G be varied to:

1. Rapidly phase out and prohibit the use of all caged systems;
2. Mandate that egg-laying hens be afforded the ability to express innate behaviours, including nesting, perching, foraging and dustbathing;
3. Mandate a reduction of stocking densities for all species of poultry;
4. Improve ambient factors in all production systems, such as lighting;
5. Mandate the provision of emergency procedures;

¹ Voiceless, the animal protection institute, *The hidden truth of hen welfare in the Australian egg industry* (2017) accessible via <www.voiceless.org.au/unscrambled-hidden-truth-hen-welfare>.

² In lieu of a ban on colony cages, Voiceless at the very least **strongly recommends that the definition of a colony cage as**

6. Prohibit mutilation practices and mandate a reduction of reliance on beak trimming as a management tool, ultimately phasing out the practice;
7. Prohibit the routine slaughter of surplus male chicks;
8. Prohibit the practice of induced moulting and skip-a-day feeding;
9. Mandate the selection of flocks based on genetic traits that promote higher welfare outcomes;
10. Mandate the provision of shade, shelter and vegetation for outdoor ranges, and a minimum period of daily access;
11. Prohibit the use of electrical water baths and blunt force trauma for stunning, and strengthen general Standards for humane killing and killing at slaughterhouses;
12. Mandate the provision of access for all ducks to water and the outdoors; and,
13. Improve clarity around handling of poultry.

Importantly, please note that any omission or lack of comment on a particular topic in this Submission does not signify acceptance or endorsement by Voiceless.

In addition to comments on the substantive content of the proposed S&G, Voiceless also wishes to comment on the review process itself. Our concerns are outlined in Part II of this Submission.

PART I

1. Rapidly phase out and prohibit the use of all caged systems

- 1.1 Voiceless partially endorses Option D provided for in the RIS, to vary the proposed S&G to phase out conventional cages for laying hens in favour of alternative systems. However, Voiceless expressly disagrees with the proposed timeframes of 10 or 20 years to phase out the use of cages, and instead advocates for a significantly earlier deadline that would still allow industry to adapt without causing undue extending suffering for poultry. Voiceless also supports extending this phase-out to include all caged systems and does not support a transition to furnished cages.² Furnished cages are an insufficient solution to welfare concerns, as they present a number of the same welfare issues as conventional cages. For example, poultry in furnished cages are still subject to extreme confinement and high stocking densities, which obstruct a hen's ability to perform natural behaviours regardless of furnishings and prevent poultry from escaping feather pecking or bullying.
- 1.2 Further, Voiceless notes that the recommended prohibition of caged systems should also extend to meat chickens and other poultry species used in Australia and, as such, disagrees with the qualification included in Chapter B2. Although meat chickens are currently reared and managed using only non-caged systems, the S&G should not permit any potential future use of caged systems for any poultry industry in Australia.
- 1.3 The RIS identifies that risks to animal welfare are the primary problem intended to be addressed by the proposed S&G [p30]. Utilizing the definition of animal welfare provided in the RIS [p31], good welfare depends on an animal being healthy, comfortable, well nourished, safe, able to express innate behaviour, and free from pain, fear and distress. Indeed, the RIS goes as far as to identify emotional wellbeing as a factor of welfare [p45].

² In lieu of a ban on colony cages, Voiceless at the very least **strongly recommends that the definition of a colony cage as provided for in the Glossary of the draft S&G be amended to require the provision of a perch, litter, scratching pad and nest box**. This would align the definition with that of an enriched cage in the EU [RIS, p233].

