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The Australasian Veterinary Poultry Association (AVPA) has a wide membership of Australian and New Zealand poultry veterinarians and also those with an interest in poultry health and science. Poultry scientists and researchers, who may or may not be veterinarians, are also active members of the Association.

This submission on behalf of the AVPA has been prepared by a subcommittee that consists of experienced poultry veterinarians and poultry welfare scientists. AVPA is well positioned to comment on the scientific justification for the proposed new Australian Animal Welfare Standards and Guidelines for Poultry. However, the AVPA does not attempt to understand community expectations or represent the views of the broader community.

It is important to recognise the critical role of veterinarians with respect to ensuring that poultry welfare is maintained and safeguarded. Therefore, it is the view of the AVPA that veterinary advice must be sought preventatively, and in cases where welfare issues arise, and that the role of the veterinarian should be strengthened in the proposed new Welfare Standards and Guidelines.

**Please find below comments relating to specific standards and guidelines.**

## **2. Feed and water**

<b>Standard/Guideline Reference</b>	<b>Comments/Alternative Wording</b>
<b>SA2.2</b> A person in charge must ensure poultry, other than newly hatched poultry or where skip-a-day feeding is acceptable (for broiler breeders) have access to food at least once in each 24 hour period.	'Skip-a-day feeding' is more appropriately referred to 'alternate day feeding' and the terminology should be changed. The glossary definition for 'skip-a-day feeding' is also incorrect, as this practice refers to meat breeder chickens and not broiler chickens. Two days ration are fed on alternate days so the net nutrient intake is the same as if they were fed daily.
<b>SA2.7</b> A person in charge must ensure feeding and watering systems are checked daily to ensure all poultry have access to feed and water.	This standard contradicts SA2.2.
<b>GA2.6</b> Feed should be carefully assessed for suitability and safety.	Suggest that add 'commercial feed' and clarify who should assess – ie. a qualified and experienced poultry nutritionist' to the end of this guideline.
<b>GA2.12</b> Water within drinking lines should be regularly flushed and monitored.	Clarification of monitoring is required – hygiene, potability?
<b>GA2.8</b> Feed quality and nutrients should be considered if poultry display negative or abnormal behaviours (eg. injurious feather pecking, cannibalism).	This guideline oversimplifies the complex issue of feather pecking when read in isolation. It would be better positioned with GA3.17.

## **3. Risk management of extreme weather, natural disasters, disease, injury and predation**

<b>Standard/Guideline Reference</b>	<b>Comments/Alternative Wording</b>
<b>SA3.2</b> A person in charge must ensure the inspection of poultry daily, at a level appropriate to the management system and the risk to the welfare of poultry.	Once daily is considered inadequate – 'once' daily should be replaced with at least twice daily.

<b>SA3.3</b> A person in charge must ensure appropriate action for sick, injured or diseased poultry at the first reasonable opportunity.	The first reasonable opportunity should be clarified by specifying a timeframe for this to occur. This standard should also require that advice must be obtained from a veterinarian in the case of illness or disease.
<b>GA3.17</b> Feather pecking and cannibalism risk should be managed. Management methods, such as the below may be considered...’.	The word ‘prevented’ should be inserted after managed to ensure that risk factors are considered. ‘Second hot blade beak trimming, with advice and from a veterinarian’ should be added to the list of management methods.

#### 4. Facilities and equipment

Standard/Guideline Reference	Comments/Alternative Wording
<b>SA4.5</b> A person must ensure that poultry on perches are protected from excreta from birds perching above.	Suggest this standard be removed. This is not a practical requirement for perches in all housing systems. This may be included for old, dual-tier caged systems? Perches in barn, aviary and free range systems for all species of poultry could not be positioned to protect birds from excreta from birds perching above.
<b>GA4.5</b> Provision of environmental enrichment should be considered, taking into account potential risks and benefits to poultry welfare. Such practices may include provision of... A radio in sheds to accustom poultry to a range of noises and voices.	The suggestion of the radio should be removed, as there is conflicting evidence about what type of music and duration is beneficial or detrimental to poultry welfare. Additional, the term ‘effective enrichment’ should be considered to indicate that the value of enrichment can be assessed by observing the use of enrichment items.
<b>GA.4.11-GA4.14</b> Relating to perches.	Space allowances for perches should be provided for all species of poultry, where appropriate.
<b>GA4.18</b> Access to the outdoors should meet the following requirements...	Recommend adding to this guideline to include aspects of 2.4.5.3 in the previous MCOP that birds ‘should have access to the range ‘during daylight hours for a minimum of 8 hours per day. The only exception is under adverse weather conditions or serious outbreaks of disease when birds may be kept inside’.

