

Dear Poultry Public Consultation.

Please find below my submission in response to the public consultation for the draft Australian Animal Welfare Standards and Guidelines for Poultry.

### **Overall Response**

**All** poultry species must be offered significantly improved protections to shield them from crowding, painful husbandry practices, the welfare consequences of selective breeding, surgical mutilations (with or without pain relief) and slaughterhouse cruelty. The draft Australian Animal Welfare Standards and Guidelines - Poultry must be updated to reflect current community views of animal welfare.

### **Specific Item Response**

Please find response to specific items in the Standards and Guidelines

SA1.1 Suggestion to change wording from 'reasonable' to 'reasonable and humane'

GA1.1 Suggestion to amend 'obtaining knowledge of relevant animal laws' to 'obtaining, demonstrating and publically displaying knowledge of relevant animal welfare laws.'

Suggestion to change 'killing poultry by appropriate methods' to 'killing poultry only through use of best-practice, most humane methods'

GA1.2 Suggestion to alter phrase to include wording that explicitly states the responsibility of the owners and managers to ensure staff are aware of the welfare requirements of poultry and where possible to exceed those welfare requirements.

## **2. Feed and Water**

SA2.1 Suggestion to change wording from 'reasonable' to 'reasonable and humane as demonstrated by animal welfare research'

SA2.2 Suggestion to amend to 'ALL poultry to have access to food more than once in each 24 hour period'

SA2.3 Suggestion to amend to 'ALL poultry'

SA2.4 Suggestion to amend hours to within 24 hours

GA2.4 Suggestion to remove the word managed

GA2.7 Suggestion to remove any reference to moulting, which is a cruel and unnecessary process, and ALL poultry should be entitled to graduated changes in diet.

SA3.1 Suggestion to amend 'reasonable' to 'ALL reasonable and humane actions with the welfare of the bird at the forefront of such actions'

SA3.3 Suggestion to remove 'reasonable' and replace with 'as soon as possible'

GA3.17 Remove the allowance of beak trimming

SA4.2 Amend to include 'natural standing posture and movement behaviours'

GA4.1 Suggestion to amend 'should' to 'must', and space allowance as would be found in a natural habitat.

GA4.5 Suggestion to amend 'Provision of environmental enrichment should be considered' to 'Provision of environmental enrichment MUST be considered and documented.'

Housed Poultry – Poultry should only be housed in a way that is for their protection and in alignment with their natural behaviours. Artificial light, condensed housing should not be an option for poultry farmers.

GA4.10 Suggestion that poultry are not brooded on wire in any circumstances.

GA4.15 Nests should be provided.

SA6.5 Strong suggestion that this is amended to include ALL poultry are exposed to a minimum requirement of continuous darkness and that this be longer than 4 hours.

SA9.1 Suggestion to add ‘and that maximises the wellbeing and welfare of the bird’

SA9.4/9.5/9.6 should be removed as no birds should have to undergo induced moulting

SA9.8 Suggestion that NO person should perform pinioning or devoicing of any poultry

SA9.9 and 9.10 Suggestion to remove this and that animals are instead kept in a way that means aggressive behaviour is minimised.

SA9.14 and 9.15 Suggestion to be removed as beak trimming should not be necessary, if animals are kept in appropriately, natural conditions.

SA9.20 Suggestion to remove as no hatchlings should be killed.

GA9.4 Suggestion that the number of birds in each hand be reduced to one.

GA9.10 Suggestion that this clause is removed, as cutting of wing feathers should NOT be performed.

GA9.12/13 Suggestion that these are removed and that ONLY therapeutic beak trimming is allowed.

**Induced moulting: This practice should be banned.**

10 Humane killing: Suggestion that the words ‘other than processing’ be removed from the objective and that **ALL** poultry be killed only when necessary and in the most **safe and humane** way possible.

SA10.4 Suggestion to amend to ‘all reasonable and humane actions’

GA10.2 cervical dislocation, captive bolt, firearm, and immediate fragmentation/maceration be removed and not accepted as a humane killing of poultry. The industry **MUST** find a better way to humanely euthanize poultry.

GA10.3 Reduce 35 seconds down to 10 seconds and increase 2 minutes to 5 minutes.

GA10.5 Replace ‘should’ with the words **MUST NOT**.

GA10.6 Again, replace ‘should’ with **MUST**

Thank you for your consideration.

Warm Regards,

Lauren Hoiles