- 1.4 A conclusive scientific case reveals that the majority of these factors are not satisfied by caged systems. Birds forced to spend their lifetime in a cage will likely suffer from injury and illness (including, but not limited to, chronic foot pain, osteoporosis, bone fractures and severe feather pecking); discomfort from an inability to regulate their own body temperature; frustration and distress from a lack of stimulation and a complete inability to adequately perform essential behaviours (such as nesting, foraging, preening, stretching, perching and dustbathing); and, fearfulness from the use of continuous light patterns. These welfare impacts are in addition to the inherent welfare issues present across most methods of egg production (including slaughter of male chicks, beak trimming, forced moulting, artificial rearing and early slaughter).
- 1.5 A failure to ban cages would also be at odds with the stated principles in the introduction to the proposed S&G [p12], which specifically identifies that good husbandry must provide poultry with ‘space to stand, lie and stretch their wings and perform normal patterns of behaviour’. Furthermore, the continued use of caged systems would be inconsistent with principles of the *OIE International Animal Health Code*. In contrast to the RIS, which claims that the proposed S&G are generally consistent with these OIE principles [p17], Voiceless contends that it is impossible for a caged environment to ‘allow comfortable resting, safe and comfortable movement including normal postural changes, and the opportunity to perform types of natural behaviour that animals are motivated to perform’.
- 1.6 As demonstrated by the extensive scientific research detailed in our Report, caged systems pose severe animal welfare impacts. These impacts are widespread, affecting at least 11-12 million hens currently confined in caged systems across Australia.
- 1.7 In light of the potential for grave suffering to be imposed on a significant number of individual animals for the majority of their lifespan, **Voiceless strongly recommends that a Standard be included in the proposed S&G to rapidly phase out the use of cages. Such a Standard should be incorporated with general application under Part A, in addition to species-specific Standards under Part B.**
- 1.8 Such an approach is supported by a strong majority of the Australian public, with a 2017 survey finding that 84% of Australians support a ban on battery cages.³ The public’s opposition to the unnaturalness and confinement of cages could arguably apply to the use of furnished cages as well. A phase-out of caged systems would also bring Australia into line with a number of international jurisdictions, such as New Zealand, the United Kingdom and the European Union, that have already made moves to ban or phase out the use of cages in egg production. As demonstrated by the scientific, social and international support for ending the use of caged systems, animal welfare expectations are evolving in a clear direction. Australia would greatly benefit from acknowledging this reality by taking action now to phase out caged systems and prohibit their future use in Australia.
2. Mandate that egg-laying hens be afforded the ability to express innate behaviours, including nesting, perching, foraging and dustbathing
- 2.1 Voiceless endorses Option F in the RIS, to vary the proposed S&G to require the availability of nests, perches, litter and dustbathing for all laying hens in all systems. These elements are indispensable to

³ RSPCA Australia, *Breakthrough research finds 84% of Australians want to end the battery cage* (26 November 2017) <www.rspca.org.au/media-centre/news/2017/breakthrough-research-finds-84-australians-want-end-battery-cage>.

achieve even the most basic level of animal welfare, as each serves an essential and primary behaviour of hens.

Nests

- 2.2 Nesting is a behavioural priority for laying hens. An ability to access nesting materials and a discrete, private and enclosed nesting space is essential for basic hen welfare. Where hens are denied this behaviour, they have been found to display agitated pacing and escape behaviours.
- 2.3 Voiceless notes that clause 2.4.4 of the Model Code specifically states that nests ‘must’ be provided for laying hens. In order to avoid regressing from the benchmark set by the Model Code, the proposed S&G must **convert Guideline GA4.15 to a Standard, and amend and convert Guideline GB1.6 to a Standard, to the effect that nests must be provided and must provide seclusion from the flock, be of adequate size and number to meet the laying needs of all poultry, and ensure poultry can lay without undue competition.**
- 2.4 In addition, Voiceless notes the failure of the proposed S&G to address ventilation for nest boxes. **A Standard should be included to reflect clause 7.2.5 of the Model Code, to ensure nest boxes are adequately ventilated and temperature protected.**

Perches

- 2.5 Perching is another fundamental behavioural instinct for hens, with most birds preferring to perch at night. The inability to perch can cause frustration and aggression, potentially leading to an increased rate of feather pecking. Research also shows that perching aids physical welfare in terms of musculoskeletal health, motor skills, balance and cognitive spatial skills.
- 2.6 Voiceless recommends that **a Standard be inserted into Chapter 4 to require the provision of perches at all times, in addition to converting Guideline GB1.14 to a Standard.**

Litter and dustbathing

- 2.7 Foraging amongst various substrate or litter is a natural daily behaviour of poultry, and one that is denied in many production systems. Substrate or litter also serves the important function and key instinct of hens to clean their feathers via dustbathing. Effective dustbathing has been found to positively affect hygiene, waterproofness and insulation of a bird’s feathers. Hens deprived of litter have been observed engaging in sham dustbathing, where the actions are mimicked without effect, and have been found to experience stress, as indicated by increased corticosterone levels.
- 2.8 Voiceless recommends that **a Standard be inserted into Chapters 8 and B1 to the effect that litter must be provided for all indoor poultry systems for the purposes of foraging and dustbathing, along with effective litter management. Further, Voiceless recommends converting Guidelines GB1.4 and GB1.5 to Standards.**