#### 5. Management of outdoor systems

Standard/Guideline Reference	Comments/Alternative Wording
<b>GA5.1</b> The outdoor area should be actively managed and maintained to...provide birds with palatable vegetation’.	The mention of palatable vegetation should be excluded, as palatable vegetation can lead to nutrient dilution and increases the risk of grass impaction.
<b>GA5.1</b> The outdoor area should be actively managed and maintained to...minimise contact with wild birds’.	Wild birds should be expanded to ‘wild birds and wild animals’
<b>GA5.5</b> Where there is risk to the welfare of poultry due to the presence of a disease organism on the outdoors area, every effort should be made to minimise the risk to the health of poultry.	This guideline should be expanded to all types of housing systems, where there may be carryover of pathogens between flocks. It may be difficult in multi-age systems but is warranted after depopulation of indoor housing.

#### 6. Lighting

Standard/Guideline Reference	Comments/Alternative Wording
<b>SA6.3</b> A person in charge must ensure that the light intensity for poultry is at least 5 lux on average	Light intensity reduction is a critical method of controlling feather pecking and cannibalism. Whilst

during light periods.	light levels should be routinely maintained at 5 lux or above, there needs to be a provision to allow for further reduction in light intensity below 5 lux for a short period on welfare grounds in laying chickens, meat chicken breeders and turkeys. As a safeguard, a veterinarian could authorise the exemption in these exceptional circumstances.
<b>SA6.5</b> A person in charge must ensure poultry except for meat chickens, emus, ostriches and quail are exposed to at least 4 hours of continuous darkness within a 24 hour period.	Excluding meat chickens is confusing in this standard – needs to be considered in conjunction with <b>SB2.1</b> . Furthermore, there may be exceptions to 4 hours continuous darkness in the first 7 days for all types of poultry. Between 3 and 7 days after placement, an intermittent lighting program with 4 hours light on followed by 2 hours lights off, has been a successful strategy for layer chicks. This program has reduced 7 day mortality, improved activity and feed intake. Is there a reason why emus, ostriches and quail are excluded?
<b>SA6.5</b> A person in charge must ensure poultry except for meat chickens, emus, ostriches and quail are exposed to at least 4 hours of continuous darkness within a 24 hour period.	Midnight feeding of layers is a vital management practice for layers during hot weather periods (1 to 2 hour period in the middle of the dark period where lights are turned on to increase feed and water intake). This practice is well recognised and practiced to reduce mortality and morbidity of laying chickens. Typically birds will have 16 hours light, 3 hours off, 2 hours on, 3 hours off then back to 16 hours. This is an important management tool to improve welfare in hot weather and must not be removed.

### **7. Temperature and ventilation**

<b>Standard/Guideline Reference</b>	<b>Comments/Alternative Wording</b>
<b>GA7.4</b> Corrective action should be taken immediately if signs of stress (sneezing, prolonged panting and wing extension due to heat or huddling due to cold) are observed.	Sneezing should be omitted from the list of indicators of heat stress.

### **8. Litter management**

<b>Standard/Guideline Reference</b>	<b>Comments/Alternative Wording</b>
<b>SB8.3</b> Where litter is used, a person in charge must manage litter to avoid excessive caking, dustiness or wetness that impacts on the welfare of poultry.	This may be difficult to achieve practically under all circumstances (eg. free range housing around popholes). Methods to achieve optimal litter condition, such as frequent rotary hoeing, in some cases may result in adverse welfare outcomes (eg. scratching, smothers, stress). This standard should be re-phrased to better reflect practicalities and difficulty of ensuring optimal litter under all circumstances.
<b>GA8.2</b> Where appropriate, poultry housed indoors should have accessed to a littered area, the litter occupying at least a third of the ground surface in order for birds to forage and dust bathe. Litter should be at a depth suitable to the species.	Recommend removing this guideline, as it does not apply to all species of poultry.

