

# **AUSTRALIAN ANIMAL WELFARE STANDARDS AND GUIDELINES FOR POULTRY – DRAFT (Version: Public Consultation Nov 2017)**

Response from Noel Kratzmann to the draft Standards and Guidelines

Noel Kratzmann

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Nobby

## Farming experience in layer poultry

- 11 years on family cage layer farm including all aspects from pullet rearing, egg laying to spent hen disposal
- 20 years poultry manager of a one million birds cage layer environmental farm including environmental rearing from day old to point of lay
- 10 years management of barn layer and organic layer and rearing farm

## Education

- Bachelor of Business with Distinction from University of Southern Queensland (USQ)
- Certificate IV in Agriculture - emergency disease or plant pest response
- Certificate of Poultry Welfare Training – codes of practice for the welfare of domestic hens and live transport, husbandry practices for better welfare, handling and inspecting stock, daily onfarm welfare inspections
- Australian Human Resources Institute member
- Workplace Rehabilitation Officer
- Workplace Health and Safety Officer
- Industry Liaison Officer
- Poultry Vaccination training

## Poultry research experience

- Rural Industry and Research Development Corporation (RIRDC) Layer - delegate for Queensland poultry industry
- Cooperative Research Centre – Poultry – layer delegate

These positions entailed reviewing proposals for research projects in poultry and recommending the most beneficial and appropriate projects to be financed. The proposals included welfare, vaccination, beak trimming, training, disease control and improvements. I was part of a committee which included layer representatives, veterinarians, nutritionists and other industry relevant personnel.

- Queensland Egg Farmers Association (QEFA) Secretary  
This position involved representing the interests of poultry producers to Government and commercial businesses

Ideas and comments are being sought to improve the draft Australian Animal Welfare Standards and Guidelines for Poultry. I was pleased to read that the committee noted that welfare is a difficult area to define and that scientific research must be bolstered by value judgements, especially from people who have direct experience with poultry. I believe I am in a unique position to provide ideas, comments and insights to poultry welfare. I have retired from any employed position regarding layer or rearing production. I believe I can offer insightful and unbiased opinions to improve the welfare of layer hens.

I have reviewed the draft proposal and was dismayed that the proposal identified issues from the Code of Practice Fourth Edition for Poultry that needed to be improved and then blatantly failed. I have identified important areas that need to be changed to ensure poultry welfare improves, not regresses. Please consider my arguments carefully as they will benefit all layers and pullets now and in the future.

I have discussed beak trimming, induced moulting, and stocking densities in cage systems below. When reviewing the draft, I found it was difficult to address all issues, so have chosen to address issues that, in my opinion, are most crucial to bird welfare. If left unchanged from this draft, these three areas will result in continuing unnecessary poor welfare outcomes for layer poultry.

My suggested changes to hot blade beak trimming and forced moulting will not add cost to a professionally managed layer enterprise. Increasing stocking densities in caged layer farms to 750 sq cm per bird will add cost, but may be offset with increased egg production and certainly by decreased mortalities.

### ***Beak Trimming***

Comments by Noel Kratzmann:

Need for restrictions on routine beak trimming.

This is an area that I have very strong opinions. I have witnessed beak trimming on millions of birds during my career, hot blade at 10 days old, hot blade at 10 weeks old and infra red at day old. I can provide an unbiased opinion. I believe you are correct in allowing infra red beak trimming at up to three days old. Having said that, please do not believe it is without its problems.

I have personally witnessed damaged beaks that includes burning of chicken's tongues and badly damaged beaks cut back to almost the nostril using infra red only. I believe those problems are already addressed, however further independent monitoring is required. I note the draft highlighted research that indicated no pain or any problems with IRBT. I can assure you that there are problems that are highlighted by Cooperative Research Centre research. There were neuromas found and deemed a painful outcome for the birds. It was difficult to find positive research. I have monitored IRBT from its infancy in the USA.

Hot blade beak trimming is indefensible in 2018. Photos are available of birds beak trimmed in Australia with their beaks almost cut to the nostril. The beak trimming was performed by a qualified and experienced crew who were responsible for almost all beak trimming in Queensland at the time. The draft addresses this, however with its allowances for "exceptional circumstances" is, at best foolish, at worse deceitful.