3. Mandate a reduction of stocking densities for all species of poultry

- 3.1 Poultry regulate their temperature by adjusting their posture and holding their wings away from their bodies. This behaviour, along with most natural activities like wing flapping, grooming, preening, stretching, foraging and dustbathing, is impossible in restricted space or crowded conditions. In the case of chickens raised for their meat, for example, high stocking densities have been shown to cause a number of welfare concerns including increased rates of mortality, disease

(such as breast blisters, chronic dermatitis and leg disorders), walking impairments and reduced behavioural activity.

- 3.2 To this end, Voiceless endorses the evidence provided by RSPCA Australia in the RIS [p230] to support lower stocking densities. **Voiceless recommends that the maximum stocking density for all species be decreased, to allow free movement for all individual animals and to provide the opportunity for proper expression of natural behaviours.**
- 3.3 Of particular importance, Voiceless **urgently recommends converting Guideline GA4.8 to a Standard**. The ability for an animal to stretch to their full height or flap their wings is fundamental to animal welfare, and it is entirely unacceptable to confine poultry in a space where these actions are not possible. As achieving animal welfare has been identified as the primary goal of the proposed S&G, it is crucial that Guideline GA4.8 is converted to a Standard if the S&G are to achieve any semblance of meaningful animal welfare.

4. Improve ambient factors in all production systems, such as lighting

- 4.1 The draft S&G permit the use of near continuous low level lighting. It has been found that continuous and/or low artificial lighting can have serious behavioural and physical welfare impacts. For example, poultry reared in continuous light were found to be more fearful than those with a natural diurnal sleep pattern, while artificial lighting also has the potential to affect the development and functioning of both a bird's eyes and reproductive system. Low-level lighting has also been linked to reduced activity, which contributes to the development of lameness, hock burn, breast blisters and dermatitis in poultry.
- 4.2 **Voiceless recommends increasing the minimum Lux prescribed by Standard SA6.3, and amending Standards SA6.5 and SB1.5 to provide for at least 7-8 hours of continuous darkness in each 24 hour period.** Voiceless notes that without amendment, Standard SB1.5 will contradict the recommended minimum period of continuous darkness recognised in the same chapter under Guideline GB1.2.

5. Mandate the provision of emergency procedures

- 5.1 It is important that the proposed S&G make mandatory provisions to prepare for emergency situations. Specifically, Voiceless **recommends converting Guideline GA4.4 to a Standard, so that maintenance programmes must be in place for all equipment where any malfunction or failure would jeopardise poultry welfare; converting Guidelines GA3.1 and GA3.2 to Standards to require contingency planning; converting Guideline GA3.5 to a Standard so that adequate firefighting equipment must always be available and maintained for indoor housing systems; and, introducing a Standard in Chapter 3 to require sufficient exits are accessible to facilitate the evacuation of birds in an emergency** (a basic protection stipulated in the Model Code, but inexplicably omitted from the proposed S&G). This will go some way towards addressing the shocking incidences where poultry have suffered from natural disasters and fires (such as the shed fire on Marburg Poultry Farm in Queensland that killed 30,000 chickens in 2016 or the bushfire at Hamley Bridge Farm in South Australia that killed 51,000 chickens, 500 pigs and 950 sheep in 2015).⁴

⁴ For more examples, see Metroid Electrical Engineering, *Poultry Shed Fires & Their Causes* (2017) <www.metroid.net.au/engineering/poultry-shed-fires/>.

