

Dear Drafting Team,

Re: Clarification of Standards for Depopulation of Ducks

Background Information:

Attached are the two sections in the Land Transport Standards and Guidelines, Edition 1, September 2012, and the Land Transport of Poultry, Second Edition PISC report, 91, 2006, that provide exemptions for duck handling during depopulation prior to crating (ADMA-Depopulation Practice pdf file).

These are important practical exemptions that are critical for the depopulation step, and have been debated previously in the development of the draft standards by Kelly Wall(AHA) and myself (Greg Parkinson CEO, ADMA)(see previous e-mail below in red)

E-mail debate:

Hi Greg

In relation to the duck chapter handling standard SB4.1.

I believe it came from the Land Transport Standards BUT I note in the LTS there is an exception for lifting and carrying ducks by the neck and or the base of both wings.
Shame we didn't raise this earlier.

I propose delete "neck"

Current:

SB4.1 A person must ensure ducks are not lifted or carried by the head, neck, legs, wings, feathers or tail feathers unless otherwise supported by the breast.

New

SB4.1 A person must ensure ducks are not lifted or carried by the head, legs, wings, feathers or tail feathers unless otherwise supported by the breast.

PUBLIC CONSULTATION 2018:

CURRENT STANDARDS & GUIDELINES RELEASED FOR PUBLIC CONSULTATION (NOV 2017)

B4 Ducks

Standards

General standards in Part A also apply to minimise risk to the welfare of ducks.

SB4.1 A person must ensure ducks are not lifted or carried by the head, legs, wings, feathers or tail feathers unless otherwise supported by the breast.

It seems that Kelly's suggested solution has been adopted in the latest version which has neck removed from the standard (SB4.1) above.

This may be adequate, but the industry would like to have a clear exemption for the depopulation practice in the Standards and Guidelines, that is consistent with the Land Transport of Livestock Standards, Edition 1, Version 1.1 (2012), B10, Specific Requirements for land transport of Poultry SB10.6 (iii). (see Attachment ADMA-Depopulation).

I hope that this suggestion is clear and that the rationale is logical.

Other elements of the Standards and Guidelines(Public Consultation, Nov 2017) have been discussed, and are accepted by the ADMA as effective improvements and compromises that should serve to enhance duck welfare.

Let me know if this submission needs a different format or the drafting group needs more clarification or detail.

Regards

Greg Parkinson

CEO/Secretary ADMA