The RSPCA should be nominated as an overseeing body of any exceptional circumstances that would require a second hot blade beak trim. The RSPCA could then monitor if any grower was using exceptional circumstances as a management tool rather than professional poultry management. A competent poultry veterinarian would need to approve the use of hot blade beak trimming and any actions would need to be reported to the RSPCA where it would maintain an independent register to oversee any abuses.

### ***Induced Moulting***

#### ***GA9.16***

*Where exceptional circumstances necessitate, induced moulting should only be carried out,*

- *When replenishing a flock in event of a disease outbreak*
- *Where there is limitation of available grower space*
- *When there is limited availability of day old pullets*

Response by Noel Kratzmann:

Need to restrict routine use of induced moulting.

Again, I have vast knowledge of the use of induced moulting and also the perspective of no bias in discussing this issue. Induced moulting must be banned. There are no exceptions to this. The exceptions noted in the draft are purely financial. The reasons put forward to allow moulting to be used are weak when compared to the suffering of birds undergoing induced moulting. I believe veterinarians have even recommended use of induced moulting at times. Anyone making comments on moulting must personally view the birds every day during the moult. I have overseen layer hens when they are subjected to induced moulting, and I am sure a fair person would ensure this practice was banned.

This is purely a tool for inefficient management. I can state categorically that banning induced moulting is absolutely required. I say this from my experience and am shocked when I have met poultry farmers who say we must have this as a management tool.

If the layer poultry industry is allowed to use the three exceptional circumstance rules for induced moulting, the industry will deserve any criticism levelled at it.

*B1*

*Laying Chickens*

***Stocking densities cage systems***

Response by Noel Kratzmann:

Inadequate space allowances for poultry – stocking density

I have clear proposals for the stocking density of cage layers. The cage standard in the draft is largely left as per the Model Code of Practice Fourth Edition.

I have been involved in reviewing welfare for cage layers with on the farm experience and commissioning and reviewing research for the last 20 years. There is sound research that cage layers will benefit when space is 750 sq cm per bird at three or more birds (<2.4 kg) per cage.

I realise research can be produced to argue the welfare benefits relating to cage sizing. However, I earnestly believe that cage size must be mandated at a minimum of 750 sq cm per bird.

Barn and rearing space

The standard proposed is 30kg per sq metre, therefore at 2kg average bird weight, there would be 15 birds per sq metre. I can assure you from my experience that 12 birds per sq metre in layers is bordering on overstocking. I believe that 9 birds per sq metre for layer hens is needed to assure the birds' welfare. I have managed organic birds at 5 hens per sq meter and the plumage and overall demeanour of the birds is superior. I realise 5 birds will never be accepted by farmers, however nine birds per sq metre would be my recommendation.

**FURTHER ISSUES IN THE DRAFT**

*1*

*Responsibilities*

***Guidelines***

*GA1.1*

- *Handling to minimise stress, and using facilities and other equipment appropriately*

Response by Noel Kratzmann:

A guideline is too weak to ensure correct handling. A standard for carrying hens by 2 legs and holding their breast is needed.

*2*

*Risk Management of extreme weather, natural disaster, disease, injury and predation*

***Standards***

*SA3.2*

*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.*

Response by Noel Kratzmann:

Vague. This is an important standard. I believe there must be wording that ensures the risk is taken care of. It could be enlarged to include minimum number of inspections and these inspections must be recorded. A welfare check with clearly written actions to be taken must be used to ensure bird welfare.

### ***Inspections***

GA3.6

*Sufficient inspections should be undertaken during which temperature, light levels, availability of feed, feeding systems, water and all parts of the ventilation system are checked, and where problems are encountered appropriate remedial action should be taken to protect the welfare of poultry.*

Response by NK:

This must be a standard, not a guideline. These inspections must be recorded at least three times per day.

GA3.7

*Inspections should be documented.*

Response by Noel Kratzmann:

This must be a standard.

GA3.10

*Poultry distribution and behaviour should be monitored during daily inspections and corrective action should be taken to adjust light, temperature or ventilation as required.*

Response by Noel Kratzmann:

This must be a standard and the actions recorded and management oversight at least weekly to identify any issues that are continually being observed and temporarily rectified.

### ***Disease and Injury***

GA3.13

*Mortalities including culls should be monitored and recorded.*

Response by Noel Kratzmann:

This must be a standard and include management oversight weekly of the records and this is documented.