6. Prohibit mutilation practices and mandate a reduction of reliance on beak trimming as a management tool, ultimately phasing out the practice

- 6.1 Voiceless endorses Option G in the RIS, to vary the proposed S&G to ban castration, pinioning and devoicing, hot blade beak trimming at hatcheries, and routine second beak trim – unless there are exceptional circumstances. **Voiceless' endorsement is conditional upon the provision of pain relief where beak trimming is performed, and recommends the inclusion of 'the use of blinkers or blinders' in the list of prohibited practices.**
- 6.2 Voiceless notes that castration, pinioning, devoicing and the use of blinkers is already prohibited under section 13 of the Model Code. A failure to expressly prohibit these practices under the proposed S&G would therefore mark a clear regression from the standards set by the Model Code.
- 6.3 Beak and bill trimming involves cutting a sensitive organ, which contains a high density of nociceptors (pain receptors), and has been shown to cause severe and chronic pain for poultry.⁵ The process itself may also result in trauma for young poultry due to the forcible restraint of their head. Scientists have also determined that the process can lead to the development of painful neuromas, and that observations of poultry behaviour suggest pain can last up to six weeks following beak trimming.
- 6.4 In response, several international jurisdictions have already banned the practice of beak trimming, including Norway, Sweden, Switzerland and Finland.
- 6.5 **Voiceless recommends introducing a Standard to prohibit beak and bill trimming, unless performed by an accredited operator in exceptional or therapeutic circumstances, when all other alternatives have been exhausted.** To this end, beak and bill trimming should be removed from the proposed S&G as an acceptable management practice and, instead, **a Standard should be inserted to the effect that all natural farm management practices must be implemented in order to reduce the incidence of feather-pecking, such as lowering stocking densities and providing adequate substrate or litter** (potentially converting elements of Guidelines GA3.17 to a Standard). This should also be reflected in species-specific chapters, such as by **converting Guideline GB13.16 to a Standard, with the effect being that where large numbers of turkeys are pecking or cannibalising other birds, action should be taken by adjusting management practices and seeking veterinary advice.**
- 6.6 **At the very least, pain relief must be provided in accordance with the OIE principle that 'where painful procedures cannot be avoided, the resulting pain should be managed to the extent that available methods allow'** [RIS, p17]. A failure to require the use of pain relief would contradict Standard SA9.12, which requires a person to use appropriate pain relief when carrying out surgical procedures on poultry.
- 6.7 Furthermore, in order to at least replicate the benchmark set by the Model Code, **the proposed S&G must expressly prohibit or restrict beak trimming in Chapters B9, B10, B11 and B13.**
- 6.8 Voiceless notes that the proposed S&G permit the practice of de-snooding for reasons other than cosmetic purposes. This procedure is intended to reduce injuries that turkeys may sustain from fighting, which usually occurs as a consequence of high stocking densities. As an invasive mutilation

⁵ In addition to scientific findings detailed in our Report, also see research demonstrating the severe and chronic pain inflicted on turkeys by beak trimming: Scheideler, S. E. and Shields, S., 2007, 'Cannibalism by poultry,' University of Nebraska-Lincoln Extension.

procedure that potentially causes pain and stress, Voiceless strongly **recommends that a Standard be introduced to expressly prohibit the practice of de-snooding**, or at the very least strictly limit any de-snooding to be performed only in exceptional circumstances or for therapeutic reasons, when all other natural farm management methods have been exhausted, and only by an accredited operator and with the provision of pain relief.

7. Prohibit the routine slaughter of surplus male chicks

- 7.1 Several jurisdictions around the world are working to phase out the routine slaughter of male chicks bred into egg production industries. Australia's continued dependence on maceration and carbon dioxide gassing as a means to slaughter 12 million male chicks annually is fast becoming outdated.
- 7.2 It is also a source of public outrage, as evidenced by the vocal backlash following the release of the first Australian footage of maceration in July 2016.
- 7.3 Voiceless strongly recommends **inserting a Standard to phase out the routine slaughter of male chicks in favour of non-lethal alternatives**.
- 7.4 In addition, Voiceless notes that **Guideline GA9.20 addresses a core and basic element of hatchling protection and should be converted to a Standard so that hatchling trays with live young birds must be moved smoothly, and tipped in such a way that the birds do not pile or become trapped**.

