

Animal Welfare Standards Public Consultation
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I am a former NSW Agriculture Poultry Specialist/Advisor of 17 years & spent an additional 12 years as a private Poultry Consultant. As well as visiting the vast majority of company & family owned egg farms throughout NSW & the ACT, one of my principal responsibilities was to deal with all matters related to the welfare of all forms of farmed poultry & to be the NSW Ag. contributor to revisions of the various Welfare Codes of Practice as related to poultry. These included the SCARM Model Welfare Code of Practice (Domestic Poultry) & the separate code for the Transport, Handling & Slaughter of Poultry. I also was principal author of The NSW Poultry Farming Guidelines which set the appropriate planning & operational standards for poultry farming in NSW & by default, the Australian industry when it was adopted by all Australian States & Territories.

In the last 6 years w NSW Ag. I resourced the NSW Poultry Traineeship run out of Murrumbidgee College, Leeton as principal lecturer w the last year spent full-time in that capacity.

Acceptable farming practice has evolved over time. What was acceptable 40yrs ago has become unacceptable since. No poultry housing system is perfect & where one system is recognised as facilitating the management, operations and efficiencies of farming poultry, that system can be equally demonstrated to have significant welfare shortcomings in respect of accommodating the behavioural & physical needs of the housed birds. ...and so it is w the cage system. I have long had professional & personal concerns about the abilities of cage systems to truly sustain cage layer stock in these regards.

Bird stress due to containment is evidenced by objective studies which have identified agonistic behaviors such as repetitive head movements as well as the measurement of blood corticosteriod levels. Birds appear additionally stressed by being prevented from expressing pre egg laying nesting behaviours whilst caged..

My concerns extend beyond just the confinement of the birds within the cages however. The birds in cages are wholly dependent on the manager of the poultry house & that house's environmental control equipment efficacy in terms of ensuring their individual thermal comfort. Birds in cages cannot subsequently move or adjust their positioning to suit their collective or individual thermal needs. Neither can they escape the attentions of an aggressive other bird. To this day I am aware of large scale older style caging within old sawtooth housing which is renowned for poor temperature and ventilation control such that the birds freeze in winter, cook in summer, & are subject to very high ammonia levels from the large quantities of manure stored under the cages. These farms tend to be dilapidated, poorly maintained, poorly drained & typically house spent hens with minimal feather body covering which have already undergone at least one year in cage production. Minimising production costs appears to be the priority concern of those operating such farms.

Birds are often "refreshed" for a new period of lay through the use of a forced moult where they are purposefully starved to reduce body fat & to eliminate those birds afflicted with other health problems. This practice needs to be actively monitored to prevent such barbaric treatment.

Birds in cages cannot escape situations of poor management. I have personally witnessed & been horrified to find live birds standing on one or two green rotting dead birds in cages with many eggs piled up behind the dead birds. This is NOT acceptable from hygiene, product quality, or poultry & welfare perspectives. I have also witnessed situations - predominately in older cage systems with manual manure removal where faeces build up has resulted in birds standing on manure. These situations are also indicative of a failure to comply with the existing welfare requirement of a daily inspection of ALL birds to ensure they are not caught up, injured or sick.

Daily inspection requirement brings to bear a startling reality and perhaps an effective means of encouraging many more smaller farms with greater potential for embodying appropriate levels of welfare via more welfare friendly systems - albeit at more expensive eggs & the upset of existing large scale intensive egg producers.Modern cage sheds regularly contain 40,000 birds per house. Visual inspection of each bird would take conservatively 3 seconds each bird but let's allow 2 seconds each. That is 80,000 seconds or 22.22 HOURS per day per shed doing nothing but continuous bird inspection NOT allowing for time removing or treating (typically euthanising) sick or dead birds. On the fallacious assumption staff can spend 8hrs per day continually doing nothing but inspection & not touching any birds this would require 3 staff members per shed every day doing nothing else!! Given that most intensive farms possess 2 to 6 sheds & some up to 10 per farm it is obvious the industry has nil hope of complying & never did!. Applying the same inspection provisions for free range farming would also likely reduce flock sizes down to welfare & environmentally friendly levels. This is a desirable outcome as the Australian physical environment cannot practically provide for year round ground cover as shown on the vast majority of free range egg cartons.

I believe the Government needs to more practically & objectively scrutinize poultry farming systems & practices if it is sincere about establishing better welfare standards for farmed poultry. To ENSURE such standards are complied with is another matter, requiring inspection by an independent arbiter reporting back to Government. From my observation over the years, the use

of the RSPCA to adequately perform this function has been a failure - particularly where egg producers pay for an accreditation or compliance symbol to be used in marketing/on egg cartons.

On a final note the unacoidable reality is that improvements in welfare standards & practical compliance w even the existing documented code WILL cost money & require restructuring of the industry. I look forward to seeing whether the Government has the conviction & fortitude to implement change.

From

Greg Poole