### ***Standards***

SA7.3

*A person in charge must monitor ammonia levels and ensure corrective action is taken if ammonia levels reach 20ppm at bird level in sheds.*

Response by Noel Kratzmann:

In the guidelines at GA7.6 it states that the variables regarding air quality should be monitored and recorded on a daily basis. It must be included as a standard and combined with SA7.3 and include a minimum of three times per day recorded monitoring. This must be included in management oversight at least weekly and that oversight is documented.

### **Guidelines**

#### **GA7.8**

*Alarm systems in mechanically ventilated sheds should have backup power, the ability to detect shed temperatures and have all hours response availability with restoration of power or emergency ventilation within 15 minutes.*

Response by Noel Kratzmann:

This should be combined with SA7.2 to develop a more comprehensive and coherent coverage of ventilation and temperature failures in sheds and remain a standard, not a guideline.

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*Handling and husbandry*

Response by Noel Kratzmann:

I believe it is a serious omission not to ensure a standard is available that is detailed enough to ensure bird welfare when handling poultry. This must include handling with two legs and breast support. No more than two birds should be carried in each hand.

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*Poultry at slaughtering establishments*

Response by Noel Kratzmann:

My experience tells me that there must be government oversight to ensure contingency plans are in place and are documented. I can say, I have seen instances in summer of layer hens dying from heat exhaustion when waiting for breakdowns to be repaired at the slaughter house. There needs to be standards that ensure the guideline GA11.4 is enforced.

General Observations by Noel Kratzmann:

#### 1. Heat

I have this as a heading because in Queensland I have observed heatwaves that resulted in large numbers of layer hens dying of heat stroke. It has occurred in the southern states as well and at times, has resulted in hundreds of thousands of layers dying due to heat exhaustion. I have personally witnessed this firsthand. A standard must be written to forestall poultry enduring any future heat stress events.

The Model Code of Practice Fourth Edition did have an affect on reducing the number of poultry that endured a painful, slow death due to heat exhaustion when numerous old cage layer systems were finally retired. With environmental shedding, there is no need for any birds to die of heat exhaustion. If there are problems in a shed fitted with the latest equipment, then overstocking and/or poor management is the cause. I cannot state strongly enough that this area needs addressing. I am convinced that you would agree with me if you had witnessed an event where birds died of heat exhaustion. It requires immediate legislation and monitoring.

2. Quantitative lighting standards

The draft standards to provide adequate lighting fail. In a cage layer shed with 5 or more tiers, it is difficult just to say that the average is 5 lux. If you place your lux meter in many spots near lights, the reading would be totally different than if it was tested at drinker nipples throughout the shed. The wording of this standard requires revision.

3. QA systems

Many people will state that they have a quality assurance system in place and that this ensures that the welfare standards are maintained. I can assure you that most auditors have little knowledge of poultry and are checking paper trails. However it is very easy to ensure the auditor is unaware of welfare problems that the farm has.

Quality assurance systems do not provide a fail safe welfare system.

### **FINAL COMMENTS**

The Regulatory Impact Statement (RIS) is concerned with cross state regulations and regulatory burden of producers.

The answer is obvious. Australia wide uniform standards are needed. This stops uncertainty for growers and will reduce regulatory cost. Productivity is increased and farm profit should be enhanced. Ensuring Australia wide uniform standards is of no benefit if the uniform standard and guidelines ensures a negative impact on the welfare of poultry.

Hot blade beak trimming is cruel and unnecessary on a professionally managed poultry enterprise. There should be no extra cost for well managed farms.

Induced moulting is an unwarranted, inhumane treatment at best, and again unnecessary with professional management.

If the draft Australian Animal Welfare Standards and Guidelines for Poultry was meant to ensure Australia wide standards and guidelines to improve poultry welfare, then it is a dismal failure. The opposite affect will occur unless the draft is dramatically altered. The layer industry appeared to have no opposition to the draft and I believe the industry will be judged by the public to have missed an opportunity to improve welfare for their animals.

The proposed Australian Animal Welfare Standards and Guidelines for Poultry is flawed. Welfare of egg producing hens and pullets and chickens will not be enhanced. Welfare will be reduced unless the draft is dramatically altered.