8. Prohibit the practice of induced moulting and skip-a-day feeding

- 8.1 Induced (or 'forced') moulting is a controversial practice that causes significant welfare concerns for egg-laying poultry. At the same time, the practice is reportedly uncommon in Australia where poultry are often slaughtered after their first egg-laying season. Australia is therefore ideally placed to take action to prohibit this practice in the name of animal welfare, considering the profound impact of intentionally inflicting bodily stress on an animal, and taking into account that only a limited number of producers would be affected by a prohibition on the practice.
- 8.2 Such a decision would bring Australia into line with a number of progressive jurisdictions that have already banned induced moulting, including the United Kingdom, the European Union and most recently India, where it was found that the practice contravened the nation's anti-cruelty statute. Importantly, major egg market purchasers are also taking steps to eliminate the practice from their supply chains: McDonald's, Burger King and Wendy's International no longer purchase egg products from US producers who employ induced moulting.
- 8.3 Accordingly, Voiceless **recommends amending Standards SA9.4, SA9.5 and SA9.6 to prohibit the practice of induced or forced moulting altogether**.
- 8.4 In order to fully address the issue of deliberately imposing additional stress on animals, **the proposed S&G must further be amended to prohibit the practice of skip-a-day feeding and provide for access to food and water for poultry more regularly within 24 hours periods**. Like induced moulting, food and water deprivation inflicts undue and unjustifiable stress on animals already facing compromised welfare in all farming systems. In order to fulfil the primary Standard SA2.1, **the proposed S&G must be amended to require that a person in charge must ensure poultry have constant access to sufficient and appropriate water, and have more frequent access to sufficient and appropriate feed (once within each 24 hour period being inadequate)**. Likewise, it is inappropriate to allow newly hatched emu chicks to have access to feed only once every 48 hours, and **Guideline GB5.4 must be amended to limit this period to less than 24 hours**.

9. Mandate the selection of flocks based on genetic traits that promote higher welfare outcomes

- 9.1 Poultry that have been selectively bred to maximise the size and production rate of eggs are faced with a number of welfare concerns, such as a predisposition to illness and disease (including an inflammation of the reproductive tract causing the body cavity to fill with pus, the growth of tumours, cloacal prolapse and a weakened immune system). Poultry bred to produce an unnaturally high number of eggs also suffer a high frequency of osteoporosis and bone fractures, which is exacerbated by skeletal and muscular disuse and injury in unenriched and crowded environments. Osteoporosis can cause chronic pain and fractures, with severe cases even resulting in paralysis.
- 9.2 Similarly, poultry selectively bred for the meat industry to grow at faster rates and to maximize the amount of saleable meat also suffer extreme welfare issues. Meat chickens, for example, have been bred to grow so rapidly that they are unable to support their own body weight, resulting in broken bones, swollen joints, spinal damage and degenerative diseases. Another consequence of rapid growth is the enormous pressure exerted on their hearts and lungs, causing millions of chickens to die from ascites and heart failure every year.
- 9.3 As a consequence of selective breeding, turkeys also grow and gain weight at an extremely rapid rate.⁶ This comes at significant welfare costs to the birds involved, including lameness, skeletal problems, heart and other organ malfunctions, deficient immune systems and physical pain.⁷ Such is the impact on usual biological functioning that the modern farmed turkey is unable to breed naturally,⁸ and is instead subject to painful, distressing and injurious artificial insemination.
- 9.4 **Voiceless strongly recommends including a Standard to the effect that poultry producers must select their flocks based on genetic traits that promote high welfare outcomes, ahead of traits that promote increased productivity, such as higher or larger egg production, body size or growth rates.**

10. Mandate the provision of shade, shelter and vegetation for outdoor ranges, and a minimum period of daily access

- 10.1 In order to encourage and ensure basic welfare for poultry in outdoor ranges, **Voiceless recommends converting Guidelines GA5.1 and GA5.2 to Standards.**
- 10.2 Furthermore, it is essential that poultry be provided with sufficient access to the outdoor range in order to become accustomed to and properly benefit from accessing the outdoor environment. To at least replicate the stipulations from clause 2.4.5.3 of the Model Code, **a Standard should be introduced into Chapter 5 to require that all adequately feathered poultry have ready access to the outdoor range during daylight hours for a minimum of 8 hours per day.**

⁶ von Holleben, K., von Wenzlawowicz, M., Gregory, N., Anil, H., Velarde, A., Rodriguez, P., Cenci Goga, B., Catanese, B., and Lambooj, B., 'Report on good and adverse practices: animal welfare concerns in relation to slaughter practices from the viewpoint of veterinary sciences' (2010).

⁷ Farm Sanctuary, Unnatural Breeding Techniques and Results in Modern Turkey Production (2007).

⁸ World Animal Foundation, 'Turkey Fact Sheet' (n.d.).

