

## SUBMISSION

### Animal Welfare Standards and Guidelines for Poultry 2018

Thank you for the opportunity to make a submission. I do so as a concerned citizen and consumer who cares deeply about animal welfare.

Rather than answer the RIS questions, I prefer to make my own submission.

I am very concerned about the controversy surrounding the development of the draft standards. I do not have faith in the process that was followed. From the many reports in the media about corruption, industry bias and collusion, it is obvious to me that the current system of standard setting for farm animal welfare is deeply flawed. I therefore support the recent Productivity Commission report, which recommended that an independent statutory authority be established to set animal welfare standards for farmed animals, including their living conditions, transport, slaughter (and live export where applicable).

I am also concerned that the Australian public were not made fully aware (through widespread advertising throughout all states) of their opportunity to make submissions on these draft standards.

Like many in the community, I totally reject cage systems and other cruel industry practices that are at present deemed to be legal. Battery cages should be phased out. I do not often eat eggs, but when I do I make sure they are 'true' free range – and that means 1500 birds or fewer per hectare. I look for that on the packet label, and I always ask whether free range eggs are used when dining out.

Australia's existing standards are not strong enough to ensure that chickens and other farmed birds are protected from cruel industry practices. The draft standards fail to meet community expectations. The RSPCA website states that its consumer research shows a significant trend against cages; in 2015 about 70 per cent of Australians thought cages cruel, but this rose to 84 per cent in a new survey by McCrindle Research in 2017. ('Breakthrough research finds 84 per cent of Australians want to end the battery cage' RSPCA media release 26/11/17).

Significantly, around 80 per cent of rural Australians and almost 83 per cent of Australians in regional areas want battery cages phased out. ('Rural and Regional Australia are concerned about hens in cages too'. RSPCA media release 13/2/18) Despite this, the draft standards **do not** progress the phasing out of cages.

I totally support the views on these draft standards that have been put forward by Animals Australia.

My family and I were horrified by the footage shown last year on ABC's 7.30. It is inexcusable that chickens should suffer such dreadful deaths, which would be less likely if independently monitored CCTV were mandatory in all abattoirs. I also believe the maceration and gassing of male chicks should be banned. (See my comments below)

Australia is lagging behind other civilised countries in its treatment of poultry. The proposed standards go against global animal welfare trends. Swedish egg farmers phased out battery

cages many years ago. Battery cages were prohibited across all 28 member nations of the EU from 2012. This was due to public pressure and pressure by retailers, consumers and the media. Switzerland banned cages 20 years earlier than this. New Zealand and Canada are phasing out battery cages. The US states of California, Michigan and Ohio have phased out cages, and several major retailers have banned the use of cage eggs in their products.

Worldwide, multinationals such as Nestle and Kraft-Heinz have pledged to use only cage-free eggs in their products. Major supermarkets and food service companies are also doing so. Grill'd, McDonald's, Hungry Jacks and Subway have promised to phase out cage eggs. And the list is growing.

Below are my detailed comments on the draft standards:

1. Battery Cages - A standard should be included in 'Chapter B1 – Laying chickens' to ensure that **all** battery cages (including furnished and colony cages) for layer hens are phased out. A standard should be included in 'Part A facilities and Equipment' to prohibit housing **any** birds in **any** cages.
2. Stocking densities and space - The standards should follow the plentiful scientific evidence available, as well as that provided by the RSPCA with regard to stocking density on page 230 of the RIS. The proposed standards for minimum space are insufficient for individual birds to move freely or carry out normal behaviours.
3. Dust Bathing and foraging - A standard should be included in 'Chapter 8 – Litter Management' that ensures all poultry housed indoors must have access to a littered area to allow for foraging and dust baths.
4. Perches - Although there are recommendations for perches, no standard legally enforces this. In Chapter 4 'Facilities and Equipment' a standard should be inserted to ensure adequate perch space must be provided to all poultry with a motivation to perch.
5. Light levels – The proposed standards allow poultry to be kept in near-dark conditions for most of their lives. Standard SA 6.3 in 'Chapter 6 – Lighting' should be amended to ensure that the minimum light intensities for all poultry be increased to at least 10 lux. Standard SA 6.5 should be amended to require 8 hours of continuous darkness in each 24 hour period for all poultry.
6. Nests – The proposed guidelines recommend sufficient nests for hens, but guidelines are not legally enforceable. Guideline GB1.6 should become a standard in Chapter 4 'Facilities and Equipment' to ensure that all hens of all species must be provided with nests.
7. Forced Moulting – Standards must be introduced to ensure poultry are not forced to moult. The starving of birds causes intense hunger, stress, loss of feathers and body weight with a reduction in bone mineral density and risk of death. The European Union and other countries have banned it
8. Beak and bill trimming – This cruel practice should be banned.

9. Stunning and Slaughter – Under the Chapter ‘Poultry at slaughtering establishments’ strict welfare standards must be implemented. Further, the practice of macerating or gassing male chicks should be banned. The CSIRO has made a breakthrough with ‘marking’ male embryos and this should become the industry standard. (See ABC website ‘Marking male embryos could hold solution to chick culling ‘ethical dilemma’ in global egg industry,’ 12 March 2016)

The draft standards must ban electrical-water-bath stunning and throat cutting. Alternative and comparatively less cruel slaughter methods such as controlled atmosphere stunning and killing (CAS) with non-poisonous gas, or low atmosphere pressure stunning and killing (LAPS) must be adopted to reduce handling, stress, and injuries to birds like those seen on ABC 7.30.

10. CCTV cameras – Independently monitored CCTV cameras should be mandatory in all housing sheds and abattoirs. Designated animal welfare officers should be employed in all abattoirs.
11. Meat chickens -- have short, painful lives in crowded sheds, without proper rest. Light requirements should be balanced. Their unnatural weight causes problems with pressure on joints and hearts. As a minimum, industry should have more natural, slow growing breeds to prevent health and welfare associated with fast unnatural growth. Stocking densities should be reduced with straw bales, perches, dust baths and opportunities for foraging and outdoor range. They should have 8 hours sleep and experience daylight to maintain healthy eye development.
12. The starving of ‘parent chickens’ (the breeding stock for meat chickens above) should be banned. ‘Skip a day’ feeding is cruel. Genetic selection of animals with slower growth rates should be a priority.
13. Ducks and water – Without water, ducks cannot clean properly; they are more susceptible to heat stress, respiratory illness, and crusty eyes leading to blindness and lameness. All farmed ducks must have access to water.
14. Turkeys – are bred to develop fast. They become so heavy they struggle to move. Crowded sheds make turkeys aggressive. Selective breeding for maximum breast meat has led to lameness, because the birds are crippled by their weight. The draft standards should be rewritten to enforce the breeding of natural, smaller and slower growing species to alleviate problems with fast growth. Beak cutting should be banned. Improved housing and husbandry should reduce aggression and injuries. There should be more space and environmental enrichment with perches, straw bales and flooring materials to scratch in so that the turkeys can live as normally as possible.

In conclusion, as well as the points mentioned above, I reiterate that battery cages should be phased out as quickly as possible.

Charles Davis

18 February 2018