## 9. Handling and husbandry

Standard/Guideline Reference	Comments/Alternative Wording
SA9.1 A person must manage and handle poultry in a manner that minimises pain, stress or injury to birds.	Suggest re-wording of this standard – “A person must manage and handle poultry in a manner that prevents pain and injury and minimises stress”
SA9.8 A person other than a veterinarian must not perform pinioning, castration or devoicing, on poultry.	See comments relating to devoicing, castration and pinioning under Option G. Devoicing and castration of commercial poultry should not be permitted. Veterinarians, under anesthetic with appropriate analgesia, may perform castration or devoicing on individual or backyard poultry. However, these procedures must be justified on animal welfare grounds. Pinioning is justified for pheasants only on welfare grounds.
SA9.9 and SA9.10 – ‘Desnooding’, ‘dubbing’, ‘despurring’ and ‘web marking’	These are technical terms, which should be defined in the glossary.
SA9.11 A person must only perform toe-trimming on day old hatchlings selected as potential breeders, except for emus and ostriches which may have toes trimmed on commercial stock up to 5 days of age.	Toe-trimming of day-old turkeys should be included as an exception to this standard. This practice is justified and may be required in order reduce mortality and morbidity associated with back scratching in this species.
SA9.12 A person must use appropriate pain relief when carrying out surgical procedures on poultry.	The definition of surgical procedures (any procedure that exposes tissues normally covered by skin or mucosa) in this glossary would also apply to dubbing, de-snooding, de-spurring and web marking (SA9.9 and SA9.10). Pain relief is not routinely used, or available, for these procedures.
SA9.13 A person must not pluck live poultry.	There should be an exception to this standard where some feathers on live poultry may need to be removed to facilitate blood collection or diagnostic sampling. Also, surgery and wound treatment may necessitate feather removal.
SA9.15 A person must not remove more than one-third of the upper and lower beaks.	This standard to be clarified by adding ‘by hot blade method’. The infrared beak treatment technology results in treatment of more than 1/3 of the beak (up to 40%). When the infrared treated portion of the beak regrows, the trim may be only 20%.
SA9.18 A person must monitor incubators at regular intervals during hatching and hatchlings that are found outside the trays must be returned to the tray or placed in brooders as soon as possible.	‘As soon as possible’ should be replaced with ‘as soon as they are identified’.

## 10. Humane killing

Standard/Guideline Reference	Comments/Alternative Wording
Standards SA10.1-SA10.4	Mass depopulation methods, in the event of a disease outbreak, must be permitted under this section. Whilst these may not easily be defined, there may need to be some leniency to enable appropriate decision making under these circumstances.

## 11. Poultry at slaughtering establishments

Standard/Guideline Reference	Comments/Alternative Wording
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<b>SA11.2</b> A person in charge must ensure killing methods for poultry result in rapid loss of consciousness, followed by death while unconscious.	Suggest replace 'killing' with 'slaughter' so there is no confusion between <b>SA10.1</b> and <b>SA11.2</b> .
<b>GA11.2</b> All poultry in holding areas should be checked at a minimum of every 2 hours for welfare. Checks should be recorded on the daily monitoring form.	The 2 hour frequency is not considered sufficient for poultry in holding areas in hot weather. The frequency should be increased to reflect the level of risk and at least hourly as a minimum.