11. Prohibit the use of electrical water baths and blunt force trauma for stunning, and strengthen general Standards for humane killing and killing at slaughterhouses

11.1 The method of stunning using an electrical water bath has repeatedly been found to be ineffective in achieving unconsciousness in poultry. The result is that a number of animals experience the electrocution process and then have their throats cut while still conscious. In addition, similar research has found the use of blunt force trauma to be an ineffective method of stunning that raises obvious and grave welfare issues for animals. Ineffective stunning is a shameful and truly shocking reality of the poultry industry, and one that must not be permitted to continue.

11.2 Voiceless recommends **introducing Standards to prohibit the use of electrical-water-bath stunning and throat-cutting as a means of stunning and killing poultry, and to prohibit the use of blunt force trauma as a means of stunning poultry, in favour of comparatively more effective and less cruel methods.** Such Standards would need to be introduced into Chapter 10, Chapter 11 and in species-specific chapters, such as **amending Guideline GB5.29, which currently encourages using blunt force trauma to stun young emus.**

11.3 Furthermore, a number of Standards and Guidelines proposed under Chapter 10 are insufficient to ensure animal welfare when ‘humane killing’ is performed on-farm. For example, Standard SA10.1 permits killing methods without prior stunning. While this chapter is in part intended to accommodate emergency or unplanned killing of poultry in unexpected circumstances, in which case prior stunning may not always be feasible, Voiceless notes that the associated Guidelines address killing methods that require equipment and planning to implement (such as gassing). In line with Standard SA11.2, which requires stunning prior to killing in slaughtering establishments, Voiceless strongly **recommends that the Standards in Chapter 10 be amended to require stunning when ‘humane killing’ is performed, and to reflect that a failure to stun may only be excused in exceptional emergency circumstances.** Without these amendments, the proposed S&G will establish contradictory welfare benchmarks for killing animals on-farm versus at a slaughterhouse, even where both methods involved the planned use and upkeep of technical equipment.

11.4 In line with moves around Australia, Voiceless also **recommends mandating the installation and use of CCTV devices in all slaughterhouses.** This approach would go some way towards monitoring and addressing incidences of non-compliance, and deter personnel from committing egregious acts of animal cruelty, as repeatedly documented and reported in Australian media as the result of undercover investigations.

12. Mandate the provision of access for all ducks to water and the outdoors

12.1 As aquatic animals with an innate attraction to and dependence on water, access to water is an essential requirement for basic duck welfare. Ducks rely on access to water to preen and clean themselves, to take pressure off their leg joints and maintain general health. Adapted to spend much of their lives in water, ducks’ legs and feet have not biologically developed to support their body weight for extended periods of time.⁹

12.2 Without access to adequate water, ducks are susceptible to heat stress due to an inability to thermo-regulate, respiratory illness, falling, wounds, breast blisters, crusty eyes that can lead to blindness, and dislocated or broken limbs.¹⁰ The issue of dislocated and broken limbs due to a lack of

⁹ Poultry Cooperative Research Centre. Poultry Hub <www.poultryhub.org/species/commercial-poultry/duck/>.

¹⁰ Kristensen, H.H, and Wathes, C.M. (2000) ‘Ammonia and poultry welfare: a review’, *World’s Poultry Science Journal* 56(3), 235-245; Animal Liberation ‘Like a duck out of water’ (October 2013).

adequate water is exacerbated by the fact that farmed ducks have been selectively bred to grow faster and to greater weights.¹¹ Furthermore, insufficient access to water prevents ducks from expressing natural and fundamental behaviours such as feeding, preening, cleaning and foraging, which can cause them to become stressed and aggressive.¹² European welfare standards recognise this, stipulating that ducks must be provided with adequate water for hygiene and swimming.¹³

12.3 The inclusion of Standard SB4.4, which requires that ducks be provided with adequate facilities to dip their heads under water, or with misters or showers to wet preen and clean their eyes and nostrils, marks an improvement from the Model Code. However, in order to properly address the welfare concerns associated with water deprivation, ducks must have access to water beyond merely being able to dip their heads in water. **Voiceless strongly recommends the inclusion of a Standard requiring the provision of sufficient swimming water for ducks.**

12.4 As noted in the RIS, there is currently limited access to water surface systems in Australia, with duck-specific feeding and drinking equipment not readily available. As a result, many duck farms reportedly use drip feeders designed for chickens that do not actually allow ducks to bathe, clean or swim.¹⁴ **Voiceless recommends that priority be given to research and experimentation on surface water systems in Australia and, accordingly, that Guideline GB4.4 be converted to a Standard.**

13. Improve clarity around handling of poultry

13.1 For the purposes of consistent interpretation, **Guidelines GB6.7 and GB6.8 must be clarified**, as they are seemingly contradictory to Standard SB6.3. In line with this Standard, **the Guidelines should clearly stipulate that all breeds of goose must be supported by the breast when carried.**

13.2 Furthermore, Voiceless **recommends Standard SB4.1 be amended to also prohibit lifting or carrying of ducks by the neck, unless otherwise supported by the breast and that Guideline GB4.8 be amended so that handling young ducks and ducklings by the neck is not suggested nor permitted.**

13.3 Unlike other species-specific Standards, the best methods for handling emus, ostriches and turkeys are only included as Guidelines in their relevant sections. Considering the potential stress and injury associated with direct human interaction and inappropriate handling of larger species, and for consistency throughout the proposed S&G, Voiceless **recommends converting Guidelines GB5.17, GB8.1 and GB13.18-22 to Standards.**

PART II

In contrast to claims made in the RIS [p22], Voiceless is concerned that the development and review process for creation of the proposed S&G has in fact been neither transparent nor inclusive. Voiceless has highlighted a number of procedural issues in this Submission, in the hope that the decision-making bodies will take the issues into account in regard to both the review of the proposed S&G and the production of future animal welfare standards.

¹¹ Poultry Cooperative Research Centre. Poultry Hub <www.poultryhub.org/species/commercial-poultry/duck/>.

¹² The Humane Society of the United States. *An HSUS Report: the welfare of animals in the duck industry*.

¹³ VIVA! USA, *'Ducks out of water: a report on the duck industry in the USA'*.

¹⁴ Environmental Impact Statement (EIS) for Livestock Intensive Industry (2013) *Proposed poultry farm (duck – live egg production)*. No 5756 Putty Road Howes Valley, Development and Environmental Planning Consultants.

While differences between stakeholder opinions are expected, it is extremely problematic that the development process itself has resulted in proposed S&G that fail to reflect current public attitudes, independent scientific research or international precedent.

Further, a number of serious and controversial shortcomings in the process have come to light and remain largely unaddressed. Documents obtained under Freedom of Information laws revealed that the NSW DPI met with poultry industry representatives to discuss strategies to secure certain interests – such as the continued use of battery cages for laying hens – before the official development process began. This complicity is reinforced by the way in which the review process was conducted, including:

- the reported use of biased and deficient discussion papers to inform the drafting process, as claimed by select scientists whose work was incorrectly or incompletely referenced;
- the fact that relevant sections of the draft RIS were shown to each industry body in the Stakeholder Advisory Group, except for the animal welfare representative bodies;
- the fact that a NSW DPI Veterinary Officer attempted to alter the basic animal welfare principles within the proposed Standards to accommodate the continued use of battery cages; and,
- the failure of the NSW DPI to conduct an independent review of scientific literature prior to drafting the S&G.

As a result, both the Western Australian and Victorian Governments have publically dissented from the process. Victoria even felt it necessary to commission its own independent scientific review separate from the national process. The results of this review support a phase-out of battery cages for egg-laying hens. This conclusion is supported by a number of recent scientific welfare reports.

The groups representing animal welfare in the official Stakeholder Advisory Group have contended and appealed a number of these deficiencies, but are yet to be met with an adequate response.

While the RIS does include a costs-assessment for a phase-out of battery cages and lower stocking densities, Voiceless considers it improper that animal welfare organisations were required to fund such policy inclusions. National animal welfare standards ought to reflect the best available research and information, rather than depend on the ability of non-governmental groups to pursue and fund policy considerations.

These procedural defects must be addressed in order for the Australian animal welfare standard-setting procedure to retain credibility. Voiceless sincerely hopes that future reviews of animal welfare standards are conducted with more integrity, in the interests of all beings.

We strongly recommend using this opportunity to address farming practices that have been socially and scientifically condemned, at both a domestic and international level. Voiceless hopes that the decision-makers will take the recommendations in this Submission into account, in order to step into line with leading nations in animal welfare and meet the expectations of the Australian public.

Respectfully submitted by Voiceless, the animal protection institute.