### **B1 Laying Chickens**

<b>Standard/Guideline Reference</b>	<b>Comments/Alternative Wording</b>
<b>SB1.5</b> A person in charge must ensure that after the training period, where hens are housed under artificial light, lighting schedules must provide a minimum of 4 hours of continuous darkness in each 24-hour period.	See comments under <b>SA6.5</b> . There may be exceptions to this standard for laying chickens. For example, midnight feeding during hot weather or to prevent smothering immediately after transfer. This is recognised in <b>GB1.2</b> guideline but also needs to be reflected in the standard.
<b>GB1.3</b> The light intensity measured at bird height across the laying facility, during the light period, should be at least 10 Lux.	10 Lux is difficult to achieve practically in caged housing systems. The light intensity is uneven from top to bottom. A minimum of 5 lux is more practical in this case and in accordance with the standards.
<b>GB1.14</b> Perches should be provided at all times.	Hay bales and other forms of perching may also be suitable without being prescriptive in relation to the type of perching. See comments under Option F on inclusion of perches in all systems.
<b>GB1.21</b> Birds should at least have daily access to the outdoor area immediately after the egg-laying period. The exceptions to this are during unsuitable weather conditions, while training birds to use the nests, under direct veterinary advice, during treatment specified in the Veterinary Health Plan, or on the day of depopulation.	The duration of access to the range should be specified in this guideline. For example, for a minimum of 8 hours per day.
<b>GB2.1</b> Catching of meat chickens should be carried out under dim or blue light.	This guideline should apply to all types of poultry, including laying chickens and meat breeders.
<b>GB13.11</b> Every effort should be made to avoid beak trimming by the appropriate selection of birds and the provision of conditions which reduce the tendency for adverse traits, such as cannibalism, to occur.	This guideline for turkeys should also be expanded and included in the laying chickens section.

### **B2 Meat Chickens**

<b>Standard/Guideline Reference</b>	<b>Comments/Alternative Wording</b>
<b>GA2.3-GB2.4</b> relates to free range management for meat chickens.	Suggest inclusion of the same guideline from the laying chickens section, <b>GB1.22</b> , a 'daily record specifying the date and times of access to the outdoor area should be kept'.

### **B4 Ducks**

<b>Standard/Guideline Reference</b>	<b>Comments/Alternative Wording</b>
<b>SB6.1</b> A person in charge must ensure geese are not force fed for any reason including pate production.	This standard for geese should also apply to ducks.

### **B8 Ostriches**

Standard/Guideline Reference	Comments/Alternative Wording
<b>SB8.1</b> A person must ensure where a bird has suffered leg rotation it must be managed. If the bird has difficulty in rising or walking and has significant heat, pain and swelling, the bird must be humanely killed.	This standard only relates to leg rotation. Suggest that it may also be applicable to other causes of lameness that result in 'difficulty in rising or walking'.
<b>GB5.9</b> To avoid injury to the chicks, separation of the hen or chicks should occur before the first chicks hatch.	This guideline for emus should also be added to the ostrich section?

### **B11 Pigeons**

Standard/Guideline Reference	Comments/Alternative Wording
<b>GB11.9</b> With the exception of birds housed in rural and semi-rural areas or, returning from racing and training, free flight exercise should be in accordance with a plan, and for at least 30 minutes duration per day and not exceeding 180 minutes per day during both pre-training and the race program.	Question why there is an exception for birds housed in rural and semi-rural areas.
	There are no standards or guidelines with respect to hygiene or biosecurity requirements for vehicles dispatching pigeons to race.

### **B13 Turkeys**

Standard/Guideline Reference	Comments/Alternative Wording
<b>SB13.5</b> A person must ensure the maximum recommended stocking densities for turkeys are according to housing type and under good management conditions and as follows...	<ul style="list-style-type: none"> <li>• Remove 'good management conditions' because these are not defined, or defined in other sections.</li> <li>• The word 'intensive' in the footnote should be removed and re-phrased to require 'mechanically ventilated sheds' to have fans and foggers. This definition is in accordance with meat chicken standards. The densities should be clarified to ensure that they apply to tunnel ventilated or mechanically ventilated sheds only.</li> <li>• There is another footnote that 'density of open-sided sheds should be less than the above intensive densities'. 'Open-sided' sheds should be re-worded to 'naturally ventilated sheds'. Curtain-sided sheds may classify as 'open-sided' but it is really whether the housing includes methods of temperature control (fans, foggers etc.) that is relevant.</li> </ul>
<b>GB1.26</b> The opening that provides access between indoor and outside areas (pop hole) should be at least 35 cm high and 40 cm wide with a combined total width of all openings being 2 metres for each 1,000 birds.	Similar guidelines should be provided for free range turkeys.